

## Annual Return on the Scottish Social Housing Charter

### Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our consultation paper on our website at [www.housingregulator.gov.scot](http://www.housingregulator.gov.scot)

Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **Friday 8 November 2024**.

By email @: [consultations@shr.gov.scot](mailto:consultations@shr.gov.scot)

Or post to: Scottish Housing Regulator  
5<sup>th</sup> Floor, 220 High Street  
Glasgow G4 0QW

#### Name/organisation name

Trust Housing Association

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#### How you would like your response to be handled

To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

#### Are you happy for your response to be published on our website?

Yes  No

#### If you are responding as an individual:

**Please tell us how you would like your response to be published.**

**Pick 1**

Publish my full response, including my name

Please publish my response, but not my name



1. There are some indicators which we do not routinely use in our regulatory assessment of social landlords' performance. As part of the consultation we are proposing to stop collecting the following indicators **14, 20, 23, 24, C3 and C4.**

Do you agree with our proposals to remove these indicators?

Agree with the proposal to remove these indicators

2. Following feedback from stakeholders we propose to amend the following indicators **10, 15 and C2.**

Do you agree with our proposals to amend these indicators?

Indicator 10: Agree with the simplification of this indicator.

Indicator 15: For providers with stock dispersed across the country in both urban and rural communities it is unclear what the meaningful value of having cases per 100 homes would be.

Indicator C2: Agree with this indicator being Local Authority area based.

3. We also propose to introduce an additional indicator to monitor long term voids.

Do you agree that we should collect an additional indicator in relation to long term voids?

Yes agree with this addition. This will help better identify geographical issues and challenges. We would hope this information will assist with the wider strategic planning for empty homes across the country. A general observation for this proposed indicator is that if a void is long-term void for part of the year (e.g. from June – November), but relet prior to 31st March, it is not reportable. As a result of the above the data is unlikely to accurately show a fully picture.

4. We propose to collect two new indicators in relation to tenant and resident safety. Do you agree with the additional indicators we propose to collect in relation electrical safety and fire detection?

Agree with the introduction of the two new indicators. Assume that the inclusion of these two new indicators will not require significant narrative to be included within indicator C9 should there be SHQS fails based upon these elements as the narrative will be included against the new indicators.

5. Do you agree with our proposed approach to collect landlords' performance in relation to compliance with tenant and resident safety duties as part of the Annual Assurance Statements?

Yes

6. Issues of damp and mould continue to be an important area of concern for tenants. We therefore propose three new indicators in relation to damp and mould. Do you agree with our proposals to introduce these indicators?

Yes, but any new indicators introduced need to be accompanied by additional guidance on the scope of the new damp and mould indicators. In our opinion 'day to day' mould growth to e.g. seal to baths, shower trays, wash hand basins, on window cills etc should not be included. Neither should reports of damp/moisture ingress associated with water leaks that are short term, quickly identified and remediated, whether that be fabric leaks or pipework.

We believe the focus of these new proposed indicators should be on rising damp, penetrating damp, mould caused due to cold bridging, damp spots associated with long term water ingress and persistent issues.

7. Do you agree with the proposal to collect the "Average length of time taken to resolve cases of damp and/or mould" or would the "median" be more appropriate to measure the time to resolve cases of damp and/or mould?

Yes, only area of clarity required is about who defines if the issue is "resolved"? Will it be at the landlord's determination i.e. When the landlord has exhausted their process and notified the customer or an agreement between the landlord and the customer?

If an agreement between landlord and customer, that may lead to some being unresolved as the customer may be requesting more by way of compensation/decoration/other than the landlord is willing to offer.

We think the average is the correct way to collect the data, but landlords could be given the option to provide specific narrative around any complex outliers which may have significantly increased their reported average.

8. Damp and mould is a complex area for landlords. Are the new indicators we propose on damp and mould clearly defined?

As outlined in our responses to Q6 and Q7 any new indicators introduced need to be accompanied by additional guidance on the scope of the new damp and mould indicators.

We believe the focus of these new proposed indicators should be on rising damp, penetrating damp, mould caused due to cold bridging, damp spots associated with long term water ingress and persistent issues

Also more clarity/guidance on the definition of 'resolved' will be required i.e. Does this mean when the landlord has exhausted their process and notified the customer or an agreement between the landlord and the customer?

Thank you for taking the time to give us your feedback