

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

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

Or post to: Scottish Housing Regulator
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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?

Yes, we broadly support removal of indicators which are identified as surplus to SHR requirements. We also welcome this in the context of streamlining the ARC and reducing the information reporting requirements placed on landlords. We would agree that indicators 23 and 24 (Homeless Referrals) have proved particularly complex, with existing guidance difficult to interpret and apply, and since their introduction have questioned their value.

Similarly, while indicators 14 (Tenancy offers refused), 20 (Adaptations funded by source) and C3 (Lets by type) and C4 (Abandonments) can provide us with some useful insight and context, we agree that these are not relevant measures of performance. Notwithstanding this, in completing our ARC we would routinely consider whether it would be appropriate to highlight some of this contextual information in our comments to the associated 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?

Yes, we broadly agree that it is appropriate to amend these indicators. We welcome the simplification of indicator 10 (Repairs Completed Right First Time) in order to achieve greater consistency in reporting across the sector. Notwithstanding this however, we feel there remains inherent practical difficulties in identifying repairs "reported again." We acknowledge the proposed changes to the technical guidance but suggest additional clarity may be needed. This includes the definition of the reporting period as the indicator refers to repairs completed and reported again in the reporting year, but the guidance refers to identifying repairs that are reported again within a 12-month period.

Similarly, with indicator 15 (anti-social behaviour) we see value in measuring cases per 100 properties. We are less clear on the material benefit of including cases that span two reporting years. In such instances we would routinely highlight these within our comments on the indicator to provide additional context. We would also highlight that re-introducing consideration of locally agreed targets makes it more difficult to undertake meaningful benchmarking with peer organisations and use comparisons in public reporting.

We acknowledge the additional information required as a result of proposed changes to indicator C2 (Lets by source) and do not anticipate this causing any significant difficulties.

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, we do not anticipate any difficulties arising from the re-introduction of this contextual indicator.

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?

Yes, we agree the proposals are valid and appropriate. We routinely collect and monitor the required information on Electrical Safety / EICRs and Fire Safety, and do not anticipate any difficulties in reporting in line with the proposed 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, we currently monitor and report compliance information in relation to lift safety, fire risk assessments, asbestos and legionella through our internal assurance processes. We agree that there is no requirement for specific ARC indicators covering these areas, and that it is appropriate for reporting to take place via the Annual Assurance Statement.

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, we agree that the three proposed indicators are appropriate. We have established arrangements for logging, responding to and monitoring cases of damp and mould and do not anticipate any difficulties in providing the required information. For benchmarking and public reporting purposes, it may be useful for the ARC to reference the number of cases resolved per 100 properties.

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, we agree with the proposal to report on average length of time. This ensures consistency with other ARC indicators and enables public reported figures to be more easily understood. We acknowledge the potential benefits of using the median, but would suggest that landlords are able to determine what contextual information and narrative they need to present in order to explain figures.

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

Yes, we acknowledge the different causes and manifestations of dampness and mould and the inherent difficulties in drafting indicator definitions that can be universally understood and consistently applied. We feel there is some scope to provide additional context around re-opened cases, for example to clarify that there may be more than one case in a property during a 12 month period, (with a different cause, affecting a different area of the property or requiring a different repair / treatment.) Otherwise, the definitions provided are helpful in setting out expectations.

Thank you for taking the time to give us your feedback