

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

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?

We welcome the review of indicators that are not routinely used in regulatory assessment of landlords' performance and the opportunity to comment on the proposed removal of these.

Indicator 14 – Yes, agree with the proposal to remove this indicator. We will, however, continue to collect this data for internal purposes as it can provide context in relation to demand and impact on letting times.

Indicator 20 – No, not agree with the proposal to remove this indicator. At a time of significant reduced investment in adaptations from SG and uncertainty on future funding, we feel that it is important that this indicator remains as it provides context and insight relating to indicators 19 and 21 on adaptations.

Indicator 23 - Agree with the proposal to remove this indicator.

Indicator 24 – Yes, agree to the proposal to remove this indicator.

Indicator C3 - Yes, agree with the proposal to remove this indicator.

Indicator C4 – No, not agree with the proposal to remove this indicator We would recommend that this is retained as abandonments are not captured in Indicator 22 and this indicator can provide context on sustainability and turnover and understanding the broader role of RSLs in preventing homelessness and potential social trends.

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 – Somewhat agree. The proposal to simplify this indicator is welcomed, however, we suggest that:

- clarity on the 'reporting period' for repeat reports is provided – i.e. is this reporting year or the last year (i.e. last 12 months)? We would further suggest that the reporting year is used as tracking repairs data for this purpose over two years may add greater complexity and could be challenging for some landlords to provide.
- The calculation for this indicator suggests that it is measuring the % of repairs **not** completed right first time and would suggest that this be amended to reflect the indicator
- Greater guidance is required on 'reported again' definition and 'complex repairs' to avoid continued anomalies in this indicator.

Indicator 15 – Yes, we agree with the proposed amendments. We agree that the measure of cases in ratio to homes be introduced for meaningful benchmarking and that re-

introducing measures cases resolved within locally agreed targets be re-introduced as this will be provide a measure on delivery of promises to tenants promises, however;

- it will be important that landlords provide context in comments on this as timescales not met does not necessarily mean lack of performance by the landlord as this can be impacted by other factors such as delays in court processes etc.
- the technical guidance for this indicator be amended further to provide greater clarify on the definition of 'resolved' to avoid anomalies and provide for meaningful benchmarking (e.g. when referred for mediation by a third party is this resolved?)

Indicator C2 – Yes, we agree with the proposed amendment to this indicator as identifying by Local Authority area will enable a greater understanding of regional trends in relation to the source of lets.

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 agree that this indicator be introduced particularly given the present housing emergency, however, reasons for empty homes can be varied and complex and numbers alone will not provide a meaningful picture or enable benchmarking of landlords' performance. We would therefore suggest that:

- this is collated in ratio to the landlord's wholly owned stock (like the proposed amendment to Indicator 15 for ASB) and as per local authority area as context to allow meaningful benchmarking and trends; and
- where landlord's report properties empty for more than 6 months, a breakdown reasons (e.g. low demand, held for decant, awaiting demolition, awaiting modernisation etc.) is also collated as contextual information to enable meaningful benchmarking

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 that Indicator 11 should continue to be collected and agree that the two proposed new indicators relating to electrical safety and fire safety be introduced. Landlords already gather this data for SHQS and informing the Annual Assurance Statement therefore this should not pose any challenges in collating and the proposed new indicators will provide greater transparency in relation to health and safety commitments for Tenants. We would however suggest that technical guidance on these new indicators clarifies the position on abeyances/exemptions for the avoidance of doubt and consistency in reporting across all landlords.

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, tenant and resident safety is paramount and these have already been reported on in the Annual Assurance Statement process for the last 2 years.

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 with proposal to introduce these three new indicators and agree damp and mould cases can be complex and we ask for greater clarity in the technical guidance for these new indicators to prevent anomalies in reporting and provide for assessment of landlords' performance and meaningful benchmarking, including:

on

- Exclusions/inclusions states that *'the time taken to carry out pre-inspections is included in the length of time taken to complete a repair'* – we would therefore suggest that, for consistency, the wording of the exclusion of 'no access' cases is amended to *'... i.e. where a landlord or contractor has been unable to access the property to carry out a pre-inspection or repair'*
- Further clarity on exclusion of no access cases – there can be periods of time in seeking to resolve cases that no access is provided for part of the works – is the intention here to discount these periods from the average days taken to monitor landlord performance?
- Clarity on the period for considering a case re-opened – is this reporting year or the 12-month period? As noted at Indicator 10 comments above, a 12-month period could be more complex and challenging for some landlords to provide.

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?

There is a precedence already set in the use of average days and may be confusing to tenants to switch to median reporting.

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

Further to comments at Q6 above, we feel further clarification would be required on:

- What if no further action other than advice is required, would this be determined as resolved at the point of giving the advice?
- Works can take time to resolve damp and mould e.g. if areas need to dry out etc. Is it the date works are complete that would be used to determine if a case was resolved?
- If it was a different cause or location of damp & mould reported within 12 months of a previous report yet the same address, is this classed as a re-opened case? notified different issue does this count as a re-opened case?
- If the report from the tenant is of 'damp & mould' yet on pre-inspection it is assessed as not a damp and mould issue e.g. wet patch due to leak – should this be re-classified and not included in this indicator?

Additionally, measuring only resolved cases may not provide a rounded picture of the extent of the issue and question whether new reports in received in the reporting year should be included as a measure



Thank you for taking the time to give us your feedback