

## **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 <a href="https://www.housingregulator.gov.scot">www.housingregulator.gov.scot</a>

	t feel you have to a	nswer every question unless yo	ou wish to do so.	
Send your co	mpleted questionna	aire to us by <b>Friday 8 Novemb</b>	er 2024.	
By email @:	consultations@shr.gov.scot			
Or post to:	Scottish Housing Regulator 5 <sup>th</sup> Floor, 220 High Street Glasgow G4 0QW			
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10 Mansfield Street				
Glasgow				
Postcode G11 5QP		<b>Phone</b> 0141 357 3773	Email info@partickha.org.uk	
To help make we receive, as	this a transparent s we receive them.	process we intend to publish or Please let us know how you we as an individual, we will not pu	ould like us to handle yo	ur
Are you happy for your response to be published on our website?				
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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?

- 14 (offers refused) disagree, retain as useful indicator of applicant needs/ aspirations.
- 20 (cost of adaptations) disagree, retain as useful means of tracking spend on indicator of tenancy sustainment suggest instead deleting 21 (time to complete adaptations, as largely outwith RSL's control and affected by lack of HAG funding).
- 23 (homeless referrals) agree, remove and picked up through amended C2.
- 24 (homeless referrals) agree, remove and picked up through amended C2.
- C3 (general needs./ supported lets) agree, remove and picked up through amended C2.
- C4 (abandonments) disagree, should retain as useful indicator of tenancy sustainment (not picked up through other 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?

- 10 (repairs right first time) agree, simplified technical guidance is clearer.
- 15 (ASB cases resolved) agree, simplified technical guidance helps differentiate cases spanning different financial years, focuses on the importance of locally agreed targets and reference to stock numbers improves context by reporting cases per 100 homes (although this can already be calculated through current ARC data fields).
- C2 (lets by source) agree, but more detailed breakdown of homeless referrals most relevant to those social landlords operating across more than one local authority area, but will allow differentiation of local authority performance comparisons re effectiveness of homeless referrals.
- 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?

- New (long-term voids) agree, reintroduce but need to differentiate between technical reasons for delayed relet and genuine low demand/ difficult to let properties.
- 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?
  - New (electrical safety/ EICR compliance) agree, include but need to differentiate between meeting 'regulatory requirement' (rather than 'statutory duty' in the case of gas safety checks).
  - New (fire safety equipment compliance) agree, include.



- 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?
  - Agree.
- 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?
  - This is an important issue of tenant health and safety and high profile given recent press coverage of tragic events. It makes sense to start gathering some baseline information on the scale of the issue in the first instance. But we must ensure that we take a measured and thoughtful perspective of what information is required and that it is clearly defined, meaningful and easy to collate, monitor, compare and review trends.
  - All indicators in the ARC must have a clear purpose and be proportionate. Introducing 3 new indicators on damp and mould seems disproportionate, when the proposed revised ARC indicators have only 1 indicator on gas safety, 1 indicator on electrical safety and 1 indicator on fire safety, etc – these are potentially and proportionally more significant risks to tenant health and safety, which are well managed by social landlords.
  - We suggest retaining only the first of the three suggested new ARC indicators on damp and mould (i.e. average length of time taken to resolve damp and/ or mould).
  - If SHR retains all 3 new damp and mould indicators, then clarification is essential. For example, '% reopened cases' need clearer definition of 'reopened' ... over what period ... during the period of the current or previous financial year only ... reference to same property or same tenancy?
  - New (damp/ mould time to resolve cases) agree, include.
  - New (damp/ mould % reopened cases) disagree, but if included ... suggest incorporating reference to stock numbers to improve context of cases per 100 homes.
  - New (damp/ mould number of open cases at year end) disagree, but if included ... suggest incorporating reference to stock numbers to improve context of cases per 100 homes.
- 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?
  - Median, but need to review and amend if required after first year's data is collected/ reported.
- 8. Damp and mould is a complex area for landlords. Are the new indicators we propose on damp and mould clearly defined?
  - New (damp/mould % reopened cases) need to clarify definition of 'reopened' ... over what period ... during the period of the current or previous financial year only ... reference to same property or same tenancy?