

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
5th Floor, 220 High Street
Glasgow G4 0QW

Name/organisation name

West of Scotland Housing Association

Address

40 Barrowfield Drive

Glasgow

Postcode G40 3QH

Phone 0141 550 5600

Email

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?

Indicator 14 - we should keep refusals as it is a good indicator of demand. Average days to relet can be long but nothing to do with demand and more to do with void maintenance performance

While there is no proposal to amend indicator 16 tenancy sustainment, it would be beneficial to exclude deaths from this indicator as this is beyond our control and not an indicator of issues re tenancy sustainment. If SHR don't want to exclude deaths from that indicator, then we should keep abandonments (**indicator C4**) which is a good additional indicator of tenancy sustainment.

Although 3 indicators for medical adaptations feels too many, we should keep **Total cost of adaptations completed in the year by source of funding (indicator 20)** due to current reduction in funding. Will be good to benchmark with others to see what proportion RSLs self-fund?

No issues with the removal of 23, 24 or C3.

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: Changing to report on how many reactive repairs were reported again is positive but clear timeframes for this should be laid out.

Agree with changes to 15 and C2.

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

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?

We agree that the additional indicator in relation to EICR's should be collected

We agree that the additional indicator in relation to Fire Safety (in line with Tolerable Standard) should be collected.

We believe data could be provided identifying exemptions/abeyances (e.g. no access), and unlike gas, there is no option to cap the meter if no access. This may avoid inconsistencies in reporting across 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

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?

Damp and mould indicators appear reasonable and relatively easy to collect however with no indication of severity of cases the value of comparison by landlord may be limited.

SHR will need to clearly define what they mean by "Resolved" in D&M indicator – is this landlord or tenant lead.

However, the number of open cases at year end is a moment in time and does not provide any direct indication on landlord performance or commitment to dealing with the issue.

To keep some degree of context around this, a calculation on the percentage of stock with damp/mould issues over a reporting year may be a useful indicator to identify the extent to which it is a problem across a landlord's portfolio

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 – it is important that whether median or average that it is the same basis being reported by all landlords

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

In our opinion, the sector may need some additional technical guidance that would help provide clarity on an issue of damp/mould in the same room, but a different location, or due to a different cause (penetrating damp, for example, rather than condensation) should not be treated as a recall.

Thank you for taking the time to give us your feedback