

# Annual Return on the Scottish Social Housing Charter: A Consultation

## Response submitted to the Scottish Housing Regulator November 2024

The Scottish Housing Regulator (SHR) is consulting on proposed changes to the Annual Return on the Charter (ARC) indicators.

The ARC indicators are the key way in which all social landlords report to the Regulator their performance in achieving the standards and outcomes in the Scottish Social Housing Charter (SSHC).

The SHR is proposing to introduce specific indicators on tenant and resident safety which include new indicators to monitor landlords' effectiveness in responding to instances of damp and mould. It is also inviting views on the continuing appropriateness of existing ARC indicators and the removal of a small number of other indicators.

### Consultation questions

#### Question 1: Do you agree that we should stop collecting the following indicators?

The proposal to review indicators that are not regularly used is welcome. Monitoring performance data is a crucial activity but should not become an ever increasing burden for landlords. However, our members did raise some concerns with some of the proposed removals. While some could choose to continue collecting data for internal purposes (indicators 14 and 22), others are useful for national/strategic purposes and should be retained (indicators 20 and C3).

Some members indicated that they would continue to collect data on indicator 14 as a useful internal measure of performance. It was also pointed out that refusals are not necessarily an indicator of poor performance but can signal a household positively exercising housing choice.

Similarly, some suggested that continuing to collect data on abandonments would be useful as this is not captured by indicator 22.

We agree that the cost of adaptations completed is not necessarily good indicator of outcomes for tenants, but the data is essential in tracking budgets and spend on



adaptations. This is especially pertinent given recent cuts to RSL budgets for adaptations despite evidence of significant unmet need.

Removing indicator C3 will make it difficult to track demand of specialist/supported housing and it should be retained.

**Question 2: Do you agree that we should amend the following indicators as outlined?**

Overall, we support the proposed amendments but our members have suggested where some additional clarity may be useful. Additional comments are set out below.

Indicator 10

- Agree that the reference to “first time” can be confusing and open to interpretation and that the indicator should be simplified. However, tracking repairs data over multiple years may prove challenging for some landlords. It would be useful for the SHR to clarify whether the proposal is to measure repeat repairs within the same reporting year or if the expectation is that this could go back to the previous year.

Indicator 15

- Tracking cases over multiple years may be problematic for some landlords.
- Introducing a measure of the number of cases resolved within banded timescales would provide a more consistent measure of progress rather than locally agreed targets which cannot be benchmarked.
- Measuring ASB cases per 100 homes will provide a simple comparison between landlords but it is not an indicator of performance. Landlords cannot always prevent cases but should be measured on how they are dealt with.

**Question 3: Do you agree that we should collect the following additional indicators?**

Collecting information on long-term voids will help to build a picture of the number of voids, trends over time and potential problem areas. However, the reasons for void properties can be complex and the numbers alone may not reflect the situation. We would recommend considering exceptions to reporting such as those in indicator 18 on void rent loss.

**Question 4: Do you agree that we should collect the following additional indicators?**

We agree that tenant safety should always be a priority. Landlords already collect a great deal of data to track their own performance and contribute to the annual assurance reporting cycle. As such, much of what is being suggested will be readily available. Some members questioned why all safety elements would not be required for the ARC as they are just as critical (e.g. lift safety, water and asbestos).



**Question 5: Do you agree with our proposed approach in relation to the tenant and resident safety issues to be considered in the Annual Assurance Statements?**

While the AAS is a useful tool in creating a culture of ongoing data collection, reflection and assurance, some thought that all safety compliance issues should be recorded through the ARC. This would provide more transparency in making the data publicly available.

**Question 6: Do you agree with the additional indicators we propose to collect in relation to damp and mould?**

We agree that data on damp and mould should be formally reported through the ARC and landlords are already gathering a lot of the data suggested. As the consultation acknowledges, damp and mould cases can be complex and tracking numbers alone may not provide the full picture. As such, our members have asked for clarity on the indicators to be used and guidance to help landlords report cases consistently. Comments included:

- Only reporting cases where damp/mould has been established rather than the number of cases reported as some tenants could misidentify the issue.
- It may be useful to create distinctions between different types of cases e.g. damp and mould, damp only.
- More clarity is needed on how to measure the length of time taken to resolve a case. E.g. is a case ended after remedial works are carried out, or after a check is completed to assess effectiveness of the work? It can take time for the work to be successful in some cases.
- Similarly, clarity is needed on the definition of “resolved”.
- Reporting should have more emphasis on effective landlord responses to damp and mould, not just the number of cases.

**Question 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?**

Measuring the average time would be more consistent with other indicators throughout the ARC.

**Question 8: Are the new indicators we propose on damp and mould clearly defined?**

See question 6 above.

### **About CIH**

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support, and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: [www.cih.org](http://www.cih.org).

### **Contact:**

Ashley Campbell CIHCM  
Policy and practice manager  
CIH Scotland  
[ashley.campbell@cih.org](mailto:ashley.campbell@cih.org)

7 November 2024