

## 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](http://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](mailto: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?

The Association agrees with the proposal to remove the current ARC indicators 14, 23 and 24. We do believe however that there is merit in retaining the following indicators:

**Indicator 20:** We believe that there is a strong case to be made for retention of this indicator as this clearly illustrates where this vitally important element of tenancy sustainment and support for independent living and health and wellbeing is being funded, or indeed not funded from. The current environment of funding cuts for medical adaptations is also causing increased pressure for RSLs to deliver all of the adaptations that are required/requested by tenants, and so we feel that some form of tracking through this indicator remains beneficial.

We also support adapting this indicator to record Medical Adaptations by both Major and Minor categories by setting an appropriate/relevant cost parameter to minor adaptations.

**Indicator C3** – There is also some benefit to retaining this indicator in terms of providing some important context for differences in void rent loss and/or days taken to let for general needs and supported housing respectively – for example, with supported housing very often there are delays in re-letting for a variety of reasons, for example, delayed discharge or support agency signposting appropriate applicant and package.

**Indicator C4** – We also feel that recording the number of tenancies which are ended by way of Abandonment remains important in providing a fuller picture. Tenancies which are terminated by Abandonment are not recorded by Indicator 22 and we believe that there is merit in recording national data in relation to abandoned tenancies and what this may tell us about tenancy sustainment processes and the success or otherwise. Perhaps there is scope to remove Indicator C4 and to incorporate the element into Indicator 22.

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** - We are not entirely convinced that there is a substantial benefit to this indicator and believe that this is often problematic for RSLs in adequately collating what is a recalled repair and what is not. The proposed guidance in relation to this Indicator is also unclear on whether social landlords are reporting on number of reactive repairs that were reported again within a 12-month period or within the reporting year, so further clarity is required in relation to this.

It is generally considered in the sector that this indicator has evolved from comments around wanting a repair "done first time" meaning without multiple visits to complete the repair as opposed to several visits to complete the repair, to now being about recalls – which, while important is less of an issue and ambiguous. Surely it is more important to

know that the repair is completed as quickly and effectively as possible, as opposed to whether the same component or repair type arose in 11 months' time or previously.

**Indicator 15** – We are also unsure of how effective this proposed indicator is in terms of national benchmarking and the proposed changes do not provide much to change this view. Locally agreed target timescales means that RSLs are often not comparing the same things, and the nature of ASB cases can differ greatly from very minor tenancy transgressions to very serious and highly complex cases that can take a long time to resolve if at all. Why should the resolution of ASB be at the behest of “locally agreed targets” – little value in this.

**Indicator C2** – We agree with the proposed amendments for Indicator 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?

We agree that this would be useful, however should be further segmented into reasons for void – investment plans etc, difficult-to-let etc

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 with these new 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 are happy with this approach.

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?

While this is an understandable area of focus, we are not entirely sure that the best measure is 'time taken to resolve'. It may perhaps be more beneficial to report on:

- Number of cases (split by for example preventative cases resolved by these measures) and reactive cases (significant RSL input with property or tenant make up)
- Type of case – e.g. Condensation, Penetrative Damp, Rising Damp, Other
- Of cases reported – The percentage resolved to tenants satisfaction (this could be either better management of moisture control, improved insulation, or even rehousing of the affected household).

The issue about reopening cases – is really just a rinse and repeat of Repairs Right First Time, which needs wholly reconsidered. We are unclear of the value of this.

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?

Agree that median is a more adequate measure of timescales to resolve – however, we are not sure that the focus should be primarily on resolution time, and should be more focussed on reasons for problem and good outcomes for tenants.

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

This area needs more discussion with social landlords to ensure that we are obtaining the most effective data which will help manage the bigger picture.

Thank you for taking the time to give us your feedback