

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?

Grampian Housing Association (GHA) supports the removal of the following indicators:

- Indicator 14: Tenancy offers refused during the year.
- Indicator 20: Total cost of adaptations completed in the year by source of funding.
- Indicators 23 & 24 Homelessness referrals.

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?

GHA generally supports the proposed amendments to:

- Indicator 10: reactive repairs completed right first time.
- C2: lets in the reporting year by source of let.
- Indicator 15: Anti- Social behaviour cases resolved

Indicator 15 seems to focus on completion timescales as opposed to effectiveness of staff intervention. It would perhaps be more beneficial if we could measure satisfaction with resolution of ASB.

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?

The number of self-contained properties void at the year end and of those, the number that have been void for more than six months.

Yes agree to this

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?

How many times in the reporting year did you not meet the requirement to complete an electrical installation condition report (EICR) within five years of the last EICR?

GHA supports the principle of enhancing the monitoring of tenant and resident safety and welcomes the proposed two new Indicators. However, it is worth noting that the requirement to hold an up to date EICR is not a legal requirement in the same way as gas checks, only being required as part of SHQS.

It would be helpful if holding an up to date EICR was a legal requirement when landlords have to manage hard to access properties

To further support landlords manage budgets and hard to access properties in the technical guidance could consideration be given to a MOT style approach similar to what's in place for gas safety. We would suggest an EICR could be completed up to 90 days in advance of the actual due date without changing the next due date. This should help landlords manage hard to access properties and avoid the costs associated with losing time by completing early.

Number of homes that do not have 'satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire' installed at the year end

Agreed, however some guidance on "regularly maintained and tested" would be helpful, alarm manufacturers will recommend weekly testing which for a landlord is not practical. Should the regulator be looking to confirm the date of a test within the reporting year and documentation held by landlords to confirm alarm age, last and next test date?

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?

GHA welcomes the proposed approach to collect resident safety duties as part of the Annual Assurance Statement

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?

Average length of time taken to resolve cases of damp and/or mould
Percentage of resolved cases of damp and/or mould that were reopened
Number of open cases of damp and/or mould at the year end

GHA supports the introduction of indicators to measure the performance of landlords with relation to Damp and Mould as it is a real area of concern for tenants and landlords.

We are happy to support the proposed indicators around average days to resolve and re-opened cases, however but we do not feel the snapshot of open cases at year end is especially useful.

We suggest that this be replaced by an indicator looking at the number reported in the reporting year with an addition to categorise the extent of any damp or mould cases with guidance for landlords to assist with categorisation.

Suggestions would be minor/ major and the underlying cause in the reporting year. This would allow comparisons based on the number of properties affected as a proportion of

all stock, giving a clearer picture of the extent, cause and prevalence of the issue in each 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?

GHA feel the median would be the most appropriate measure as it smoothing outliers.

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

We feel its important to have clarity on some aspects of the technical guidance to ensure meaningful reporting.

- Its important to clarify the start date for a damp and mould repair as the issue may not be diagnosed until a pre-inspection visit is carried out or a routine repair changes to damp after attendance by a trade operative.
- The phrasing of the guidance assumes work will always be required, that will not always be the case, often providing information and advice is all that's required. Would a call back from the tenant 6 months after guidance was issued constitute a re-opened case?
- Some clarity on "work is satisfactorily completed in the opinion of the landlord" Its possible to carry out a chemical clean as an urgent repair in less than 5 days. At that point any concerns relating to mould and harmful spores will be removed. Follow on orders to perhaps identify an underlying cause by install environmental sensors could result in massive fluctuations in time to complete, unless technical guidance is clear. In this example landlord "A" could rightly justify reporting completion in 5 days and landlord "B" monitoring for 6 months again rightly reports completion in 6 months.
- With regard to re-opened cases, we would like specific guidance on cases where the landlord has taken all reasonable steps and resolution is out with the landlord's practical ability. Some examples fuel poverty, where the resident can't afford to run their heating. Ventilation at windows, extractors etc is blocked after we have cleared them on a previous visit.
- We feel the regulator should perhaps classify damp and mould cases as minor/major and also ask landlords for the underlying cause in each case. This information would be valuable in building a national picture of the root causes of damp and mould.

Thank you for taking the time to give us your feedback