

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 No

If you are responding as an individual:

Please tell us how you would like your response to be published.

Publish my full response, including my name

Pick 1

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?

If SHR is not using indicator data, we are comfortable with its removal from the ARC. However, given recent cuts in Scottish Government adaptation funding it is concerning that SHR is not interested in the cost of this work to RSLs- Indicator 20. Having to increasingly cover rising adaptation costs will directly affect future rent setting and affordability.

The proposed removal of indicator C4 on abandoned properties also seems an anomaly, without clear rationale. We believe that SHR should be monitoring the number of abandoned properties which differ from evictions and court cases.

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?

We welcome the proposed changes to Indicator 10 - Repairs Completed Right First Time. There has been considerable confusion across housing associations about interpreting this indicator since its introduction, reducing its value for benchmarking performance.

In our view the proposed changes to Indicator 15 do not resolve the inherent issues of this indicator. Benchmarking locally agreed response targets will continue to make organisational performance comparisons difficult. Similarly, guidance on what constitutes a resolved case needs to be more robust, and the measure does not appear to assess the quality of response and service in dealing with often complex issues.

We are comfortable with the proposed change to Indicator C2: Lets in the reporting year by source of let.

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 have no concerns about this information being collected.

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 support this.

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?

We are happy to continue confirming our health and safety compliance in the Annual Assurance Statement, until the new indicators become part of the ARC.

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?

Whilst we welcome the introduction of indicators which help evidence legal and regulatory compliance in relation to damp and mould; the suggested indicators need to provide clarity on what constitutes a resolved case, or risk being interpreted in different ways by organisations.

Whilst it is acknowledged within the consultation paper that there are different types of damp and mould that require a different response (e.g. condensation damp requires a very different response than penetrating damp), the proposed indicators do not currently reflect this, focussing on quantity rather than quality of response. SHR should consider how to strengthen the indicators to reflect this and may wish to undertake a Thematic Study on dampness and mould to support its analysis.

If the indicators are introduced further consultation/review should be undertaken after 12 months to ensure the indicators are producing robust data that can be effectively benchmarked.

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?

We are happy to collect data on the average time taken to resolve cases. However, we should be able to highlight where a more complex case has taken longer to resolve.

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

We are not convinced that the indicators are refined enough, and SHR should consider how it can differentiate more complex cases like penetrating dampness which are likely to take longer to resolve. We support the principle of submitting dampness and mould data, which evidences legal and regulatory compliance, but it needs to produce robust information that can benchmark performance.

Thank you for taking the time to give us your feedback