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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Glasgow G4 0QW

Name/organisation name

Aberdeen City Council

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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?

   <u>Indicators 23 & 24</u>
   We are comfortable with proposed approach, however it is important the definition of a let to a homeless household is made clear so there is consistency in recording across Registered Social Landlords. Aberdeen City Council define a homeless person as someone who has been assessed and is recorded on the homeless persons register (HL1). They are considered homeless from the date of assessment until we discharge our duty by making an offer of housing to them.

   RSLs however do not always assess homeless applicants in the same way, nor do they have to submit the same data, so it is not entirely clear when they report on the number of homeless offers made. Clarity is required on whether this relates to offers to people who are recorded as homeless by the council (statutory homeless applicants) or people who have told the RSLs they are homeless.

   Therefore, clarification is needed to the question; would a let to a homeless person only include those who have had an assessment and decision made by the local authority?

   <u>Indicator C4</u>
   It is important that data on abandonments are still collected. We are unclear from the proposals if this will form a new category under indicator 22 alongside evictions and court orders. It could possibly indicate a failing in support and tenancy sustainment, and it would be important for this to be clarified, as we would not want to see figures on abandonments removed entirely.

   <u>Indicator 14</u>
   Lettings and average time to relet are different from refusals. We are unclear how indicator 30 would cover refusals to allow for the proposal to remove indicator 14. Level of refusals is an important indicator of stock profile, desirability of areas, and allow us to ensure allocations systems are working effectively.

   <u>Indicator 20</u>
   We think it is important to capture the data in relation to adaptations as it is an investment in the housing stock. Although, it is still something we would continue to do through local groups, but it may be more challenging to get the information if it is not part of Scottish Housing Regulator indicators as not all providers may continue to record this information.

   What may help is if the cost of adaptations could be drilled down to the scale of adaptation. For example, small cheap adaptations such as grab rails to major more expensive adaptations such as wet rooms. It is important to collate the information for Indicators 19 and 21 on the number of households waiting for adaptations and the average time to complete adaptations. Adaptations may also require an additional indicator showing how many adaptations are carried out within the year.

> **Indicator C3**
> We have no issues with this indicator and are comfortable with the proposal.

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 in agreement with this proposal; however, the amendment looks complicated which may prove difficult to monitor. Our existing system does not allow us to report on re-reported repairs. This would need to be clarified to allow this indicator to be fully understood and discussed.
>
> Clarification is needed on what defines a re-reported repair; what timescale defines a repair being reported again, as many variations may seem to be the same repair to the tenant but when attending it may not be the same.
>
> **Indicator 15**
> We do not agree with the measure of anti-social behaviour cases per 100 homes as this would not be like for like across landlords, as some only deal with and record ASB cases for their own tenants, however we also record and report on private owners' complaints.
>
> We also need clarity on what constitutes a resolved case, does it just mean that the organisation has just given some help and advice and that is the case closed or does it mean something else?
>
> **C2**
> We agree that Registered Social Landlords should report their lets to homeless households by local authority area. This is important to give an accurate picture since many Registered Social Landlords house homeless applicants in multiple local authority areas.

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 are in agreement with the proposals regarding including a long-term voids indicator, as it is re-establishing the indicator that was previously removed. However, the list of exclusions to the indicator can hide too many properties, and it may be worth including some of the current exclusions. It may also be worth looking at adding lettable and unlettable stock. This could include properties undergoing major works and upgrades and only exclude properties that will never be relet, for example those properties set for demolition.

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 in principle with collecting these two new indicators as this provides an indicator to the regulator as to where there may be issues, and councils can use their resources more effectively to solve self-identified issues.
>
> With regard to Electrical Installation Condition Reports, we agree with the additional indicators that the SHR proposes to collect in relation electrical safety and fire detection.
>
> With regard to Fire Safety/Smoke detection, we agree with the additional indicators that the SHR proposes to collect in relation electrical safety and fire detection.

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 have no general issues with this proposal, however the figures on the topics listed should be given as some form of self-assessment. This allows the regulator to easily identify where issues are post-Grenfell, especially for fire.

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?

> We have no issue with this proposal to add these 3 new indicators.
>
> However, we do have some comments around the 4 reporting amendments:
>
> 1. There is a need to need to define between damp and mould caused by water penetration or structural issues" and tenant caused issues such as condensation.
>
> 2. There is no way of extracting this data from our current system unless someone does this manually. To carry this out for 23,500 individual addresses would be extremely time consuming and difficult to undertake. Also how do we determine that this is the same issue, in same room etc when extracting information? Further clarification on this point would be useful.
>
> 3. We agree with this indicator.
>
> 4. We have some issues with this reporting indicator, as it only gives a snapshot in time of ongoing open cases at year end. We are unsure of the value in reporting this and we would be grateful for some clarification on the reasoning behind this indicator.

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 in agreement with the proposal to collect this data; however, this would depend on the compilation of the dataset. Mean is best when the data is symmetrical and median where there are outliers.

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

> We do not feel the indicators are clearly defined; there are many variables that can be identified as either damp or mould. Such as incorrect reporting by tenants, damp and mould from either water penetration, leaks or structural issues and potentially condensation.
>
> If we are recording data in relation to damp and mould, we feel it should be captured accurately under each different heading so to better determine if this is a landlord issue or tenant issue which will allow for this to be targeted accurately, and the route of the problem can be identified. This could allow the regulator and social landlords to determine trends and accurately focus on the major contributory factors.

Thank you for taking the time to give us your feedback