

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.

Pick 1

Publish my full response, including my name

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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?

We agree with the proposals to remove indicators 14, 23, 24 and C3. We would suggest that C4 (abandoned homes) and 20 (cost and funding of adaptations) remain in the ARC for the following reasons:

- C4 provides information on abandonments (an indicator of tenancy sustainment) which is not reported elsewhere in the ARC.
- 20 provides information on how organisations are funding adaptations which is helpful, particularly given recent funding cuts.

The approach of removing indicator 23 (homelessness referrals RSLs only) and introducing additional information on homeless lets by local authority area (C2) is particularly welcome. This will ensure accurate and comparable information is collected on this critical issue. While the current indicator can be accurately reported on when an RSL is working with a limited number of local authorities using Section 5 referrals, it does not support accurate reporting from RSLs working with varying local authority referral systems across multiple areas. It is particularly challenging when common housing registers and choice based lettings systems are used.

It would be helpful to clarify if these indicators are removed from the May 2025 ARC. The consultation states the existing ARC will be used for the collection year 2024/25 but we are unclear if this applies to removed indicators.

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?

While we agree these indicators should be amended, clarification on the proposals is required.

Indicator 10

The amendment of indicator 10 (right first time) to focus on repairs reported again is the correct approach. The previous blend of two different aspects – a repair completed without the need for recall and locally agreed targets – confused reporting. The indicator will now provide clearer information focused on whether the customer required to report the repair again. With the time taken to complete repairs separately reported in indicator 9. This provides tenants with more transparent information to compare landlord performance.

It would be helpful to clarify the following points for indicator 10:

- Is the reporting to be based on a repair reported again “during the reporting year” or “a defect ... reported within a 12-month period”? Both of these definitions are mentioned in the guidance.

- If a repair is reported again more than once how is this counted?

Indicator 15

The proposal to use locally agreed targets means the benchmarking information won't be comparable.

Indicator C2

To provide comparable data of percentage of homeless lets by local authority, the total number of lets in each local authority would also require to be provided.

As the consultation states the existing ARC will be used for the collection year 2024/25, it is assumed that these amendments won't apply for the May 2025 ARC. It would be helpful to confirm this.

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?

Yes, we agree this would be a useful indicator to collect. Increasing homelessness presentations and breaches of the Unsuitable Accommodation Order (UAO) - combined with reduced social rent newbuild completions – means best use of existing stock is critical.

We would suggest a commentary box is available for this indicator to ensure qualitative information on the reasons for long-term voids is available.

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 to electrical safety and fire detection?

We agree with the additional indicator in relation to electrical safety. We would note it is set out on the same basis as the current gas safety indicator (11) but specifies "rented housing" unlike indicator 11. Could it be clarified if "rented housing" includes social rent, midmarket and market rent?

The value of the additional indicator on fire detection is unclear. This focuses on the existing SHQS requirements of detection installation; not the ongoing inspection/testing which is covered in the current gas safety indicator and the proposed electrical safety indicator. Therefore, we do not agree with the proposal to include this additional indicator on 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?

Yes, we agree with this approach to compliance with tenant and resident safety duties.

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?

Yes, we agree with the proposals for these three indicators.

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?

For consistency with other ARC indicators and ease of understanding, we would suggest that the average is used with the opportunity to provide comment. This would allow landlords to provide context if performance is skewed by a small number of cases.

If the SHR is considering a change of approach to use of the median, then other indicators should also be considered. For example, average time to complete adaptations (indicator 21) and average relet times (indicator 30). Particularly in smaller associations, performance can be adversely impacted by a small number of adaptations or relets with longer completion times.

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

These indicators are similar to the indicators currently used by Housemark, so it would be useful to check any definition or reporting issues with them.

We agree that damp and mould is a complex area for landlords. The indicators do not include all relevant information. For example, reasons for damp and mould, reasons for cases being re-opened and categorisation of severity. It would be useful to obtain this and more qualitative information – such as the actions taken by landlords and what actions have been most effective. Perhaps a thematic review could be considered.

Other points

It would be helpful to clarify if “flipping” includes all temporary accommodation that becomes permanent. For example, decant accommodation

Thank you for taking the time to give us your feedback