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

Forth Housing Association

Address

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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 x ☐   **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?

   > 14 – we think that this can show some context around difficult to let properties or where nominations are not being match appropriately from the LA and the impact on overall relet times. Perhaps this can be added to C2.
   > 20 – we think this should be kept as it shows the financial investment on adaptations, particularly the investment from the landlord's own finances which can be taken into consideration for grant funding if its going to be based on % spend then this can show the total spend by the RSL.
   > 23 & 24 – agree this is confusion however we would still like to have some oversight of refusal from homeless referrals as this can give context to relet times in this category.
   > C3 – agree
   > C4 – we think it is important to collect abandonment data to give context to tenancy sustainment activities. If indicator 22 is expanded to cover this then that may make more sense to have it under one indicator.

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?

   > 10 – we agree that this indicator is far too complicated and would welcome any approach to simplify it – technical guidance would need to be clear. Repairs completed out with target are reflected in the average time taken.
   > 15 – we agree that the current indicator does not reflect cases complete within target and would welcome including this based on locally agreed targets, however this does not highlight were there is good performance around shorter targets and may lead to targets changing to longer timescales. It might we worth considering asking to provide the target timescales to allow deeper analysis
   > C2 – agree, however it may be useful to collate refusal via this route also to give context to how successful the referral process is.

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?

   > Agree – we think this would help give a sector wide picture of the extent of empty homes particularly when we are facing a housing crisis.

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?

Electrical Safety – we agree that it is fair for the performance to be assessed relating to complete within 5yr in a similar way to gas however this is covered in the SHQS compliance and with the clarity on the technical guidance this additional indicator may not be necessary to record it separately.

Fire Safety – again we agree that it is fair for properties to be assessed for LD2 compliance however this is part of the SHQS indicator should may not be necessary to record it separately.

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?

Agree – we already consider this when carrying out our assessments for our AAS.

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 agree that this is becoming an area of concern for the sector however the complexity and range of issues and causes may make it difficult to 'fit' into an indicator. Particular concern around cases resolved and opened again as it can be out with reasonable measure that the landlord can take particularly if guidance and advice given is not acted upon.
Furthermore with the concerns of fuel costs rising and the number of tenants in fuel poverty increasing this could impact on this. With limited access to funds to support tenants in fuel poverty, the instances of condensation may increase.
Even if we collate data based on structural issues these are also very complex and may take considerable time to resolve partially when decants are required so the average length of time to resolve is meaningless.
Number of open cases at year end is also a problem as this does not relate to when it was opened – could have been reported the day before the year end. This scenario is similar to that for the ASB cases at year end.

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 think the average time taken in a simple form does not reflect the wide range of complexity of cases including causes and remedial works required. We therefore do not agree that this is a suitable indicator.

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 believe they are clearly defined – the range of causes and complexity of cases and remedials cannot be measured in a quantitative way.

Thank you for taking the time to give us your feedback