

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
5th Floor, 220 High Street
Glasgow G4 0QW

Name/organisation name

City of Edinburgh Council

Address

Waverley Court, 4 East Market Street, Edinburgh

Postcode EH8 8BG

Phone 0131 200 2000

Email

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?

Yes, we agree with the proposals to remove these indicators, particularly those that include the same or similar data reported through other 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?

Indicator 10

We agree with the effort to simplify this indicator to help eliminate inconsistencies in reporting across landlords. We would welcome clarification on the timescales for a repair to be 'recalled' as the proposed definition includes references to both the reporting year and a 12 month period, which are different. It is also worth noting that landlords can only report on those cases that tenants report back to us that have failed or are picked up through inspections. A large increase in the number of inspections may mean more faults are identified, which is not necessarily a true reflection of the quality of repair work when compared to other years or landlords.

It should also be noted that the removal of repairs not completed within target timescales from the definition is likely to have a large impact on performance and will not be comparable with previous years data. Thought should be given to replacing the indicator entirely rather than amending the current one.

Indicator 15

We do not agree with amending the current indicator but would welcome a change to the definition to include cases raised in the previous year. This indicator was previously changed as landlords across Scotland all had different locally agreed targets for resolution and was therefore not useful for benchmarking purposes.

We do not agree with introducing an indicator on the number of anti-social behaviour cases per 100 homes. Presumably this indicator would be a measurement of the landlords stock only and some, perhaps all, local authorities do not just manage anti-social behaviour cases for their own properties. Cases can also be very complex and cover a large range of tenures. This could result in local authorities in particular reporting a disproportionately large number of cases compared to their stock levels.

Indicator C2

We would welcome the introduction of asking RSLs to report their homeless lets by local authority to get more up to date and accurate data on priority lettings.

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 agree with introducing a new indicator on long term voids but would welcome more clarity or removal of the exemptions which, if kept in, could result in the data being less meaningful.

We also suggest consideration of carrying out a thematic inspection as one-off to understand the many reasons for properties being empty rather than reporting a single figure through the ARC. This may prove more useful than a new indicator.

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?

Indicator 11

We agree with continuing to keep this indicator but would like it expanded to include the total figure broken down to highlight 'how many were due to taking Force of Law measures to resolve'. We also think it's worth considering adding the overall percentage of compliance as well.

Fire and Electrical Safety

We agree with adding new indicators to the ARC on tenant safety, however we would propose consistency in the wording of the measures, and we consider an overall compliance percentage to be more useful. We also note that fire safety equipment and electrical safety inspections are included as part of the Tolerable Standard and as such where compliance is not met, we will also report this through the SHQS indicator. We suggest that to limit duplication, you consider expanding the SHQS indicator to include reasons for non-compliance.

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 agree with this approach.

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 with the principle of seeking to report on damp and mould, but the nature of this work is complex and varies significantly in scale, scope, resolution and root cause. So much so that the proposed indicators do not provide a valuable enough picture of how landlords are dealing with this. Further to reporting the number of cases received and still open we suggest reporting on time taken to initially respond (measured through survey response times) and satisfaction with how the landlord has dealt with the problem. The latter could be done through satisfaction surveys from tenants who have recently experienced the problem.

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 have no specific preference over using an average or a median.

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

We suggest further consideration is given to clearly defining at what point a case is deemed as being “re-opened”. Dampness cases/repairs in properties may occur more than once but it doesn’t necessarily have to be the same source or in the same room. Also, a percentage of cases are due to how the tenant is managing the effective ventilation of home.

Thank you for taking the time to give us your feedback