

## 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](http://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](mailto: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

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?

**Indicator 14 - Tenancy offers refused during the year**

We do not support the removal of this indicator. There is value in understanding the number of tenancies which are refused and this indicator allows for the ability to compare with other housing providers. However, the current data only reflects offers made via letter and many offers are verbal. Therefore, this indicator does not reflect the work involved in a let or areas of low demand

**Indicator 20 – Total cost of adaptations completed in the year by source of funding**

We do not support the removal of this indicator. At a time when the funding which allows adaptations to take place has been reduced significantly, it is more important than ever that we understand how much is being spent on adaptations and how this is being funded. This allows the sector to monitor costs over time and also to track any link between available funding and volume of adaptations completed. These measures allow people to live more safely in their homes.

**Indicator 23 – Percentage of referrals under Section 5, and other referrals for homeless households made by the local authority, that result in an offer, and the percentage of those offers that result in a let**

We support the proposal to remove this indicator. Under the current method, it does not support accurate reporting from RSLs which operate across a number of local authorities with differing referral processes including CBL and CHR lists which can lead to duplications.

**Indicator 24 – LA only**

**Indicator C3 – Number of lets during the reporting year, split between general needs and supported housing**

We support the proposal to remove this indicator.

### **Indicator C4 – Properties abandoned**

We do not support the removal of this indicator. This data gives an indication of tenancy sustainment and it is not collected elsewhere in the ARC.

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 – Reactive repairs completed right first time**

We support the amendment of indicator 10 as a focus on repairs reported again will provide clearer information and allow comparison between landlords to be simpler. Clarification would be welcomed on the use of both 'reporting year' and '12-month period' in the definitions for this indicator in the guidance. It is also unclear how a repair should be counted if it is reported again more than once?

### **Indicator 15 – Anti-social behaviour cases resolved**

We partially support this amendment.

Measuring levels of ASB per cases across LA areas will enable an assessment of cases being managed by the RSL and identify areas hot spot areas.

Locally agreed targets do not provide meaningful information in relation to performance or to severity of and time required to resolve cases.

Number of cases resolved when closed provides more meaningful data on performance.

There are too many variations on type of ASB and time to resolve to provide meaningful information on average days to close and may reflect the various processes followed in different RSLs as to when cases are closed.

The use of locally agreed targets means comparison between landlords will not be possible so we are unclear on the value of this being collected. The total ASB cases per 100 homes would be a more useful indicator of performance.

### **Indicator C2 – Lets in the reporting year by sources of let**

In order to provide comparable data of percentage of homeless lets by local authority, the total number of lets in each local authority would also need to be provided. A further amendment should be made to ensure lets to homeless households from our own waiting lists or refugee schemes are included.

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 the proposal to reinstate this indicator. However, we do not believe providing a number of void properties at the end of year is useful as it reflects only a snapshot of a moment of time and not overall performance.

We would propose the ARC collects data on how many properties have been void for more than 6 months at any point during the reporting year. Some qualitative data would also be useful in terms of understanding the reasons for long-term voids. For example, there have been many reported instances of utility companies delaying lets, the property may be undergoing extensive works. We assume the new indicator would be clear it is in relation to lettable voids only and not those excluded from our letting pool such as those held for demolition.

The proposed measure seems to assume long-term voids are the result of low demand and without additional information it will not be clear how many empty properties are actually available to help meet housing need.

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 the collection of these indicators as it is data already collected by our organisation. However, we believe a percentage of self-contained stock would be a more useful measure than a number given the range of total stock across the sector.

In relation to the proposal on electrical safety, it states it applies to 'rented housing' and this differs from indicator 11 which is the equivalent measure for gas safety. It should be clear if it relates to only social rented stock or all tenures.

On the fire safety measure, the indicator could be simplified to ask how many/what percentage of homes do not have 'satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire'.

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 support the proposed approach to compliance with tenant and resident safety duties being considered through the ongoing assurance process.

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?

Given the importance and profile of tenant health and safety in relation to damp and mould, we support the proposals to introduce these indicators.

To ensure what is being measured is valuable and proportionate a number of factors not set out in the consultation need to be considered. SHR must ensure the indicators are clearly defined, straightforward to collect and compare.

#### **Average length of time taken to resolve cases of damp and/or mould**

We support the inclusion of this indicator, although given the different types and treatments for damp/mould (rising damp, penetrating damp, condensation, etc) some further breakdown would provide valuable context. To resolve these issues can involve a range of methods from fixing a leaking roof or pipe, to installing extractor fans or repairing external walls.

A definition of what a 'case' is would be useful as it's currently unclear if this means a report of damp/mould or a repair which has been reported and then assessed to confirm a case of damp/mould.

#### **Percentage of resolved cases of damp and/or mould that were reopened**

We believe this measure requires some clarification. As a landlord we can have completed all necessary actions within a home and consider

the case resolved, but the tenant may choose to shut off ventilation or not adequately heat the home which results in cases of damp/mould being reported to us again.

**Number of open cases of damp and/or mould at the year end**

As indicated in relation to the new indicator on voids, collecting data on the number of open cases at year end is not valuable information. It misses critical context which can identify trends and severity. It does not identify if cases are increasing or decreasing over time. We would suggest this measure instead is a percentage of stock with damp/mould issues over the reporting year. This will allow comparison across landlords and across time.

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?

There are pros and cons to both approaches. We appreciate the use of ‘median’ can lessen the impact of outliers on the figure reported. However, for consistency with other ARC indicators and ease of understanding, we would suggest that the average is used. There could also be the option to provide comment if a landlord believes its performance is impacted by a small number of cases.

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

We believe greater clarity should be provided on these new indicators. As referenced above, there are multiple categories of damp/mould which range in severity. There are also varying reasons for damp/mould as well as different reasons for cases being reopened. It is unclear what is considered to be a recurrence of damp/mould. Clarity on whether this means it is the same location or within the same room or from the same root cause, for example, would be useful. An outline of some scenarios would be helpful.

Clarification that in some instances the 'work' required to resolve cases of damp/mould may be advice and support would be useful, especially in enabling understanding of what 'resolved' means in these cases. This could be without any physical works being completed, or with works being completed by where the measures installed are not used by the tenant.

Thank you for taking the time to give us your feedback