

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

North Lanarkshire Federation of Tenants and Residents (NLF)

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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	<input type="checkbox"/>
Please publish my response, but not my name	<input type="checkbox"/>

The North Lanarkshire Federation of Tenants and Residents (NLF) is an umbrella organisation that aims to strengthen and unify the voice of local resident groups across North Lanarkshire. Established in 2006, we work in partnership with North Lanarkshire Council and Registered Social Landlords operating in the North Lanarkshire area. NLF is managed by our Executive Committee (EC), made up of 12 people democratically elected by our member organisations. In addition to our EC meetings, we also hold at least 3 meetings and an AGM each year open to any member, and seek the opinions of members outwith our general meetings to guide and support the EC. We do this as and when required in a range of ways, including structured consultations, public events, attending member group meetings and networking with members.

The Federation works to make sure that every resident in North Lanarkshire receives excellent housing and related services, and to make sure that the opinions of local people are an integral part of decision-making processes.

NLF are the largest tenants and residents' representative group in Scotland. We therefore welcome the opportunity to respond to this discussion paper from the Scottish Housing Regulator. Information collected through the ARC is important to transparency and to support scrutiny of landlord activities across Scotland.

Our response has been collated with the support of the North Lanarkshire Council tenant participation team, and independent consultants North Star Consulting and Research, who facilitated a hybrid discussion meeting of eleven tenants and residents from across the authority (including some representing their tenant or resident association) to inform this response.

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 that the above indicators are removed.

(14) The number of offers made before a new tenancy is allocated is subject to too many vary localised variables, and does not provide useful benchmarking information at a national level. To become useful the reporting requirements would become disproportionately complex.

(20) We also recognise that the cost of individual adaptations is also very variable, depending on the complexity of work, local supply chain factors and property construction, for example. These variables also mean that the information is very difficult to benchmark in a meaningful way. The source of funding for adaptations is also a secondary interest for us.

The levels of unmet need and the time that households are waiting to have an adaptation completed are more important trends to monitor, and we agree that these indicators should remain.

(24 & 24) We are very concerned about the increasing levels of homelessness across almost all Scottish local authority areas, and with the declaration of a national Housing Emergency, this is an important trend to monitor. However, we agree that the number of Section 5 referrals is time consuming to collect, and not a useful indicator as very few homeless households are housed through this route. We agree that the information can be collected instead through indicator C2.

(C4) We are not clear about whether the information about abandoned tenancies will always come through the indicator for court actions and evictions, as currently defined. (22).

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?

Yes, we agree with these amendments.

(10) We agree that the right first time indicator is currently difficult to benchmark. The proposed amendment is simpler to collect and understand. However, we feel that a fixed timescale for repairs reported again, e.g., 12 months, might be more useful than only counting those within the reporting year. Otherwise, any repairs first reported towards the end of a reporting year may not be counted if reported again in a relatively short timescale.

(15) We agree that the amendment to include cases opened in the previous year will provide a more accurate picture of overall cases. We also agree that pro-rata reporting will enable better benchmarking.

We feel that the issue of whether a case has been resolved can be subjective. If it is not mutually resolved and is raised by a tenant again, we would like clarity about whether this is counted as a new case, or whether it becomes a continuation of the original complaint.

(C2) We agree that breakdown by local authority area will provide much more useful information for local scrutiny purposes.

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 that this additional indicator should be collected.

We believe most landlords will already be collecting this information and that it will not be an onerous additional indicator. It will help to capture an annual snapshot of the overall picture nationally, and will also help to identify trends over time at a local level. In our own area, for example, tenants meet with our local authority performance team at regular intervals during the year. This indicator will help to ensure transparency and prompt questions on reasons for long term voids to better understand trends and emerging issues at a local level.

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?

Yes, we agree that these additional indicators should be collected.

In both cases, the checks provide additional assurances and peace of mind for tenants, and at a practical level help to keep home insurance premiums lower where they can show checks and safeguards to be in place.

Within our consultation group, we have experience of hidden unsafe wiring being picked up in the homes of tenants of two different landlords as a direct consequence of electrical safety checks being carried out. Tenants are otherwise unaware of and living with potentially dangerous situations.

Electrical safety checks require checks in all parts of all homes, and we also recognise and support the incidental benefits of landlords being able to pick up potential welfare issues with tenants they may otherwise have very little contact with.

We note that there are no periodic checks for fire detectors, but recognise that the reports will show a reduction in abeyances over time. We also recognise that individual alarms should be checked as part of the whole house electrical safety checks every 5 years.

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 that this is a reasonable and proportionate 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?

Yes, we agree that these additional indicators should be collected.

It is important that landlords are fully aware of issues being raised across their stock, and that these are resolved quickly. These indicators will help to ensure that levels of dampness and mould and any trends are identified and can be addressed.

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 feel there may be some instances where exceptionally complex cases may have a disproportionate impact, and so probably lean towards a median measure for that reason. However, we suggest a more pragmatic approach may be to collect both for two or three years until the relative variances can be better understood.

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

In part.

We feel there needs to be more clarification on the timescale for reported cases that have been re-opened, and also clarification on whether cases need to be resolved to mutual satisfaction before they are closed.

Although not part of this consultation, we also recognise that the causes of dampness and mould can be complex and may be difficult to address, especially where the cost-of-living crisis and energy costs makes it harder for tenants to heat and ventilate their homes. We believe that landlords need to make clear information and advice available to tenants, supported by adequate investment in staff training and expertise.

Thank you for taking the time to give us your feedback