

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

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.

No

We feel there is value in knowing the number of tenancies offers that are refused, removing this indicator eliminates the ability to analyse, compare and benchmark results with the wider housing sector on refusals.

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

No

There are real concerns within the sector regarding the reduction in grant funding for adaptations. Collating this information sector wide enables the ability to track housing provider costs as well as available grant funding over time. Having access to this information means housing providers can identify and monitor correlations between funding (and funding reductions) and the number of adaptations completed.

**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 (RSLs only).
SHR and Indicator 24 which is for LA's only.**

Yes

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

Yes

Indicator C4 – Properties abandoned.

No, not as currently proposed.

Evictions and court actions do not include abandonments therefore it is not appropriate to remove this indicator and offer Indicator 22 as a suitable replacement. We would agree if abandonments were included at indicator 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?

Indicator 10 – Reactive repairs completed right first time.

No. Although further clarity is needed.

The main factor impacting on results against this indicator is number of repairs that were not completed within our defined own timeframes, as any repair not completed within locally defined targets is judged as not right first time. This appears to have been removed and is the area likely to be of most interest to the tenant / customer.

It is unclear what the regulator seeks to understand from this indicator, when housing providers use their own definition on timeframes and what represents a status of complex (is it time, cost, type, or a combination of them all). Until there is a universal agreement on these points, we risk continuing to seek comparison using an incomparable measure.

This indicator creates significant challenges for housing providers in terms of investment and the resources required to collate the information. It is difficult to understand the benefits of this information when housing providers are not using the same measurement definitions and approach.

Clarity is also required in understanding what should be counted i.e., if there are three visits to a property for the same repair, is this classed as the same (one) job recalled twice or two jobs recalled once each?

Indicator 15 – Anti-social behaviour cases resolved.

Yes, to some degree.

Although we agree that open cases into the reporting year should also be included, we feel further exploration of this indicator is required. The current reporting format does not give way to fully understand the story of anti-social behaviour within communities.

Housing providers and tenants can become impacted by anti-social behaviour originating from or involving owner occupiers or private sector renters within the communities we operate in. This may not be reflected in our internal management of anti-social behaviour if it does not originate from our own tenants. If we understand anti-social behaviour as a wider locality issue, not simply a housing provider issue, we need to understand the full picture regarding anti-social behaviour. This indicator measurement fails to achieve this.

Tenants and the wider observer would likely be more interested in the number of repeat cases. This could indicate whether our responses to anti-social behaviour are making a difference. This offers more value than reporting solely on the number of cases we closed, where often the issue was not resolved for our tenants, we had simply taken action as far as we could.

Indicator C2 – Lets in the reporting year by source of let.

Yes

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?

New Indicator 'Voids'

Yes

We agree to the collation of a snapshot of voids at the end of the reporting year. That said it would be helpful to understand the status of those voids i.e., the number of properties available, over those that may be void but not suitable for allocation, i.e. not being allocated due to locality issues, property issues or strategic decisions. Distinguishing between the total number of voids and the number of empty available properties will present different stories on voids in Scotland.

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 with the additional indicators on fire and electrical safety, whilst recognising the challenges on right of access in the face of tenant refusals.

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 our legal duties in relation to lift safety, fire risk assessments, asbestos and legionella should be considered through our assurance processes with notice of any non-compliance notified through our Annual Assurance Statement and Notifiable Events where necessary.

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

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?

As all other measurement are collated as averages it would maintain consistency retaining the average scale, if there are wider benefits in seeing the median result both could be recorded.

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

No

Not as currently defined - some distinction should be made about the type and size of the issue, with measurement of time provided against these definitions, alongside the property types. Housing providers with new stock are less likely to be faced with challenging cases within older properties such as tenements where its more difficult to undertake actions to reduce or eliminate damp and mould.

There are situations where cases are raised where damp or mould is caused due to condensation from inadequately heated properties. This is particularly salient during the ongoing economic 'cost-of-living crises. In situations such as this, how would stock related and behaviour caused (where there is limited scope to intervene or prevent) damp and mould cases be differentiated.

Thank you for taking the time to give us your feedback.