

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

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?

We do not believe that the SHR should collect data from RSLs that it does not routinely use and in principle would support the removal of all such indicators. However, with respect to Indicator 20 retention of this may be useful to track trends and provide benchmarking information particularly in the light of the reduction in funding availability.

We would suggest the SHR give some consideration to removing Indicator 21 instead as timescales are likely to become much more challenging in the current funding environment and can often be outwith our ability to control, particularly in the case of major or complex adaptations.

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 believe that the amendments to the Indicators and supporting guidance provides more clarity.

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 this would be a useful indicator to collect. Long term voids are frequently caused by poor performance by utility companies. Will the SHR collect the reasons for long term voids or offer the opportunity for RSLs to submit supporting commentary also with this 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?

Yes.

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.

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?

In principle we would agree to the introduction but do not agree that this issue warrants 3 new indicators which seems disproportionate in terms of other areas of health and safety.

We do have concerns about the type of data being collected and whether this gives the best picture of the extent of the problem and RSLs performance in dealing with it.

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?

The average length of time taken would be more appropriate and consistent with how other indicators are measured.

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

What is introduced for measurement needs to be very clearly defined and we do not believe that they are in the current proposals. There can be many different reasons, combinations of different reasons and some cases more complex than others to deal with. We do however welcome the fact that the SHR accepts that this is a complex area and one which can be notoriously difficult for both landlords and tenants.

There was no other space in the consultation for any other comments so we have added this additional box to include a further observation. We report on complaints performance to our governing body and tenants using the SHR ARC indicators and also the separate requirements of the SPSO. Do the SHR have any plans to discuss with the SPSO how reporting on complaints to regulatory bodies could be streamlined for RSLs

Thank you for taking the time to give us your feedback