

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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Name/organisation name

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

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 - Percentage of tenancy offers refused during the year. This is an important indicator as offer refusals appear to be on the increase. We do not agree with its removal as it provides useful wider context to the allocations process.

Indicator 20 - Total cost of adaptations completed in the year by source of funding. Given the erosion of adaptations funding we would propose that this indicator be retained. It provides useful context to the overall funding of adaptations across the country and is especially useful to Housing Associations. We would also want to add a sub indicator on percentage of requested allocation provided by Better Homes.

Indicator 23 (Homelessness) – the 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 – Agree with proposal to remove

Indicator 24 - Homelessness – the percentage of homeless households referred to RSLs under section 5 and through other referral routes – Agree with proposal to remove.

Indicator C3 - Number of lets during the reporting year, split between 'general needs' and 'supported housing' – We would propose that this is retained. This is an important indicator for an RSL like Cairn, which has both types of stock. The comparator information with our peers is also informative for us and tenants. Also, this indicator is about the 'type' of let not 'source' of let so cannot be substituted by C2. We don't understand the logic of the rationale for removal and would want the indicator retained.

Indicator C4 – Abandoned homes. Part of the information is available elsewhere in indicator 22, however not to the detail required. An Abandonment might not relate to a court action/eviction and the ability to track numbers across all reasons is useful. We do not agree with its removal.

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?

We would welcome the proposed amendment to the identified indicators but would highlight the importance of the Regulator allowing sufficient time for landlords to revise their collection and recording systems in advance of the date set for the introduction of revised indicators.

Indicator 10 - Percentage of reactive repairs carried out in the last year completed right first time – we agree with the proposal to amend this indicator, however clarification is required on the timescale between original repair to being reported again (timeframe).

Also, further clarification would be required if a repair was reported towards the end of the financial year and raised again early in the new financial year:

Indicator 15 - Percentage of anti-social behaviour cases reported in the last year which were resolved – we agree with the proposal to amend this target, however we would require clarification on whether the cases per 100 homes is for all Cairn stock or for the stock broken down by each of the Local Authorities we operate within.

C2: Lets in the reporting year by source of let – We agree with this change. However, as a national RSL operating over several Local Authorities we would appreciate if the systems for collection could take this into account so that the data can be submitted in a straightforward manner.

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 include a long-term voids indicator with clear and concise technical guidance and definition of a long-term void.

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?

The proposal to introduce two new indicators in relation to electrical safety and fire detection is welcomed, given the importance of tenant and resident safety and associated compliance requirements.

We believe that there is a need for clarification of the requirements in relation to the indicators. We would suggest that clarification on the inspection date renewal if an inspection was carried out in advance i.e. where the original date stands if carried out for example a 2-month period of expiry date. This would give landlords more flexibility to programme inspections to meet timescales.

Regarding electrical safety there are several cases where there has been 'no access' or failures due to remedial works not being able to be completed due to property condition or other issues. We would suggest standard reasons and guidance for incidences where landlords did not meet the requirement this would provide consistent reporting for all landlords. We would also suggest clear definition and classification of reporting fails and abeyances. This would provide consistent reporting across the sector.

Fire Safety: As above we would suggest standard reasons and guidance for incidences where landlords did not meet the requirement this would provide consistent reporting for all landlords.

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 welcome the proposed approach to collect landlords' performance in relation to tenant and resident safety within the Annual Assurance Statement. To promote consistency and clarity across the sector, it would be helpful if a standard format were developed to accompany this introduction to ensure consistency across the sector and across the Big 6 areas of H&S compliance.

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 introduction of three new indicators in relation to damp and mould. However as a national RSL who operates across several Local Authorities it will be important that revisions to regulatory focus in relation to this area provide for the flexibility required to reflect the different scale and operating contexts of local authorities and RSLs.

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 would suggest that clear and specific guidance be provided for accuracy of reporting. There are varying timescales to complete certain types of damp and mould repairs for example;

1. Rising Damp - failed damp course
2. Penetrating damp - leaky roof
3. Traumatic Damp - leaky pipe in bathroom coming through kitchen ceiling.
4. Mould caused by condensation.

Due to the varying timescales for completion of the categories above using an average across all categories may result in a false representation of results. Therefore, we would suggest reporting this indicator by category – not limited to the examples above.

We would ask that there is clarity provided on the definition of what is a resolved case.

We also propose that the median is used to avoid lengthy cases unreasonably skewing the outcome.

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

We believe that the DMC indicators lack clarity and would benefit from clear definitions, particularly around what is considered a recurrence. Would this be with reference to the same tenancy? Or the same property, different tenant? Or the same tenants, different property?

Also, as outlined above would several types of DMC with different sources or unrelated causes be considered reoccurrence? If these things are not clearly set out, it is open to interpretation and it is highly likely that responses will not be comparable. If the intention is to get an understanding of what is happening in the sector, the indicator in its current form will not provide that.

We would ask that there is clarity round the definitions and the scope of the indicator to assist on this sector comparability. We would ask that there is further consultation with industry experts as this indicator develops.

Thank you for taking the time to give us your feedback