

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?

Indicator 14: Tenancy offers refused during the year. We collect data from Indicator 30 on number lets and average time to re-let and therefore propose to remove indicator 14.

Keep-We believe that refusals can be indicative of allocations systems not efficiently meeting need and/or the unpopularity of particular areas, or types/condition of stock. Instead of removing, we think it should be enhanced by including figures for offer withdrawals, as an indicator of issues with stock popularity or selection process issues.

Indicator 20: Total cost of adaptations completed in the year by source of funding. We collect data from Indicators 19 & 21 on the number of households waiting for adaptations and the average time to complete adaptations. Both of these will continue to provide information on the demand for and extent of adaptation work being carried out in the sector.

Keep-Total cost should remain as a benchmark of your budget/spend against other landlords.

Indicators 23 and 24: Homelessness referrals

Agree on the removal.

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

Agree on the removal

C4: Abandoned homes. We collect data from Indicator 22 on court actions and evictions.

Keep-Court Actions and Evictions do not relate to abandoned houses. A good figure for benchmarking and helps as indicator of tenant sustainability.

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 - Stakeholders told us there are too many recording anomalies across landlords, particularly in relation to what repairs and what timescales are and are not to be included. We are proposing to simplify this indicator by asking landlords to report, of the reactive repairs which were completed, how many were reported again.

We welcome the removal of the Right First Time Indicator, but do not agree on the new proposal of repeat repairs recording. Regardless of having a system to record, there are too many anomalies as to what is classified as a repeat repair. For example drainage work caused by tenant misuse, different types of repairs to a door or window, but classified as the same location and repeat revisits to new dampness or condensation issues, due to tenant fuel poverty. Compiling the figure would require manual checks about whether the job meets the criteria.

Indicator 15: Anti-social behaviour cases resolved - Stakeholders told us that the current definition means that the cases which were opened in the previous reporting year are not considered, so we are proposing to now include these. We are also proposing to reintroduce measuring whether cases were resolved against locally agreed targets. Stakeholders told us that this indicator does not allow for meaningful benchmarking, so we are proposing to also measure the number of anti-social behaviour cases per 100 homes.

Agree on this change.

C2: Lets in the reporting year by source of let - We are proposing that RSLs report their lets to homeless households by local authority area. Stakeholders told us this was important to give an accurate picture as many RSLs house homeless applicants in multiple local authority areas.

Agree on this change.

3. We also propose to introduce the following indicators:

- Long term voids - We propose to re-introduce the previous ARC indicator 'the number of self-contained properties void at the year end and of those, the number that have been void for more than six months'. This will allow us to collate a sector wide picture of empty properties.

This would have some value for benchmarking and six months accords with our own internal definition. However, we would suggest a sub category of the reason for the LTV, including those used for decant. This shows type of use which can be different from LTV which are unpopular and difficult let. However, the figure is a snapshot at year end and a LTV could have been let before the reporting date and not reflecting the issues.

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?

Agree - We provide this information already, although this is through SHQS tolerable standard.

However, with regard to electrical safety indicator; even though this is similar reporting process to gas safety, a lot of social landlords are still trying to get through backlog of electrical safety checks from the 10 to 5 years compliance requirement. Therefore, electrical safety reporting over the next two years (2024/25 and 2025/26) will still be focused on these backlog and new addresses expiring. Most landlords are prioritising safety checks in date order (older first) and finding it harder to catch addresses before

their 5-year anniversary dates. At present, the electrical safety process is unlike gas checks, where landlords already have processes in place to start getting access, at least two months before anniversary dates.

The other complexity with electrical safety check is the remedial works required, which in most cases require longer time to resolve / repair. Therefore, it would help give landlords time and the opportunity to start their process and measurement indicator, from a better baseline / base year reporting period (for example from 2025/26 onwards).

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, process is already in place and happy for this to continue as it is.

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 therefore propose three new indicators on damp and mould:

- Average length of time taken to resolve cases of damp and/or mould;
- Percentage of resolved cases of damp and/or mould that were reopened; and
- Number of open cases of damp and/or mould at the year end.

As a landlord we welcome the issue of damp and/or mould becoming a reporting issue. However, we have concerns over the complexity of these cases and how they could be reported or misreported, especially when the information becomes public. Our concerns are noted in 8 below.

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?

If this becomes an indicator, after all the clarification required, see above, then median would be the better measurement.

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

This would mean landlords would report to us on the following:

- i. Number of cases of damp and/or mould that were resolved within the reporting year

- ii. Number of resolved cases of damp and/or mould that were reopened (within 12 months)
- iii. Total number of working days to resolve cases of damp and/or mould
- iv. Number of open cases of damp and/or mould as at 31 March each year.

1. Given the complexity around the root cause of damp and mould, we have seen in most cases that both tenants and landlords may need to take action.

2. There should be some sort of classification around root cause / remedial actions, instead of a general approach to average length of time taken to resolve.

3. There is a difference between a property suffering from damp and/or mould due to structural or insulation issues versus a property correctly insulated and with a fully working heating system. Tenant lifestyle, fuel poverty and refusal to accept remedial works have to be recorded.

4. Measurement of days / count should be from when we are first notified by tenants.

5. What happens where tenants do not provide access for surveys or for works to be rectified? Are these going to be included in the length of time it took to resolve?

6. Counting dampness and/or mould reported within 12 months is problematic. If mould growth was resolved and the issues are lifestyle related, then it is not a re-opened case. The situation was resolved. What about refusal of remedial work and then the customer reports the issue again?

7. The number of reports versus remedial action taken should be recorded. Not all requests for an inspection require remedial work.

8. The number of properties reporting dampness and/or mould should be recorded separately from the number of repairs carried out, to establish a truer picture.

Thank you for taking the time to give us your feedback