

Respondent Information Form and Consultation Questionnaire

Consultation on Scottish Social Housing Charter Indicators

FEEDBACK FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Association of Local Authority Chief Housing Officers (ALACHO) AND the Scottish Housing Best Value Network (SHBVN).

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

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3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a)	Do you agree to your response being made available to the public (on Scottish Housing Regulator website)?	
	<i>Please tick as appropriate</i> <input type="checkbox"/> Yes <input type="checkbox"/> No	
(b)	Where confidentiality is not requested, we will make your responses available to the public on the following basis	
	<i>Please tick ONE of the following boxes</i>	
	Yes, make my response, name and address all available	<input type="checkbox"/>
	or	
	Yes, make my response available, but not my name and address	<input type="checkbox"/>
	or	
	Yes, make my response and name available, but not my address	<input type="checkbox"/>

(c)	The name and address of your organisation will be made available to the public.	
	Are you content for your response to be made available?	
	<i>Please tick as appropriate</i> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

What tenants and other service users can expect

Question 1

In general do you find the format for the report we are proposing to be clear and easy to understand?

The use of symbols such as the arrows to help explain performance is helpful, and follows the National Performance Framework. The idea of the house sections to show ranking seems good, but would need to be made more obvious – an alternative would be to have green / amber / red to identify relative performance. Combining trend and comparison information is important, particularly where performance is very good but with little or no improvement.

SHR should also make it clear that their report for tenants has a different purpose from the report by a landlord to its tenants. Landlords should work with their tenants to decide on the content, but there should be an expectation that the landlord should identify particularly good performance, and the action it is taking where performance is less satisfactory, and its priorities for this. This should allow tenants to respond with comments that feed into the organisation's business or service planning process.

Question 2

Have we included the right indicators? If not what alternative would you suggest?

ALACHO & SHBVN were closely involved in the technical working group set up to help develop the indicators and their definitions. In general we are content with the proposed indicators as measures to gauge achievement of or progress to towards the Charter.

Specific comments in relation to the indicators are noted in the questions below. Both organisations are willing to continue to work with SHR to fine tune the indicators and their definitions where this is required.

Question 3

Are there any other changes or improvements you would like to see?
If so, what are these?

There are **two volume measures** included (number of anti-social behaviour cases, and number of homeless applications). It is not clear what sense can be made of these within the report to tenants unless they are reported as a percentage of stock or some other comparator. Information about rent levels and rent increases should be added, to give tenants an indication of their relative rents.

A number of **customer satisfaction questions** are proposed but it is not clear whether they are questions the regulator expects to be asked during large scale periodic surveys or during routine monitoring of services. This should be made clearer in the final guidance.

Several landlords have expressed their concern at reporting **repairs performance** by average hours and days. Firstly the results do not allow landlords to report performance against locally agreed targets. Secondly, many will be required to make significant alterations to their IT system reporting arrangements to allow this data to be automatically produced.

At present the **complaints handling** questions do not quite match those being proposed by the SPSO and it is critical that the approaches taken by both organisations are identical at the top level.

The Indicators

Question 4

Are there any indicators that you feel are not appropriate and, if so, why?

Because the Scottish Housing Regulator has been clear that it wants to limit the burden of data collection for the Charter, indicators should emphasise outcomes, with some input measures to assess value for money. Process measures should only be included where there is a clear outcome as part of this. On this test, Indicator 6.2, tenancy offers, and Indicator 11.4 legal action, would not be included as outcome measures. These may be better collected as context data.

It will be critical for SHR to make it clear that landlords need to be able to explain performance against the Charter outcomes using the comments boxes for examples where indicators provide only a partial view.

'Write-offs of former tenant arrears' is an unsatisfactory indicator, and is more a reflection of accounting approaches. Collection of former tenant arrears is a better measure (where post-tenancy collection of Housing Benefit is excluded).

In view of the current Scottish Government consultation on an energy efficient standard for social housing, indicator 4.2 SAP ratings may be less useful to collect. An indicator could be added once the outcome of the consultation is known.

Question 5

If you think that any of our proposed indicators are not appropriate, what alternatives would you suggest?

SHR should reiterate at every opportunity that landlords will have a wide range of additional performance information being routinely collected and reported to help explain performance and the Charter Indicators are only part of the big picture. Reinforcement of the need for effective benchmarking would also be welcomed as a reminder to landlords of the importance of this.

Question 6

Is the proposed approach to reporting landlord spending sensible?

An easy view of landlord spending across the sector is welcomed and we feel the suggested approach is adequate. A handful of landlords already report spend in this way. This will no doubt encourage tenants, service users, staff and Boards to compare results across the sector and question their own results.

We recognise though that it will be difficult for the regulator to produce this data for local authorities given the wide differences in how financial information is gathered for RSLs and councils at present. For example, the current Scottish Government Housing Revenue Account return contains a 'supervision and management' indicator that can translate directly to 'costs of running the organisation', however it is not clear if 'written off arrears' and 'void rents' would also be included.

There are a number of issues that will also need to be considered including:

- On repairs, would 'CFCR' be included within this?
- How would transfers of money be dealt with, e.g. to and from reserves?
- For RSLs, how would non-housing activities be treated?
- 25 RSLs have taxable activities – how would this be treated?

How would other non-rental income be treated? Would these figures be net of other costs, such as factoring expenditure which may be included in the repairs expenditure, but should be matched by income. Support expenditure may also be high for some landlords.

For both sectors, does 'paying loans' include capital re-payments and how would one-off payments or transfers to and from reserves be treated?

These issues and other will need to be considered before meaningful comparisons can be made.

Question 7

If not, what alternatives would you suggest?

n/a

Contextual Information

Question 8

Is the contextual information we propose to collect appropriate?

There are some elements of the context information that are really outcomes, as referred to earlier.

For SHQS, we would prefer this to be measured positively as stock meeting the SHQS, as set out in Indicator 4.1. Measuring failing as well as meeting SHQS is likely to be confusing for users of the data.

Question 9

Are there any pieces of information we have identified that you feel do not need to be included or have been missed?

ALACHO & SHBVN strongly believe in the need to avoid data collection for the sake of it and any duplication. Several of the indicators being proposed are the same as or similar to those being collected by others, such as the Scottish Government. We are aware that the regulator is already in discussions with the relevant organisations to agree a way forward. We welcome this approach and highlight the need to ensure that all parties should work hard to secure data sharing arrangements where appropriate.

Members of ALACHO and SHBVN have expressed concern about the timetable for completion of the ARC, in particular the financial information that is required. The deadline for completion of local authority accounts is generally 30 September, and final figures are unlikely to be available until September.

One factor which may affect this is the sign-off procedure for completion of the ARC by local

authorities. At present the APSR is approved by RSL governing bodies but it is not clear if the regulator will require councils to adopt a similar practice and if so what level within the local authority would have authority to do so. This needs to be clarified.

We recognise that detailed definition of the indicators and guidance on interpretation will be needed, and would welcome the opportunity to be further involved in this.

Responding to the consultation

We would prefer that consultation responses are submitted to us electronically, however we will accept written responses to the consultation. We are inviting responses to this consultation paper by **24 August 2012**. Please send your response to:

consultation@scottishhousingregulator.qsi.gov.uk or write to:

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