

Scottish Housing Regulator consultation – APSE Response

To: All Chief Executives, Main Contacts and APSE Contacts in Scotland. For information only to England, Northern Ireland and Wales

1 Executive summary

The Scottish Housing Regulator released a consultation on the Annual Return on the Scottish Social Housing Charter. They aim to confirm and publish the revised ARC indicators in a Technical Guidance with a list of FAQs by January 2025 to allow social landlords to start collecting data from 1 April 2025.

The proposed set of indicators they consulted on were informed by engagement via their advisory groups, conferences and forums facilitated by organisations including APSE Scotland as well as reviews of the websites of social landlords and conversations with regulatory bodies and people within the social housing sector. For further information on the questions proposed please [click here](#)

2 APSE Response

APSE was pleased to be given the opportunity to respond to the consultation. APSE's full response is outlined below:

About APSE

APSE's (Association for Public Service Excellence) aims and values are to support and promote the delivery of excellence in frontline local government services. APSE works with over 300 local authorities throughout the UK specialising in frontline service delivery issues. All local authorities within Scotland are members of APSE and in responding to this consultation APSE have considered the views of our member councils, including responses drawn from our discussions with our Scottish Building Officers Process Mapping Group. We have also drawn upon APSE's Performance Networks service, which is the largest voluntary data benchmarking service in local government. As a representative body of our member local councils we have not endeavoured to answer every point raised in the consultation but to cover the main themes on behalf of our membership.

Our response

APSE, whilst in broad agreement with the revised ARC indicators outlined within the consultation, would make the following comments and suggestions in response, informed by the APSE network of our member local authorities across Scotland.

There are a number of key policy agendas for Scotland linked to building and housing services including climate change, energy and sustainability as well as heat in homes, tenant safety and the cost-of-living crisis. With housing and building repairs and maintenance services continuing to play a pivotal role in helping to meet these important agendas. The additional budget pressures which have continued to intensify, bring into sharp focus the challenges local authorities face when supporting Scottish Government and others with these important policy agendas. With this in mind, while the membership welcomes the reasons behind the new indicators the two key themes from our discussions were further clarification and context.

Colleagues across our member local authorities would benefit from greater clarification of the new and proposed amended indicators as this would provide our membership with a clearer picture of what is required to be recorded and provided for the ARC return. Local authorities are working under a backdrop of continued budget and resource pressures therefore clarification on these indicators would help our member authorities assess the budget and resource impacts on ensuring the data is collected and reported accurately. It will also help to ensure consistency across what is being reported. It was suggested during our membership discussions that incorporating scenario guidance could help to provide those completing the ARC return with the information and clarity on the process they are to follow. It was highlighted that this may further help provide a level of consistency in relation to the data being reported.

As well as clarification and context across the new and amended indicators, the following was noted as part of the Building Officers Process Mapping Group in terms of specific indicators:-

- There was a consensus with the proposal to introduce two new indicators in relation to tenant and resident safety. However, to maintain consistency in SHQS reporting, it was felt that this should be aligned with Indicator 6 (Percentage properties meeting SHQS year-end). Creating a separate indicator increases the risk of reporting discrepancies. Also, in relation to the fire safety indicator this should be specific in stating that it relates to smoke and fire detection. This helps to provide further clarity.
- With regards to the new proposed dampness/ mould indicators, the consensus from discussions would be to measure the average length of time rather than median. Many of the local authority existing indicators are measured as average and customers are

therefore familiar with this approach. It was noted that clarification on whether this was to be calendar days for consistency would also be beneficial.

- With regards to the new dampness/ mould indicators, it was agreed that guidance provided must be exceptionally clear on when a case is "resolved", i.e. resolved from the landlord's and not customer's perspective. Therefore, the importance of an exact definition was noted as key for this indicator.
- With regards to the new dampness/ mould indicators, in relation to year end from discussions it was felt that to avoid misinterpretation, careful consideration must be given on how this aligns with the SHQS. Some SHQS-compliant properties may still have damp and mould problems. It is therefore critical to define the exact metrics and desired outcomes to ensure accurate assessment.
- With regards to the new proposed void indicator, it would be good to measure as a whole instead of as a snapshot.
- With regards to gas safety (indicator 11), there was consensus that collecting additional data - what percentage of gas supply properties are capped – would help to provide an indication as to the level of fuel poverty across Scotland.
- With regards to antisocial behaviour (indicator 15), there was agreement that due to local arrangements this would be inconsistent.

Some of the areas outlined could also be actively supported by APSE's Performance Networks Data. These existing datasets are a rich source to both monitor and report on performance information in terms of building maintenance and repairs services, supported by strong participation across Scottish Local Government as all councils in Scotland are members of this. Drilling down this data can also highlight areas of best practice and information sharing that have and continue to support key policy areas within the building maintenance services for example customer satisfaction, voids and emergency/ non-emergency repairs. The performance networks model does evolve over time and is flexible to introduce new measures if required, this is to ensure that the information being collected continues to be relevant and useful to our membership.

We have worked with a range of national governing and audit bodies on performance including Audit Scotland and have actively supported national programmes through supplying robust and reliable performance data, for example working with SEPA on local government recycling measures.

APSE would be pleased to provide further detailed evidence of the matters raised herein to the Scottish Housing Regulator or its advisors. APSE had a representative on the SHR tenant safety advisory board which met earlier this year and would continue to welcome the opportunity to provide the valuable input from local authorities. In the first instance please contact Louise Melville

on lmelville@apse.org.uk who is our lead advisor for APSE Scotland and she will be pleased to answer any questions on my behalf.

3 APSE Comment

As outlined within the consultation response above, it is important to note that local authority building maintenance and housing services plan a vital role in the delivery of a number of policy agendas. However, with the budget and resource pressures continuing to intensify, it is important that clarification of the indicators highlighted needs to be extremely clear to ensure that there are no undue extra pressures on local authority resources. As any changes will inevitably affect the data local authorities record/keep and report.

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Advisory groups are a free service included as part of your authority's membership of APSE and all end with an informal lunch to facilitate networking with peers in other councils. If you do not currently receive details about APSE advisory group meetings and would like to be added to our list of contacts for your service area please email enquiries@apse.org.uk.

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- Cost of Providing/Cost of Living Network
- Highways and Street Lighting
- Housing, Construction and Building Maintenance
- Local Authority Commercialisation, Income and Trading Network
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