

Scottish Housing Regulator (SHR) Response to the consultation on indicators for monitoring the Scottish Social Housing Charter

We have reviewed the publication issued by the Scottish Housing Regulator (SHR) on 14th January 2025 and extracted information relevant to the NEW tenant and resident safety indicators only.

Please read the [SHR publication in full](#) to ensure you fully understand the requirements.

New indicators: tenant and resident safety



The Scottish Housing Regulator had proposed to introduce new indicators on electrical and fire safety; most respondents to the consultation agreed with this. Some respondents highlighted the importance of landlords being able to provide explanation and context for any non-compliance, which they said could be because the landlord has struggled to gain access to tenants' homes.

A small number of respondents suggested that both indicators were already covered within SHQS (Scottish Housing Quality Standard), which landlords already report on in the ARC. However, the separate EICR (electrical condition installation report) indicator being proposed would measure instances within the reporting year where the 5-year anniversary date for the EICR has been missed, in the same way as the current indicator on gas safety. The current indicator on SHQS, however, measures point in time (year-end) compliance only.

The SHQS requirement related to fire safety (smoke and heat alarms) has been in place since 21 February 2022; there are still a number of these outstanding and, as an essential element of tenant and resident safety, splitting this into a separate indicator gives it cognisance and provides the ability to monitor compliance more closely.

A small number of respondents requested clarity in relation to outstanding works resulting from an EICR and whether or not this would be regarded as non-completion of an EICR. Others requested landlords be given more flexibility about the dates they would be permitted to carry out EICRs. Both of these issues are outwith SHR powers to decide on, as they are set by the Scottish Government.

SHR has provided additional clarity in the Technical Guidance on how these issues should be reported in line with the current Tolerable Standard.

Most respondents agreed with SHR proposals not to collect specific indicators in relation to social landlords' legal duties in relation to lift safety, fire risk assessments, asbestos and legionella. Respondents agreed that landlords should consider their compliance with these duties through their ongoing assurance processes and notify SHR of any non-compliance through their Annual Assurance Statement.

The Regulator will, therefore, introduce indicators on electrical and fire safety only, and this will include comments boxes for landlords to explain any non-compliance.

SHR has updated the Technical Guidance (January 2025), to provide clarity and we have extracted the two indicators relevant to electrical and fire safety from the guidance for reference.

NUMBER	CHARTER INDICATORS
29	How many times in the reporting year did you not meet the requirement to complete an electrical installation condition report (EICR) within five years of the last EICR? (i) The number of times you did not meet the requirement as set out in the Scottish Government's SHQS Technical Guidance where the recommended period for inspection of rented housing is intervals of no more than five years.
30	Number of homes that do not have 'satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire' installed at the year end. (i) Number of homes that do not have 'satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire' – as set out in the Scottish Government's SHQS Technical Guidance - installed at the year end.

<https://www.housingregulator.gov.scot/media/rcznknyw/arc-technical-guidance-clean-version-january-2025.pdf>

New indicators: damp and mould

SHR proposals included three new indicators on damp and mould, which would measure the average length of time to resolve cases of damp and/or mould, how many cases were reopened and the number of open cases at the year end.

While most respondents agreed with the proposed indicators in principle, almost three quarters did not think that they were clearly defined.



There was no clear consensus amongst respondents for collecting either the average time to resolve cases or the median time to resolve cases. Some respondents said that the average will not provide an accurate picture of response times given the wide variation in terms of complexity and severity of damp and mould cases. Some respondents highlighted that median is not collected for any other ARC indicators, including those where there can also be a wide variation (for example Indicator 15 - anti-social behaviour cases resolved).

SHR will, therefore, introduce the three new indicators on damp and mould that were proposed, but for each one, landlords will be asked to provide a breakdown of cases (i) caused by condensation and (ii) caused by structural issues.

For the indicator measuring length of time for cases to be resolved, SHR will collect the average rather than median.

Stakeholders wanted additional clarity on defining damp and mould, and whether condensation cases should be included. In the Technical Guidance, SHR has confirmed that cases of damp and/or mould should be **based on the landlord's own policies and procedures**.

After the first submission of this data (in May 2026), SHR will review the usefulness of the new indicators and, if resources allow, carry out a thematic review of landlord's approach to preventing and resolving cases of damp and mould. The outcomes from these will then inform any proposed changes to these indicators.

Some stakeholders expressed concern over how the data from the new damp and mould indicators would be presented and suggested that a direct comparison of performance would not be helpful.

SHR will not, therefore, include the data within the National Report on the Charter that they publish each year but will publish a separate report which will provide additional context around the data.

SHR has updated the Technical Guidance (January 2025), to provide clarity and we have extracted the three indicators relevant to damp and mould from the guidance for reference.

NUMBER	CHARTER INDICATORS
31	Average length of time taken to resolve cases of damp and/or mould by cause (i) Number of resolved cases of damp and/or mould (ii) Time taken in working days to resolve all cases of damp and/or mould
32	Percentage of cases of damp and/or mould resolved during the reporting year that were reopened by cause (i) Number of resolved cases of damp and/or mould (iii) Number of resolved cases of damp and/or mould that were reopened during the reporting year
33	Number of open cases of damp and/or mould at the year end (iv) Number of open cases of damp and/or mould at the year end

<https://www.housingregulator.gov.scot/media/rcznknyw/arc-technical-guidance-clean-version-january-2025.pdf>

Updated Technical Guidance

Within the updated Technical Guidance, SHR has provided additional clarity on the definitions of some existing indicators which was previously provided in their published FAQs. Landlords should continue to use the current version of the Technical Guidance for the upcoming 2024/25 ARC, which is due by 31 May 2025.

The first return that landlords will make based on this NEW guidance will be April 2025 to March 2026; Landlords should start to collect data from 1 April 2025 to enable them to report on their performance in the ARC due to be submitted to SHR by 31 May 2026.

<https://www.housingregulator.gov.scot/media/rcznknyw/arc-technical-guidance-clean-version-january-2025.pdf>

For ease of reference, over the following pages we have extracted the detailed requirements for indicators 29 - 33.

Indicator 29	<i>How many times in the reporting year did you not meet the requirement to complete an electrical installation condition report (EICR) within five years of the last EICR?</i> (i) The number of times within the reporting year that you did not meet the requirement as set out in the Scottish Government's SHQS Technical Guidance where the recommended period for inspection of rented housing is intervals of no more than five years.
Definition	Electrical installation condition report (EICR) Safe electrical systems form part of the Tolerable Standard. In order to demonstrate compliance with this, landlords must organise electrical safety inspections by a competent person at intervals of no more than five years. More details can be found in the Scottish Government's SHQS Technical Guidance. Please note that SG updates this guidance from time to time.

Indicator 30	<i>Number of homes that do not have 'satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire' installed at the year end.</i> (i) Number of homes that do not have 'satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire' – as set out in the Scottish Government's SHQS Technical Guidance - installed at the year end.
Definition	Satisfactory Fire Detection A house meets the tolerable standard if it complies with the relevant requirements in relation to satisfactory smoke and heat alarms. More details can be found in the Scottish Government's SHQS Technical Guidance. Please note that SG updates this guidance from time to time. Please also refer to the Scottish Government Guidance Fire and smoke alarms: tolerable standard guidance.

Indicator 31	<i>Average length of time taken to resolve cases of damp and/or mould by cause</i> (i) Number of resolved cases of damp and/or mould caused by condensation (ii) Number of resolved cases of damp and/or mould caused by structural issues (iii) Number of resolved of damp and/or mould caused by other issues (iv) Time taken in working days to resolve cases of damp and/or mould caused by condensation (v) Time taken in working days to resolve cases of damp and/or mould caused by structural issues
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32	(vi) Time taken in working days to resolve cases of damp and/or mould caused by other issues
	Percentage of cases of damp and/or mould resolved during the reporting year that were reopened by cause. (i) Number of resolved cases of damp and/or mould caused by condensation (ii) Number of resolved cases of damp and/or mould caused by structural issues (iii) Number of resolved cases of damp and/or mould caused by other issues (iv) Number of resolved cases of damp and/or mould that were reopened during the reporting year caused by condensation (v) Number of resolved cases of damp and/or mould that were reopened during the reporting year caused by structural issues (vi) Number of resolved cases of damp and/or mould that were reopened during the reporting year caused by other issues
33	Number of open cases of damp and/or mould at the year end. (iv) Number of open cases of damp and/or mould at the year end
Definition	Cases of damp and/or mould Any repair that has been reported as or assessed as a case of damp and/or mould as per your own policy. Case of damp and/or mould resolution time The time taken (expressed in working days) between the earliest date a request is received by the landlord (from either the tenant/tenant's representative or landlord's member of staff/contractor) until the work is satisfactorily completed in the opinion of the landlord. When calculating working days this excludes weekends and official public holidays. Other days when your office is closed (for example extended office closure over Christmas holiday period) should be counted as they are still working days. Reopened Damp and/or mould cases which are reopened should be counted where a report has been made of an instance of damp and/or mould within a property, a resolution has been carried out to that case of damp and/or mould and it is deemed as satisfactorily complete in the opinion of the landlord, following which further unplanned work is required during the reporting year. Further information We worked with ALACHO (Association of Local Authority Chief Housing Officers), Chartered Institute of Housing (CIH) Scotland and Scottish Federation of Housing Associations (SFHA) to publish a briefing note to provide the social housing sector with improved information on how they can respond to damp and mould.

Inclusions/ exclusions	Do not include: • advice-only cases; • repairs carried out under the defects liability period on any new build properties; • repairs to void properties; • repairs to lock-ups or garages; and • any 'no access' cases (i.e. where a contractor has been unable to access the property to carry out the repair). Ensure to include: • the time taken to carry out any pre-inspections in the length of time taken to complete a repair; • 'Right to repair' repairs that in your opinion meet the above definition of a case of damp and/or mould; and • cases resolved in the current reporting year, which were raised in the previous year, but not resolved until the current year.
SHR Calculation	To calculate the average length of time take to resolve damp and/or mould cases: (ii) Time taken in working days to resolve all cases of damp and/or mould By: (i) Number of resolved cases of damp and/or mould To calculate percentage of resolved cases of damp and/or mould that were reopened we will divide: (iii) Number of resolved cases damp and/or mould cases that were reopened By: (i) Number of resolved cases of damp and/or mould