



**Scottish Housing
Regulator**

**Gypsy/Travellers
in Scotland
A thematic inquiry**

November 2015

About Us

We are the independent Regulator of just under 200 social landlords – around 160 Registered Social Landlords (RSLs) and 32 local authorities. We are led by a Board of non-executive members and directly accountable to the Scottish Parliament.

Our one objective is **to safeguard and promote the interests of:**

- nearly 600,000 **tenants** who live in homes provided by social landlords;
- around 90,000 **owners** who receive services from social landlords;
- around 40,000 **people and their families** who may be homeless and seek help from local authorities; and
- over 2,000 **Gypsy/Travellers** who can use official sites provided by social landlords.

Our role is to gather, monitor, assess and report on social landlords' performance of housing activities and RSLs' financial well-being and standards of governance, and to intervene where appropriate to achieve our objective. We also keep a public register of social landlords.

You can see more on how we regulate social landlords in our published [Regulatory Framework](#) available on our [website](#).

The Scottish Government's [Social Housing Charter](#) sets out the standards and outcomes which social landlords should aim to achieve. We monitor, assess and report landlords' performance against the Charter, through our regulatory assessments, published analysis and thematic work.



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Overview

Introduction

1. This report provides our assessment of social landlords' approaches to the management and maintenance of residential sites for Gypsy/Travellers, including rent setting, engagement with site residents and levels of resident satisfaction. Our inquiry involved a review of national statistical and performance information, interviews with residents on official Gypsy/Traveller sites, a review of landlords' websites, a survey of social landlords and discussions with key stakeholders. Our report includes positive practice highlighted by social landlords.

Gypsy/Travellers in Scotland

2. There is a degree of uncertainty over the number of Gypsy/Travellers living in Scotland. Over 4,200 people identified their ethnicity as 'White: Gypsy/Traveller' in the [2011 census](#). This represents less than 0.1% of the Scottish population. In the [last official count of Gypsy/Travellers](#) commissioned by the Scottish Government in 2009, over 2,000 were living on Council/Registered Social Landlord (RSL) sites, private sites and unauthorised encampments in Scotland.
3. There are 29 official Gypsy/Traveller sites in Scotland; 26 are owned and operated by 19 local authorities and three are owned and operated by one RSL.
4. The Scottish Government, through the [Scottish Social Housing Charter](#) (the Charter), set out the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Charter took effect from 1 April 2012 and requires that "local councils and social landlords with responsibility for managing sites for Gypsy/Travellers should manage the sites so that sites are well maintained and managed."
5. The Charter also sets out standards which apply to both tenants and other service users, such as Gypsy/Travellers, on equalities, communication, participation, value for money and rents/service charges.
6. We have set two specific indicators relating to official Gypsy/Traveller sites which we require social landlords to report to us annually to help us monitor and assess landlords' performance against the Charter. The indicators are about the average weekly pitch rents paid by residents and resident satisfaction with the landlord's management of the Gypsy/Traveller site(s).
7. This is the first thematic inquiry by the Scottish Housing Regulator to assess the performance of social landlords against the Charter standards for Gypsy/Travellers.

Main findings

8. In 2013/14, site residents' satisfaction with their landlords' management of the Gypsy/Traveller site(s) varied from 100% to 0% with an average of 59.88%. In 2014/15, satisfaction varied from 100% to 44%, with an average of 78.57%. The information submitted to us by social landlords does not provide an obvious explanation for the significant variations in the site pitch rents and levels of site resident satisfaction reported against the Charter for 2013/14 and 2014/15. We found no apparent or direct correlation between the variations in resident satisfaction level and the number and types of services provided by social landlords at their Gypsy/Traveller site(s) and the pitch¹ rents charged. Interviews with site residents suggest a more complex inter-relationship between these indicators. There are also other important factors affecting site residents' perceptions and these may relate to issues of site location and the impact of neighbours on particular sites.
9. In relation to the Charter standards and outcomes we found:

Equalities:

- little awareness among landlords that the relevant provisions of the Scottish Social Housing Charter apply to residents of Gypsy/Traveller sites;
- some landlords have made efforts to provide for the needs of residents including barrier free pitches and amenity blocks, offices or communal facilities on their Gypsy/Traveller sites, others have not.

Communication:

- most landlords have taken appropriate measures to gather and report residents' satisfaction with their Gypsy/Traveller site(s);
- limited routine gathering, analysis and use of performance information, feedback and complaints from site residents to improve the standard of sites and services;
- Gypsy/Travellers we spoke to have little awareness of how to make a complaint about their landlord;
- some social landlords were able to identify complaints relating to their Gypsy/Traveller site(s); others could not due to limitations in their recording systems.

Participation:

- few of the Gypsy/Travellers we spoke to could cite instances where their landlords had specifically asked them for their views on the services they received;
- Gypsy/Travellers also told us that where their landlord had engaged with them they particularly appreciated the landlord's efforts to give them comprehensive feedback on the results and proposed actions.

Repairs, maintenance and improvements:

- most landlords have published target timescales for carrying out responsive repairs at their Gypsy/Traveller site(s). However, while having published target timescales, some landlords do not record, monitor or report their performance to site residents.

¹ A pitch is a serviced area provided by the landlord where mainly Gypsy/Travellers place their homes (Scottish Social Housing Charter Revised Technical Guidance 2015).

Management of Gypsy/Traveller sites:

- some landlords have published service standards for their Gypsy/Traveller site(s), although only a few developed these in consultation with local site residents;
- a small number of landlords routinely measure performance against their standards and report the results to site residents.

Rents and service charges:

- Gypsy/Travellers have a keen interest in pitch rents and landlords' annual rent reviews;
- some landlords could not demonstrate a clear and structured approach to the setting of pitch rents for their Gypsy/Traveller sites;
- some landlords seek the views of site residents when carrying out their annual review of pitch rents, others do not.

Value for money:

- an important element in site residents' value for money judgement is the comparability of their pitch rent with rents for social rented houses locally;
- some landlords have not adopted an asset management approach to their Gypsy/Traveller site(s);
- local authority landlords have different approaches to where funding for, and revenues from, Gypsy/Traveller site(s) are accounted for.

10. We will use the findings from this inquiry to determine if there is a need for us to engage further with any social landlords specifically regarding the standards and services provided at their Gypsy/Traveller site(s). We will continue to monitor and assess landlords' performance through the Annual Return on the Charter (ARC) and we look forward to contributing to the discussion on how the Scottish Government's minimum standards "[Improving Gypsy/Traveller sites](#)" are linked to the Charter to ensure better outcomes for Gypsy/Travellers.

Recommendations

11. Social landlords should:
- apply all relevant Charter standards and outcomes to residents of official Gypsy/Traveller sites;
 - understand the particular needs of Gypsy/Travellers in order to deliver services which respond to those needs;
 - assess the feasibility of making their Gypsy/Travellers site(s) and buildings barrier free, wherever possible;
 - regularly gather resident satisfaction with their Gypsy/Traveller site(s) and report this to residents and in their ARC;
 - regularly provide information to site residents about their complaints policy and process;
 - routinely gather information, feedback and complaints from residents to improve the standard of their site(s) and the services they deliver to Gypsy/Travellers;
 - engage with site residents and identify appropriate methods for regular communication and opportunities for participating in their landlord's decision making process;
 - publish target timescales for carrying out responsive repairs at their Gypsy/Traveller site(s);
 - routinely measure, report and publish repairs performance relating to their Gypsy/Traveller site(s);

- develop service standards with site residents and/or their representatives and publish them;
- routinely measure, report and publish their performance against their Gypsy/Traveller service standards;
- ensure that they provide a named contact for their Gypsy/Traveller site(s);
- ensure that a structured rent setting policy is in place for their Gypsy/Traveller site pitches which takes account of what potential site residents will be able to afford;
- provide site residents, as with social housing tenants, opportunities to provide comment and feedback prior to any decision around annual pitch rent increases;
- consider value for money priorities for site residents and provide information to site residents about how they achieve value for money including comparable information about local social rented housing costs; and
- adopt an asset management approach in relation to their Gypsy/Traveller site(s).

About this thematic inquiry

12. In this thematic inquiry we analysed the information which social landlords reported to us about their Gypsy/Traveller site(s) in their ARC; specifically the rents charged for individual pitches on sites and the level of site resident satisfaction.
13. We drew our evidence for this thematic inquiry from:
 - analysis of national performance and statistical information;
 - on-site discussions and interviews with Gypsy/Travellers;
 - a survey of all social landlords operating official Gypsy/Traveller sites in Scotland;
 - follow-up inquiries with landlords about their survey returns;
 - a review of social landlords' websites;
 - feedback from discussions with a range of stakeholders.
14. Our on-line survey questionnaire was completed by all the social landlords who operate official Gypsy/Traveller sites in Scotland. The questionnaire gave landlords the opportunity to tell us about the facilities provided on their sites and the type and standards of service offered. We also asked landlords to tell us about any planned improvements to their site(s) or services. And we asked landlords a number of supplementary questions to verify their survey responses and gathered further evidence where necessary. A number of landlords provided us with documentary evidence.
15. We asked Gypsy/Travellers directly about their experiences and views through our National Panel of Tenants and Service Users. We established the National Panel in 2013 as a way to help us understand the opinions and experiences of tenants and others who use social landlords' services, and in this way, assist us to shape our regulatory focus. In total we held on-site discussions with 48 Gypsy/Traveller residents on five official sites across Scotland. Our findings are reported in full in our [Report on Findings from Year 2 of the National Panel of Tenants and Service Users](#).
16. We gathered additional evidence by examining the information that each social landlord provides on its website about its Gypsy/Traveller sites and services.
17. We have highlighted positive practice identified by social landlords. While we have not directly assessed the reported positive practice, we have included it to help other landlords identify practice they may wish to consider for adoption in their work with Gypsy/Travellers.

Gypsy/Travellers in Scotland

Context

18. In this section we have provided some statistical information about Gypsy/Travellers in Scotland, drawn from a number of sources. This information around the characteristics and needs of the Gypsy/Traveller community provides useful context to the findings and recommendations of our report.

Numbers

19. There is a degree of uncertainty about the number of Gypsy/Travellers living in Scotland. The [2011 census](#) was the first in Scotland to add a 'Gypsy/Traveller' response category to the question relating to ethnicity.
20. Analysis of the 2011 census shows that 4,212 people identified their ethnicity as 'White: Gypsy/Traveller'. This represents less than 0.1% of the population. This is more than the numbers shown in the [last official count of Gypsy/Travellers in 2009](#), when there were just over 2,000 people declared as living on official Gypsy/Traveller sites provided by social landlords. The higher census figure is not surprising since a review of the twice yearly count found that it likely only recorded between a third and a half of the Gypsy/Traveller population.
21. The Gypsy/Traveller community comprises a wide mix of different groups including: Irish Travellers; English Gypsy/Travellers; Scottish Gypsy/Travellers and Roma. The census does not collect information in any further detail other than 'White: Gypsy/Traveller'. It is therefore, not possible to provide figures for the numbers falling within each group.

Age & Gender

22. The 2011 census data shows that the age profile of the Gypsy/Traveller community in Scotland is much younger than that of the population as a whole. For instance, only 28% of Gypsy/Travellers are aged 45 or over, compared to 44% for the population as a whole.
23. The gender breakdown shows that 49% of Gypsy/Travellers are male and 51% are female. This is comparable to the gender split for the Scottish population as a whole.

Household composition and characteristics

24. Analysis of the 2011 census data shows that members of the Gypsy/Traveller community are twice as likely as those in the wider population to live in a lone parent household and are much less likely to live in a married couple household. Gypsy/Travellers are more likely to have dependent children; (36%) compared to the rest of the population (26%) and they are three times more likely to contain three or more dependent children. The census also collected data on health, which shows that Gypsy/Travellers are more likely than the general population to have a limiting long-term health problem or disability; 28% compared to 20%.

Location

25. All census respondents were classified according to whether they lived in a rural or urban area, according to the Scottish Government's eight fold classification. The urban / rural profile of Gypsy/Travellers was fairly similar to that of the population as a whole. 35% of Gypsy/Travellers lived in a large urban area, compared to 40% of the

population as a whole. 21% of Gypsy/Travellers lived in rural areas, compared to 17% of the population as a whole.

26. The census figures include those Gypsy/Travellers who have no fixed address and those in permanent housing. The census information does not allow us to break this down into how many are in each group.

Gypsy/Traveller site provision

27. In terms of the areas where Gypsy/Travellers live, the local authority with the largest Gypsy/Traveller population is Perth and Kinross Council. This is followed by Glasgow and Edinburgh City Council areas. Perth and Kinross Council has two official Gypsy/Traveller sites and Edinburgh City Council has one official site. Glasgow City Council does not own or manage any official Gypsy/Traveller sites. Shetland Islands, Orkney Islands and Inverclyde Council areas have the smallest Gypsy/Traveller populations. None of these three Councils have an official Gypsy/Traveller site.
28. The information we gathered showed there are 29 official Gypsy/Traveller sites in Scotland; 26 of these are owned and operated by 19 local authorities and three are owned and operated by one RSL (Table 1). Two local authorities, East Lothian and Midlothian, jointly manage one site. Scottish Borders Council's official site is managed by an independent private business which leases the land from the Council. The majority of the land is used as a commercial caravan park but a specified area and related amenities are for the exclusive use of Gypsy/Travellers. The majority of Gypsy/Traveller sites are open all year round, however a small number only open seasonally, for six months over the summer period.

Table 1

Social Landlord	Sites	Pitches
	2014/15	
Aberdeen City Council	1	17
Aberdeenshire Council	1	20
Angus Council	1	18
Argyll Community Housing Association (RSL)	3	29
City of Edinburgh Council	1	20
Clackmannanshire Council	1	16
Dumfries & Galloway Council	2	30
Dundee City Council	1	20
East Lothian Council*	1	8
Midlothian Council*	1	8
Falkirk Council	1	15
Fife Council	3	50
Highland Council	4	47
North Ayrshire Council	1	16
Perth & Kinross Council	2	26
Scottish Borders Council **	1	10
South Ayrshire Council	1	8
South Lanarkshire Council	2	28
Stirling Council	1	18
West Dunbartonshire Council	1	20
Total	29	424

* Jointly operate one site

** Site is leased and managed by an independent private business, under a lease agreement with the Council

29. After hearing evidence from Gypsy/Travellers in 2012 the Scottish Parliament's Equal Opportunities Committee decided to look at [Where Gypsy/Travellers Live](#) "after hearing that accommodation is at the root of many problems faced by Gypsy/Travellers".
30. The [Housing \(Scotland\) Act 2001](#) requires all local authorities to prepare a local housing strategy, which is supported by an assessment of local housing need and demand. This assessment should include information gathered from the different community and household groups.
31. The Equal Opportunities Committee reported that few councils had acted on the outcomes of their assessments in relation to Gypsy/Travellers.
32. Overall, the Equal Opportunities Committee found that the provision of sites for Gypsy/Travellers is 'not sufficient'. It found that "with some exceptions, sites in general are inappropriately located and of a poor standard". The Committee found that few local authorities had plans for new sites with most favouring the refurbishment of existing sites. It also found that, whilst several councils were themselves content with the sites they provide, many Gypsy/Travellers who used their sites did not feel so satisfied. The Committee concluded "this suggests that many local authorities do not either understand, or care about, what Gypsy/Travellers actually want and need from sites".
33. The Equal Opportunities Committee report led to the Scottish Government proposing the introduction of a strategy and action plan for Gypsy/Travellers in Scotland. The Scottish Government established the Gypsy/Traveller Strategy Development Group to take forward this work. The Scottish Government also established the Gypsy/Traveller Site Working Group to look at issues around sites, including those highlighted in the Equal Opportunities Committee report. Following the Working Group's considerations, in May 2015 the Scottish Government published guidance setting out [minimum standards](#) for official Gypsy/Traveller sites and core rights and responsibilities for those renting pitches from social landlords.
34. A recent Scottish Government [summary of the evidence base on Gypsy/Travellers](#) in Scotland found that there is limited evidence on the travel patterns of the community and that both 'push' and 'pull' factors were found to influence the travel choices of members of the community. 'Push' factors included: a lack of space on existing sites and disputes with other families on sites, making some unwilling to move into available pitches. The main 'pull' factor was choosing to move into settled accommodation due to poor health.
35. In our report [The Priorities of Gypsies/Travellers and Factored Owners](#) we highlighted that for some Gypsy/Travellers the mix of site residents, and relationships between residents, was at least as high a priority as how landlord services are delivered.
36. It is positive that the Scottish Government's recently published guidance "[Improving Gypsy/Traveller Sites](#)" introduces new minimum standards for official sites and core rights and responsibilities for those renting pitches on those sites from social landlords. The Scottish Government expects all sites to meet the new minimum standards and have revised tenancy agreements in place by June 2018.

Discrimination against Gypsy/Travellers in Scotland

37. There is a growing body of evidence around the levels of discrimination faced by the Gypsy/Traveller community in Scotland. The latest findings from the [Scottish Social Attitudes Survey](#) on discrimination concluded that Gypsy/Travellers, as a group, are

the subjects of ‘fairly widespread discriminatory attitudes’. Recent research by Amnesty International on the [Scottish media coverage of Gypsy/Travellers in Scotland](#) found that the Gypsy/Traveller community received disproportionate coverage in the media and that nearly half (48%) of this coverage was negative, and only 28% positive.

38. In 2012 the Scottish Parliament’s Equal Opportunities Committee reported in its inquiry [Gypsy/Travellers and Care](#) that “despite various reports and initiatives since devolution...very little has been achieved to improve the lives of Gypsy/Travellers”.
39. In its subsequent inquiry [Where Gypsy/Travellers Live](#) the Equal Opportunities Committee found evidence that Gypsy/Travellers experience ‘extreme difficulties’ in accessing many services. This was found to be partly due to site locations often making local amenities difficult to access. Other key barriers to the Gypsy/Traveller community accessing services was the stigma of living on a site leading to discrimination and the transient nature of their lifestyle making consistent access to services difficult.

Charter indicators for Gypsy/Traveller sites

40. All social landlords provide us with details of their annual performance information in their ARC. Where applicable, this includes details of the two Charter Indicators specifically relating to official Gypsy/Traveller sites, namely, Indicator 36 average weekly pitch rents and Indicator 37 service user satisfaction with the landlord’s management of the Gypsy/Traveller site(s). Details of the landlords’ returns are contained in Table 2.

Table 2

Social Landlord	Average weekly pitch rent		Service user satisfaction	
	2013/14	2014/15	2013/14	2014/15
Aberdeen City Council	£75.69	£75.69	93.75%	87.50%
Aberdeenshire Council	£67.12	£70.28	100.00%	100.00%
Angus Council	£48.34	£50.13	20.00%	66.67%
Argyll Community HA	£42.47	£42.91	70.00%	57.14%
City of Edinburgh Council	£75.53	£77.27	30.77%	50.00%
Clackmannanshire Council	£56.28	£85.00	100.00%	93.33%
Dumfries & Galloway Council	£65.20	£65.20	no return	no return
Dundee City Council	£67.74	£67.74	100.00%	100.00%
East Lothian Council*	£41.44	£39.90	no return	71.43%
Midlothian Council*	£41.44	£39.90	no return	71.43%
Falkirk Council	£68.94	£71.42	100.00%	100.00%
Fife Council	£53.94	£53.94	18.52%	70.59%
Highland Council	£71.85	£72.31	70.83%	70.59%
North Ayrshire Council	£75.79	£80.09	100.00%	100.00%
Perth & Kinross Council	£83.63	£87.56	71.43%	71.43%
Scottish Borders Council **	£45.00	£45.00	no return	no return
South Ayrshire Council	£72.81	£76.60	100.00%	100.00%
South Lanarkshire Council	£55.07	£55.07	no return	100.00%
Stirling Council	£77.88	£80.23	100.00%	95.24%
West Dunbartonshire Council	£59.34	£68.28	0.00%	44.44%

* Jointly operate one site

** Site is owned and managed by a private individual, under a management agreement with the Council

41. We require all social landlords to report to us annually the percentage of Gypsy/Travellers responding that they are either very or fairly satisfied with the landlord's management of its site(s). We appreciate the potential complexities of carrying out satisfaction survey work with Gypsy/Travellers and for this reason have allowed landlords flexibility in how this data is collected locally. While we expect to see this information gathered at no more than three year intervals, we encourage landlords to conduct such surveys more frequently, as part of their own service improvement processes.
42. In 2013/14 five landlords were unable to provide any information on satisfaction among residents of their Gypsy/Traveller site(s), as survey work had yet to be carried out. This number had reduced to two landlords in 2014/15.
43. Our initial examination of the first ARC returns submitted by the 20 social landlords for the period 1 April 2013 to 31 March 2014, revealed that:
 - across Scotland the average weekly rent charged for pitches varied from £41.44 to £83.63;
 - satisfaction with the landlord's management of the Gypsy/Traveller site(s) varied from 100% to 0%, of those site residents who responded.
44. In the ARC submissions for the corresponding period 1 April 2014 to 31 March 2015:
 - the average weekly rent charged for pitches varied from £39.90 to £87.56; and
 - satisfaction with the landlord's management of the site(s) varied from 100% to 44.44%, of those site residents who responded.

Our findings

“Social landlords perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.”

Scottish Social Housing Charter Outcome 1: Equalities

45. The [Charter](#) sets out standards and outcomes which apply to both tenants and other service users, such as Gypsy/Travellers, with regard to equalities, communication, participation, value for money and rents/service charges. We found little awareness among landlords that these relevant provisions of the Charter apply to residents of Gypsy/Traveller sites, as they do to tenants in social housing. The Scottish Government’s recently published guidance on [minimum standards](#) for official Gypsy/Traveller sites confirms that the Charter outcomes and standards apply to Gypsy/Traveller sites and that “site providers should ensure they are meeting the relevant Charter outcomes in their services, and the way they are being provided, as part of their general work to meet the outcomes in the Charter”.

Positive practice

Argyll Community Housing Association (ACHA) owns and operates three Gypsy/Traveller sites within its area of operation. ACHA has a Gypsy/Traveller Strategy 2012-15, with associated action plan, which has been developed reflecting site residents’ expressed views. The strategy states that while residents do not have a Scottish Secure Tenancy, the Association is committed to providing equality of service and thus “Right to Repair” and rent consultation as a contractual right. The Association advises residents of these rights through its sign-up process and in its regular correspondence.

46. The Equal Opportunities Committee [reported](#) on the difficulties encountered by residents of Gypsy/Traveller sites in accessing employment, health and care services. Although beyond the scope of this inquiry we found positive examples of some landlords’ efforts to promote wider social inclusion through the commissioning of independent advocacy, and the provision of information, advice and support services for residents of their Gypsy/Traveller site(s).

Positive practice

At South Lanarkshire Council’s Gypsy/Traveller site, the communal facility is used for regular dental and NHS clinics and education classes. Evening events have also been held in the community facility to provide site residents with information on a number of services such as trading standards, fire awareness and smoking cessation.

Positive practice

Clackmannanshire Council arranges an on-site fortnightly mental health wellbeing drop-in clinic.

47. The majority of social landlords have made provision for residents to access the internet on their Gypsy/Traveller site(s), generally at no charge. However, in some instances, access can be restricted to the times when the communal facilities and/or the site office are open.
48. Landlords told us that they will make specific adaptations to pitches as necessary, subject to an Occupational Therapist appraisal, when an approach is made by a

resident or a need is identified. However some landlords have made no provision for barrier free pitches and amenity blocks, offices or communal facilities on their Gypsy/Traveller site(s).

49. The [2011 census](#) highlighted the over-representation of children and young people in the Gypsy/Traveller community in Scotland. Under these circumstances adequate site provision for play is critically important.

Positive practice

North Ayrshire Council's work in this area has recently been recognised by Nancy Owens Awards for Play. It appointed Play Rangers to work with families and children from the travelling community, build trust and relationships and the children drew up their own Golden Rules to improve behaviour. It developed a wide range of child-led activities. A playground has now been established on the site. Among the main benefits of the initiative has been greater trust between families and the local Council, better understanding of the benefits of play and exercise, and better interaction with available services for the travelling communities.

Positive practice

Stirling Council told us that when young children are resident on its Gypsy/Traveller site, its local staff arrange for the Council's "Playbus" to visit.

We recommend that landlords:

- » apply all relevant Charter standards and outcomes to residents of official Gypsy/Traveller sites;
- » understand the particular needs of Gypsy/Travellers in order to deliver services which respond to those needs;
- » assess the feasibility of making their Gypsy/Travellers site(s) and buildings barrier free, wherever possible.

"Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides."

Scottish Social Housing Charter Outcome 2: Communication

50. Most landlords have taken appropriate measures to gather and report residents' satisfaction with their Gypsy/Traveller site(s) as part of their ARC submission; a small number have not.
51. We found that there is limited routine gathering, analysis and use of performance information, feedback and complaints from residents to improve the standard of their sites and the services social landlords deliver to Gypsy/Travellers.
52. Some landlords told us about different approaches to gathering site residents' views and acting upon feedback received:

Positive practice

Argyll Community Housing Association (ACHA) carries out annual site resident surveys, discusses results with residents at local meetings, and thereafter agrees and publishes annual action plans.

Positive practice

East Lothian and Midlothian Councils told us that prior to the recent refurbishment of their jointly operated Gypsy/Traveller site, they made significant efforts to consult site residents on, not only the potential priorities for investment on the site, but also the proposed operational arrangements for carrying out the works.

Positive practice

Falkirk Council told us that in 2012 it made significant efforts to engage with Gypsy/Travellers on its site when carrying out a review of its occupancy agreement. It gathered residents' views and suggestions at a number of tailored events and incorporated these in the final document.

Positive practice

South Lanarkshire Council told us that it developed its current pitch allocation policy and occupancy agreement in consultation with residents on its Gypsy/Traveller sites. It based its occupancy agreement upon the Scottish Secure Tenancy Agreement, which was varied to reflect the particular needs and requirements of site residents. The Council told us that engagement in both these major policy areas has provided a catalyst for further dialogue with site residents.

53. The Charter standard on communication also encompasses landlords making it easy for customers to make complaints.
54. Gypsy/Travellers we spoke to had little awareness of how to make a complaint about their landlord. Nearly all of those who had made a complaint had done so via local site staff.
55. We found that some social landlords were able to identify complaints relating to their Gypsy/Traveller site(s); others were not due to limitations in their recording systems. Under these circumstances, it is difficult to see how residents' complaints can be analysed and used to improve the services provided by the landlord.

We recommend that landlords:

- » regularly gather resident satisfaction with their Gypsy/Traveller site(s) and report this to residents and in their ARC;
- » regularly provide information to site residents about their complaints policy and process;
- » routinely gather information, feedback and complaints from residents to improve the standard of their site(s) and the services they deliver to Gypsy/Travellers.

“Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord’s decisions at a level they feel comfortable with.”

Scottish Social Housing Charter Outcome 3: Participation

56. Our report [The Priorities of Gypsies/Travellers and Factored Owners](#) highlighted that having the ability to input to services and decisions is a significant priority for Gypsy/Travellers. However, few of the Gypsy/Travellers we spoke to could cite instances where their landlord had specifically asked them for their views on the services they received.
57. Our [report](#) also highlighted communication and engagement as important factors in achieving site resident satisfaction on Gypsy/Traveller sites. Gypsy/Travellers we spoke to highlighted the potential role of the local site staff in improving landlords'

engagement with residents. Residents also appreciated the provision of an on-site “Suggestions Box” by one landlord.

58. Gypsy/Travellers we spoke to highlighted proposed site investment as an area of particular interest for them, and consequently, a potential opportunity for social landlords to engage with site residents.
59. Gypsy/Travellers also told us that, where their landlord had engaged with them, they particularly appreciated the landlord’s efforts to give them comprehensive feedback on the results and proposed actions.
60. We found that a number of landlords provide regular, specific newsletters tailored for users of their Gypsy/Traveller site(s). Gypsy/Travellers we spoke to told us that this approach is well received by site residents.
61. A number of social landlords told us that they have actively promoted the establishment of a Registered Tenant Organisation with residents of Gypsy/Traveller sites.

Positive practice

Falkirk Council told us that it had undertaken a comprehensive review of all of its policies and procedures relating to its Gypsy/Traveller site. It looked at ways to involve site residents in improving the site and investigated setting up a Residents’ and Tenants’ Association.

Positive practice

East Lothian and Midlothian Councils have established a Site Management Working Group where site residents, independent advocacy staff and Council officers meet regularly, providing an opportunity to discuss issues of concern. The Councils told us that they plan to re-introduce cultural awareness training sessions for their staff; these being delivered by Gypsy/Traveller site residents and their independent advocacy organisation.

Positive practice

Perth and Kinross Council told us that it has a specific improvement action within its Tenant Participation Strategy to engage with residents at its Gypsy/Traveller site. The Council tested interest among residents by holding forum style events this year.

Positive practice

In Spring 2015 South Lanarkshire Council introduced a tailored satisfaction survey with the involvement of its Gypsy/Traveller site residents. It discussed the results with residents and developed an improvement plan. It regularly monitors and reports on progress to site residents.

We recommend that landlords:

- » engage with site residents and identify appropriate methods for regular communication and opportunities for participating in their landlord’s decision making process.

“Social landlords manage their businesses so that tenants’ homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.”

Scottish Social Housing Charter Outcome 5: Repairs, maintenance and improvements

62. We found that most, but not all, landlords have published target timescales for carrying out responsive repairs at their Gypsy/Traveller site(s). However, while having published target timescales in place, some landlords do not record, monitor or report their performance to site residents.
63. We found that where landlords have published target timescales for responsive repairs, these can vary significantly. In the case of emergency repairs, targets range from two hours at Angus Council, to 24 hours at Aberdeenshire Council. In the case of urgent repairs, targets range from one day at Edinburgh City Council to 10 days at West Dunbartonshire Council.

We recommend that landlords:

- » publish target timescales for carrying out responsive repairs at their Gypsy/Traveller site(s);
- » routinely measure, report and publish repairs performance relating to Gypsy/Traveller site(s).

“Local councils and social landlords with responsibility for managing sites for Gypsies/Travellers should manage the sites so that sites are well maintained and managed.”

Scottish Social Housing Charter Outcome 16: Gypsies/Travellers

64. Some landlords have published service standards for their Gypsy/Traveller site(s). These typically cover times to process applications, periodic general site inspections and individual pitch inspections. Only a few landlords developed their standards in consultation with local site residents. Only a small number of landlords told us that they routinely measure their performance against their standards and report the results to site residents.

Positive practice

North Ayrshire Council told us that it reports performance against its service standards quarterly to Gypsy/Traveller residents and posts its results at its site.

65. We found that, where they exist, landlords’ published service standards can vary dramatically. For example, in the case of processing applications for pitches, landlords’ published service standards varied from five to twenty eight working days. However, we also saw evidence that some landlords can regularly process pitch applications within one working day of their receipt.
66. Gypsy/Travellers told us that general performance results, aggregated across a landlord’s housing services were of little value or interest to them.
67. Gypsy/Travellers we spoke to had a very limited awareness of their landlord’s published service standards. However, they told us they appreciated the efforts of some landlords’ local site staff who provided them with information when they requested services and in keeping them updated on progress. Not all landlords have dedicated on-site staff for their Gypsy/Traveller site(s).

68. While some landlords provide site residents with comprehensive site handbooks, including details of the role and main duties of the local staff, others told us that they cover this at agreement sign-ups or post this information on the site. In contrast, a number of landlords told us that they have decided not to make this information available to residents. Gypsy/Travellers we spoke to value a named contact for the landlord.

We recommend that landlords:

- » develop service standards with site residents and/or their representatives and publish them;
- » routinely measure, report and publish their performance against their Gypsy/Traveller service standards;
- » ensure that they provide a named contact for their Gypsy/Traveller site(s).

“Social landlords set rents and service charges in consultation with their tenants and other customers so that:

- ***a balance is struck between the level of services provided, the cost of the services, and how far current and prospective tenants and other customers can afford them;***
- ***tenants get clear information on how rent and other money is spent, including any details of individual items of expenditure above thresholds agreed between landlords and tenants.”***

Scottish Social Housing Charter Outcomes 14 and 15: Rents and service charges

69. We found that some landlords could not demonstrate a clear and structured approach being adopted to the setting of pitch rents for their Gypsy/Traveller sites. A number of landlords’ rent policies made reference to “affordability” or “covering costs”, however in some instances we found no evidence of landlords testing proposed pitch rent increases against these criteria.
70. Gypsy/Travellers we spoke to highlighted their keen interest in pitch rents and landlords’ annual rent reviews. Only a very small number indicated they had been asked for their views on alternate options for rent increases.
71. A number of landlords told us that they make efforts to consult with residents of their Gypsy/Traveller site(s) around proposed pitch rent increases. However, a number of landlords confirmed that they did not seek the views of residents when carrying out their annual review of pitch rents.

Positive practice

South Lanarkshire Council told us that it has established annual consultation events with residents on its Gypsy/Traveller sites. The main topics for discussion at these events are issues relating to rent setting and site investment.

Positive practice

Stirling Council, in an effort to reduce unauthorised encampments in its area, encourages transient Gypsy/Travellers to use its official site by not levying any pitch rent for short stays of up to 10 nights.

We recommend that landlords:

- » ensure that a structured rent setting policy is in place for their Gypsy/Traveller site pitches which takes account of what potential site residents will be able to afford;
- » provide site residents, as with social housing tenants, opportunities to provide comment and feedback prior to any decision around annual pitch rent increases.

“Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.”

Scottish Social Housing Charter Outcome 13: Value for money

72. Our report [The Priorities of Gypsies/Travellers and Factored Owners](#) highlighted that value for money is a significant priority for some Gypsy/Travellers as is consistency in the approach to charging across sites.
73. Gypsy/Travellers we spoke to told us that an important element in site residents' value for money judgement was their pitch rent's comparability with rents for social rented houses locally. Some Gypsy/Travellers suggested that it was important for differences in rent levels to reflect differences in accommodation provision and the level of service available.
74. While the Scottish Government expects social landlords to bring their site(s) up to its recently published [minimum standards](#) by June 2018, thirteen social landlords told us that it is their intention to make various improvements to their Gypsy/Traveller site(s) over the next two years.
75. We found that a number of social landlords have adopted a reactive approach to investing in their Gypsy/Traveller site(s). We found little evidence that these landlords had adopted an asset management approach to their Gypsy/Traveller site(s) to ensure they had plans developed to systematically replace elements and components when needed.
76. We found that local authority landlords have different approaches to where funding for, and revenues from, Gypsy/Traveller site(s) are accounted for; the Council's Housing Revenue Account (HRA) or General Services Fund. The Scottish Government has committed to exploring “the case for including finances around Gypsy/Traveller sites in the HRA”.

We recommend that landlords:

- » consider value for money priorities for site residents and provide information to site residents about how they achieve value for money including comparable information about local social rented housing costs;
- » adopt an asset management approach in relation to their Gypsy/Traveller site(s).

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Terms we use in this report

Asset management	Ensuring that current and future assets (houses, land, etc.) fully support the organisation's objectives – working towards having the right assets, of the right quality, in the right place at the right time.
General Services Fund	The budget a local authority has for providing all of its services, with the exception of managing and maintaining its houses and housing services.
Happy to Translate	An initiative to improve the quality of life of people in Scotland who speak or read little English or who use a non-verbal language. Member organisations display a logo to indicate that they will provide language assistance in the form of confidential translation and interpretation.
Housing Revenue Account (HRA)	The budget a local authority has for managing and maintaining its houses and housing services.
Inquiry	The Housing (Scotland) Act 2010 gives the Scottish Housing Regulator powers to obtain information and carry out inquiries. An inquiry can be used to get assurance about an issue, assess an issue or concern with a landlord, or scrutinise or investigate a landlord's performance.
Right to Repair	Statutory scheme which sets out timescales for some repairs, and what can be done by a tenant if a landlord does not do the repair within the timescales.
Registered Social Landlord (RSL)	A social landlord registered and regulated by the Scottish Housing Regulator, such as a housing association or housing cooperative.
Registered Tenant Organisation (RTO)	A tenant-representative group meeting certain conditions set down in the Housing (Scotland) Act 2001 and registered with a social landlord.
Value for money	Value for money is about obtaining the maximum benefit with the resources available.

