



The Royal Environmental Health Institute of Scotland

Ref TB/Consult/03/055

19th June 2003

Mr David Gow Scottish
Executive Development
Department Area 1-H,
Victoria Quay Edinburgh
EH6 6QQ

Dear Mr Gow

Stewardship & Responsibility: A Policy Framework for Private Housing in Scotland - The Final Report and Recommendations of the Housing Improvement Task Force

The Royal Environmental Health Institute of Scotland (The Institute) welcomes the opportunity to respond to the above Scottish Executive consultation document.

The following response was prepared by the Institute's Public Health and Housing Working Group which comprises mainly Environmental Health Officers employed by Scottish local authorities and who are involved in public health and housing enforcement work.

The Institute commends the Housing Improvement Task Force in dealing effectively with so many complex issues and is in broad agreement with the all the recommendations made by it.

Comments on the main proposals follow:

The Tolerable Standard

The Institute welcomes the recommendation that the tolerable standard should be extended to include thermal insulation and electrical safety, however it appears to omit gas safety. This should be addressed.

The Institute also recommends that any proposed guidance on the implementation of the revised tolerable standard should be subject to consultation with local authorities and other agencies and in particular with the Institute.

The Scottish Housing Quality Standard

The Institute is aware of the need for a Scottish Housing Quality Standard and agrees that it is impractical for it to be a pass/fail standard and should only be a tool to assist in the development of Local Housing Strategies. The Institute notes that noise nuisance is not included in the standard and recommends that this be addressed.

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The Repairing Standard for Private Landlords

The Institute welcomes the recommendations concerning the use of Schedule 4 of the Housing Act to require landlords to provide higher standards of repair of their properties, and that the requirement should be effectively publicised.

Common Repairs and Maintenance

The Institute recognises the extent of the problem in securing the satisfactory state of repair of private sector housing, especially in multi-ownership properties and welcomes all the Task Force's proposals in addressing the problem.

Annex C - Local Authority Powers.

The Institute fully supports the proposal to allow local authorities to serve Notices requiring minor repairs or improvements which do not generate mandatory grant and Notices requiring owners to establish and implement plans to maintain houses in a satisfactory state of repair.

The Institute recognises that if these recommendations are to be accepted by the Scottish Executive they will require to be significantly resourced if their objectives are to be achieved.

Given the prominent role that the Environmental Health Officers play in dealing with sub-standard housing in Scotland it is a matter of some concern to the Institute that it was not invited to be represented, in any capacity, on the task force.

I trust the foregoing is of assistance.

Yours sincerely

Director of Professional Development

The Royal Environmental Health Institute of Scotland has been in existence for over 125 years and has around 1,200 members the majority of whom are Environmental Health Officers working in that capacity for Scottish local authorities.

The objects for which the Institute is established are for the benefit of the community to promote the advancement of Environmental Health by:

- stimulating interest in and disseminating knowledge concerning Environmental Health;
- promoting education and training in matters relating to Environmental Health; and
- maintaining, by examination or otherwise, high standards of professional practice and conduct on the part of Environmental Health Officers in Scotland.

Environmental Health Officers in Scotland are part of a graduate only profession and by virtue of their under-pinning academic education, professional practical training, professional qualifications and experience are well placed to apply a holistic public health approach to the education of the public and to the enforcement of a wide range of Scottish legislation.