



The Scottish Parliament
Pàrlamaid na h-Alba

Local Government, Housing and Planning Committee

Kenneth Gibson MSP
Convener
Finance and Public Administration Committee

26 September 2025

Dear Kenneth,

Building Safety Levy (Scotland) Bill

Following my letter of [3 September](#) outlining the Committee's intended approach to consideration of issues raised by the Building Safety Levy (Scotland) Bill, I am pleased to present the Committee's conclusions on its work on building safety earlier in the year. These are included in the Annexe to this letter.

We heard mixed views from witnesses but one element was clear – both damp and mould, and RAAC require considerable resource to remedy, as well as strong leadership to ensure this is done comprehensively, consistently and efficiently.

Many of those homeowners and tenants who find themselves living in a property built using RAAC are in the same position as those who find their building clad with unsuitable materials.

We understand it is the Scottish Government's position that the Building Safety Levy (Scotland) Bill allow for the raising of funds for building safety issues and this is intended to support cladding remediation. However, we urge you to read the evidence we have received in our consideration of other building safety issues. This includes first-hand accounts of the implications for those living in these conditions which we commend to you for your consideration as you scrutinise the Bill.

The Committee has also undertaken extensive work this year on the housing emergency which may be relevant to your deliberations. Our [report](#) and the Scottish Government's [response](#) are included below.

- [Local Government, Housing and Planning Committee Housing Inquiry, 1st Report, 2025 \(Session 6\), 15 May 2025](#)
- [Response from the Scottish Government](#)

We wish you well with your consideration of the Bill.

Yours sincerely,

Contact: Local Government, Housing and Planning Committee, The Scottish Parliament, Edinburgh, EH99 1SP. Email localgov.committee@parliament.scot. We welcome calls through Relay UK and in BSL through Contact Scotland BSL.

Ariane Burgess MSP
Convener

Annexe

Building safety

A common theme across the three strands of our work on building safety has been a lack of knowledge of the materials used to build homes and other buildings in Scotland. Linked to this is a lack of knowledge of the current status of a building or programme of regular inspection.

We have previously proposed a national construction database be established which could detail the materials used to construct buildings.¹ Similarly, we previously explored the idea of an MOT for buildings.² We posed queries on these proposals during our evidence sessions this year too.³

The then Minister for Housing told us last year that initial research had been carried out on how existing building standards statutory registers could be more accessible.⁴ However, these only contain details of buildings which have been subject to a building warrant process.⁵ He said a wider database would require resource. He also said:

“...any future work on cross tenure housing standards would benefit from considering the recommendations from the Tenement Maintenance Working Group made in 2019 for 5-yearly building inspection reports. In taking forward this work, we can consider how to improve the information we have on the condition of our buildings in this important area of the built environment.”⁶

You told us in July of this year:

“Creation of a national register of higher risk buildings is under consideration as part of the work of the building standards futures board.”⁷

The Royal Incorporation of Architects in Scotland (RIAS) told us that while it had welcomed a national construction products regulator, it remained concerned at the rate of progress.⁸ In August, the Cabinet Secretary for Housing wrote:

“The four national governments met recently in Cardiff and an agreement was reached to work together closely in relation to further planned reform of

¹ [Letter](#) from the Committee to the Minister for Housing, 23 June 2023

² [Letter](#) from the Committee to the Minister for Housing, 23 June 2023 and written submission from the [Chartered Institute of Building](#)

³ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 24 and [Official Report](#), 25 March 2025, Col 17

⁴ [Letter](#) from the Minister for Housing to the Committee, 12 July 2024

⁵ [Letter](#) from the Minister for Housing to the Committee, 12 July 2024

⁶ [Letter](#) from the Minister for Housing to the Committee, 12 July 2024

⁷ [Letter](#) from the Cabinet Secretary for Housing, 2 July 2025

⁸ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 46

construction products regulation and on the regulation of professionals working in the construction industry.⁹

The Committee seeks an update from the Scottish Government on:

- **consideration of how a national construction database could be resourced at a local and national level;**
- **consideration given to updating the building warrant process to achieve the outcomes associated with a national database and building MOT;**
- **the work of the Building Standards Future Board in relation to a national register of buildings;**
- **progress on work on the recommendations of the Tenement Maintenance Working Group on regular inspection reports and work in general to “improve the information” on the “conditions of buildings”; and**
- **Next steps on reform of construction products regulation and associated timescales.**

Damp and Mould

The Committee heard of the detrimental effects on physical and mental health as a result of living in a home with damp and mould.¹⁰ These included conditions ranging from respiratory illnesses to stress and anxiety.¹¹

The impact on the housing emergency was also emphasised to us, as people were relocated or placed in temporary accommodation.¹² Having to leave damp and mouldy homes was thought to be causing homelessness in some cases.¹³ Living Rent suggested tangible action the Scottish Government could take would be to provide a mechanism by which people living in unsuitable accommodation could bid for a new home.¹⁴

We were provided with powerful case studies which we urge the Scottish Government to consider.¹⁵ Some of these included children living in homes with damp and mould and suffering ill health as a result.

⁹ [Letter](#) from the Cabinet Secretary for Housing, 2 July 2025

¹⁰ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 4 and 6

¹¹ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 4, 6, 10 and 15

¹² Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 4, 10 and 11

¹³ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 4

¹⁴ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 18

¹⁵ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 4, 6-7 and 10 and written submissions from [Citizen's Advice Scotland](#) and Living Rent

Awaab's Law

The tragic death of Awaab Ishak in 2020 prompted calls for a law in his name to mandate action by landlords in response to reports of damp and mould in their properties.¹⁶

The Committee welcomes Scottish Government action in this area and the amendment the Scottish Government lodged to the Housing (Scotland) Bill, which was subsequently passed at Stage 2.¹⁷ However, there are elements of this which must be clarified.

Application in both the social and private rented sector

The amendment provided the Scottish Government with the power to make regulations to ensure that social landlords investigate and respond to reports of damp and mould within a certain time period. Witnesses told us this must also apply to private landlords.¹⁸

The Scottish Government has stated its commitment to ensuring Awaab's law would apply to both social and private sector landlords.¹⁹ It asserts that powers already exist to compel the latter and had committed to a consultation exercise with both social and private sector landlords.²⁰

You said:

“Just like the social rented sector, the government is committed to implementing Awaab's law for private tenants, using existing powers and a significant programme of engagement and consultation will be carried out before changes are introduced. We aim to start this work this year too. The ‘tolerable standard’ and the ‘repairing standard’ already both apply in the private rented sector.”²¹

Should the focus be on timescales?

There was support for a focus on timely action in response to reports of damp and mould in housing.²² However, the quality of that action was also deemed important.

The Scottish Tenants Organisation stressed the importance of setting a standard for repairs and the Scottish Federation of Housing Associations (SFHA) said:

¹⁶ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Cols 6, 9 and 10

¹⁷ Local Government, Housing and Planning Committee, [Minutes](#), 27 May 2025

¹⁸ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 15, 16, 45

¹⁹ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 6

²⁰ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 6 and [Official Report](#), 20 May 2025, Col 18

²¹ [Letter](#) from the Cabinet Secretary for Housing to the Committee, 23 July 2025

²² Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 18, 19 and 45

“We want to ensure that focusing on timescales is not counterproductive, in terms of a contractor striving to meet targets at the expense of proper diagnosis of the issue.”²³

The then Minister for Housing agreed that:

“It should not just be a case of doing a paint-over job because, within a year or two, the problem will come back, so that will not solve the situation in the medium to long term.”²⁴

He said he would discuss these issues with local authorities and the Scottish Housing Regulator.²⁵

The Scottish Tenants Organisation also suggested legislation in this area should include the landlords’ responsibilities with regard to knowledge of stock condition.²⁶

Living Rent proposed tenants should be able to withhold rent in situations where repairs were not carried out.²⁷

You wrote to the Committee that:

“... there is existing provisions and routes available to a social tenant, although the Scottish Government approach to engaging further with stakeholder will explore further how tenants can be ensured their landlords are meeting the requirements of investigating and commencing repairs. This is something that will be determined during the consultation period with stakeholders and subject to parliamentary approval will be set out in subsequent updated regulations.”²⁸

Timing of introduction of Awaab’s law

The Cabinet Secretary for Social Justice told us this consultation would take place this calendar year and in your correspondence of 23 July you said:

“There will be a programme of engagement and consultation across the social housing sector and with social tenants to develop the detail of the regulations. This will take place over the course of this year.”²⁹

In a statement to Parliament on 2 September, you said regulations would be “in force” by March 2026.³⁰

The Committee welcomes progress towards legislation mandating action from landlords where damp and mould is reported. We look forward to considering

²³ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 15

²⁴ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 3

²⁵ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 3

²⁶ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 9

²⁷ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 19

²⁸ [Letter](#) from the Cabinet Secretary for Housing, 2 July 2025

²⁹ [Letter](#) from the Cabinet Secretary for Housing to the Committee, 23 July 2025

³⁰ Scottish Parliament, [Official Report](#), 2 September 2025 Col 18

the consultation and resulting regulations subject to the passage of the Housing (Scotland) Bill. The Committee requests:

- **an update on the timescales for finalising the consultation with stakeholders and the laying regulations in the Scottish Parliament, subject to the passage of the Housing (Scotland) Bill.**
- **clarification of how the Scottish Government intends to ensure regulations do not incentivise a superficial response from landlords;**
- **details of how the regulations will address standards of qualifying repairs; and**
- **and the options available to tenants of landlords who do not adhere to qualifying repair requirements. We also seek confirmation that these options will also be equally available to private sector tenants.**

Strategic approach to the issue

The amendment to the Bill will provide tenants with a safety net for reporting problems with damp and mould in individual properties. However, it does not address the wider systemic issues. Themes arising in evidence to us included:

- The underlying causes of damp and mould in properties;
- Establishing the extent of the problem; and
- Prevention

Remediation

Underlying causes

We explored the conditions in which damp and mould appear in a property. Architect Gloria Lo provided a detailed scientific description of this in her evidence, including the impact of different types of building materials and water.³¹

The causes of damp and mould ranged from the way in which a building had been constructed to the impact of the use of the building.³²

The cost of living crisis and energy price rises contribute to this. We heard of issues with the affordability of heating a home, and concerns at the effect of using ventilation systems on energy bills.³³ We also heard people may open windows for

³¹ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 22

³² Written submission from the [Chartered Institute of Building](#)

³³ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 20 and [Official Report](#), 25 March 2025, Col 12, 15, 19 and 20 and written submission from [Tenants Together Scotland](#) and the [Royal Incorporation of Architects in Scotland](#)

ventilation but this had negative impacts on the warmth of the home and its inhabitants.³⁴

The SFHA said:

“We need joined-up policy making to tackle the issue. Efforts to tackle poverty more generally will improve the tenant experience of their home. That can be anything from welfare reform and cash-first approaches to supporting tenants to heat their homes properly, right through to energy market reform, which is necessary to combat the energy price rises and the disparity between tenants who use different heating systems. I note that the fuel insecurity fund, although extremely valuable, has come to an end. Instead of unpredictable rounds of funding, we need a multiyear approach.”³⁵

The Committee explored the impact a bill on heat in buildings could have on the underlying causes of damp and mould. We heard of the need to ensure the agenda to decarbonise buildings did not exacerbate issues of damp and mould.³⁶

Living Rent sought progress on an energy efficiency standard in the private rented sector and said there was a danger of a two-tiered approach for social and private rented sector accommodation.³⁷

It has been announced that regulations on the latter will be forthcoming.³⁸ A consultation on the content of the regulations closed at the end of August this year.³⁹

People need confidence about how to heat their home in an energy efficient and cost effective way. We note comments on how changes to the support available can impact this.

The Committee seeks details of:

- **the timescales for introducing regulations on an energy efficiency standard for private rented sector accommodation;**
- **timescales for the establishment of the Social Housing Net Zero Standard which was consulted on in 2023; and**
- **your views on how you ensure standards of energy efficiency in social and rented accommodation are consistent.**

³⁴ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 20

³⁵ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 20

³⁶ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 30 and written submission from the [Royal Incorporation of Architects in Scotland](#), [Built Environment Forum Scotland](#), the [Royal Institution of Chartered Surveyors](#) and the [Chartered Institute of Building](#)

³⁷ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 22

³⁸ Scottish Parliament, [Official Report](#), 3 April 2025, Col 62

³⁹ Scottish Government (2025). [Draft Energy Efficiency \(Domestic Private Rented Property\) \(Scotland\) Regulations](#)

Establishing the extent of the problem

In our consideration of damp and mould issues in 2023, the Committee highlighted issues with establishing the extent of the problem.⁴⁰ This appears to still be the case and is partly related to data issues.

In responses to our call for views and discussions with witnesses, we heard mixed views on improvements to data collection on the prevalence of damp and mould. This is despite the then Minister for Housing saying in 2023 that “....our current data collection allows us a good understanding of the issue.”⁴¹

We heard it was hard to establish a baseline.⁴² Living Rent noted that the available statistics did not reflect the volume of people engaging with the organisation on damp and mould issues in their properties.⁴³

Councils told us there was an increase in incidents of damp and mould, which could be due to increased awareness.⁴⁴ Clackmannanshire Council noted the benefits for data collection of having in-house teams working on damp and mould.⁴⁵

The Scottish Public Services Ombudsman (SPSO) reported similar numbers of complaints about damp and mould to the previous year.⁴⁶

There appears to have been some progress with steps to monitor the problem in social housing with the Scottish Housing Regulator proposing new indicators on damp and mould as part of the monitoring of the Scottish social housing charter returns and a planned thematic review on damp.⁴⁷ The then Minister for Housing said there was a role for the Scottish Government in disseminating best practice arising from analysis of returns on these indicators.⁴⁸

The SFHA note there could still be gaps in relation to the private rented sector.⁴⁹ The Scottish Association of Landlords said anecdotally, they believed there were fewer reported cases of damp and mould last winter in comparison to the previous two due to a fall in energy costs.⁵⁰

⁴⁰ [Letter](#) from the Committee to the Minister for Housing, 23 June 2023

⁴¹ [Letter](#) from the then Minister for Housing to the Committee 28 July 2023

⁴² Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 5 and written submission from the [Scottish Federation of Housing Associations and Scottish Association of Landlords](#)

⁴³ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 5

⁴⁴ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 2 and 4 and Written submission. [Scottish Public Services Ombudsman](#)

⁴⁵ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 13

⁴⁶ Written submission. [Scottish Public Services Ombudsman](#)

⁴⁷ Scottish Housing Regulator (2025). [News Release: Regulator publishes outcome of consultation on the indicators to monitor Scottish Social Housing Charter performance](#)

⁴⁸ Local Government, Housing and Planning Committee, [Official Report](#), 22 April Col 3

⁴⁹ Written submission from the [Scottish Federation of Housing Associations](#)

⁵⁰ Written submission from the [Scottish Association of Landlords](#)

While councils we spoke to appear to be making great strides in understanding stock condition and data collection, the use of this information to deliver improvements varied.⁵¹

Architect Gloria Lo told us there could be value in mapping damp and mould patterns across the country.⁵² The SFHA described doing this across their member stock.⁵³ This could lead to opportunities to improve and share best practice, including through using AI technologies to support analysis.

The Committee is disappointed to hear calls for better data collection two years on from our previous appeal on this issue.

We call on the Scottish Government to lead relevant organisations in the development of a consistent standard of data collection, which would allow for comparative analysis and the efficient dissemination of best practice. We seek the Scottish Government's view on this proposal and details of how it will approach this, including consultation with stakeholders.

The Committee also requests details of the Scottish Government's plans to consider the data arising from the Scottish Housing Regulator indicators and how it intends to share best practice arising from analysis of these.

Prevention

The Committee heard of the need for tenants and landlords to work together to help prevent damp and mould in homes, and on ongoing maintenance.⁵⁴ We also heard landlords should be proactively maintaining properties to avoid issues developing or becoming worse.⁵⁵

This requires a knowledge of where action is needed. We heard of the importance of proactive assessment of stock.⁵⁶ Both Dundee City Council and RIAS noted that resources were required to act on the results of assessment.⁵⁷

Tenants Together Scotland said it was important that the features of a property, and how to best use them, were fully explained to tenants when they moved in to avoid safety issues.⁵⁸ We heard information provided to social tenants across Scotland on properties in advance of moving was varied.⁵⁹ RIAS cautioned against a

⁵¹ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 7 – 8 – and 17-18

⁵² Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 41

⁵³ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 5

⁵⁴ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 11 and [Official Report](#), 25 March 2025 Col 6 and written submission from [City of Edinburgh Council](#)

⁵⁵ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 12 & 14

⁵⁶ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 7 and [Official Report](#), 25 March 2025, Col 5

⁵⁷ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 43 and [Official Report](#), 25 March 2025, Col 17

⁵⁸ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 11

⁵⁹ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 10-12

standardised approach to information provision, noting different inhabitants would use a building differently.⁶⁰

Similarly, our consideration of issues has highlighted a need for a shared understanding of how best to prevent and treat damp and mould. Tenants Together Scotland spoke of tenants receiving conflicting advice.⁶¹

Reporting damp and mould

Councils and the SFHA described their processes for responding to reports of damp and mould in properties, including how the results of surveys and required action are communicated to tenants.⁶²

Previously we were concerned by evidence received about landlords blaming tenants for the development of damp and mould in homes.⁶³

Living Rent and others said this was still an issue.⁶⁴ The SFHA said it was important that communications between landlords and tenants were handled in a way which did not make tenants feel blamed.⁶⁵ ALACHO told us local authorities were “...getting beyond tenant blaming whilst recognising that fuel poverty and underheating is a factor that landlords have to be able to respond to, not use as an excuse”.⁶⁶

The Scottish Association of Landlords said:

“Based on experiences reported by our members, it is apparent that damp/mould problems in the private rented sector often do not arise until a new occupant moves into the property and heats/ventilates/occupies it in a different way to previous occupants.”

We also heard of instances where landlords denied there was a problem.⁶⁷

Several organisations emphasised the importance of training for council and social landlord officers to be able to identify and treat damp and mould.⁶⁸ ALACHO reported improvements in the tools used by local authorities to identify and repair damp and mould.⁶⁹

⁶⁰ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 38

⁶¹ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 8 and [Official Report](#), 25 March 2025, Col 5

⁶² Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 4 and 11 and written submission from [City of Edinburgh Council](#)

⁶³ [Letter](#) from the Local Government, Housing and Planning Committee to the then Minister for Housing, 23 June 2023

⁶⁴ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 5 and written submission from [Tenants Together Scotland](#)

⁶⁵ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 5

⁶⁶ [Letter](#) from ALACHO 27 June 2025

⁶⁷ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 5 and 6

⁶⁸ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 9, 19 and 40 and [Official Report](#), 25 March 2025, Col 4 and 5

⁶⁹ [Letter](#) from ALACHO 27 June 2025

The Committee agrees that knowledge of the state of properties on an ongoing basis is essential, as well as a suitable programme of preventative maintenance. The Committee is also of the view that tenants and landlords must work together on everyday upkeep of a property and the initial letting period is an ideal time for landlords to provide information on how a property works.

The Committee is disappointed to have heard that landlords blaming tenants for the development of damp and mould in properties is still an issue. We present the evidence we have heard on this for your consideration.

Remediation

Fixing properties prior to letting

We were particularly interested in situations where properties are let with existing damp and mould issues. Living Rent and Citizens Advice Scotland both said this should not happen.⁷⁰

We heard of the processes for assessing void properties and preparing them for letting within local authorities.⁷¹ These included checking historical records of properties when they became available, collaboration with tenants on the property and any remediation required in advance and the establishment of a re-let standard.⁷²

Investigating the problem

Evidence presented to us focused on confidence in the results of surveys.⁷³ We heard arguments in favour of these being done independently of the landlord and also by in-house teams.⁷⁴

Gloria Lo and RIAS, among others, emphasised the need for training and robust qualifications for those doing the surveys.⁷⁵ Peter Drummond of RIAS also raised the nature of surveys with us:

“We use surveys by looking, mainly, not by monitoring and not by knowing the temperature and relative humidity over time—even for just a week—of what it is like in winter, for example. You do not know how the building is behaving. You also do not know if there is interstitial condensation, because you have not investigated and drilled through and made that in-depth investigation. Most of the building surveyors just use their eyes, which is fair enough for liquid damage, but vapour damage and interstitial condensation are much harder to diagnose.”⁷⁶

⁷⁰ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 10

⁷¹ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 8 and 9

⁷² Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 8 and 9

⁷³ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 12-13

⁷⁴ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 13 and [Official Report](#), 25 March 2025, Col 13 and 14

⁷⁵ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 35 and 36

⁷⁶ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 35

Local authority witnesses described their progress in using sensors in homes to monitor such issues. For example, Stirling Council has installed over 1000 sensors in homes and the City of Edinburgh Council described their pilot of up to 2000 sensors.⁷⁷ These can alert councils to changes, rather than providing a snapshot in time of the moment of a visual survey. Other local authorities were less advanced and it was suggested this was an area of best practice which could be shared.⁷⁸ The Committee was pleased to hear this was the focus of discussions of ALACHO.⁷⁹

The then Minister for Housing provided the Committee with several examples of situations where collaboration between the Scottish Government and local authorities will be crucial to improving the quality of housing stock, including on maximising emerging technology.⁸⁰ Similarly the then Minister for Housing said he would consult the Scottish Housing Regulator.⁸¹

The Committee welcomes progress being made in identifying and implementing solutions such as sensors. It appears best practice is being shared and the Committee calls on the Scottish Government to consider how it could facilitate this further.

The Committee seeks details of how the Scottish Government is showing leadership in this area, including the discussions it has with COSLA and the Scottish Housing Regulator and the resulting agreed actions, the timescales by which action will be taken and how action will be measured to ensure it is successful.

RAAC

Establishing the extent of the problem

Dundee City Council and others proposed there should be a national database of the presence and remediation of RAAC.⁸² Councils told us of the survey work they had undertaken in their areas to ascertain the extent of the issue.⁸³ As with damp and mould, we heard concerns as to whether the type of surveys undertaken were sufficient to establish the scope of the issue in some buildings.⁸⁴

Stephen Garvin of the Scottish Government told the Committee:

⁷⁷ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 16 and 17-18

⁷⁸ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 16 and 18

⁷⁹ [Letter](#) from ALACHO - 27 June 2025

⁸⁰ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 3

⁸¹ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 3

⁸² Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 28 and [UK RAAC Campaign Group](#)

⁸³ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 25 – 27 and written submissions from [Dumfries and Galloway Council](#), [City of Edinburgh Council](#) and [South Lanarkshire Council](#)

⁸⁴ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 25 and written submission from [Dundee RAAC Campaign Group](#)

“The work that we have done is primarily about understanding the extent of RAAC across Scotland in the housing sector, schools, hospitals and so on. Although we now understand the numbers that are involved, there is still some work to do in looking across those estates at any ongoing risk.”⁸⁵

Experience of social tenants

Social housing tenants decanted from homes with RAAC elements have had to accept unsuitable alternative accommodation (if accommodation was available), have faced challenges in accessing their homes to collect belongings, and incurred significant expense in purchasing new furnishings and fittings for their alternative accommodation.⁸⁶

We also heard the disruption from being removed from accommodation for an indeterminate period of time was detrimental to community cohesion.⁸⁷

Experience of homeowners

The owners of homes with RAAC elements are making mortgage payments on properties they cannot access, and have issues with obtaining building insurance, and alternative housing.⁸⁸ As with tenants, many also experience difficulty in accessing furniture and personal belongings.⁸⁹

The value of privately owned homes with RAAC elements have fallen dramatically, leaving most owners in a ‘negative equity’ situation – i.e. the value of their home is less than the outstanding mortgage. This means that many such owners cannot afford to buy a new home and may need to move into rented accommodation for the long term.⁹⁰

The support offered by local authorities to home owners affected by RAAC is very variable. We heard concerns about the approach adopted by some councils to information sharing, the conduct of surveys, and engagement with home owners.⁹¹

Action for the Scottish Government

Guidance for RAAC in domestic properties

The SFHA, the Dundee RAAC Campaign Group, RIAS and others called for the development of guidance on RAAC in domestic properties.⁹²

⁸⁵ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 13

⁸⁶ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 23, 24, 26 and 27 and [Official Report](#), 25 March 2025, Col 30 and 32 and written submission from [Tenants Together Scotland](#)

⁸⁷ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 24-25

⁸⁸ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 28-29 and written submissions from [Dundee RAAC Campaign Group](#) and [UK RAAC Campaign Group](#)

⁸⁹ Written submission from [Tenants Together Scotland](#)

⁹⁰ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 27

⁹¹ Written submission from the [Chartered Institute of Building](#) and [Dundee RAAC Campaign Group](#)

The then Minister for Housing told us:

“...the Institution of Structural Engineers—that is its long name—is looking at developing additional guidance specific to the issue of RAAC in housing. Moreover, the Royal Institution of Chartered Surveyors is preparing a consumer guide that will provide advice to landlords, tenants and home owners, and that guide is expected shortly. The Institution of Structural Engineers is also preparing guidance to support landlords, tenants and home owners in making informed decisions on how they manage RAAC in residential properties, and that work is due to be completed later in the year.”⁹³

Alex Norris MP, the Parliamentary Under-Secretary of State for Building Safety, Fire and Local Growth told us building owners “...should follow guidance from the Institution of Structural Engineers (IStructE) to identify, assess and manage issues relating to RAAC in their buildings”.⁹⁴

The Scottish Government is in a unique position to bring together relevant actors in RAAC remediation. There appears to be more certainty on a pathway to remediation for non-domestic buildings than for domestic houses (rented and privately owned).

The Committee urges the Scottish Government work with relevant bodies to ensure there is guidance on RAAC in domestic properties as soon as possible. We seek an update on when it anticipates guidance for tenants and homeowners from the Institution of Structural Engineers will be available and what will be done to expedite this work.

Establishment of a funded RAAC remediation scheme

We heard calls for Scottish Government support to fund RAAC remediation.⁹⁵ Government support has been made available in similar situations, where buildings have been found to contain defective or unsafe building materials.⁹⁶ RIAS offered the example of “...pre-cast concrete houses, or Dorran houses”.⁹⁷ The Scottish Government is also currently legislating to establish a means of funding a national resource for cladding remediation in the form of the Building Safety Levy (Scotland) Bill.⁹⁸ This will be in the form of a “tax on the construction of residential property

⁹² Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 25 and 43 and written submissions from the [Scottish Federation of Housing Associations](#) and the [Chartered Institute of Building](#)

⁹³ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 16

⁹⁴ Letter from the Parliamentary Under-Secretary of State for Building Safety, Fire and Local Growth, Alex Norris MP 1 September 2025

⁹⁵ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 22, 23 – 24, 26, 42 and 43 and written submission from the [Chartered Institute of Building](#) and [UK RAAC Campaign Group](#)

⁹⁶ Written submission from the [Chartered Institute of Building](#)

⁹⁷ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 42 and written submission from the [Royal Incorporation of Architects in Scotland](#),

⁹⁸ <https://www.parliament.scot/-/media/files/legislation/bills/s6-bills/building-safety-levy-scotland-bill/introduced/spbill73pms062025accessible.pdf>

development in Scotland” which will ensure “...”that the associated costs of cladding remediation do not fall directly onto affected homeowners or disproportionately onto the general taxpayer.”⁹⁹

We sought the Scottish Government’s view on whether there was any legislative barrier to a RAAC remediation scheme.

In your letter to us in July, you said:

“Scottish Ministers do have discretionary powers to provide grant funding - as provided for in sections 1 and 2 of the Housing (Scotland) Act 1988. Ministers can make grants among other things to provide, and assisting in the provision of, finance to persons or bodies intending to provide, improve, repair, maintain or manage housing. However, the use of these powers will clearly be dependent on the particular issue in question – and the availability of funds.”¹⁰⁰

The then Minister for Housing also said it came down to funding and that the Scottish Government would continue to press the UK Government on that.¹⁰¹

On engagement with the UK Government, he also said:

“We continue to push the UK Government for funding, but it has so far refused. The latest response from the UK Government makes it clear that it does not intend to provide any funding and that the issue is devolved.”¹⁰²

However, he argued this was because the UK Government only considered the issue in relation to public buildings, as opposed to private homes.

The Committee wrote to the UK Government seeking clarification of its position.¹⁰³ It reiterated its stance that the issue is devolved.¹⁰⁴

The then Minister also said “...we will continue to look at the issue as we move forward.”¹⁰⁵

Unfortunately, it is not clear to the Committee how the Scottish Government is progressing RAAC remediation. The Committee has heard there has been little progress since we last considered the issue of RAAC.¹⁰⁶ RIAS said “...pressure has to be put on Westminster—this is a pre-devolution matter—to expedite the process

⁹⁹ <https://www.parliament.scot/-/media/files/legislation/bills/s6-bills/building-safety-levy-scotland-bill/introduced/spbill73pms062025accessible.pdf>

¹⁰⁰ [Letter](#) from the Cabinet Secretary for Housing, 2 July 2025

¹⁰¹ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 15-16

¹⁰² Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 15

¹⁰³ [Letter](#) to the Rt Hon Angela Rayner MP, then Secretary of State for Housing, Communities and Local Government, 27 June 2025

¹⁰⁴ Letter from the Parliamentary Under-Secretary of State for Building Safety, Fire and Local Growth, Alex Norris MP 1 September 2025

¹⁰⁵ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 15

¹⁰⁶ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 43

with considerable urgency, or we will hear more stories like those we have heard today, and people's lives will be ruined."¹⁰⁷

The Scottish Government's pursual of the UK Government for funding for a national remediation scheme suggests it believes such a scheme is necessary.

However, it need not rely on the UK Government's action in this area and has the power to make funding available. In the absence of additional funding from the UK Government, the Committee calls on the Scottish Government to consider what further financial support it can provide to homeowners and tenants experiencing housing difficulties due to RAAC.

We urge the Scottish Government to consider how the Building Safety Levy (Scotland) Bill could be a suitable vehicle for delivering support at pace to councils and homeowners for RAAC remediation.

In your letter of 2 July, you highlighted your "...initial areas of focus – cladding, RAAC and reform of the building and construction products regulations."¹⁰⁸

Other suggestions as to how the Scottish Government could support RAAC remediation including removing barriers to council work in mixed tenure buildings.¹⁰⁹ When asked about legal basis for managing work in terraced properties where RAAC panels spanned 2 or more, the then Minister for Housing said:

"I have been made aware of the concern, and I have asked officials to look into the matter and see whether, if there is a gap in legislation, there is anything that we can do in that respect."

The Committee seeks an update on the legal position for remedial works in terraced properties, noting there is existing provision in tenement properties. In particular, we seek details of the Scottish Government assessment of whether further legislation is required.

It was also suggested the Scottish Government could be leading on establishing a position with mortgage lenders, insurance bodies and valuation surveyors on a standard of remediation which would ensure viability for those products.¹¹⁰

We explored the Scottish Government's role in setting a minimum standard for local authority engagement and support with homeowners and tenants of properties in which RAAC has been discovered.¹¹¹

The Committee calls on the Scottish Government to ensure it is leading in maintaining momentum of remediation of RAAC.

¹⁰⁷ Local Government, Housing and Planning Committee, [Official Report](#), 8 March 2025, Col 43 -

¹⁰⁸ [Letter](#) from the Cabinet Secretary for Housing, 2 July 2025

¹⁰⁹ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 27

¹¹⁰ Local Government, Housing and Planning Committee, [Official Report](#), 25 March 2025, Col 28

¹¹¹ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 14

Cladding

The Committee received an update from you on 7 August on the next phase of the cladding remediation programme.¹¹² We welcome the determination to increase the pace of this work and will take you up on your offer to discuss this with the Committee.

Notwithstanding our intention to invite you to speak to these issues with the Committee, we highlight some of our queries below.

Progress of the Pilot and Single Building Assessments

In April, we posed several queries on the status and progress of buildings in the pilot. The then Minister for Housing said:

“We have also confirmed that all 107 entries in the Scottish Government pilot programme are progressing on an appropriate pathway of assessment, which will lead to mitigation or remediation works.”¹¹³

In June, the then Minister for Housing provide the following update on the pilot:

“The 107 buildings on the Pilot were put on a pathway to assessment, starting with pre assessment checks made by an appointed fire engineer consultant. 51 were assessed as being out of scope of the Housing (Cladding Remediation) (Scotland) Act following a review by the appointed fire engineering consultants. Of the 56 buildings within scope:

- 10 of the buildings have been taken on by the developer
- two were identified by the fire engineers as being low risk and not requiring an SBA.
- 12 have had or are undergoing an SBA commissioned by Scottish Government
- 32 will require an SBA – these will now have the opportunity to be funded for assessment through the Single Open Call.”

This pilot is not mentioned in your update of 7 August and the Committee would welcome an update on the progress of the 107 buildings within the pilot project. We also seek clarity on how the pilot programme is being monitored and assessed in order to inform next steps.

In April, the then Minister for Housing told us there were 13 Single Building Assessments (SBA) in progress. The Cladding Remediation Programme: Next

¹¹² [Letter](#) from the Cabinet Secretary for Housing on cladding remediation - 7 August 2025

¹¹³ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 17

Phase Plan of Action¹¹⁴ says that 3 SBAs have been completed with a further 12 still in progress. The then Minister for Housing told us an SBA took 8-10 weeks.¹¹⁵

The Committee seeks clarification of why there has been little progress in these numbers in the months since we asked the then Minister for Housing about it. You have also highlighted deadlines for beginning SBA on other identified buildings and we seek details of the timescales why you believe these will be completed.

Interlinked fire alarm systems

During our evidence session with the then Minister for Housing, we asked about council homes which did not yet have interlinked fire alarm systems.¹¹⁶ The then Minister for Housing undertook to engage with the following local authorities and provide an update to the Committee:

- Fife,
- Aberdeen,
- South Lanarkshire
- Edinburgh

In your response of 2 July, you said the Scottish Government continues to engage with COSLA on progress towards universal installation of interlinked fire alarm systems. You also said you had allocated an additional £10m for the installation of systems.

We seek an update on:

- **discussions between the Scottish Government and the local authorities mentioned, including whether all council homes within those local authority areas now have the specified standard of fire alarms;**
- **We also seek details of the outcomes of liaison with COSLA on the issue; and**
- **How the £10m of additional funding will be allocated and to whom.**

¹¹⁴ Scottish Government (2025). [Cladding Remediation Programme: Next Phase Plan of Action](#)

¹¹⁵ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 29

¹¹⁶ Local Government, Housing and Planning Committee, [Official Report](#), 22 April 2025, Col 7