

Consultation on the future of our regulatory approach in response to the COVID-19 pandemic: Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **14 August 2020**.

By email @: shr@shr.gov.scot

Or post to: Scottish Housing Regulator
Buchanan House
58 Port Dundas Road, Glasgow, G4 0HF

Name/organisation name

Rural Stirling Housing Association

Address

Stirling Road, Yes

Doune

Perthshire

Postcode FK16 6AA

Phone 01786 841101

Email enquiries@rsha.org.uk

How you would like your response to be handled

To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

Are you happy for your response to be published on our website?

Yes

If you are responding as an individual ...

Please tell us how you would like your response to be published.

Pick 1

Publish my full response, including my name

Please publish my response, but not my name

1. Are our proposals for the Annual Assurance Statement right?

No. It would be fairer to all RSLs if there was an extension to the deadline for submission rather than a requirement for individual RSLs to approach the SHR directly if there are issues. This was not the approach taken with other Statutory Returns and given the circumstances seems out of kilter. The deadlines for some returns, which also form part of the overall assurance framework being extended, in itself has a knock-on impact to the annual assurance statement and the work involved in its review. An extension for submission would also give RSLs additional time to get a clearer picture of the financial impacts of Covid -19 and some of the uncertainty about the long-term impacts of this crisis that still surrounds us.

An extension of up to 3 months for submitting the Annual Assurance statement we feel would be a better approach (i.e. to 31 January 2021), this would give our Senior Management Team, Audit and Risk Committee, Board and tenants an appropriate time frame to fully review and understand the context of the submission this year and any additional assurance required as a result.

The sector guidance from SFHA and the additional guidance anticipated from SHR, are also not yet available. We need time to review updated guidance and be able to respond.

Some RSLs also continue to face additional difficulties due to the pandemic and an extension would be appreciated.

2. Should we publish advisory guidance to assist landlords to adapt their approach to the submission of the AAS?

Yes, this would be welcomed.

3. Would you like to make any other comments or suggestions about our approach to getting Annual Assurance Statements?

We are supportive of the approach being taken to identify Covid 19 non-compliance and to distinguish this from any other non-compliance with the regulatory standards.

4. Are our proposals for the publication of Charter performance right?

We are supportive of this extension and happy with this approach.

5: Would you like to make any other comments or suggestions about our approach to the publication of Charter performance?

No.

6: Are our proposals for the publication of Engagement Plans and regulatory status right?

Yes, happy with this approach.

7: Would you like to make any other comments or suggestions about our approach to the publication of Engagement Plans and regulatory status?

No.

Thank you for taking the time to give us your feedback!