

Our regulation of social housing in Scotland

Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our consultation paper on our website at www.housingregulator.gov.scot
Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **15 December 2023**.

By email @: regulatoryframeworkreview@shr.gov.scot

Or post to: Scottish Housing Regulator
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36 North Hanover Street, G1 2AD

Name/organisation name

West of Scotland Housing Association

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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 No

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. Do you agree with our proposed approach on specific assurance in Annual Assurance Statements?

Yes - but also to highlight that while it is important that you can include additional requirements to the statement in respect of specific topics. It would be good if this did not become too onerous in terms of several different requirements. It would also be beneficial if you could communicate why any additional is made so that we are aware of this and can ensure our Board have assurance accordingly and the right evidence is put in place to meet the requirement.

2. Do you agree with our proposal to initiate a comprehensive review of the Annual Return on the Charter which we will consult on next year?

Yes but would like to point that if we don't introduce charter indicators in respect of damp and mould until 25/26, we won't be reporting on these until 2027 which doesn't feel right in terms of priorities. Not sure what the solution is in respect of this as you need to give notice in respect of data collection and need to agree indicators before this. It might be worth taking a position that you will be determining the indicators as part of the above but in the meantime, RSLs should collect baseline data in respect of this topic in 2024/25 e.g. number of damp & mould cases, average no of days to resolve damp & mould cases etc so that you have some data for 2024/25.

3. Do you agree with our proposed amendments to strengthen the emphasis on landlords listening to tenants and service users to include a requirement that landlords:
- provide tenants, residents and service users with appropriate ways to provide feedback and raise concerns, and
 - ensure that they consider such information and provide quick and effective responses?

Yes agree but more clarify required in respect of what the requirements are to meet the amendments.

4. Do you agree with our proposed approach to Notifiable Events?

Yes agree with proposed approach but would be beneficial if there could be some further additions to the guidance would be helpful to reflect that a notifiable event is not always concerning something negative, and that RSLs should not be actively trying to keep the volume of notifications they submit to the SHR low. It is important to reduce any anxiety RSLs may have in submitting a notifiable event and address any perception stakeholders (or external media) may have about how the volume of notifiable events submitted relates to an RSL's performance.

5. Do you agree with our proposed approach to regulatory status?

Yes

6. Do you agree with our proposed approach to Significant Performance failures?

Yes

7. Do you agree with our proposed changes to the guidance on *Annual Assurance Statements*?

Yes

8. Do you agree with our proposed changes to the guidance on *Consultation where the Regulator is directing a transfer of assets?*

Yes

9. Do you agree with our proposal to maintain *the Determination* at this time?

Yes

10. Do you agree with our proposed changes to the guidance on *Determination of what is meant by a step to enforce a security over an RSL's land?*

Yes

11. Do you agree with our proposal to maintain the guidance on *Financial viability of RSLs?*

Yes

12. Do you agree with our proposed changes to the guidance on *Group structures?*

Yes

13. Do you agree with our proposed changes to the guidance on *How to request an appeal of a regulatory decision?*

Yes

14. Do you agree with our proposal to maintain the guidance on *How to request a review of a regulatory decision?*

Yes

15. Do you agree with our proposed changes to the guidance on *Notifiable events?*

Yes

16. Do you agree with our proposed changes to the guidance on *Preparation of financial statements?*

Yes

17. Do you agree with our proposal to maintain the guidance on *Section 72 reporting events of material significance?*

Yes

18. Do you agree with our proposed changes to the guidance on *Tenant consultation and approval?*

Yes

19. Would you like to give feedback on any aspect of our impact assessments? Are there other potential impacts that we should consider?

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