

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
2nd floor , George House
36 North Hanover Street, G1 2AD

Name/organisation name

Regional Network of Tenant and Resident Organisations

Address

c/o Shona Gorman, Chairperson Central Scotland Regional Network

Postcode	Phone	Email
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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

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 agree the charter indicators need full attention, there are a number of existing indicators that need revised. In relation to setting up a cross sector working group we feel there needs to be 2 tenant representatives on this, one from a local authority landlord and one from a RSL to provide full representation of tenants views.

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 that whilst some landlords do have good approaches not all landlords do and this needs strengthened across the social sector. This also has to be monitored effectively to ensure this happens. Tenants need proper communication from landlords so they know what they can expect. A thematic review of tenant participation by the SHR would be welcomed.

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

Yes

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

Yes, with the added wording for further clarity

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

Yes we agree with this proposed approach, it will provide more clarity around when tenants can go down the route of a SPF and when a complaint to a landlord through their formal complaints policy or via SPSO are the appropriate route

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*?

No comment

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

No comment

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*?

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

Yes, whilst we recognise the Regulator doesn't have the power to do this, we believe that tenants of the landlord who are proposing to take over the assets of another social landlord should also be entitled to vote on whether they think their landlord should be proceeding with the transfer. The impact of the transfer particularly in relation to cases involving a larger RSL can have an impact on the services provided to their existing tenants.

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

Whilst no comments on the impact assessments we are concerned about accessibility issues for tenants in relation to this consultation document. We would have liked there to have been a consultation in a more tenant friendly accessible format with more plain language explanation of the changes being proposed.

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