

## 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](mailto:shr@shr.gov.scot)

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

### Name/organisation name

Scottish Regional Networks Scottish Housing Regulator Liaison Group

### Address

C/o Regional Networks/ SHR Liaison Group Chair, 19 Portland Road

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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

### If you are responding as an individual ...No as a group

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?

Yes. Although each housing provider may have different data recording and reporting systems in place, almost all the data required to complete the AAS should have been held by the point of lockdown, so with a little assistance, where required, we consider the timescale is achievable.

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

Yes, but it is the view of the Liaison Group the guidance should be set up in such a way that it could remain in operation for up to the next 2 years because we could be entering next year with further uncertainty or restrictions as a result of the pandemic.

Whilst we appreciate the reasons for the restrictions in place at the moment, these must be having an effect on the ability of landlords to provide the total service to tenants and service users expect and deserve. We consider that clear guidance is an important part of supporting landlords to enable them to support their tenants and service users at this time.

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

The liaison group recognise the challenging times that landlords and indeed the Regulator are facing during COVID 19, however may we suggest that you should ask for AAS to be submitted as early as possible allowing you to focus on landlords having problems. Following the closing date, the Liaison Group and the Regional Networks would appreciate an update on the AAS as part of our ongoing liaison. The Liaison Group has some concerns about the ability of landlords to provide 'normal' services during this time, and we feel this should be reflected in the AAS and guidance.

We would also appreciate SHR making specific information available for tenants and service users on the temporary changes which are implemented and what these mean for tenants and service users. If future reviews or extension of the temporary changes are to be considered, it would be helpful to know if/how SHR intends to engage with and consult tenants and service users on any potential future changes.

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

Yes, in principle we see the need for flexibility. Anecdotal information from our own landlords suggests that they would have had no requirement for extension. We would like to know how you decided that the various extensions were required. We feel a December deadline has implications for staffing, Christmas leave etc and may not be achievable. At this stage, it may be beneficial to find out how many landlords need added time and assistance and communicate openly to enable publication a little sooner.

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

Yes. Tenants and service users all over Scotland look for this data to see how their landlord has performed and pushing back the timing of the report will have implications for tenant's groups and tenant participation activities. This report plays a big part in setting up TP and Scrutiny work that many groups have endeavoured to keep operating throughout this epidemic. The Liaison Group know of many tenant publications timed to go out around the normal publication date and to move these causes problems with funding, postal issues and disruption to the usual cycle of tenant-focused publications.

The view of the Regional Networks is that if the December deadline is agreed, it would be helpful for SHR to publish specific information for tenants and service users on the finalised changes to the timeline for publication for this year and what this might mean for tenants and service users this year.

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

Yes, as in our answers to our previous questions, we appreciate the need for flexibility. As these publications are so critical in giving tenants and service users an idea of the circumstances, challenges and regulatory issues facing landlords, we would want to ensure that this work is carried out meaningfully and doesn't represent just a short review and 'upgrade' of previous plans.

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

As above, these publications are of significant interest to tenants and service users and the view of the Liaison Group is the alterations and amendments should be speedily communicated to tenants, service users and all who may be affected.

In terms of the disruption to landlord service delivery, we feel going forward there is an opportunity for SHR to engage directly with tenants and service users as well as landlords on their experiences of the pandemic as we are likely to be living with COVID 19 for some time to come and future lockdowns and restrictions, local and national, are to be expected as we move forward. We consider there to be potential for helpful thematic work on key issues, and it would be useful if tenants could contribute to this type of work.

The Liaison group has found SHR's monthly dashboard publications to be helpful and we would hope to be updated on these indicators during our cycle of meetings. We believe this could be a positive addition to tenant and service user access going forward. In these challenging times we see communication, honesty and openness between landlords, tenants, service users and SHR to be essential during the pandemic and in the future.

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