

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

Chartered Institute of Housing Scotland

Address

4th Floor, Hayweight House, 23 Lauriston St, Edinburgh

Postcode EH3 9DQ

Phone

Email scotland@cih.org

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?

CIH Scotland welcomed the Scottish Housing Regulator's (SHR) swift response to the Coronavirus pandemic, allowing greater flexibility for social landlords to focus resources where they were most needed to support tenants, homeless households and often benefiting the wider community as well.

Our members have been working incredibly hard to deliver essential services to people during a very difficult time. They have had to adapt quickly to new ways of working, dealing with higher than average rates of staff absences and with many having to juggle family and work commitments.

While we broadly agree with the principles set out in the consultation document, some of our members have expressed concern that while deadlines have been pushed back for data reporting, it is suggested that Annual Assurance Statements should be submitted within the normal timescales.

The social housing sector is very diverse, providing a wide range of services and different delivery models. Landlords will have been impacted very differently by the pandemic depending on the location of their stock, the profile of their tenants and customers and how staffing levels have been impacted by illness, caring obligations or the need to make se of the 'furlough' scheme. While some landlords will be confident that they can meet the existing deadline for submitting Annual Assurance Statements, others may have been focussing stretched resources on other areas, particularly to ensure essential service delivery.

For some, when Management Committees and Governing Boards would ordinarily have been reviewing assurance processes, these meetings have either been cancelled, postponed or changed focus to the emergency response to the pandemic. Governing body annual reviews, internal audit programmes and business planning activities which contribute to compliance with the assurance framework have also been disrupted.

Guidance to support landlords to comply with the framework would certainly be welcome. We also note that the consultation document states an intention to work with landlords that indicate they may find the deadline for Annual Assurance Statements difficult and we hope that adequate flexibility is allowed for within this work. Extensions to the deadline should be granted where necessary to ensure that social landlords are not penalised for having to deal with extraordinary circumstances outwith their control.

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

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

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

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

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

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

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