Our regulation of social housing in Scotland
Discussion questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our discussion 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 11 August 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

Address

Postcode	**Phone**	**Email**

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 **x**☐   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	*x*☐

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1. We believe that our regulatory priorities should be:
   - listening and responding effectively to tenants and service users
   - providing good quality and safe homes
   - keeping homes as affordable as possible
   - doing all they can to reduce the number of people who are experiencing homelessness

   We are keen to hear your feedback on these priorities. Are they the right ones?

   > In my eleven years in Governance I have never seen 'listening and responding effectively to Governing Body members' appearing as a priority. There does need to be some recognition that voluntary Governing Body members are increasingly being asked to give more and more of their time to their Associations governance due to the increase in regulatory requirements. I am proud to be a volunteer (ie not paid) but I am aware that many people support payment which I believe to be a retrograde step. The four priorities proposed are acceptable for this coming year.

2. What are your views on amending the Statutory Guidance on Annual Assurance Statements to include provisions on specific assurance?

   > Currently my Association's approach to the AAS is a series of 6 two-hour meetings to consider the Standards. This is followed by a further two-hour meeting to consider the overall picture of the 7 Standards. Further consultation which may be by F2F meeting or 'virtual' will result in the AAS for the Board's approval. Although the whole Board is requested to attend the initial 6 meetings only 4 do regularly, with 2 occasionally. The remainder do not have the time or the inclination. The AAS needs to be simpler and one way to achieve simplicity would be to re-evaluate the language of the seven Standards which I believe to be over complicated. Once that is achieved then I would agree that adding specific assurances from associations would be a good move forward.

3. Do you think that we need to change any of the indicators in the ARC or add to these?

   > They remain relevant and appropriate. However, I take issue with the inclusion of the option 'neither satisfied nor dissatisfied' in many of the indicators. I suspect a consultant was paid a lot of money to come up with the indicator, but it is totally meaningless in the ARC context. A tenant is either satisfied or not satisfied with the service they are receiving; they do not have to justify either. The inclusion of 'neither satisfied nor dissatisfied' figures in the calculation gives a false impression and also affects comparison with peers. Please remove it!

4. Are the proposed areas of focus for tenant and resident safety indicators the right ones, and what should those indicators be?

   > Happy for more safety indicators remembering the additional task this will put on those tasked with assembling the ARC information. Justification is important.

5. What do you think would be the most effective and appropriate way to monitor the effectiveness of landlords' approach to managing reports and instances of mould and dampness?

   > Should be monitored, but I must leave the proposals as to how to do this to the experts.

6. What are your views on strengthening the Framework further on landlords listening to tenants and service users?

   > Needs to be justified. The more regulatory demands, and every question so far is looking at additional information coming from associations, the more time is spent on paperwork and not on tenants.

7. How do you think we could streamline the requirements for landlords in the Notifiable Events statutory guidance?

   > I leave this to the experts.

8. *Do you think there is value in using more direct language in the working towards compliance status, or in introducing an intermediary regulatory status between compliant and working towards compliance?*

> Keep it simple. An association is either compliant or working towards compliance status. Let us not muddy the waters further.

9. Are there any changes we should make to the Significant Performance Failures approach, including how we define these?

> Insufficient knowledge to comment.

10. Are there any other changes to the Regulatory Framework and associated guidance that you would suggest?

> At the same time as adding a considerable amount of extra work for association administrators could you please also look at reducing/simplifying the existing regulatory requirements. The camels back is not yet broken but increasing demands on the time and goodwill of both voluntary Board members and very willing and competent Association staff will cause the camel harm eventually.

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