

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.scottishhousingregulator.gov.uk. Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **14 December 2018**.

By email @ consultation@scottishhousingregulator.gsi.gov.uk



Or post to: Scottish Housing Regulator
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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	<input type="checkbox"/>
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1. Is our overall approach, set out in Chapter 2 of the Framework, right? Do you have any other comments?

Chapter 2 does appear to make it clearer that additional evidence is a requirement; The Framework sets out more clearly that Landlords must give assurance based on the evidence gathered.

That being said, by taking a risk-based approach, we would be concerned that areas which are not regulated then become risks. We do think that section 2.8 of the framework does outline the importance of landlords undertaking their own risk assessments and having them run in tandem with the SHR approach.

2. Do the proposed regulatory requirements cover the right things, and are they framed in the right way?

The proposed regulatory requirements are as expected

3. Is there anything missing? Or any other comments?

No

4. Should we add to, amend, or remove anything from the proposed Standards?

No

5. Is the new Standard 7 useful, and is it framed in the right way?

Related to RSLs- No Comment

6. Would you like to make any other comments about the Standards?

No

7. Is the approach we have set out in Chapter 4 right? Any other comments?

Yes- No comment

8. Are our proposals for the Annual Assurance Statement right?

We would be keen to have some guidance to ascertain what SHR would consider a standard deviation for not being able to give complete assurance. The proposals appear somewhat ambiguous, thus leaving it down to each LA/ RSL to determine whether or not assurance should be given.

9. Is our approach to risk assessment right?

The approach to risk assessment seems overly complicated and, therefore, open to interpretation when it comes to evidentiary support.

Under section 5.8 of the risk assessment, we would be interested to ascertain what "other sources of information" are gathered and where this information is gathered from. It is unclear as to whether the landlord will be notified that additional information is being gathered about them or if they will be approached in the first instance.

10. Should we publish a regulatory status for each RSL as we propose?

This seems like a reasonable approach

11. Is it right that we publish an Engagement Plan for every landlord?

This does not seem necessary. An individual Engagement Plan would not be relevant to those landlords who are meeting the standards and requirements.

We suggest that it would be more reasonable to produce a generic Engagement Plan for all LAs and all RSLs unless risk assessments have determined that there are issues which have to be addressed. It would only be at that time that individual engagement plans are drawn up for the landlord concerned.

12. Would you like to make any other comments or suggestions about our approach to getting assurance?

The approach seems very clear.

13. Is the approach set out in Chapter 6 right? Any other comments?

No comment

14. Is the approach set out in Chapter 7 right? Any other comments?

In terms of Thematic Work, we believe that the approach is right but we would like to comment that the output of such projects is not always clear. Is there an expectation that any recommendations are implemented or should they just be given consideration?

15. Is the approach set out in Chapter 8 right? Any other comments?

The approach set out seems very standard.

16. Are these registration and de-registration criteria the right ones? Any other comments?

Related to RSLs- No Comment

17. Do you have any feedback on the draft Assurance Statement guidance?

We think the draft Assurance Statement Guidance is very useful and very clear.

18. Do you have any feedback on the draft notifiable events guidance?

Related to RSLs- No Comment

19. Should we add to, delete or amend anything in the list of proposed indicators? Any other comments?

Previous Indicator 9- We would suggest this indicator is an important for benchmarking purposes and to exemplify tenant satisfaction

Indicator 25- Length of time in temporary/ emergency accommodation is extremely relevant given the Scottish Government's drive to reduce homelessness

20: Do you have any feedback on the draft group structures guidance?

Related to RSLs- No Comment

21: Do you have any feedback on this guidance?

Related to RSLs- No Comment

22. Would you like to give feedback on any other aspect of the proposals set out in the draft Framework and guidance?

No

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

No Comment- As expected

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