

## 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

Shelter Scotland

### Address

Scotiabank

6 South Charlotte St

Edinburgh

Postcode

Phone **0334 515 2447**

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

### 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?

These proposals seem satisfactory, taking into account the impact of the pandemic, however we would not want further delays.

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

This would be something which we feel would be beneficial

**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?**

These proposals seem satisfactory, taking into account the impact of the pandemic, however we would not want further delays.

**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?**

These proposals seem satisfactory, taking into account the impact of the pandemic, however we would not want further delays.

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

## **Additional comments we would like to raise in relation to impact of pandemic and performance of social landlords and local authorities**

We have taken the opportunity to highlight some of the key areas we have concerns about as we emerge out of the pandemic and areas we hope the SHR will be able to focus on. To ensure as many households as possible are supported to remain in their homes, despite the challenges created by this pandemic, and people who have become homeless are quickly supported into suitable temporary or settled accommodation. Building on the progress and swift response of Scottish Government and many Local Authorities and social landlords to fully support tenants and those who have slipped in to crisis and homelessness will be vital, to ensure we do not see a return to high numbers of people sleeping rough, and address the large numbers of households in temporary accommodation.

### **Impact of the pandemic and how tenants are supported**

As we hopefully emerge out of the pandemic it will be vitally important that landlords continue to support tenants to manage their finances and support them to apply for Universal Credit and Discretionary Housing Payments as soon as possible so they can sustain their tenancies.

### **Evictions**

The impact of this crisis will be felt for many years to come with thousands of household's incomes negatively affected. A strong no eviction for rent arrears approach should be embedded in how RSLs and LAs approach supporting tenants to stay in their homes, and monitoring of these PARs by the SHR will be vital to make sure that pre actions requirements are fully complied with and eviction is an absolute last resort. This is vital as we start to plan an exit strategy post pandemic for the housing sector, when many more households will be struggling to pay their rent and will be at risk of homelessness.

### **Homelessness**

The SHR has produced very useful monthly statistics during the pandemic period, and as we have seen there has been an increase in households in temporary accommodation. The on-going challenges created by the health crisis which social landlords face in allocating the homes and supporting people into them is recognised, however we would ask that as soon as possible Local Authorities, using the guidance from Scottish government, quickly resume allocating properties to those in housing need.

### **Rough sleeping**

We need to ensure that as emergency pandemic funding for hotels comes to an end that we do not see a return to rough sleeping, with local authorities and the Scottish Government stepping in to ensure that there is enough suitable temporary accommodation of a good standard for anyone who ends up in crisis and becomes homeless. It is vital that we do not take a step backwards and see rough sleeping increase again.

### **Gatekeeping**

Gatekeeping cannot be allowed to return - we must build on the progress made during the pandemic and we will look to the SHR to monitor and address any breaches of legal duties. Local authorities who do not fulfil their legal duty and provide temporary accommodation for someone who is homeless must be held to account. An immediate assessment of why gatekeeping is happening should take place and where support is needed for local authorities, to ensure they no longer turn away people in crisis should be provided quickly.

### **No more dormitory style emergency accommodation**

Dormitory style emergency accommodation must not be used, this is included in the recommendations from the HARSAG group which have been agreed in principle. Safe, suitable and good quality temporary accommodation should be provided by the local authorities, with support from the Scottish Government where help is required to provide this accommodation in accordance with the revised Unsuitable Accommodation Order.

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