

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

Govanhill Housing Association

Address

Samaritan House

79 Coplaw Street

Glasgow

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

X

Please publish my response, but not my name

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

Yes the approach is right and to be applauded in that it allows for Housing Associations to discuss openly with SHR any concerns they have regarding submitting their AAS this year as a result of the recent Pandemic.

However, it is our view that extending the deadline for submission for 1-2 months may be more appropriate than requesting the AAS Statements be submitted by 31 Oct 2020.

There are three reasons for this. One is that it is sympathetic and consistent with the approach to extend other deadlines for submissions to the SHR because of the unprecedented Pandemic and how it has effected workflows for organisations.

Secondly, the clear purpose of the AAS is for the Housing Association's benefit and for its committee members to 'own it' and be assured that decisions taken on behalf of the organisation are indeed the right ones. But for this year's submission it is understandable that HAs action plans developed as a result of last year's AAS submission could have been effected by the Pandemic and/or need to be revised because of it to ensure the AAS doesn't immediately become redundant and be of no help to Committee Members. This would merit a delay to ensure that can be reconsidered.

Finally, recent public health and government briefings on 'Easing out of Lockdown' caused by the spread of the virus have shown the fragile nature of this process. It is evident that Housing Associations will still be considering the 'live' risks of Covid-19 and its impact on its business through Sept /October which may make it difficult to provide the assurances of what they are doing is right as early as the 31st October.

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

Yes. Guidance would help create a consistent approach for both parties (SHR and RSLs)

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

None other than to reiterate that we welcome the approach SHR are taking to recognise that they are very open to discussing regulatory concerns each RSL may have during these unprecedented times.

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

Yes. Its a sensible approach

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

None

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

Yes. They would be in danger of becoming quickly redundant otherwise

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

None other than to re-affirm that this approach would seem to be the most appropriate to ensure Engagement Plans are based on relevant and accurate information

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