

We believe that regulation of Registered Social Landlords in Scotland is light touch with RSLs and Local Authorities being able to largely self regulate within the regulatory framework which you falsely claim is to safeguard and promote the interests of current and future tenants, homeless people and other service users. In your discussion document in clause 11 you give away the fact that you regulate not for the well-being of tenants and the homeless but for the financiers of RSLs in that you state, "We also recognise the wider harm If lenders, investors and founders to RSLs do not see them as a good place to invest..... By regulating effectively we help to maintain lenders, investors and founders confidence."

The above explains the why of light touch regulation and how you do not regulate in tenants and the homeless best interests.

The Scottish Tenants Organisation is stating for the record that only tight and firm regulation of RSLs and Local Authorities in Scotland is needed at all times and that is the only form of effective regulation to best look after the interests of tenants, the homeless and other service users

We have represented a good number of tenants and homeless people in recent years and it is clear that RSLs and Local Authorities very often represent only their own interests to the detriment of service users.

In your discussion paper you state that RSLs and Local Authorities are looking for stability and continuity and we know that this means they want light touch regulation to continue over the next five years. It is the opposite of what is required. You mention that you want RSLs and Local Authorities in Scotland to tackle damp and mould. The only way to do this properly is to require all RSLs and Local Authorities in Scotland to carry out up to date stock condition surveys and to eradicate all damp and mould in their properties to ensure the health and safety of all tenants within a defined period of time.

RSLs and Local Authorities are not representing the best interests of the homeless in that we have record numbers of homeless people living in unsuitable and squalid temporary accommodation. We are now witnessing increasing numbers of homeless people also dying in temporary accommodation and therefore the Scottish Housing Regulator has to carry out far more interventions on behalf of the homeless. It is only with tight and firm regulatory intervention can tenants, the homeless and other service users interests be best served and not through continued light touch regulation which only serves the best interests of landlords and their financiers. We in the Scottish Tenants Organisation would very much like to meet with the Scottish Housing Regulator to enlighten you with the current experiences of tenants and homeless people.

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