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
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Name/organisation name

Shire Housing Association

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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	☒
Please publish my response, but not my name	☐

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?

   > The priorities are correct. However, they should include an additional priority about collaborating with social landlords to improve standards across the sector.

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

   > No-SHR should avoid reacting to specific policy agenda issues. Greater emphasis should be placed on working with SFHA, GWSF, COSLA and ALACHO to highlight the relevance of existing Regulatory Standards, and statute to emerging issues.
   >
   > We believe a more effective way is to look at a small number of additional robust ARC indicators rather than being prescriptive in the content of Assurance Statements.

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

   > We are comfortable with refining ARC indicators, but the metrics must be robust and meaningful. There must be clear purpose for collecting any additional data.
   >
   > SHR should avoid creating additional indicators that are difficult to measure such the current Anti-social Behaviour indicator in the ARC.

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

   > They are broadly the right ones.

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?

   > The most effective way is through the ARC. Any new metrics should focus on RSL action to deal with cases and outcomes. Additional ARC indicators on dampness and mould indicators should not just be reported numbers but should link to cases that then go through, for example, the formal Complaints Process so that there is a more refined view of case outcomes.

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

   > The Regulatory Framework is already clear about the requirement to engage with tenants and does not require to be made any clearer. The key issue is the quality of the engagement, and the ARC already includes an indicator on satisfaction with the opportunity to participate in landlord's decision-making.

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

   > The guidance is already clear- examples of incidents that are not Notifiable Events may also help. The guidance should also stress the importance of speaking to SHR if there is any ambiguity about whether an event is Notifiable

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?*

Not unless there is clear feedback from stakeholders to change this. Our view is that there is no requirement for change.

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

We do not feel there is a requirement for any change.

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

No.

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