

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.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 **15 December 2023**.

By email @: regulatoryframeworkreview@shr.gov.scot

Or post to: Scottish Housing Regulator
2nd floor , George House
36 North Hanover Street, G1 2AD

Name/organisation name

Louise Feely, Renfrewshire Council

Address

Renfrewshire House		
Cotton Street		
Paisley		
Postcode PA1 1JD	Phone	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 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 checked="" type="checkbox"/>
Please publish my response, but not my name	<input type="checkbox"/>

1. Do you agree with our proposed approach on specific assurance in Annual Assurance Statements?

We agree that a provision for a requirement for specific assurance may be required in certain circumstances. We welcome the suggested approach that in some circumstances, specific assurance may be requested through the Engagement Plan.

2. Do you agree with our proposal to initiate a comprehensive review of the Annual Return on the Charter which we will consult on next year?

Yes, we would welcome a comprehensive review of the Annual Return on the Charter and look forward to participating in it.

3. Do you agree with our proposed amendments to strengthen the emphasis on landlords listening to tenants and service users to include a requirement that landlords:
- provide tenants, residents and service users with appropriate ways to provide feedback and raise concerns, and
 - ensure that they consider such information and provide quick and effective responses?

Renfrewshire Council has a range of ways in which tenants, residents and service users can provide feedback and raise concerns. As such we welcome any methods that would support tenants and residents in providing feedback to their landlord. We provide a quick and effective responses to service users but believe that it should be recognised some requests for information are more complex and that response times would need to be proportionate. There may remain some work to do on differentiating between complaints and serious issues. It could be concluded that a serious issue for a tenant is a complaint, which we would address using our complaints process. We would not welcome additional timebound measures from the regulator.

4. Do you agree with our proposed approach to Notifiable Events?

Although local authorities are not required to declare a notifiable event, we have as a rule of thumb, contacted our regulation manager to determine whether something should be considered a Notifiable Event.

5. Do you agree with our proposed approach to regulatory status?

We note that this applies to RSLs and as such will not comment.

6. Do you agree with our proposed approach to Significant Performance failures?

The proposed approach seems reasonable. We look forward to the revised document on Significant Performance Failures.

7. Do you agree with our proposed changes to the guidance on *Annual Assurance Statements*?

Yes, this appears reasonable. However, if there is a specific requirement for explicit assurance by individual landlords then the landlord should be advised of this at the Engagement Plan stage.

8. Do you agree with our proposed changes to the guidance on *Consultation where the Regulator is directing a transfer of assets*?

We note that this applies to RSLs and as such will not comment.

9. Do you agree with our proposal to maintain *the Determination* at this time?

We note that this applies to RSLs and as such will not comment.

10. Do you agree with our proposed changes to the guidance on *Determination of what is meant by a step to enforce a security over an RSL's land?*

We note that this applies to RSLs and as such will not comment.

11. Do you agree with our proposal to maintain the guidance on *Financial viability of RSLs?*

We note that this applies to RSLs and as such will not comment.

12. Do you agree with our proposed changes to the guidance on *Group structures?*

We note that this applies to RSLs and as such will not comment.

13. Do you agree with our proposed changes to the guidance on *How to request an appeal of a regulatory decision?*

We note that this applies to RSLs and as such will not comment.

14. Do you agree with our proposal to maintain the guidance on *How to request a review of a regulatory decision?*

We note that this applies to RSLs and as such will not comment.

15. Do you agree with our proposed changes to the guidance on *Notifiable events?*

We note that this applies to RSLs and as such will not comment.

16. Do you agree with our proposed changes to the guidance on *Preparation of financial statements?*

We note that this applies to RSLs and as such will not comment.

17. Do you agree with our proposal to maintain the guidance on *Section 72 reporting events of material significance?*

We note that this applies to RSLs and as such will not comment.

18. Do you agree with our proposed changes to the guidance on *Tenant consultation and approval?*

We note that this section titled 'Tenant Consultation and approval' applies to RSLs and as such will not comment.

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

No

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