

## 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

Graeme Galloway / Triodos Bank

### Address

50 Frederick Street

Edinburgh

### 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?

Yes, these seem fine, and we note that a key aim will be to distinguish any directly related pandemic / lockdown issues from those issues that would be deemed non-compliant under normal operational circumstances. This will provide a clearer understanding that any pandemic related issue may only be temporary and that an estimated timeframe perhaps can be given for review in relation to ongoing covid developments.

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

Yes.

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

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

Yes, allowing c.2-month extension of time seems right.

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

It might be worth highlighting areas of the return in 2021 where it has become known that covid has had a material impact e.g. arrears / bad debt levels, anti-social behaviour levels, additional staff time spent on assisting tenants, managing arrears. Some early indications of impact in 2020 would be a useful benchmark too perhaps? This will (ongoing) be dependent upon how long covid remains a significant challenge to society, however the data would be useful in understanding the impact on both tenants and landlords. It would also be useful in analysing the geographical impact e.g. on major cities (Glasgow, Edinburgh etc) as opposed to the more remote regions e.g. Lochalsh & Skye.

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

Ok with it - March 2021 slightly later than expected however funders should have re-assurance that if there are any material / significant covid impacts, governance failures or ongoing service level issues beyond a certain timeframe, that notification will be forthcoming as soon as possible (as was the case under normal pre-covid circumstances).

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

Pleased to note that a regulatory status will be included in new EPs by end of March 2021

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