

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

City of Edinburgh Council (Elaine Scott, Housing Services Manager)

Address

Waverley Court (G.6), 4 East Market 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. We support the proposals for the timescales for submission of the Annual Assurance Statement to remain the same. It is important that the Regulator recognises where landlords are unable to make this deadline or have to take a different approach to getting governing body approval for their statement.

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

Yes. We consider it important that the Regulator provides advisory guidance to landlords to assist with preparation for this year's Annual Assurance Statement. The guidance will help to achieve a level of consistency amongst landlords when reporting any areas of non-compliance that have arisen due to the restrictions placed on landlords during the current pandemic. The guidance should also make clear how the Regulator will respond to any areas of non-compliance to help landlords in reporting to their governing bodies for approval.

The guidance should however recognise that individual landlord may have already engaged with or sought approval from their governing bodies and it should therefore be sufficiently flexible to account for this.

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

None

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

We agree with the proposal to extend the date of reporting our Scottish Social Housing Charter performance to our tenants and service users to the end of December 2020. This will provide sufficient time for the Regulator to carry out its verification checks; give each landlord the opportunity to compare its performance with other landlords on release of all the data and it will enable landlords to consult with its tenants on what to include in its report, recognising that engaging effectively with tenants at this time is more challenging.

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?

We agree that the Regulator should reintroduce updated Engagement Plans by the end of March 2021. Early clarity on the proposed engagement approach and the timeframe in terms of performance that the engagement plans will relate to will be important. It would also be useful for the Regulator to be clear on how the impacts of Covid-19, that will vary between landlords, will be taken into account in assessing performance. We would suggest that the Regulator considers a number of factors when determining the level of engagement with each landlord:

- Performance in 2019/20 as reported in the Annual Return on the Charter.
- Performance in 2020/21 as reported through the Covid-19 monthly returns.

- The impact the pandemic has had, including the success in maintaining service levels for tenants/service users and the delay this has caused in introducing some service improvements or changes.

We will be happy to provide additional information to the Regulator should it be required.

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

None.

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