

## **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**

Moray Council

### **Address**

Housing and Property

Moray Council

PO Box 6760

Elgin

Postcode IV30 1BX

Phone 0300 123 4566

Email [housingstats@moray.gov.uk](mailto:housingstats@moray.gov.uk)

### **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?**

The only issue we foresee in producing the annual assurance statement within the usual timescales (i.e. by 31 October 2020) is that meetings of our Communities Committee, who would normally consider and formally approve the content of the statement prior to submission, are currently suspended. We may not be in a position to comply with this requirement.

When lockdown restrictions were put in place the initial approach was to provide a mixture of enhanced delegation to officers with an emergency cabinet for strategic decisions. Since then the Council has agreed to move towards consolidating committees with a temporary meeting schedule of virtual meetings until at least February 2021. This means there could be a limited capacity to progress normal Committee business.

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

Yes, this would be helpful if it addressed our concerns about the Committee approval process set out in our response to Q1.

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

No.

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

The Council has had some issues in adapting to home working as quickly as we would have liked, mainly due to issues with access to equipment. It has been extremely challenging to meet the extended timescales with fewer resources. Although there has been some progress, it is unlikely that our offices will be available to non-critical staff for some time to come and many are waiting to be issued with equipment to work effectively from home.

Our main concerns are:

- the timing of the ARC data being published by the SHR will have an impact on the development of the report. We would normally use this within the report for benchmarking comparisons. Since the ARC has been delayed by 2 months we assume this will be available by 31 October? The festive period closure would reduce the time we normally have to finalise the report after the data publication.
- that we would normally involve our main tenant group in the development of the report through meetings with housing staff. Face to face meetings are unlikely to be possible for some time and very few of our tenant representatives have access to the Internet to arrange this digitally. However, we will consider options to ensure meaningful involvement in the development of the report and also refer to feedback forms received from the previous report.
- there may be issues with our graphic design arrangements which may mean only a basic document can be produced.

For these reasons, we would ask you to consider a mid-January 2021 deadline rather than 31 December 2020.

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

No.

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

We have no concerns with the proposal to produce and publish engagement plans by the end of March 2021 since these would take the impact of COVID-19 into consideration.

We expect many areas of performance will be adversely affected due to COVID-19 for some time to come. As an example, major work programmes for EESSH and upgrading smoke alarms/CO2 detectors have been set back as a result of the pandemic. We expect our resources and activities to be negatively impacted for some time to come as we adjust our procedures in line with Government guidance.

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

No.

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