

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			
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1. Are our proposals for the Annual Assurance Statement (AAS) right?

In our opinion the AAS should be returned within the previously set timescale as a delay is not necessary. If organisations have issues they currently are required to register these as notifiable events and have been requested to provide monthly stats from 1 April onwards in relation to gas fails etc. Organisations should always be in a position to provide assurance that is governed and managed correctly, it is not a static position and requires routine review through meetings and communication, therefore, should always be current.

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

Yes, this would be much appreciated if this could be made imminently to ensure the time for organisations to review and carry out the necessary communication with Boards. Some Boards may have felt less connected as they have not met in person for some months and this will also be the case for the short-term including for AGMs.

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?

Yes, however, revised July deadline seems generous given that we were almost at year end and most organisations would be in the planning stages for the return and also most office-based colleagues were still working.

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?

Agreed that the appropriate plan for future engagement plan publication incorporating Risk associated with COVID-19 for 2021/22. However, we would have normally had draft engagement plans prior to the office closures so should have been signed off in March 2020 with any exceptions to that plan because of COVID-19 being reported to the regulating manager. The delay in publishing the March 2020 plan has not provided stakeholders with the appropriate assurance that organisations are viable.

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!