

## 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

ALACHO

### Address

C/O Verity House

Haymarket Yards

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- The annual assurance statement is an important addition to the range of tools available to the sector to improve oversight and accountability and to drive improvements in Governance. Sustaining a focus on these issues is more important in testing times like these.

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

Yes. However, some Councils may already have started discussions with elected members and tenants, the revised guidance should be issued as soon as practically possible. Equally, it is possible that disruption to committee cycles as a result of Covid may mean that some councils have to submit their AAS subject to committee approval. In the current circumstances we would hope that this can be accommodated though we understand that it would be far from ideal

**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 – in the current circumstances it makes sense to allow some additional time to submit and publish the ARC. There would also be some value in linking the deadline for local publication with the SHR's own publication timetable for the full data set. We would certainly want to avoid a situation where the SHR has published its own landlord summaries and the full data set before landlords have made this information available to tenants locally.

**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?**

Yes – whilst we would expect most landlords to want an earlier publication date, in the current circumstances it makes sense to allow some additional time for this work to be properly completed. It would also be helpful to indicate in advance what period the engagement plan will relate to and what, if any, particular arrangements or approaches the SHR is proposing as a result of the current emergency situation.

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

It would be helpful to understand how the SHR intends to take account of the current very difficult service delivery environment in its approach to assessing performance.

It is very likely that most landlords will see a decline in performance in some areas. This is likely to vary from area to area depending on the severity of the local pandemic and the extent to which resources have been drawn off to provide other services linked to local resilience responses.

Approaches based on, for example, indicators in the lowest quartile may not provide a good benchmark to and could require a deeper understanding of local pandemic impacts and responses.

In these circumstances we would hope that the SHR work with landlords to understand these issues of wider context before making any particular judgments about performance or direction of travel.

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