



**Scottish Housing
Regulator**

Annual Performance Report & Accounts 2019/20



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This report summarises our work during 2019/20. It includes our accounts for the financial year 2019/20 in accordance with the Accounts Direction given by Scottish Ministers and section 19(4) of the Public Finance and Accountability (Scotland) Act 2000

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1. Welcome from our Chair & Chief Executive



We are pleased to welcome you to our new look annual report. Like our new website www.housingregulator.gov.scot, we have designed it to meet new accessibility regulations.

When we started to write this report, in March 2020, the Coronavirus Covid-19 had just hit and the challenges for social housing in Scotland changed dramatically and at pace.

We recognised the unprecedented circumstances for social landlords and quickly aligned our regulatory approach to support them through the Coronavirus crisis. This included postponing the publication of updated Engagement Plans planned for 31 March 2020 for all landlords including a regulatory status for RSLs, postponing all but the most critical regulatory engagements to allow landlords and us to focus on the most serious existing risks or those that emerged from the pandemic. We also extended the timescales for submission of annual Charter returns and Five Year Financial Projections.

We helped to establish the Social Housing Resilience Group alongside the Scottish Government and landlord representative bodies to respond to the challenges which the social housing sector was experiencing.

We are using notifiable events and a concise new monthly data return agreed with the Resilience Group to monitor changes to service levels provided by all RSLs and local authorities and the financial impact on RSLs as a consequence of the pandemic. We report these to the Resilience Group and Scottish Government to help them develop policies and responses to emerging issues and serious risks to tenants, people who are experiencing homelessness and other service users.

While this was an intensive end to 2019/20, in this report we reflect on the other work we did during the year.

At the start of the year we published our new [Corporate Plan for 2019- 2022](#) setting out our priorities, and we implemented our [new Regulatory Framework](#). The support we have received from stakeholders during our Framework consultation shifted into real and meaningful self-assurance by all landlords and a key milestone was the submission of the first [annual assurance statements](#) in October 2019. In early March 2020, we published lessons learned from the first year of assurance statements highlighting positive practice, drawn from visits to 10 landlords to hear about their experiences.

Services to people who are homeless or who are experiencing homelessness remain a priority for us. We had engagement with 23 local authorities during the year, published a report on housing options and homelessness services in Dumfries & Galloway and

started an inquiry into Glasgow City Council's service for people who are homeless. We also used our National Panel to gain insight into people's experience of using homelessness services and what makes the biggest positive difference to that experience.

A strong tenant voice is important to us and this year we used the feedback from our National Panel of Tenants and Service Users and the RTO Regional Networks to inform our regulatory approach on safety, value for money, affordability, and service quality. We also published research with our National Panel of tenants and service users on Gypsy/Traveller site standards and continued to engage with the community and Scottish Government on site standards.

In 2019/20 landlords have reported in their annual Scottish Social Housing Charter returns that nine out of ten of their social housing tenants are satisfied with the overall service.

Landlords and tenants continue to benefit from competitive borrowing rates and investors in social housing in Scotland remained in close contact to understand how regulation was supporting the sector during the pandemic crisis.

We give human rights prominence in our new [Regulatory Framework](#). We plan to continue to shine a light on this as we work with social landlord representatives and the Scottish Human Rights Commission to provide guidance for landlords on human rights and build our own capacity on human rights.

We welcomed three new Board members: Ewan Fraser, Colin Stewart and Helen Trouten Torres. We would also like to thank and wish well Anne Jarvie CBE. She stepped down on 31 March 2020 as our Deputy Chair. We would like to thank all our Board members, our staff team and all the tenants and service users and stakeholders who have worked with us during the year. We also thank those who served as statutory appointees to RSLs governing bodies; they are all volunteers drawn from the sector and are key to supporting organisations that are working to improve.

We would also pay tribute to the hard work by all those who work and volunteer in social housing in Scotland, particularly during these unprecedented times.



George Walker



Michael Cameron

The background features two large, overlapping triangles. The upper-left triangle is a solid blue color, and the lower-right triangle is a solid grey color. They meet at a point in the center-right of the frame, creating a white triangular area between them.

2. Who we are and what we do

Who we are

We are the independent regulator of social landlords in Scotland. Social landlords are made up of registered social landlords (RSLs) – housing associations and co-operatives – and local authorities (LAs) that provide housing and homelessness services.

What we do

We regulate to safeguard and promote the interests of current and future tenants of social landlords, people who are or may become homeless, and people who use housing services provided by RSLs and local authorities.

We regulate social landlords by:

- keeping a register of social landlords and making this available for the public – all landlords on the register need to meet [regulatory requirements](#)
- monitoring, assessing and reporting on how well social landlords are run and how they manage their money – we call this governance and financial health
- taking action, where we need to, to protect the interests of tenants and other service users

We do this in a way that:

- is proportionate, accountable and transparent - this means we are open about how we work and we take responsibility for our decisions
- is targeted – this means we only take action where it is needed
- encourages treating people fairly and promotes equal opportunities law
- is consistent with the [Scottish Regulator's Strategic Code of Practice](#)

[Who we are](#)

[Watch a video about who we are and what we do](#)



3. Overview

Our work performance and achievements during 2019/20

3. Overview of our work performance and achievements during 2019/20

We empowered tenants, people who are homeless, Gypsy/Travellers and others by:

- promoting messages on tenant voice, affordability and safety
- working with our tenant advisors on developing our website and meeting with our Registered Tenant Organisations liaison group
- carrying out research with our national panel of tenants and service users on tenant participation, digital access, rent consultation, Gypsy/Traveller sites and the experience of people who are homeless, promoting the findings to our stakeholders and using the findings to inform our work
- engaging with Gypsy/Traveller site providers on minimum site standards and safety
- publishing a suite of performance information on landlords' performance against the Scottish Social Housing Charter
- publishing videos about our work and how to raise a concern about a social landlord
- launching a modernised and accessible website
- publishing a new guide for tenants and service users on our Regulatory Framework

We sought assurance by:

- publishing and updating engagement plans for every LA and RSL from 1 April 2019
- publishing our national analysis of landlords' performance against the Scottish Social Housing Charter as well as refreshed landlord reports for every LA and RSL, data tables and comparison tool and new technical guidance for landlords
- publishing FAQs on our new Regulatory Framework and working with sector representatives to provide a self-assurance toolkit for landlords
- receiving and publishing the first annual assurance statements on regulatory requirement compliance for all councils and RSLs
- carrying out a risk assessment of all landlords and publishing information about the risks that we are focusing on
- analysing the financial health of the RSL sector
- writing to all LAs seeking assurance around emergency arrangements for people at risk of sleeping rough over the winter
- writing to landlords who provide sites for Gypsy/Travellers seeking assurance around fire safety
- liaising closely with landlords and our stakeholders during the pandemic to understand the impact and to provide support

We took action to protect the interests of tenants and others when we:

- continued the use of our statutory powers to intervene in Ruchazie, Thistle and Fairfield Housing Associations
- completed our intervention at Wishaw & District Housing Association and Arklet Housing Associations
- published accounts of our intervention at
 - Antonine Housing Association
 - Ferguslie Park Housing Association
 - Kincardine Housing Cooperative
 - Dalmuir Park Housing Association
- published an information note for statutory appointees to RSL governing bodies
- updated our list of people we appoint as statutory managers using an open selection process
- published our inquiry into Dumfries and Galloway Council's housing options and homeless service
- started an inquiry into Glasgow City Council's homelessness services as a continuation of our engagement with the Council
- responded to whistleblowing concerns raised with us and reported on these

We raised awareness and shared positive practice by:

- publishing a report on landlords' experience of the first annual assurance statements to promote positive practice
- promoting our national panel feedback as part of our conference presentations and in our discussions with stakeholders
- providing advice to landlords on:
 - tenant and resident safety requirements such as management of asbestos and electrical safety
 - cyber security
 - fraud
 - Brexit
 - Coronavirus

We promoted equalities and human rights by:

- giving it a high profile in our new Regulatory Framework
- refreshing our own commitment and publishing a new equalities statement
- working with the Scottish Human Rights Commission to build our capacity and inform how we regulate
- funding development of guidance in collaboration with sector representative organisations
- committing to the Scottish Government's gender balance objective for public boards

We demonstrated we were an effective public body by:

- achieving substantial assurance for our internal auditor and an unqualified audit opinion from our external auditor
- giving evidence to the Scottish Parliament's Local Government and Communities Committee
- maintaining high engagement scores in the 2019 Civil Service wide people survey and investing in our staff and Board development
- ensuring our Management Team monitored our performance monthly and Board quarterly
- publishing information and learning about any complaints about us
- investing in our IT systems that support our work and launching a new accessible website that we continue to develop
- achieving Cyber Essentials Plus certification for the second year
- starting to work to achieve Carer Positive employee accreditation
- submitting our climate change return and forging a partnership with Scottish Canals for our staff to contribute to biodiversity work
- encouraging the formation and participating in the Scottish Social Housing Resilience Group to respond to the Coronavirus pandemic
- keeping our stakeholders up to date through @shr_news and our SHR update ezine



4. Performance Analysis

- 4.1 Empowering tenants and others
- 4.2 Getting assurance
- 4.3 Taking action when we need to
- 4.4 Carrying out thematic work
- 4.5 Promoting equality and human rights
- 4.6 Our public body duties

4.1 Empowering tenants & others

Our new website has a dedicated section for tenants to help them find the information they want. It links to our new guide for tenants on our regulatory framework. We have also published videos about us and on how to raise a concern about a social landlord. We are grateful for the input of our tenant advisors to this work. [View the tenant section of our website and the videos here.](#)

We continued to work with our National Panel of over 400 tenants and service users. It is one of the ways we find out what matters most to them. This helps us focus on the important things. This year we published four research reports on the Panel's work. We promoted the Panel's feedback widely, and the findings of each report informed our work and our dialogue with stakeholders.

Experience of homelessness services looked at what makes the biggest positive difference for people's experiences. Common themes are suitable and safe accommodation, access to dedicated staff and support, and minimising the number of moves.

It also found the biggest challenges for people using homelessness services include the length of wait for settled accommodation, financial difficulties, equality and fair treatment and safety and condition of temporary accommodation.

The report highlighted the importance of accessing a settled home quickly.

Rent consultation found that over a third of panel members have experienced difficulties in affording their rent, over two thirds were concerned about the future affordability, rent increases and changes to income, particularly through changes in benefits.

Tenant participation and digital access showed widespread awareness and interest in tenant participation and an appetite for more opportunities. Benefits expressed by tenants, including a sense of community and a feeling that landlords are listening to them.

The report also presented views on digital access to services, with Panel members have a high level of digital engagement, access across all age groups to the internet at home and feeling confident in using it. More than half preferred getting online information from their landlord.

Gypsy/Travellers sites with most Gypsy/Travellers who took part expressing concerns about their site. Common concerns were around the overall condition and cleanliness of sites and a view that sites have suffered from a lack of investment.

Just over 1 in 10 of all those interviewed had heard of the minimum site standards and most felt that Gypsy/Travellers would benefit from access to information about them. Participants said that site location, the mix of residents and sense of community, and on-site wardens were the main positives for current site provision.

[Find out how to join the National Panel and read the full reports here.](#)

We also continued to engage with landlords who provide Gypsy/Traveller sites around safety standards and the Scottish Government's minimum site standards. This work will continue into 2020/21 as the Scottish Government considers reviewing the standards for sites, which will be an important opportunity for Gypsy/Travellers to determine what is required for homes that genuinely meet their needs.

We continued to meet quarterly with our Registered Tenant Organisation liaison group. Discussions and feedback from it and the Regional Networks help inform our priorities and what we focus on. Our Chair George Walker participated in the RTO Regional Network conference in November 2019.

We used the research and feedback to inform our priorities and key messages. [Read our speeches and blogs.](#)

Chair George Walker and Board member Helen Trouten Torres highlighted that a strong tenant voice matters to SHR at the national Tenant Participation Advisory Service Scotland conference.

Chair George Walker emphasised the important role RSLs have in addressing homelessness and urged RSLs to maximise the number of lets to people who are homeless at the SFHA Chairs' conference,

Chief Executive Michael Cameron underlined the need for landlords to keep rents affordable for tenants at a Tenant Information Service event and in a blog for an Inside Housing publication in September, which set out why landlords need to consider future affordability when increasing rents.

Director Ian Brennan highlighted that rent affordability continues to be a priority in how we monitor risks to tenants' interests at the Scottish Federation of Housing Associations Annual Finance conference.

We also highlighted the importance of landlords ensuring tenant and resident safety by writing to RSLs and local authorities. Read our [letters.](#)

4.2 Getting assurance

On 1 April 2019, as our new Regulatory Framework went live, we published engagement plans for every LA and RSL for the first time and we published a summary of the outcome of our risk assessment. Our engagement with RSLs was focussed around financial health, governance and delivery of services. We also set out our planned activity with LAs focussed on Gypsy/Travellers sites standards, services for people who are homeless and service quality in [Audit Scotland's National Scrutiny Plan](#).

During the year we updated engagement plans as we had gained or were seeking further assurance. Read more about engagement plans.

In August we published our sixth annual [national analysis of landlords' performance against the Charter](#). We reported that overall, landlords continue to perform well in the service areas that matter most to tenants. Tenant satisfaction remains high, with nine out of ten social housing tenants satisfied with their landlord's overall service. We published a suite of performance information:

Our landlord reports and comparison tool let tenants find out about their landlord's performance in the areas tenants said matter most: homes and rents, quality and maintenance, neighbourhoods, tenant satisfaction, and value for money.

Our data tables show how landlords performed against each Charter standard and outcome. Landlords can use them to benchmark their performance.

Later in the year we published updated Charter technical guidance and FAQs to help landlords completing their annual returns.

[Read more about landlord performance and access landlord reports and our comparison tool here.](#)

To support our FAQs on the Regulatory Framework and assurance statement we collaborated with the Scottish Federation of Housing Associations, Glasgow West of Scotland Forum of Housing Associations and the Association of Local Authority Chief Housing Officers to publish a new self-assurance toolkit in July. The toolkit, hosted by the Scottish Federation of Housing Associations, provides guidance on gathering evidence to demonstrate compliance in order to feed into LA and RSL self-assurances processes. [Read our FAQs and access the toolkit here.](#)

In early November we published the [first annual assurance statements](#) submitted by LAs¹ and RSLs. These statements confirmed if landlords were assured that they meet regulatory requirements or set out which of the requirements they do not comply with.

Also in November we set out [the risks that we would focus on](#) in our risk assessment and that for the first time we would take account of annual

¹ One body we regulate, Glasgow City Council submitted a draft annual assurance statement in October 2019.

assurance statements. The main risks we focused on were service quality, rent affordability, homelessness, quality and maintenance of homes, Tenant and resident safety, Gypsy/Travellers, financial health of RSLs and good governance of RSLs.

We wrote to all LAs seeking assurance around emergency arrangements for people at risk of sleeping rough over the winter

In December we reported that our analysis showed lender and investor confidence continues to grow and the RSL sector was financially strong. We published [our analysis of RSL annual loan portfolio returns](#) at 31 March 2019. Total investment reached £6 billion, with the total owed by RSLs rising to more than £4 billion for the first time. 40% of all the new finance was from the capital markets with two new entrants to the field of investors. Continued growth in lender confidence and a financially strong sector is good news for tenants and service users.

We had planned to publish a summary of the outcome of our risk assessment and refreshed engagement plans for all LAs and RSLs in March 2020 with a regulatory status for RSLs. We paused this so that landlords could focus on the Coronavirus pandemic and will revisit the position later in 2020.

84% of LAs and RSLs reported that they have met Energy Efficiency Standard for Social Housing (EESH). We are working with landlords to develop indicators for EESH2 which Scottish Government is planning to come into effect in January 2021.

4.3 Taking action when we need to

At 31 March 2020 we were using our statutory powers to intervene in Ruchazie, Thistle and Fairfield Housing Associations. We did not take any new statutory action during 2019/20.

During the year we completed intervention at [Wishaw & District Housing Association](#) and [Arklet Housing Association](#).

“The board and staff all felt that the action taken and required by SHR was proportionate and always in the best interests of tenants. The turnaround and transfer were very difficult professionally and emotionally at many times but the hard and extensive work required was due to Arklet’s failures of governance and management, not by the regulatory requirement to resolve them. We all believe that the actions now concluded will bring the best possible outcome for Arklet tenants and help to maintain the good overall reputation of the housing association sector; with one association helping another to secure good services to tenants for what we hope will be decades to come.”

Lynn McCulloch, Housing Services Manager Arklet Housing Association

We also published accounts of our intervention at:

[Antonine Housing Association](#)

[Ferguslie Park Housing Association](#)

[Kincardine Housing Cooperative](#)

[Dalmeir Park Housing Association](#)

“... Ferguslie Park has emerged from the experience with good governance structures, a strong management board and a new invigorated staff team, able to deliver quality services to our tenants..” **Ferguslie Park’s Chairperson Shona McIntyre**

“..the transformation to DPHA today is incredible. All of the Committee and staff team have worked really hard. We all pass our sincere thanks to the team at the SHR and to our Statutory Manager for all their help and support over this period to help us achieve what we have and to set us on a strong course for the future to best serve our tenants and service users.” **Craig Edward, Vice Chair Dalmeir Park**

“Regulatory intervention protected the interests of Antonine’s tenants during a difficult few years. Whilst initially this intervention was intended to address governance weaknesses, it quickly became obvious that the scale of the investment needed to deliver modern warm homes for tenants at an affordable rent was better delivered by joining with Caledonia. The merit of this proposal was tested in a ballot, and the overwhelming support from Antonine’s tenants was proof of its value. Despite the difficulties, this was a positive outcome for tenants and was made possible by the work of the appointees, the existing tenant committee members, the staff at Antonine and the Statutory Manager and Interim Director.” **Patrick McGrath, statutory appointee to Antonine Housing Association**

We are very grateful for the input of all our statutory appointees – people we appoint to the governing body of an RSL. They are all volunteers drawn from the sector to help to protect the interests of tenants and others by sharing their knowledge and experience with organisations that need support. During 2019/20 31 statutory appointees worked across 5 organisations. In July 2019 we published [an information note](#) for voluntary statutory appointees, explaining what is involved in appointments.

Following an open selection process, in November we published an updated list of people with the necessary expertise to be appointed under the Housing (Scotland) Act 2010 as statutory managers. The list helps us be open and transparent about the people we will select and helps us control costs for landlords who, under legislation, pay for the statutory managers. The list will be in place for three years and we will keep it under review. [Read more about the list and selection process.](#)

In December 2019 we published [a report on our inquiry into Dumfries and Galloway Council's Housing Options and Homeless Service](#), finding the Council has significantly improved the service and is working more effectively with its Registered Social Landlord partners.

We also commenced an inquiry into the homelessness services provided by Glasgow City Council in December 2019. This was part of our continued engagement with the Council. We aim to report on our findings during 2020/21.

SHR is a prescribed person under whistleblowing legislation. Read more [information for potential whistleblowers](#) and also about [how we deal with whistleblowing concerns](#) about a social landlord.

During 2019/20 whistle-blowers contacted us 16 times, two of which were qualified disclosures.

We took no further action in seven cases for the following reasons:

- in four cases there was insufficient information and evidence relating to the allegations to enable us to take it forward;
- two cases related to employment grievances; and
- in one case the allegations had already been investigated and we engaged with the landlord about the findings.

We worked with the landlords to establish the facts in nine cases:

- we obtained assurance from one landlord and did not require any further action to be taken. We are continuing to engage with another landlord to seek assurance.
- we engaged with two landlords who carried out internal investigations in three cases; and
- we engaged with four landlords who commissioned independent investigations, two of which are ongoing as at 31 March 2020.

We introduced new requirement in our Regulatory Framework that as of 1st April 2020 all social landlords must have effective arrangements and a policy for whistleblowing by staff and governing body/elected members which it makes easily available and which it promotes.

4.4 Carrying out thematic work

We visited ten landlords to learn about their experience of the first annual assurance statements and published [a report highlighting lessons learned and positive practice](#). We also gave every landlord specific feedback on their first statement to help inform their preparation for the next one.

George Walker, SHR Chair said, “We wanted to hear from landlords about their experience of producing their first Statement. This included visits to some landlords to find out more about their approach. Many told us the process had increased their level of self-assurance, especially in the areas of tenant and resident safety and rent affordability. We also heard how landlords had taken a range of different approaches to reflect their own circumstances.

“We know that the vast majority of landlords prioritise getting feedback from tenants about their performance. Many of the landlords we visited said they will consider how tenants can be more involved in the self-assurance process”.

In response to emerging risks we provided direct advice to all councils and RSLs around:

- tenant and resident safety requirements such as [management of asbestos and electrical safety](#)
- [cyber security](#)
- [fraud](#)
- [Brexit](#)
- [Coronavirus](#)

4.5 Promoting equality and human rights

We are committed to promoting equality and human rights in how we regulate. Tenants, people who are homeless and Gypsy/Travellers as well as other service users of all backgrounds are at the heart of our work. Everyone should be treated fairly, with dignity and respect.

All RSLs and LAs must meet the requirements of relevant equalities and human rights legislation. This includes working to understand the individual needs of their tenants and service users, and to deliver services that recognise these needs. We have provided £15,000 to a collaboration project with the Scottish Federation of Housing Associations, Glasgow West of Scotland Forum of Housing Associations and the Association of Local Authority Chief Housing Officers to develop guidance for landlords.

We re-affirmed our commitment to promoting equalities and human rights at work by refreshing and publishing our [equalities statement](#), setting out what we have done and future objectives.

We give human rights prominence in our new [Regulatory Framework](#) and have work planned for early 2020/21 with the Scottish Human Rights Commission to build our own capacity and inform how we work.

We are also committed to the Scottish Government's gender balance objective for public boards. We celebrated the contribution of our female Board members and staff on International Women's day and have agreed a forward programme to help us input to the gender balance policy objective.

4.6 Our public body duties

In 2019/20 we achieved substantial assurance from our internal auditor and an unqualified audit opinion from Azets Audit Services on behalf of Audit Scotland.

In November 2019, we presented evidence in our 2018/19 annual report and accounts to the [Scottish Parliament's local Government and Communities Committee](#) who are responsible for scrutinising our work. We kept the Committee updated on all our publication and news throughout the year.

In the [2019 Civil Service People Survey](#) our staff scored amongst the highest engagement level of Scottish Public Bodies and in the top quartile for many indicators of all 102 UK public bodies who participated. We investing in our staff and Board's learning and development including governance training for entire Board and Management Team.

We spent our £4.2m budget. Around 75% of our revenue budget relates to 46 FTE staff. We retained Living Wage accreditation.

Our Board and Management Team monitor our performance against our Corporate and operational plans as well as published targets.

Type	Response time	Target	Performance
General correspondence	8 working days	95%	✓ Except in Quarter three when we achieved 85%
FOI requests	20 working days	100%	✓ Except for one request that was one day late
FOI reviews	20 working days	100%	✓
Significant Performance Failures	5 working days	100%	✓
Invoice payment	10 working days	100%	✓ Except for one invoice

We publish a [summary of complaints](#) about us and what we learned from them that is updated each quarter. We did not receive any formal complaints during 2019/20. Find out more about how to provide SHR with feedback and how to make a complaint [here](#).

We invested in our IT systems implementing our new Regulatory Framework and on our new website, which we continue to develop to enhance the accessibility of our information. We invested £63,100.00 in the Scottish Government sponsored CivTech® challenge programme with the aim of making our data more accessible to tenants. We learned much from this initiative, including implications for our new website and the accessibility of our data and documents. Following rigorous testing of the proposed solution, however we decided not to implement the proposed product.

We achieved [Cyber Essentials Plus certification](#) for our business intelligence system for the second year. We also promoted the Cyber Essentials accreditation scheme to social landlords highlighting the importance of protecting against cyber fraud and of the need to ensure they protect tenants' information. [Read more here.](#)

Our staff wellbeing is important to us and in 2020 we started work to achieve 'Carer Positive' accreditation for the first time. Carer Positive employers support working carers in their workplace. We started by awareness raising on our staff intranet of support available for employees and surveying our staff to gain a better understanding of their caring responsibilities.

We submitted a report on our progress towards climate change targets in November. In October, we also participated in a volunteer day litter picking for Scottish Canals close to our office.

Join our 1480 twitter followers [@shr_news](#) and over 1400 [SHR Update e-zine](#) subscribers to keep up to date with our news.



Michael Cameron, Chief Executive

Date: 12 October 2020



5. Accountability report

Corporate Governance Report

Directors' Report

Introduction

We have prepared these accounts for the financial year 2019/20 in accordance with the Accounts Direction given by Scottish Ministers and section 19(4) of the Public Finance and Accountability (Scotland) Act 2000.

Statutory Background

The Scottish Housing Regulator (SHR) was established on 1 April 2011 under the Housing (Scotland) Act 2010. We are a Non-Ministerial Department (NMD), part of the Scottish Administration and directly accountable to the Scottish Parliament. We commenced our full regulatory powers, duties and corporate responsibilities under the 2010 Act in April 2012.

Our relationship with Scottish Ministers is set out in a published **Framework Agreement**, available on our website www.housingregulator.gov.scot

Our Board

Our organisation is led by a Board of non-executive members, appointed by Scottish Ministers following an open public appointments process. The Board sets our strategic direction and is responsible for oversight of our aims, objectives and performance.

Membership of the Board during the period April 2019 to the end of March 2020 is provided below:

- George Walker, Chair
- Anne Jarvie, Deputy Chair, retired from the Board at the end of March 2020
- Mike Dailly
- Andrew Watson
- Bob Gil
- Siobhan White, Audit and Risk Assurance Committee Chair from December 2018
- Colin Stewart
- Helen Trouten Torres
- Ewan Fraser.

Details of our governance framework for Board appointments, appraisal and reviewing the Board's effectiveness are described in the Governance Statement of this report.

Our Executive Team

Our Executive Team is made up of our Chief Executive and Directors. Our Executive Team is responsible for providing strategic management and leadership.

Our Executive Team is:

- Michael Cameron, Chief Executive
- Ian Brennan, Director of Regulation
- Iain Muirhead, Director of Digital and Business Support.

Each member of the Executive Team has confirmed that so far as they are aware, there is no relevant audit information of which the auditor is unaware.

Details of Executive Team remuneration can be found in the Remuneration Report.

Register of interests

Our Board members and Executive Team have to complete a declaration of interests. No significant company directorships or other interests were held which may have conflicted with their management responsibilities, and there were no related party interests.

Our Board members' declarations of interest are published on our [website](#).

Our resources

Our budget as set out in the Budget (Scotland) Act for 2019/20 was £4,392m, this included a £0.200m capital budget and £4.192m revenue budget, an increase of around 7.9% revenue budget from 2018/19 (£3.885m). We spent £4.392m (2018/19 - £3.750m). We also had a non-cash budget of £0.215m for depreciation of IT assets (2018/19- £0.219m).

In 2019/20 we continued our modest recruitment programme commenced in the prior year. Around 75% of our revenue costs were staff costs, 10% were IT equipment and support and 4% was accommodation.

Since March 2018 we have been located in our current office space. Our current space continues to deliver annual savings, through co-location with another public body, incurring around £0.150m less than we spent on our previous larger permanent office in 2015/16.

Our Business Intelligence Systems represent the majority of our IT costs. These systems support our regulatory data collection and data analysis.

All public bodies face funding pressures in the coming years and there is increased future uncertainty in the context of the coronavirus pandemic . Our revenue budget for 2020/21 is £4.085m, which is a reduction of £107k from 2019/20 before taking account of the impact of inflation on staff salaries and other costs. This is a very challenging budget position for us. The Scottish Government is aware of the pressures and we have put forward a business case for an increase in budget during the year. The Scottish Parliament will set our funding for 2021/22 during 2020/21.

In April 2019 we introduced our new Regulatory Framework. This followed a comprehensive review of how we regulate in 2018/19, looking at all aspects of our work and processes. The new Regulatory Framework is designed to enable us to regulate effectively and sustainably within our resources.

Reporting of personal data related incidents

During 2019/20 there were no incidences of data loss which required to be reported to the Information Commissioner.

Appointment of auditors

Audit Scotland appointed Azets Audit Services to audit our accounts. Our notional audit fee of £22,970 is shown at note 10. Azets Audit Services supplied no other services to us during the year. The Scottish Government internal audit department provided internal audit services.

Post-balance sheet events

There have been no material events occurring after the year end which have a bearing on these accounts.

Supplier payment policy

Our policy is to pay all invoices not in dispute within 10 days from receipt of the invoice. We aim to pay 100% of invoices on time in these terms. This includes disputed invoices once the dispute has been settled. We process invoices on the Scottish Government's Accounting System (SEAS). We are reliant upon the financial information and management system provided by the Scottish Government for all our financial functions.

For the year ended 31 March 2020, we paid 99.5% of all invoices received within the terms of our payment policy.

Statement of Accountable Officer's Responsibilities

In accordance with section 19(4) of the Public Finance and Accountability (Scotland) Act 2000, Scottish Ministers have directed the Scottish Housing Regulator (SHR) to prepare a statement of accounts for each financial year in the form and on the basis set out in the Accounts Direction at the end of these financial statements.

We prepare the accounts on an accruals basis and they give a true and fair view of our state of affairs at the year end, and of our operating costs, recognised gains and losses, and cash flows for the financial year.

The Permanent Secretary of the Scottish Administration has appointed me, the Chief Executive, as the Accountable Officer for SHR.

In preparing the accounts, I am required to comply with the requirements of the Government Financial Reporting Manual and in particular to:

- observe the Accounts Direction issued by Scottish Ministers, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- make judgements and estimates on a reasonable basis;
- state whether applicable accounting standards, as set out in the Government Financial Reporting Manual, have been followed, and disclose and explain any material departures in the financial statements; and
- prepare the accounts on a going-concern basis.

The responsibilities of the Accountable Officer, including responsibility for the propriety and regularity of the public finances for which I am answerable, for keeping proper records and for safeguarding SHR's assets, are set out in the Accountable Officer's Memorandum issued by Scottish Ministers.

As Accountable Officer, I am not aware of any relevant audit information of which our auditors are unaware. I have taken all necessary steps to ensure that I am aware of any relevant audit information and to establish that our auditors are also aware of this information.

I confirm that the annual report and accounts as a whole is fair, balanced and understandable. I take personal responsibility for the annual report and accounts and the judgements required for determining that it is fair, balanced and understandable.

Governance Statement

Scope of responsibility

As Accountable Officer, I am responsible for sound governance and internal controls that help us to achieve our statutory objective. I am also responsible for safeguarding SHR's public funds and assets.

As Accountable Officer, I am responsible for:

- the propriety and regularity of financial transactions which have taken place under my control;
- the economic, efficient and effective use of our resources;
- ensuring that arrangements are made to secure Best Value;
- signing our annual accounts;
- ensuring that effective governance and management systems are in place; and
- ensuring that all risks are identified, assessed and managed appropriately.

Our governance, internal control and Best Value arrangements

Our governance framework is made up of the systems, processes, cultures and values by which we manage and control our organisation. It enables us to monitor progress against our objectives and to ensure that we use our resources efficiently and effectively.

We have a clearly defined governance framework which fits with best practice principles. I am satisfied that this framework works well. In May 2019 the Board approved revisions to its standing orders as proposed by the Audit and Risk Assurance Committee. It considered its governance arrangements and mapped its sources of assurance at a strategy workshop with the Management Team in June 2019. In October 2019 the Board adopted social media guidance for Board members. The Audit and Risk Assurance Committee did more follow up work on the Board's assurance map in December 2019. In January 2020 the entire Board and Management team participated in an externally facilitated governance training workshop. In February 2020 the Board examined in-depth the governance of statutory authority delegated from it to the Chief Executive.

Our system of internal control is an important part of this framework. We identify, evaluate and manage risk to a reasonable level, rather than attempt to eliminate all risk. Our approach is proportionate and provides reasonable assurance of effectiveness.

Our internal control processes comply with guidance from Scottish Ministers provided in the Scottish Public Finance Manual (SPFM). These processes have been in place for the year ended 31 March 2020 and up to the date of approval of the annual report and accounts.

We aim to foster a culture of continuous improvement, in accordance with the principles of Best Value. In 2019/20 we reviewed our approach to Best Value with ARAC. In 2020/21 we will introduce a new format for Best Value reporting.

Our Board

Our organisation is led by a Board of non-executive members, appointed by Scottish Ministers following an open public appointments process. The Board is responsible for providing strategic direction and oversight of our aims, objectives and performance.

Details of Board membership is provided in the Directors' Report.

The Board met nine times in 2019/20 to fulfil its role and all meetings were quorate. It also met for two strategy workshops and a development session during the year. We publish minutes of the meetings, our Board Code of Conduct and Board members' registers of interest on our website. Members also took part in additional workshops and events to consider a wide range of topics.

Board appointments are made by Scottish Ministers and overseen by the Commissioner for Ethical Standards in Public Life in Scotland.

The Scottish Government's Director for Housing and Social Justice appraises our Chair's performance annually. Our Chair appraises each Board Member's performance annually. The Chair and Board Members participate in regular training and carry out reviews of the Board's collective effectiveness.

Audit and Risk Assurance Committee

Our Audit & Risk Assurance Committee provides assurance to our Board and to me, as Accountable Officer, that appropriate risk, control and governance structures are in place. The Audit & Risk Assurance Committee met four times in 2019/20. Our Audit and Risk Assurance Committee meetings are published on our website alongside information about membership and the terms of reference.

Membership comprised of the following members of the Board:

- Siobhan White, Chair from December 2018
- Mike Dailly
- Bob Gil
- Ewan Fraser

I have considered the matters raised and discussed by the Board and Audit & Risk Assurance Committee when preparing this statement.

Executive Team and Management Team

I am joined by our Directors to form our Executive Team. We are responsible for providing strategic management and leadership. Following a restructure in 2018/19 we have two Groups, each with a Director.

Our Management Team supplements the Executive Team and is responsible for oversight of operational management. Our Management

Team is comprised of the Executive Team along with our five Assistant Directors and our Business Intelligence Manager. I chair the Management Team.

Throughout 2019/20 our Board, Executive Team and Management Team received regular reports to monitor progress against our statutory objective, the objectives in our corporate plan and annual operating plan, and to ensure we are managing risk effectively.

Risk framework

Our risk management strategy was developed by our Board and along with our risk register, identifies the key risks to the delivery of our statutory, strategic and corporate objectives.

During 2019/20 Our Management Team reviewed the risk register regularly and reported to both the Audit & Risk Assurance Committee and Board on a quarterly basis. These reviews enable us to:

- discuss and evaluate key risks that could affect our ability to deliver our statutory objective;
- assess existing controls (i.e. measures in place to reduce or limit risk);
- determine the appropriate response to each risk;
- allocate responsibility for managing each risk to a risk owner; and
- profile our risks by ranking them in order of overall risk exposure (in terms of likelihood and impact) and our risk tolerance.

In 2019/20, following a review of our approach to risk with our Board, we implemented a new risk management strategy and identified the following strategic risks as those potentially having the greatest impact on our activities:

- a significant reduction in quality or break in shared services from Scottish Government, which impacts on our ability to operate effectively
- our regulatory framework not working effectively
- losing stakeholder support
- suffering a serious business failure
- failing to comply with the duties and expectations on us as a public body
- suffering reputational damage as a result of a development outwith our control
- insufficient resources to deliver effectively

Our risk register is aligned to the activities in our operating plan. This ensures we are targeting our activities at areas that address the risks we face, so far as this is possible. I am satisfied that our arrangements have enabled us to identify and manage risk effectively during 2019/20.

For data and information handling risks, I am assisted by our Senior Information Risk Owner and six Information Asset Owners. There were no

significant data incidents in 2019/20 that required us to report to the Information Commissioner. We share a Data Protection Officer with Transport Scotland. We provided training and awareness-raising for our staff. Our Data Protection Officer completed a data protection compliance exercise in January 2020 and reported that good compliance was found.

We have fraud, whistleblowing and anti-bribery policies in place, and a fraud response plan, to ensure the effective management of risks associated with these issues.

Review of effectiveness of internal control and risk management

As Accountable Officer, I have responsibility for reviewing the effectiveness of our systems of internal control and risk management arrangements. My review is informed by:

- annual certificates of assurance and internal control checklists from the Director of each of our Groups;
- the work of our internal auditors, who submitted regular reports to our Audit Risk & Assurance Committee;
- comments made by our external auditors, Azets Audit Services, in their management letters and other reports; and
- quarterly reports to our Board from the Chair of the Audit & Risk Assurance Committee.

Our systems of internal control have been supported by:

- regular Board meetings and workshops;
- meetings of our Executive and Management Teams
- regular Regulatory Framework Review Programme Board meetings; and
- regular monitoring and reporting of performance against our operating plan and other areas of corporate performance, including finance and risk management.

We use and rely on the core financial management systems of the Scottish Government to carry out accounting and payment functions. I have received assurances from the Scottish Government that reliance can be placed on the central systems they provided in 2019/20.

We are committed to a process of continuous improvement and we develop our systems in response to any relevant reviews and advancements in best practice. In the period covering the year to 31 March 2020 and up to the signing of the accounts, we liaised with Scottish Government Internal Audit, Azets Audit Services and Scottish Government Finance colleagues to ensure that our internal control procedures were fit for purpose and compliant.

During 2019/20, our internal auditors completed their risk-based internal audit plan with specific work on our approach to the review of our regulatory framework.. Internal Audit has provided substantial assurance in relation to the work undertaken. One recommendation was identified and we will take action to respond to that when we undertake our next programme.

In March 2020 our office closed in line with Scottish Government guidance in response to the Coronavirus pandemic. We continued to operate

throughout the pandemic, our staff are able to work remotely with access to our corporate systems.

Throughout the pandemic our standard governance arrangements remained in place with Board, Audit and Risk Assurance Committee and Management Team meetings taking place remotely. To oversee our response to the pandemic, the Management Team met daily initially, moving to twice a week from June 2020. Our Board met more frequently than it normally would. Our Audit and Risk Assurance Committee meetings continued to take place in line with the standard annual schedule.

In August 2020 the Board agreed a restated Corporate Plan that takes account of the impact of the pandemic on our work and a revised operating plan.

We continued to operate within our normal delegated authorities during the pandemic.

I am satisfied that no significant control weaknesses or issues have arisen during 2019/20. There have been no significant failures in expected standards for good governance, risk management and control.

Remuneration and Staff Report

Remuneration policy (unaudited)

Our staff are civil servants and our Chief Executive is a senior civil servant.

The remuneration of senior civil servants is set in accordance with the Civil Service Management Code (available at www.civilservice.gov.uk) and with independent advice from the Senior Salaries Review Body (SSRB). Information about the work of the SSRB can be found at www.ome.uk.com. Within the Scottish Government, the Top Level Pay Committee ensures that the Pay and Performance Management System (PPMS) policy falls within the parameters set by the SSRB and Cabinet Office.

Remuneration (audited)

Single total figure of remuneration:										
	Salary (£'000)		Bonus payments (£,000)		Benefits in kind (to nearest £100)		Pension benefits (£'000)²		Total (£'000)	
	2019-20	2018-19	2019-20	2018-19	2019-20	2018-19	2019-20	2018-19	2019-20	2018-19
Officials										
Chief Executive										
Michael Cameron	75-80	70-75	-	-	-	-	50-55	20-25	125-130	95-100
Executive Team										
Ian Brennan	75-80	70-75	-	-	-	-	25-30	25-30	105-110	100-105
Christine Macleod (retired 15 th August 2018)	-	70-75	-	-	-	-	-	0-5	-	70-75
Iain Muirhead	70-75	65-70	-	-	-	-	40-45	25-30	115-120	90-95
Board Members Fees (NMD)										
Mike Dailly	5-10	5-10	-	-	-	-	-	-	5-10	5-10
Ewan Fraser (joined 1 st April 2019)	5-10	-	-	-	-	-	-	-	5-10	-
Robert Gil	5-10	5-10	-	-	-	-	-	-	5-10	5-10
Anne Jarvie (left 31 st March 2020)	10-15	10-15	-	-	-	-	-	-	10-15	10-15
Simon Little (left 31 st March 2019)	-	5-10	-	-	-	-	-	-	-	5-10
Lisa Peebles (left 31 st March 2019)	-	5-10	-	-	-	-	-	-	-	5-10
Colin Stewart (joined 1 st April 2019)	5-10	-	-	-	-	-	-	-	5-10	-
Helen Trouten Torres (joined 1 st April 2019)	10-15	-	-	-	-	-	-	-	10-15	-
George Walker (Chair)	20-25	15-20	-	-	-	-	-	-	20-25	15-20
Andrew Watson	5-10	5-10	-	-	-	-	-	-	5-10	5-10
Siobhan White	5-10	5-10	-	-	-	-	-	-	5-10	5-10

Pensions

	Accrued Pension (P) at pension age and Lump Sum (LS) at 31/03/2020 £000 Band	Real Pension Increase (P) and Lump Sum (LS) at pension age £000 Band	CETV at 31/03/2020 £000	CETV At 31/03/2019] £000	Real Increase in CETV £000
Ian Brennan Director of Regulation	15-20 (P) 0 (LS)	0-2.5 (P) 0 (LS)	318	278	22
Michael Cameron Chief Executive	35-40 (P) 80-85 (LS)	2.5-5 (P) 2.5-5 (LS)	719	650	37
Iain Muirhead Director of Digital and Business Support	20-25 (P) 45-50 (LS)	0-2.5 (P) 0-2.5 (LS)	420	372	28

Salary

'Salary' includes gross salary, overtime and any other allowance to the extent that it is subject to UK taxation. This report is based on accrued payments made by SHR and recorded in these accounts.

The Cash Equivalent Transfer Value (CETV)

A Cash Equivalent Transfer Value (CETV) is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost.

The real increase in the value of the CETV

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

Pay multiples

The banded remuneration of our highest-paid director in 2019/20 was £75,000-£80,000 (2018/19, £70,000-75,000). This was 1.6 times (2018/19, 1.6) the median remuneration of the workforce, which was £48,372 (2018/19, £44,975).

In 2019/20, no employees (2018/19, 0) received remuneration in excess of the highest-paid director. Remuneration ranged from £15,389 – £77,948 (2018/19, £21,466 to £74,200).

Total remuneration includes salary, non-consolidated performance-related pay and benefits-in-kind. It does not include severance payments, employer pension contributions and the cash equivalent transfer value of pensions.

Employment contracts

Staff covered by this report hold appointments which are open-ended. Early termination, other than for misconduct, would result in the individual receiving compensation as set out in the Civil Service Compensation Scheme. During 2019/20 we also employed a small number of temporary staff. Further information about the work of the Civil Service Commission can be found at www.civilservicecommission.org.uk.

Staff Report

Employee engagement, learning and development

We ensure that our staff are kept informed and engaged in our work through a range of activities. These include staff briefing sessions, regular face-to-face meetings, intranet updates and a range of other internal and external events.

Each of our Groups focuses on contributing to the delivery of our corporate strategic objectives. To support this, our performance management system ensures that all staff agree annual objectives with their line manager which are closely linked to our Corporate Plan and annual operating plans.

We are committed to investing in our staff, using our resources as effectively as possible to achieve our objectives and maximising value for money.

In the 2019 Civil Service People Survey our staff scored one of the highest engagement levels of all Scottish Public bodies.

Trade unions

We are party to the Scottish Government's Partnership Agreement with trade unions recognised by the Scottish Government (SG). Our staff are part of SG Main for the purposes of pay, terms and conditions.

Employee recruitment

We carry out our recruitment and promotion activities on the basis of fair and open competition, selection on merit and in accordance with Scottish Government guidance.

Equal opportunities and diversity

We treat all staff equally. We are committed to increasing the diversity of staff within the organisation to reflect the people of Scotland, and to valuing positively the different perspectives and skills of all staff and making full use of these in our work.

Health and safety

We aim to provide a safe and healthy working environment for all staff. We act in accordance with our Health and Safety Policy Statement, and have policies on particular matters available to support managers and staff. We offer a place on our staff Health and Safety Committee to a Trade Union Representative.

Civil Service Pensions

Pension benefits are provided through Civil Service Pensions. Further details can be found at <http://www.civilservice.gov.uk/pensions>

Staff Costs (audited)

			2019-20 £000	2018-19 £000
	Permanently employed staff	Others	Total	Total
Wages and salaries	2,423	-	2,423	2,206
Social security costs	278	-	278	254
Other pension costs	667	-	667	476
Inward secondments	-	-	-	-
Temporary staff	38	-	38	57
Movement in short term employee benefits	21	-	21	4
Early retirement	-	-	-	(1)
Total net costs	<u>3,427</u>	<u>-</u>	<u>3,427</u>	<u>2,996</u>

Pension benefits are provided through the Civil Service pension arrangements. The Principal Civil Service Pension Scheme (PCSPS) is an unfunded multi-employer defined benefit scheme. The Scottish Housing Regulator is unable to identify its share of the underlying assets and liabilities. The Scheme Actuary valued the scheme as at 31 March 2016. You can find details in the resource accounts of the Cabinet Office: Civil Superannuation (www.civilservicepensionscheme.org.uk/about-us/resource-accounts/).

During the year ended 31 March 2020, employers' contributions of £0.667m (2019 £0.476m) were payable to the PCSPS at one of two rates in the range 27.1 to 27.9 per cent of pensionable pay, based on salary bands. The Scheme Actuary reviews employer contributions usually every four years following a full scheme valuation. The contribution rates are set to meet the cost of the benefits accruing during 2019-20 to be paid when the member retires and not the benefits paid during this period to existing pensioners.

Average number of persons employed

			2019-20	2018-19
	Permanently employed staff	Others	Total	Total
Directly employed	46.23	-	46.23	43.20
Other	-	0.58	0.58	1.21
Total	<u>46.23</u>	<u>0.58</u>	<u>46.81</u>	<u>44.41</u>

Number of Senior civil service staff employed

Band	2019-20 Total	2018-18 Total
SCS - Deputy Director 1	1	1

Gender Balance

At the end of the 2019/20 financial year, the number of persons of each sex who were Board Members, Senior Managers and employees was as follows:

	<u>Female</u>	<u>Male</u>
Board Members	3	6
Executive Team (including Chief Executive)		3
Employees	32	15

Sickness absence data

The average total number of sick days per full time employee in 2019/20 was 12 days (19 days – 2018/19).

Employment of disabled people

We adhere to Scottish Government recruitment policies which ensure that all disabled applicants who meet the minimum advertised criteria for a job vacancy will be invited to interview. Disabled candidates are guaranteed the chance to be judged along with everyone else on their abilities.

Reporting of Civil Service and other compensation schemes – exit packages (audited)

None of our staff received exit packages in 2019/20

Expenditure on consultancy

We incurred expenditure of £34.8k on external consultancy in 2019/20. This equates to 0.8% of our total revenue expenditure (1.7% in 2018/19). This includes our legal advice costs, a programme of work with our National Panel of Tenants and support for procurement of our future IT contracts.

Parliamentary Accountability & Audit Report

SHR is a Non-Ministerial Department (NMD) and part of the Scottish Administration, with direct accountability to the Scottish Parliament. Whilst our accounts are not consolidated with those of the Scottish Government, we liaise with Scottish Government Finance colleagues on a regular basis to provide them with information relating to our expenditure and anticipated outturn. Our Framework Agreement sets out our relationship with Scottish Ministers.

Statement of Losses and Special Payments

No losses or special payments were incurred by the Scottish Housing Regulator during the year ended 31 March 2020.

These accounts were authorised for issue on the same date as the Independent Auditor's report.



Michael Cameron
Chief Executive

Date: 12 October 2020

Independent Auditor's Report

Independent auditor's report to the Scottish Housing Regulator, the Auditor General for Scotland and the Scottish Parliament

Report on the audit of the financial statements

Opinion on financial statements

We have audited the financial statements in the annual report and accounts of Scottish Housing Regulator for the year ended 31 March 2020 under the Public Finance and Accountability (Scotland) Act 2000. The financial statements comprise the Statement of Financial Position, the Statement of Comprehensive Net Expenditure, the Statement of Cash Flow, the Statement of Changes in Taxpayers' Equity and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and International Financial Reporting Standards (IFRSs) as adopted by the European Union, and as interpreted and adapted by the 2019/20 Government Financial Reporting Manual (the 2019/20 FReM).

In our opinion the accompanying financial statements:

- give a true and fair view in accordance with the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers of the state of the body's affairs as at 31 March 2020 and of its net expenditure for the year then ended;
- have been properly prepared in accordance with IFRSs as adopted by the European Union, as interpreted and adapted by the 2019/20 FReM; and
- have been prepared in accordance with the requirements of the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers.

Basis for opinion

We conducted our audit in accordance with applicable law and International Standards on Auditing (UK) (ISAs (UK)), as required by the [Code of Audit Practice](#) approved by the Auditor General for Scotland. Our responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of our report. We were appointed by the Auditor General on 31 May 2016. The period of total uninterrupted appointment is 4 years.

We are independent of the body in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. Non-audit services prohibited by the Ethical Standard were not provided to the body. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern basis of accounting

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- the body has not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about its ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

Risks of material misstatement

We have reported in a separate Annual Audit Report, which is available from the [Audit Scotland website](#), the most significant assessed risks of material misstatement that we identified and our conclusions thereon.

Responsibilities of the Accountable Officer for the financial statements

As explained more fully in the Statement of the Accountable Officer Responsibilities, the Accountable Officer is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Accountable Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Accountable Officer is responsible for using the going concern basis of accounting unless deemed inappropriate.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, intentional omissions, misrepresentations, or the override of internal control. The capability of the audit to detect fraud and other irregularities depends on factors such as the skilfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those individuals involved. We therefore design and perform audit procedures which respond to the assessed risks of material misstatement due to fraud.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

Other information in the annual report and accounts

The Accountable Officer is responsible for the other information in the annual report and accounts. The other information comprises the information other than the financial statements, the audited part of the Remuneration and Staff Report, and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon except on matters prescribed by the Auditor General for Scotland to the extent explicitly stated later in this report.

In connection with our audit of the financial statements, our responsibility is to read all the other information in the annual report and accounts and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Report on regularity of expenditure and income

Opinion on regularity

In our opinion in all material respects:

- the expenditure and income in the financial statements were incurred or applied in accordance with any applicable enactments and guidance issued by the Scottish Ministers, the Budget (Scotland) Act covering the financial year and sections 4 to 7 of the Public Finance and Accountability (Scotland) Act 2000; and
- the sums paid out of the Scottish Consolidated Fund for the purpose of meeting the expenditure shown in the financial statements were applied in accordance with section 65 of the Scotland Act 1998.

Responsibilities for regularity

The Accountable Officer is responsible for ensuring the regularity of expenditure and income. We are responsible for expressing an opinion on the regularity of expenditure and income in accordance with the Public Finance and Accountability (Scotland) Act 2000.

Report on other requirements

Opinions on matters prescribed by the Auditor General for Scotland

In our opinion, the audited part of the Remuneration and Staff Report has been properly prepared in accordance with the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers.

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the Performance Report for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers; and
- the information given in the Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers.

Matters on which we are required to report by exception

We are required by the Auditor General for Scotland to report to you if, in our opinion:

- adequate accounting records have not been kept; or
- the financial statements and the audited part of the Remuneration and Staff Report are not in agreement with the accounting records; or
- we have not received all the information and explanations we require for our audit.

We have nothing to report in respect of these matters.

Conclusions on wider scope responsibilities

In addition to our responsibilities for the annual report and accounts, our conclusions on the wider scope responsibilities specified in the Code of Audit Practice are set out in our Annual Audit Report.

Use of our report

This report is made solely to the parties to whom it is addressed in accordance with the Public Finance and Accountability (Scotland) Act 2000 and for no other purpose. In accordance with paragraph 120 of the Code of Audit Practice, we do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.

Nick Bennett

Nick Bennett, Senior Statutory Auditor

Azets Audit Services
Exchange Place 3
Semple Street
Edinburgh
EH3 8BL

Date: 12 October 2020



6. Financial Statements

For the year end 31 March 2020

Statement of Comprehensive Net Expenditure

For the year ended 31 March 2020

The Scottish Housing Regulator has made no gains or losses during the period, other than as reported above.

The results for the year ended 31 March 2020 derive from the ordinary activities of the Scottish Housing Regulator, all of which are continuing.

	Note	2019-20 £000	2018-19 £000
Administration costs:			
Staff costs	2	3,427	2,996
Other administrative costs	2	1,140	1,241
Total		4,567	4,237
Net operating cost		4,567	4,237

The notes on pages 53 to 67 form part of the financial statements.

Statement of Financial Position

as at 31 March 2020



Michael Cameron
Chief Executive

Date: 12 October 2020

The financial statements have been authorised for approval on 12 October 2020

	Note	2020 £000	2019 £000
Non-current assets:			
Property, plant and equipment	3	49	7
Intangible assets	4	322	529
		----	----
Total non-current assets		371	536
		----	----
Current assets:			
Trade and other receivables	6	0	3
Cash and cash equivalents	7	2	2
		----	----
Total current assets		2	5
		----	----
Total assets		373	541

Continued overleaf

The notes on pages 53 to 67 form part of the financial statements.

Statement of Financial Position

Cont'd...

As at 31 March 2020

	Note	2020 £000	2019 £000
Current liabilities			
Trade and other payables	8	(365)	(262)
Provisions	9	0	0
		----	----
Total current liabilities		(365)	(262)
		----	----
Total assets less current liabilities		8	279
		----	----
Net assets		8	279
		====	====
Taxpayers' equity:			
General Fund		8	279
		----	----
Total taxpayers' equity		8	279
		====	====

The notes on pages 53 to 67 form part of the financial statements.

Statement of Cash Flows
for the year ended 31 March 2020

	Note	2019-20 £000	2018-19 £000
Cash flows from operating activities			
Net operating cost		(4,567)	(4,237)
Adjustments for non-cash transactions:			
Depreciation and amortisation	3,4	175	218
Auditor's remuneration	10	23	23
Movement in working capital:			
(Increase) / decrease in trade and other receivables	6	3	(3)
Increase / (decrease) in trade and other payables	8	103	128
Use of provisions	9	0	(9)
Net cash outflow from operating activities		(4,263)	(3,880)
Cash flows from investing activities			
Purchase of property, plant & equipment		(10)	0
Purchase of intangible assets		0	0
Net cash outflow from investing activities		(10)	0
Cash flows from financing activities			
Scottish Government funding		4,273	3,881
Net financing		4,273	3,881
Net increase / (decrease) in cash and cash equivalents		0	1
Cash and cash equivalents at beginning of period	7	2	1
Cash and cash equivalents at end of period	7	2	2

The notes on pages 53 to 67 form part of the financial statements.

Statement of Changes in Taxpayers' Equity

for the year ended 31 March 2020

	Note	General Fund £000	Total Reserves £000
Balance at 1 April 2018		612	612
Net funding		3,881	3,881
Non-cash charges – auditor's remuneration	10	23	23
Comprehensive expenditure for the year		(4,237)	(4,237)
Balance at 31 March 2019		279	279
Net funding		4,273	4,273
Non-cash charges – auditor's remuneration	10	23	23
Comprehensive expenditure for the year		(4,567)	(4,567)
Balance at 31 March 2020		8	8

The notes on pages 53 to 67 form part of the financial statements.

Notes to the Accounts

1. Accounting Policies

The financial statements have been prepared in accordance with the 2019-20 Government Financial Reporting Manual (FReM). The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of the Scottish Housing Regulator for the purposes of giving a true and fair view has been selected. The particular policies adopted by the Scottish Housing Regulator are described below. The policies have been applied consistently in dealing with items considered material to the accounts.

1.1 Accounting Convention

These financial statements have been prepared under the historical cost convention modified to account for the revaluation of intangible assets where material, at their value to the organisation by reference to their current costs.

1.2 Going Concern

The financial statements for the year ended 31 March 2020 show a surplus on the general fund of £0.008m (18-19 – surplus of £0.279m). This has arisen as a result of the requirement to account for the activities of the Scottish Housing Regulator on an accruals basis, whilst recording funding from the Scottish Government on a cash basis. Net current liabilities will be funded by the Scottish Government as they arise. As a consequence, these financial statements have been prepared on a going concern basis.

1.3 Administration and Programme Expenditure

The Statement of Comprehensive Net Expenditure is analysed between administration and programme expenditure. The classification of expenditure as administration or programme follows the definition of administration costs set out in Consolidated Budgeting Guidance 2019-20 by H M Treasury.

1.4 Non-Current Assets

1.4.1 Property, Plant and Equipment

The minimum level for capitalisation of non-current assets is £7,500. Where multiples are purchased together, and individual values are less than £7,500, they are capitalised if their collective value exceeds £7,500.

Non-current assets are depreciated on a straight line basis at rates sufficient to write-off the cost of the individual assets over their estimated useful lives, which are considered to be:

ICT Equipment	4 years
Bespoke ICT Equipment	7 years

ICT assets are carried at valuation in existing use. Depreciated historical cost has been used as the proxy for valuation in existing use for ICT equipment as it is not practicable to obtain valuations due to the low values and high volumes of this class of assets.

1.4.2 Intangible Assets

The minimum level for capitalisation of intangible assets is £7,500. Where multiples are purchased together, and individual values are less than £7,500, they are capitalised if their collective value exceeds £7,500.

Intangible assets are recognised initially at cost, comprising all directly attributable costs needed to create, produce and prepare the asset to the point that it is capable of operating in the manner intended. Subsequently, they are measured at amortised replacement cost. This is a proxy for fair value.

Software licences are disclosed separately as intangible assets in accordance with the FReM. However, the Scottish Housing Regulator has only the Business Intelligence System as an intangible asset.

Intangible assets are amortised on a straight line basis at rates sufficient to write off the costs of the individual assets over their estimated useful lives, which are considered to be:

Computer software – internally developed	7 years
Computer software – licences	3 years or life of licence if shorter

The Business Intelligence System will be fully amortised by 31st March 2023.

1.5 Leases

The Scottish Housing Regulator occupies office space under the basis of a Memorandum of Understanding. The arrangement is treated as an operating lease and the rentals payable in that respect are charged to the statement of comprehensive net expenditure on a straight line basis over the term of the lease.

1.6 Provisions

Provisions are made to the extent that the Scottish Housing Regulator meets the additional costs of benefits beyond the normal PCSPS benefits in respect of employees who retire early by paying the required amounts annually to the PCSPS over the period between early departure and normal retirement date. The Scottish Housing Regulator provides for this in full when the early retirement programme becomes binding by establishing a provision for the estimated future years' payments.

1.7 Trade Payables

The Scottish Housing Regulator's policy is to pay all invoices, not in dispute, within 10 days of receipt. The Scottish Housing Regulator aims to pay 100% of invoices, including disputed invoices, once any dispute has been resolved, on time in these terms.

1.8 Value Added Tax

Operating costs are stated net of VAT where VAT is recoverable by the Scottish Housing Regulator.

The Scottish Housing Regulator is registered for VAT as part of the Scottish Government, which is responsible for recovering VAT from HM Revenue & Customs.

1.9 Pensions

Present and past employees are covered by the provisions of the Principal Civil Service Pension Scheme (PCSPS). The defined benefit scheme is unfunded and is non-contributory except in respect of dependants' benefits. The Scottish Housing Regulator is unable to identify its share of the underlying assets and liabilities. The Scheme Actuary valued the scheme as at 31 March 2016. You can find

details in the resource accounts of the Cabinet Office: Civil Superannuation (www.civilservicepensionscheme.org.uk/about-us/resource-accounts/).

The Scottish Housing Regulator recognises the expected cost of these elements on a systematic and rational basis over the period during which it benefits from employees' services by payment to the PCSPS of amounts calculated on an accruing basis. Liability for payment of future benefits is a charge on the PCSPS. In respect of the defined contribution scheme, the Scottish Housing Regulator recognises the contributions payable for the year.

1.10 Income

The Scottish Housing Regulator does not undertake any income generating activities.

1.11 Cash and Cash Equivalents

Banking arrangements are undertaken by the Scottish Government on behalf of the Scottish Housing Regulator. As a result, cash and cash equivalents represents only petty cash at the year end.

1.12 Short Term Employee Benefits

A liability and an expense is recognised for holiday days, holiday pay, bonuses and other short-term benefits when the employees render service that increases their entitlement to these benefits. As a result accruals have been charged for holidays and flexi time earned but not taken at the year end.

1.13 Critical Accounting Estimates

Accounting estimates are used to determine the valuation of property, plant and equipment, intangible assets and

provisions. Details of the estimates are included in notes 1.4 and 1.6.

1.14 Post Balance Sheet Events

There have been no post balance sheet events of which the Scottish Housing Regulator is aware.

1.15 Impact of New Accounting Standards Issued But Not Yet In Effect

International Accounting Standard (IAS) 8 requires disclosure of information on the expected impact of applying new accounting standards that have been issued but are not yet in effect.

A number of new accounting standards have been issued or amendments made to existing standards, but have not yet been applied in these financial statements. The standards that are considered relevant and the anticipated impact on the Scottish Housing Regulator's accounts are as follows:

IFRS 16 – Leases

This will apply for all accounting periods commencing on or after 1 April 2021. The standard sets out the principles for the recognition, measurement, presentation and disclosure of leases for both parties to a contract, ie the customer ('lessee') and the supplier ('lessor'). A right of use asset valued at £0.324 million as at 1st April 2019 would be recognised if this were adopted with immediate effect. This value would be subject to depreciation.

IFRS 17 – Insurance Contracts

This will apply for all accounting periods commencing on or after 1 January 2022 and will have no impact on the Scottish Housing Regulator.

2. Administration Costs

Auditor's remuneration relates to a charge notified by Audit Scotland in respect of audit work carried out by Azets Audit Services on its behalf during 2019-20. No other services were supplied by Audit Scotland or Azets Audit Services during the year ended 31 March 2020.

	2019-20 £000	2018-19 £000
Wages and salaries	2,423	2,206
Social security costs	278	254
Other pension costs	667	476
Inward secondments	-	-
Temporary staff	38	57
Movement in short term employee benefits	21	4
Early retirement	-	(1)
IT costs	471	556
Depreciation and amortisation	175	219
Accommodation expenses	168	165
Non-executive board members' fees & expenses	100	88
Support and consultancy	35	71
Office expenses	35	27
Stakeholder engagement	34	22
Travel and subsistence	28	20
Training and development	28	13
Auditor's remuneration (notional change – note 10)	23	23
Conferences and seminars	19	18
Marketing	10	7
HR and recruitment costs	7	6
Professional fees and subscriptions	5	4
Catering	2	2
	-----	-----
Total	4,567	4,237
	===	===

3. Property, Plant and Equipment

	ICT Equipment £000	2020 Total £000
Cost		
At 1 April 2019	246	246
Additions	10	10
Disposals	(9)	(9)
At 31 March 2020	247	247
Depreciation		
At 1 April 2019	239	239
Charged in year	(32)	(32)
Disposals	(9)	(9)
At 31 March 2020	198	198
Carrying value at 31 March 2019	7	7
Carrying value at 31 March 2020	49	49

Continued overleaf

3. Property, Plant and Equipment
Cont'd

	ICT Equipment £000	2019 Total £000
Cost		
At 1 April 2018	249	249
Additions	0	0
Disposals	(3)	(3)
At 31 March 2019	----- 246 -----	----- 246 -----
Depreciation		
At 1 April 2018	231	231
Charged in year	11	11
Disposals	(3)	(3)
At 31 March 2019	----- 239 -----	----- 239 -----
Carrying value at 31 March 2018	18	18
Carrying value at 31 March 2019	----- 7 ====	----- 7 ====

4. Intangible Assets

	Information Technology £000	Software Licences £000	2020 Total £000
Cost			
At 1 April 2019	1,452	123	1,575
Additions	-	-	-
Disposals	-	(123)	(123)
At 31 March 2020	1,452	0	1,452
Amortisation			
At 1 April 2019	923	123	1,046
Charged in year	207	0	207
Disposals	-	(123)	(123)
At 31 March 2020	1,130	0	1,130
Carrying value at 31 March 2019	529	0	529
Carrying value at 31 March 2020	322	0	322

Continued overleaf

4. Intangible Assets
Cont'd

	Information Technology £000	Software Licences £000	2019 Total £000
Cost			
At 1 April 2018	1,452	123	1,575
Additions	-	-	-
Disposals	-	-	-
At 31 March 2019	1,452	123	1,575
Amortisation			
At 1 April 2018	716	123	839
Charged in year	207	0	207
Disposals	-	-	-
At 31 March 2019	923	123	1,046
Carrying value at 31 March 2018	736	0	736
Carrying value at 31 March 2019	529	0	529

5. Financial Instruments

IFRS 7, Financial Instruments: Disclosures, requires disclosure of information about the significance of financial instruments held by the entity over the year and the nature and extent of risks arising from those financial instruments. The Scottish Housing Regulator is not exposed to the degree of financial risk faced by business entities because of the non-trading nature of its activities and the way in which it is funded. Moreover, financial instruments play a much more limited role in creating or changing risk than would be typical of the listed companies to which IFRS 7 mainly applies. Financial assets and liabilities are generated by day to day operational activities and are not held to change the risks facing the entity in undertaking its activities.

Liquidity Risk

The Scottish Parliament makes provision for the use of resources by the Scottish Housing Regulator in a Budget Act for each financial year. Cash authorisation is provided by the Scottish Government to the extent that expenditure is covered by budget authority. The Scottish Housing Regulator is not therefore exposed to liquidity risks.

Fair Values

Assets and liabilities are carried at fair value in the Statement of Financial Position of the Scottish Housing Regulator. The Scottish Housing Regulator's financial assets consist of trade receivables, financial and other assets (note 6) and cash and cash equivalents (note 7). The financial liabilities consist of trade payables and other current liabilities (note 8).

6. Trade Receivables, Financial and Other Assets

	2020 £000	2019 £000
Amounts falling due within one year:		
Prepayments	0	2
Other receivables	0	1
	-----	-----
	0	3
	===	===
Intra-government balances		
Balances with other central government bodies	-	-
Balances with bodies external to government	0	3
	-----	-----
	0	3
	===	===

7. Cash and cash equivalents

	2020 £000	2019 £000
Balance at 1 April 2019	2	1
Net change in cash and cash equivalent balances	0	1
Balance at 31 March 2020	2	2

The following balances were held at 31 March 2020:

Commercial banks and cash in hand	2	2
Balance at 31 March 2020	2	2
Balance at 31 March 2020	2	2

8. Trade Payables and other current liabilities

	2020 £000	2019 £000
Trade payables	74	36
Accruals	141	108
Other payables	150	118
Balance at 31 March 2020	365	262

Intra-government balances

Balances with other central government bodies	-	-
Balances with bodies external to government	365	262
	-----	-----
	365	262
	===	===

9. Provisions for liabilities and charges
at 31 March 2020

	Early Departure Costs £000	Other £000	Total £000	2019 £000
Balance at 1 April 2019	-	-	-	9
Provided in the year	-	-	-	-
Provisions not required written back	-	-	-	-
Provisions utilised in the year	-	-	-	(9)
Unwinding of discount	-	-	-	-
	-----	-----	-----	-----
Balance at 31 March 2020	-	-	-	-
	===	===	===	===

10. Notional Charges

The following charge has been included in the accounts:

	2019-20	2018-19
	£000	£000
Auditor's remuneration	23	23
	----	----
	23	23
	===	===

11.0 Related Party Transactions

The Scottish Housing Regulator is a Non Ministerial Department within the Scottish Administration. The Scottish Government is regarded as a related party. During the year, the Scottish Housing Regulator had various material transactions with the Scottish Government and with other entities for which the Scottish Government is regarded as a parent body.

In addition, the Scottish Housing Regulator has had a small number of material transactions with other government departments, central government bodies, local government, non-departmental public bodies and similar organisations.

During the year, apart from their service contracts, no Board member, key manager or related parties has undertaken any material transactions with the Scottish Housing Regulator.

12.0 Capital Commitments & Contingent Liabilities

No contracted capital commitments or contingent liabilities existed at 31 March 2020 (2019, None).

13. Leasing Commitments

At 31 March 2020, the total of future minimum lease payments under non-cancellable operating leases for each of the following periods were:

	2019-20 £000	2018-19 £000
Obligations under operating leases for the following periods comprise:		
Buildings		
Not later than one year	165	165
Later than one year and not later than five years	-	165
Later than five years	-	-
	-----	-----
	165	330
	===	===
Other		
Not later than one year	1	1
Later than one year and not later than five years	1	2
Later than five years	-	-
	-----	-----
	2	3
	===	===

14. Other Financial Commitments

The Scottish Housing Regulator has entered into contracts (which are not leases) for the provision of support services to the Business Intelligence System. The contracts are fixed term with the option to add additional years. The total payments for which the Scottish Housing Regulator is budgeting are as follows:

	2019-20 £000	2018-19 £000
Not later than one year	166	208
Later than one year and not later than five years	366	417
Later than five years	-	-
	====	====
	532	625
	===	===



The Scottish Government
Riaghaltas na h-Alba

SCOTTISH HOUSING REGULATOR

DIRECTION BY THE SCOTTISH MINISTERS
in accordance with section 19(4) of the Public Finance and Accountability (Scotland)
Act 2000

1. The statement of accounts for the financial year ended 31 March 2009 and subsequent years shall comply with the accounting principles and disclosure requirements of the edition of the Government Financial Reporting Manual (FReM) which is in force for the year for which the statement of accounts are prepared.
2. The accounts shall be prepared so as to give a true and fair view of the income and expenditure, recognised gains and losses, and cash flows for the financial year, and of the state of affairs as at the end of the financial year.
3. This direction shall be reproduced as an appendix to the statement of accounts.

Signed by the authority of the Scottish Ministers

Dated 11 March 2009

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The accountable officer authorised these statements for issue on
12 October 2020

Laid before the Scottish Parliament 2020 SG/2020/207

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