Our regulation of social housing in Scotland
Discussion questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our discussion paper on our website at www.housingregulator.gov.scot
Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by 11 August 2023.

By email @:   regulatoryframeworkreview@shr.gov.scot

Or post to: Scottish Housing Regulator
2nd floor , George House
36 North Hanover Street, G1 2AD

Name/organisation name

Manor Estates Housing Association

Address

Suite 4, 5 New Mart Place		
Edinburgh		
Postcode EH 14 1RW		

How you would like your response to be handled
To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

Are you happy for your response to be published on our website?

Yes X☐   **No ☐**

If you are responding as an individual …

Please tell us how you would like your response to be published.	*Pick 1*
Publish my full response, including my name	☐
Please publish my response, but not my name	*X*☐

1. We believe that our regulatory priorities should be:
   - listening and responding effectively to tenants and service users
   - providing good quality and safe homes
   - keeping homes as affordable as possible
   - doing all they can to reduce the number of people who are experiencing homelessness

   We are keen to hear your feedback on these priorities. Are they the right ones?

   > They are the right priorities however we feel that the homelessness priority should be more proactive/definite in what it is trying to achieve rather than saying "doing all that they can do". Also reflecting about 'conflict' between keeping rents affordable whilst seeking to develop additional services, improve services and try to address the issues emerging due to reduction in external services, such a support

2. What are your views on amending the Statutory Guidance on Annual Assurance Statements to include provisions on specific assurance?

   > Supportive of the amendment. Only concern is having an appropriate timescale to be able to show compliance with the specific assurance ie not just gathering evidence but also demonstrating to the Board the compliance

3. Do you think that we need to change any of the indicators in the ARC or add to these?

   > Question over the indicator " management of the area" maybe included an opt out option for those RSLs that have dispersed stock versus local/community based Associations.
   > ASB – does not provide meaningful benchmarking information as RSLs have different timescales for responding to different levels of cases.
   > Medical Adaptations – difficult for meaning comparisons as this is dependant on funding allocation and tenants needs profile
   > % of evictions as % of court referrals – again not really meaningful as 1 court referral could lead to an eviction and the % would be 100%, maybe % of evictions as % of stock

4. Are the proposed areas of focus for tenant and resident safety indicators the right ones, and what should those indicators be?

   > Yes

5. What do you think would be the most effective and appropriate way to monitor the effectiveness of landlords' approach to managing reports and instances of mould and dampness?

   > Agree definition of levels of mould and condensation that we can all be measured against ie the number of category 1 cases etc

6. What are your views on strengthening the Framework further on landlords listening to tenants and service users?

   > There are sufficient opportunities for landlords to listen to tenants and service users. Need to recognise that not all tenants want to engage with their landlord, emphasis on the signposting and providing information on "how to" raise a concern, report etc

7. How do you think we could streamline the requirements for landlords in the Notifiable Events statutory guidance?

   > Current guidance works well, if in doubt we would contact our SHR manager

8. *Do you think there is value in using more direct language in* the working towards compliance *status, or in introducing an intermediary regulatory status between compliant and working towards compliance?*

> Happy for the introduction of different levels but would need an agreed definition

9. Are there any changes we should make to the Significant Performance Failures approach, including how we define these?

> Provide summary of performance failures and good practice

10. Are there any other changes to the Regulatory Framework and associated guidance that you would suggest?

> Website to be more intuitive/user friendly for both tenants and landlords

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