

# 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](http://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](mailto:regulatoryframeworkreview@shr.gov.scot)

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

### Name/organisation name

Grampian Housing Association

### Address

Huntly House

74 Huntly Street

Aberdeen

Postcode **AB10 1TD**

Phone 01224 202900

Email  
**info@grampianhousing.co.uk**

### How you would like your response to be handled

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

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

Yes  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

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?

In principle we agree with these however like our peers are concerned about the level of demand on landlords within the context of rent constraint whether as a product of self-regulation in that re or as was seen recently legislation. We recognise that tenants are under great pressure as a result of wider socio-economic factors and like others working hard to reconcile meeting increasing expectations in terms of delivering a wider agenda with seeing rents kept low. Whilst priorities are appropriate, how these are regulated needs to be proportionate and mindful of cost implications.

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

No issue in principle with seeking assurance in a specific area, although one might argue that is already the case as expressed with an Engagement Plan. Could the two be better linked then and co-terminus?

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

Whilst overall, we do not see a case for significant change, noting that in the recent past there has been a reduction in what is reported overall. There is however a case for reporting on further landlord safety indicators, for example the recently introduced reporting on EICRs. An additional area which might be relevant is to consider how we have to report satisfaction. For example looking at greater segmentation in this or greater focus on tenant expectations. We note that in England there is a focus on measures related to consumer rights and perhaps worth consideration in Scotland. In summary are we measuring the wrong things well?

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

As per response to Q3, reporting compliance against a set of landlord safety measures is important. The Association has already participated in a pilot on reporting against such measures.

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?

Our view is that a set of indicators are developed. For example, the number of occasions of damp or mould identified., their severity with reference to a grading system, numbers addressed and timescales and then perhaps a follow up and outcome update? That could then be reported.

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

The proposed approach here makes sense. Making it easier for tenants and service users to do this plus use of plain language should be encouraged across the sector

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

This should focus on material risks so the future focus on the most critical issues is welcomed.

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?*

It would be helpful to see the development of more specific categories reflecting the extent of a landlord's compliance. This should be supported through transparency as to their application. As a minimum though the approach of an interim category as set out in the consultation is supported.

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

We feel these should be kept at as high a level as possible and ensure that any issues are addressed at the correct level e.g. fully investigated and reported by the RSL or appropriate body (i.e. SPSO) before referral to the SHR.

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

We were surprised that no reference to RSLs and net zero and or energy efficiency was referenced.

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