

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

HIGHLAND COUNCIL

Address

HIGHLAND COUNCIL HEADQUARTERS		
GLENURQUHART ROAD		
INVERNESS		
Postcode IV3 5HN	Phone	

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	<input type="checkbox"/>
Please publish my response, but not my name	<input type="checkbox"/>

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?

Highland has a good track record of engaging with our tenants and the above priorities resonate with feedback we have received. Listening to our tenants is crucial in terms of how services are delivered and monitored.

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

This is a reasonable amendment to the current process. Any provisions need to be preceded with significant landlord engagement to ensure that the context of the issues is understood (for example, much of Highland stock is remote rural, off-gas and of a certain age – all factors which influence themes such as energy efficiency, repair delivery and affordability).

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

The annual preparation of the ARC requires significant landlord resources and increasing the number of indicators may not be productive. Highland intends to consult with our tenants as to what ARC indicators they wish to see within the summary Annual Customer Report.

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

The proposed areas are consistent with legislative duties. There is concern that the recent emphasis on fire and electrical safety – while sound in principle – is not intrinsically linked to affordability (for example, social landlords have not had external funding for the LD2 smoke alarm programme).

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?

This is a complex issue and requires further workshop-style discussion with all social landlords. Highland agrees that landlords should improve their monitoring arrangements around mould and dampness but there needs a lengthy lead-in time to ensure that IT reporting systems are adapted to meet any regulatory monitoring requirements.

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

This is to be encouraged and Highland will encourage our tenants to engage with future discussion on the details behind this approach.

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

No comment.

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?*

An intermediary status may be useful in clarifying the issues involved. For example, Highland was working towards compliance with smoke alarm legislation for some time. In practice, Highland

would have been compliant many months before if Highland had been able to access tenant properties without resorting to numerous access attempts.

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

None.

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

It would be useful for further Regulator documentation to be shared with tenants and drafted primarily with tenants in mind.

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