

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

Muirhouse Housing Association

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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 checked="" 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?

Yes, would agree that these are the right priorities although could perhaps adjust wording to focus on the longer term of the homes, for example 'providing good quality, sustainable and safe homes which meet the needs of current and future tenants'

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

Would agree with the amendment ensuring that those provisions on specific assurance are included and updated on an annual basis however these should be agreed between SHR and the sector in advance of publishing. Depending on the topic SHR could provide guidance on how compliance can be demonstrated.

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

Indicators in general remain applicable however some are complex and require considerable manual work depending on factors including IT software and resources. Consideration could be given to reduce number of indicators or extend deadline to 30th June as this would ensure great accuracy of data.

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

Yes agree they are the right ones. Data could be collected through indicators similar to the current Indicator 11 or is there an alternative method to provide assurance for this area out with the ARC for example requirement for an audit or specific compliance in relation health and safety.

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?

How many instances of damp and mould have been reported in the period (% of stock)? How many days taken to respond? Does there need to be some form of categorisation so that landlords are comparing like for like e.g. Significant through to minor to allow for better report/clearer picture of scale of problem.

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

Would consider this to already as part of organisation process via tenant engagement, complaints handling and regular tenant surveys. Not sure if duplicates what is already in place across these areas and why it would require additional content.

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

To reduce of volume NE's being submitted the first stage could include discussion with regulation manage to determine the materiality of the event which keeps a record of the communication between RSL and SHR but doesn't meet the requirement for submission as Notifiable Event.

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?*

Possibly, but would need to be clear on the definition of each status particularly as existing process is around compliance with no material non-compliance – what would ‘compliance with improvements required’ mean as assumption would be that any material compliance failures would result in ‘Working Towards Compliance’ status and any non-material compliance failures would mean ‘Compliant’.

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

Clearer process and guidance on the threshold that has to be achieved before SHR becomes involved. Tenants referred back to Association to conclude complaints process.

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

For example annually the SHR produces information on the risk they will focus on could there be merit in this being acknowledged by a sector wide event which would provide clarity and allow for discussion. Where resources allow annual or bi annual meeting with regulation manager.

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