

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
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TIS

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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 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?

TIS supports the regulatory principles, as set out in the discussion paper. It is essential that the SHR and Registered Social Landlords (RSLs) listen and respond effectively to tenants and service users in the planning, delivery and monitoring of housing services. A focus on equality and human rights needs to underpin all of the work that we do.

With the cost-of-living crisis, it is important that a commitment to continue to fund and support tenant participation, is at the heart of how we deliver social rented housing in Scotland.

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

This requires to be supported with information and advice to support RSLs, Boards and tenants to understand how to include specific assurance provisions in the AAS. It is important to ensure that adequate time is given for RSLs to take these on board ahead of regulatory submission requirements.

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

It would be useful to include information around sustainability and decarbonisation in the ARC.

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

We support the recommendations for the tenant and resident safety indicators. The SHR needs to ensure that the introduction of these new indicators is supported with information and training to ensure RSLs/Boards/Tenants understand how to gather data around these areas. The timeframe also needs to be realistic.

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?

RSLs need to have a Damp and Mould policy in place that is developed in consultation with tenants and service users.

This is a complex area and requires further discussion with the SHR, RSLs and tenants around how to register and monitor arrangements around damp and mould.

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

SHR to commission a Thematic Study to explore the work that social landlords are doing to listen and respond to tenants and service users, to develop and share good practice and case studies.

There is a robust framework for tenant participation and tenant scrutiny in Scotland.

SHR to emphasise the importance of supporting and resourcing tenant participation and a human rights approach to housing.

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

It would be useful to provide clarity on what constitutes a notifiable event and how this is approached by the SHR.

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 have more specific categories that clearly details the regulatory status so that this is clear.

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

It is essential that the SHR and RSLs advertise Significant Performance Failures – so that tenants are clear what this means and what they can do if they are required to use this approach. This information is required in both digital and paper formats to suit the different needs of tenants and service users.

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

As stated earlier, it is essential that commitment to tenant participation is central to how we deliver housing services using a human rights approach.

That RSLs work in partnership with local communities to ensure sustainability and move to net zero.

TIS has produced an “Engagement Toolkit - on Climate Change and your Home” with Scotland’s Housing Network, to support the sector develop meaningful consultation.

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