

Annual Performance Report & Accounts 2024/25



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## 1. Welcome message

This year has seen acute challenges continuing for social landlords and their tenants and service users.

Our research with our National Panel of Tenants and Service Users highlighted the continuing financial difficulties that many tenants are experiencing, and we have reported extensively on the range of financial pressures on landlords as they seek to deal with rising costs, higher interest rates, the investment required to maintain their homes, and meet net zero and the associated supply chain challenges in doing all of this.

Systemic failure is continuing to impact the delivery of homelessness services in some areas in Scotland, meaning that the demands on the system, in terms of the number of people and the level of need they have, exceeds the capacity to respond and for some councils this goes beyond that which they alone can deliver. At March 2025 we assessed that three local authorities are impacted by systemic failure and a further eight at heightened risk of systemic failure. This sits alongside the Scottish Parliament having declared a national housing emergency in May 2024 and 13 out of 32 councils having declared local housing emergencies.

We are clear that the continuing systemic failure that impacts on local authorities' ability to meet legal duties on homelessness, that we have reported on over a number of years, requires a systemic intervention. Over the longer term this is about reducing demands on the system by preventing homelessness and increasing the capacity by building new homes. However, we see many landlords scaling back on plans to build new homes due to limited funding, supply chain issues, higher costs and labour shortages. There is an immediate need now to increase capacity in the system to meet the current level of need, particularly for suitable temporary accommodation and permanent homes. A significant reduction in current levels of statutory failure by councils to meet their legal duties to provide temporary accommodation and in breaches of the Unsuitable Accommodation Order, would indicate that all involved in social housing in Scotland are starting to tackle the factors that lead to the declaration of a housing emergency. For our part, we will continue to monitor, assess and report on councils' performance in discharging their duties to people who are homeless, and we will engage with councils to promote improvement where this is possible. We will also work with the Scottish Government and other stakeholders to identify and implement actions that will address the acute issues in temporary and permanent accommodation for people who are homeless.

During the year we have also continued to focus on tenant and resident safety and have seen some landlords continue to face challenges, for example in meeting their electrical and fire safety obligations or responding to unforeseen issues with the need to address issues, with cladding or falling stonework on buildings. We published our latest update on RAAC in November 2024 and are engaging with those landlords who have identified RAAC in their homes about the management plans for those homes. We have also been working with the Scottish Government and stakeholders to determine actions for the sector in Scotland following the publication of the Phase 2 Report from the Grenfell Inquiry and to consider the sort of information that is needed to inform next steps. As part of our review of the Scottish Social

Housing Charter Indicators this year, we have worked with stakeholders to introduce indicators around damp and mould that we will start to collect in 2025/26.

We monitor and report on social landlords' achievement of Scottish Government's minimum site standards for Gypsy/Travellers sites. We published a thematic into landlords' approaches to involving Gypsy/Travellers and also published the outcome of three serious concerns investigations involving Gypsy/Travellers sites. Charter obligations, site standards and engagement by landlords with Gypsy/Travellers will remain key areas for us during 2025/26.

In many areas social landlords performed well against the Charter, a notable achievement given the ongoing challenges facing them and their tenants. We reported that RSLs' finances are increasingly constrained as they face tough economic conditions. We expect these challenges to continue into 2025/26 and we will keep our focus on all these critical issues, particularly the housing emergency and homelessness, tenant and resident safety, and Gypsy/Travellers.

Social housing provides important wider benefits to Scotland and makes a vital contribution to many of the Scottish Government's National Outcomes, not least around reducing child poverty and improving health outcomes. It is critical we and all our stakeholders continue to strive to sustain that contribution.

We would like to pay tribute to the hard work of all those who volunteer and work in social housing in Scotland supporting communities. The context has remained challenging. Together, they continue to support some of the most vulnerable people in Scotland.

We would also like to thank our resilient and professional staff team, our Board members and all the tenants, service users and stakeholders who have worked with us. We were delighted with the outcome of the UK Civil Service-wide People Survey, in which our staff feedback gave us the equal highest "engagement index" across more than 100 organisations taking part. In October 2024 we welcomed Dr Abhishek Agarwal onto the Board. At June 2025 George, alongside Siobhan White and Andrew Watson, will stand down having completed their full terms on our Board. We are extremely grateful for all their work and leadership over the last eight years. The Board and staff team look forward to welcoming a new Chair and Board member later in 2025. Finally, we welcome the scrutiny of our work by the Scottish Parliament's Local Government, Housing and Planning Committee during the year, and we are grateful to our stakeholders who inputted. We continue to engage with the Committee on this, and we will work with our stakeholders to ensure our regulation is relevant, impactful and understood.

George Walker, Chair (until 30 June 2025) and Michael Cameron, Chief Executive

## 2. Who we are and what we do

### Statement of purpose and activities

#### Who we are

We are the independent regulator of social landlords in Scotland. Social landlords are RSLs – housing associations and co-operatives – and local authorities that provide housing and homelessness services. Our organisational structure is set out in section 4.6.

#### What we do

We regulate to safeguard and promote the interests of current and future tenants of social landlords, people who are or may become homeless, and people who use housing services provided by RSLs and local authorities.

We regulate social landlords by:

- monitoring, assessing and reporting on how well social landlords are run and how they manage their money we call this governance and financial management;
- taking action, where we need to, to protect the interests of tenants and other service users; and
- keeping a register of social landlords and making this available for the public all landlords on the register need to meet regulatory requirements.

### We do this in a way that:

- is proportionate, accountable and transparent this means we are open about how we work and we take responsibility for our decisions;
- is targeted this means we only take action where it is needed;
- · encourages treating people fairly and promotes equal opportunities; and
- is consistent with the Scottish Regulators' Strategic Code of Practice.

### Find out more via these links:

Who we are & more about our organisational structure

Watch a video about who we are and what we do

Read about our Strategy 2024 - 2027, which sets out our priorities.

Read our equalities statement 2023 - 26

SHR regulates 138 Registered Social Landlords (138 in 2024 & 140 in 2023) and 32 Local Authorities.

### 3. Performance Overview – Our Work

### A summary of our strategic objectives, goals, performance and achievements

This overview is a summary of all the work we have done during 2024/25 under each of the four priorities we set out in our 2024 – 2027 Strategy. If you would like more detail about our work, please refer to the performance analysis section in section four of our 2024-25 Annual Report.

Our Strategic Priorities for 2024-27 help us achieve our statutory objective to safeguard and promote the interests of tenants and others who receive services of social landlords including people experiencing homelessness, Gypsy/Travellers and owners.

Our priorities and the work we have done:

### 1. We delivered our statutory functions:

- a. monitoring, assessing and reporting regularly on the performance of social landlords and the governance and financial health of RSLs
- b. making regulatory interventions where appropriate
- c. maintaining a register of social landlords

### We did this by:

- implementing our refreshed Regulatory Framework and the associated statutory guidance;
- responding to landlords' feedback and publishing our first annual report on Notifiable Events detailing the type of events RSLs reported to us during 2023/24 and how we dealt with them;
- publishing the <u>outcome of our consultation</u> on the indicators we use to monitor landlord performance against the Scottish Social Housing Charter;
- updating our <u>factsheets</u> on raising serous concerns about a landlord for tenants and service users and for social landlords on how we handle those:
- updating our guide on how we regulate for tenants and service users;
- updating our business planning advisory guidance for social landlords;
- publishing the <u>outcome of our 2023/24 risk assessment</u>, including <u>engagement plans</u> setting out our requirements for every social landlord as well as a <u>summary of the outcome</u> of our annual risk assessment;
- providing a single view of the governance, financial well-being and performance of every RSL in a regulatory status;
- implementing and keeping our engagement plans updated during the year;
- publishing information on the <u>focus or our 2024/25 risk assessment</u>, and at the end of March 2025, we published the summary <u>outcome</u> and update <u>engagement plans</u> for the 2024/25 risk assessment;

- keeping a public Register of Social Landlords;
- carrying out structured conversations with every council to gather further information and assurance about their homelessness services;
- identifying and reporting on the three councils we consider to be impacted by systemic failure, and the further eight who are at heightened risk of being impacted by systemic failure;
- publishing our National Report on the Scottish Social Housing Charter for 2023/24, updated landlord reports and comparison tool as well as the Charter related statistical information about landlord performance;
- publishing thematic analysis on new homes, empty homes and lettings;
- collecting data for Scottish Government on empty homes and voids, which we published a report on in April 2025;
- carrying out visits to nine RSLs and four local authorities on how they assure compliance with regulatory requirements and prepare their Annual Assurance statements and publishing a review report and all the Annual Assurance Statements landlords submitted to us;
- asking landlords to again provide specific assurance around their compliance with relevant obligations in relation to tenant and resident safety in their statements that they will submit in the autumn of 2025;
- engaging with the landlords that have identified RAAC in their homes, seeking assurance that they have management plans for the affected homes and monitoring landlords' management of RAAC;
- publishing our <u>analysis of RSL loan portfolio returns</u>, <u>statistical information</u> and <u>audited accounts</u> for all RSLs in our landlords directory, <u>a summary of the aggregated financial plans of RSLs</u> for the next five years and our <u>analysis of RSLs Audited Financial Statements</u>;
- considering two requests to review our regulatory decisions, which we upheld; and
- considering information from potential whistle-blowers who contacted us.

# 2. We listened to tenants and service users, used their feedback to inform effective regulation, and empowered them by publishing useful performance information about their landlord by:

- actively including tenants, people experiencing homelessness, other people who use the services of social landlords and their representatives in our work as set out in <u>How we include tenants and service users in our work 2023-2026</u>;
- working with the <u>Tenants Together (Scotland) SHR Liaison Group</u>, which is chaired by one of our tenant Board members Helen Trouten Torries. We met regularly with the group to gather views, including on our review of the Scotlish Social Housing Charter indicators;
- publishing research with our National Panel of more than 420 Tenants and Service Users;
- working with our <u>Tenant Advisors</u> who also helped with our review of the Charter indicators and reviewed landlords' websites for accessibility;
- meeting with stakeholders that represent tenants and service users including a range of advice agencies, Tenants Together (Scotland) and the Tenant Information Service:
- speaking about our work at the Tenant Information Service annual conference;
- publishing material targeted at tenants and service users including:
  - o a range of performance information about landlords that is designed to empower tenants and inform their landlords.
  - O How we regulate: A guide for tenants and service users | Scottish Housing Regulator

- o Video: About the Scottish Housing Regulator
- o Complaints and serious concerns information for tenants and service users of social landlords & report form
- o Video: How to make a complaint or raise a serious concern about a social landlord
- publishing a thematic review of the provision of British Sign Language services by social landlords that we worked on with the British Deaf Association;
- publishing a thematic review of tenant and Gypsy/Traveller participation in Scottish social housing;
- reporting on serious failings at some Gypsy/Traveller sites, following reports of serious concerns to us by residents and their representatives, and engaging with the landlords involved around improvements. We worked closely with the Scottish Human Rights Commission and representative group Making Rights Real in these cases;
  - o Read more about the serious failings in Fife Council Gypsy/Travellers sites
  - o Read more about the serious failings in Perth & Kinross Council Gypsy/Travellers sites.
- reviewing all landlords' websites and writing to landlords to remind them of our expectations for them to publish their Annual Assurance Statement, Engagement Plan, report on performance (our Landlord Report) and information for tenants on raising serious concerns with us.
- 3. We worked closely with, and listened to, all our stakeholders, to help us understand the challenges they face, and to promote a wider understanding of the current and emerging risks that may impact on social housing by:
  - using all our interactions with our stakeholders to inform how we regulate and the areas that we focus on;
  - having regular engagement with Scottish Government colleagues, the Scottish Federation of Housing Associations, Association of Local Authority Chief Housing Officers (ALACHO) and Glasgow and West of Scotland Forum of Housing Associations;
  - speaking regularly with UK Finance, Shelter, Scottish Human Rights Commission and OSCR, and engaging with other scrutiny bodies including the Health and Safety Executive and Care Inspectorate as appropriate;
  - participating in a range of round table groups including Scottish Government's Housing to 2040 Strategic Scrutiny Board, Grenfell phase two response, housing emergency response, RAAC, Net Zero and Rent affordability & homelessness;
  - hosting regular meetings with a group of Advice Agencies chaired by Board member Lindsay Paterson;
  - hosting regular meetings with groups of landlords to discuss important and topical issues and publishing related blogs, this includes:
    - o urban landlord group, which includes 13 landlords hosted by our Chair George Walker;
    - o rural and islands group, which includes 9 landlords both hosted by our Deputy Chair Andrew Watson; and
    - o Systemically Important RSLs, which includes 20 landlords, hosted by our Chair, George Walker.
  - hosting a range of our stakeholders at our Board meetings including, the Auditor General, Scottish Human Rights Commission, Tenants Together Scotland, the Minister for Housing, Professor Ken Gibb, ALACHO and Scottish Government;
  - speaking about our work at 14 stakeholder conferences, publishing our <u>key speeches</u> and attending the Chartered Institute of Housing Festival;
  - publishing as much information and data as we can on our website, sharing periodic updates on our work to more than 1700

- subscribers to our SHR Update newsletter and tweeting about our work on X (formerly twitter) @shr\_news;
- welcoming scrutiny and engagement with the <u>Scottish Parliament's Local Government</u>, <u>Housing and Planning Committee</u> and continuing to keep it updated on all our work.

## 4. We demonstrated that we are an effective, efficient and open public body and contributed constructively to the Scottish Government's public service reform agenda by:

- spending £5.147 million of our £5.307 million budget, responding to Scottish Government's in-year spend controls by achieving savings and returning £73.5k of revenue funding and £63.8k of capital funding to the Scottish Government during the year for it to reuse;
- moving to a permanent office sharing space with another public body in Glasgow and achieving recurring annual revenue savings of more than £120k, which contributed to our duties to consider Best Value and Public Service Reform objectives;
- continuing to support our staff working effectively both from home and from our office;
- reviewing our climate change targets to align with our new office operating circumstances and taking account of the impact of climate change in how we manage risk;
- promoting biodiversity awareness to our staff and carrying out a successful staff volunteering day at Richmond Park, Glasgow;
- monitoring and demonstrating how we meet our duty to consider Best Value themes;
- sharing a Data Protection Officer with another public body, which contributes to Best Value and Public Service Reform aims;
- conducting cyber incident response planning tests and maintaining a high level of staff awareness of cyber risk;
- retaining our <u>Cyber Essentials accreditation</u> and working towards renewing our Cyber Essentials Plus accreditation, which we achieved in May 2025;
- participating in a range of Scottish Government groups relating to digital and cyber resilience;
- commissioning a website accessibility audit to test our site against the Website Content Accessibility Guidelines, making fixes and updating our <u>accessibility statement</u>;
- consulting upon and publishing our second <u>British Sign Language Plan (BSL) for 2025-31</u>, including a series of BSL <u>videos</u> that cover the plan, our thematic review, how we regulate and how to make a complaint or raise a serious concern;
- publishing a new Corporate Parent action plan and report and actively planning for meeting the new requirements of the United Nations Convention on the Rights of the Child (UNCRC);
- reporting on gender equality on our Board;
- embedding a new learning and development initiative for our staff including mandatary topics such as information security, data protection and security essentials;
- transitioning to the Scottish Government's new Oracle HR and Finance IT systems;
- transitioning to a 35-hour working work in alignment with the Scottish Government;
- supporting our staff through our Heath, Safety and Wellbeing Committee;
- participating in the Civil Service people survey. Our overall "engagement index" score for the survey is the equal highest of all the 100+

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participating organisations across the UK;

- monitoring and reporting on our performance against our response targets;
- managing risks to our objective and priorities, adjusting work plans to allow us to focus on top priorities;
- achieving substantial assurance from our internal auditor and an unqualified opinion from or Audit Scotland.

Our entire staff team is made up of two Groups: the Regulation Group and the Digital and Business Support Group. Our Chief Executive and Directors for each Group form our Executive Team, which is responsible for providing strategic management and leadership. Our Assistant Directors along with the Executive Team form the Management Team, which is responsible for the overall oversight of operational management. Our staff are all civil servants.

### **Principal risks and mitigations**

Alongside our regulatory risk assessment of social landlords, we identify and manage risks to us achieving our statutory objective. We maintain and regularly review our corporate risk register.

In 2024/25, we had one overarching risk, which is that we do not achieve our statutory objective. Below that sat nine additional strategic risks, listed below along with a summary of our actions to mitigate them:

Risk description	Mitigating actions		
A significant reduction in quality or change in agreed delivery of shared services from Scottish Government, which impacts on our ability to operate effectively	<ul> <li>Managing our interface with Scottish Government business partners for IT, HR and finance</li> <li>Engaging at strategic level for example through Shared Services Customer Board, Scottish Delivery Bodies Group to influence Oracle system development</li> <li>Engaging with our internal auditor and other customer bodies to help us understand risks and approaches</li> <li>Providing feedback and raising issues with Scottish Government as required</li> </ul>		
<ul> <li>Our regulatory framework not working effectively</li> <li>Losing stakeholder support</li> <li>Suffering reputational damage as a result of a development out with our control or</li> <li>Systemic failure in social landlords damages our reputation or pressures our resources</li> </ul>	<ul> <li>Consulting on regulatory proposals</li> <li>Engaging with a wide range of stakeholders including via forums, working groups, conferences and guest speakers</li> <li>Publishing a range of regulatory guidance and reports of our regulatory analysis and assessments</li> </ul>		

	Ensuring the integrity of our data and our regulatory business intelligence system
Suffering a serious business failure	<ul> <li>Moving to a new office, supporting staff and reviewing arrangements after 6 months</li> <li>Managing our IT replacement programme and digital contracts</li> <li>Supporting the roll-out of new IT tools and software</li> </ul>
Suffering a cyber incident	<ul> <li>Exercising our incident response planning</li> <li>Maintaining vigilance and a high level of staff awareness</li> <li>Working towards renewing our Cyber Essentials Plus accreditation</li> </ul>
Failing to comply with the duties and expectations on us as a public body	<ul> <li>Meeting deadlines and requirements for submitting, reporting and responding across a wide range of statutory issues</li> <li>Managing internal budget monitoring, corporate governance, procurement and communications</li> </ul>
Not having sufficient resources to deliver effectively	<ul> <li>Engaging with senior Scottish Government officials on our future resourcing requirements</li> <li>Discussing peer improvement support with social housing bodies</li> <li>Monitoring key staff trends</li> </ul>

In the second half of 2024/25 we saw increases in the scoring of our risks around our Regulatory Framework in connection with potential availability of rescue partners, shared services from the Scottish Government as a result of challenges relating to transition and implementation of the new Oracle HR and Finance IT systems we draw on, and our resourcing in relation to our ability to fill vacancies in the context of our budget position.

Our Board agreed our 2024/25 operating plan in March 2024. This plan set out in detail our work plans for 2024/25, flowing from our Strategy. Our operating plan is our key tool to mitigate risk. During 2024/25 we actively reviewed our corporate risk register and mitigating activities through our Management Team (monthly), and via reporting to our Audit and Risk Committee (quarterly) and our Board (quarterly). During the year we developed our Board reporting to demonstrate more clearly the relationship between our operating plan activities and the primary risk they mitigate.

### Looking ahead in 2025/26 we will:

- continue to implement our 2024-27 Strategy, taking time to review it at the mid point;
- remain agile and responsive in recognising the very complex and challenging environment for tenants, people who use social housing services and the landlords that deliver them;
- use risk management to mitigate the risks that could impact how we deliver against our objectives and priorities;
- welcome a new Chair and Board member.
- manage our budget settlement of £5.343 million revenue, £0.1 million capital, £0.1 million non-cash and £0.2m UK-funded Annual Managed Expenditure and
- seek clarity on future costs including the annual Scottish Government pay settlement and the uplift in employer National Insurance contributions.

## 4. Performance Analysis

This section gives a detailed view of our performance against our priorities during 2024/25.

### **Our Strategy**

This section of the annual report provides further detail to that covered in the overview of our work and performance during 2024-25 and is aligned to our <u>Strategy for 2024 – 27</u>, which we published in April 2024. We will review the strategy at its mid-point in 2025/26 to ensure it remains relevant.

Our Strategy sets out priorities that we are focusing on to meet our statutory objective.

- 1. To deliver our statutory functions:
  - a. monitoring, assessing and reporting regularly on the performance of social landlords and the governance and financial health of RSLs
  - b. making regulatory interventions where appropriate
  - c. maintaining a register of social landlords
- 2. To listen to tenants and service users, use their feedback to inform effective regulation, and empower them by publishing useful performance information about their landlord.
- 3. To work closely with, and listen to, all our stakeholders, to help us understand the challenges they face, and to promote a wider understanding of the current and emerging risks that may impact on social housing.
- 4. To be an effective, efficient and open public body and contribute constructively to the Scottish Government's public service reform agenda.

We will maintain our focus on the major challenges in social housing – including those in homelessness, net zero, cost inflation and affordability – while being agile in response to events and developments in social housing and the wider world. We will be ready to flex our focus and adjust our approach to ensure these remain relevant and appropriate.

We will engage with our stakeholders regularly to hear from them about their priorities and our work. This is important to us and we will use this to inform our approach and work plans. We will look for opportunities to collaborate and to use our information and influence to help achieve the best possible outcomes for tenants and service users.

We also published a summary of our work plans for 2024/25 in May 2024 - What we will do 2024/25 | Scottish Housing Regulator

### **Our strategic priorities**

### 4.1 To deliver our statutory functions:

- a. monitoring, assessing and reporting regularly on the performance of social landlords and the governance and financial health of RSLs
- b. making regulatory interventions where appropriate
- c. maintaining a register of social landlords

Following extensive consultation, in February 2024 we published our refreshed <u>Regulatory Framework and the associated statutory guidance</u>. We implemented these from 1 April 2024. We are grateful to all our stakeholders who helped shape the new Framework and assisted with implementation.

In response to the feedback from stakeholders, we maintained much from the previous Framework which enshrines the better regulation principles set out in the Scottish Regulator's Strategic Code of Practice.

We introduced a new provision to allow us to require landlords to provide explicit assurance in the Annual Assurance Statement (AAS) on a specific issue or issues.

We also strengthened the emphasis in the Regulatory Framework on social landlords listening to tenants and service users and made it clearer when a social landlord is non-compliant. We worked internally to ensure our staff are working consistently in alignment with our new Framework, by reviewing internal procedures and sharing knowledge.

In response to feedback, we committed to provide further information on the type of Notifiable Events we receive and what we do with them. In December 2024 we published our first Notifiable Events annual report covering 2023/24. Notifiable events are things RSLs need to report to us as they could put tenants' interests at risk or affect the reputation of the RSL itself or the housing sector as a whole. The report also includes some case studies which are examples of the notifiable events we received, what we asked landlords to do and what we did as a result. Read our annual report on notifiable events.

We also committed to a comprehensive review of the Annual Return on the Charter, and in January 2025 we published the outcome of our consultation on the indicators to monitor Scottish Social Housing Charter Performance that landlords report in their Annual Return on the Charter (ARC). This is the main way landlords demonstrate that they are performing against the standards and outcomes of the Charter. We are grateful to all our stakeholders who participated in the extensive consultation. Social landlords will start collecting data for the new indicators from 1 April 2025 and submit returns to us using these by 31 May 2026. We have introduced new tenant and resident safety indicators including on fire and electrical safety and on damp and mould. We reinstated an indicator on long term voids. We also removed a small number of indicators and improved clarity of the definitions of some other indicators. Damp and mould is a complex issue and we will use the first submission of this data in May 2026 to review the usefulness of the new indicators.

Read more about the consultation and outcome Annual Return on the Scottish Social Housing Charter: consultation outcome.

In follow-up to the new Framework, we also:

- published <u>factsheets</u> on raising serous concerns about a landlord for tenants and service users and for social landlords on how we handle those;
- updated our guide to how we regulate for tenants and service users; and
- updated our business planning advisory guidance for social landlords

In April 2024, to align with the introduction of our new Regulatory Framework, we published the <u>outcome of our 2023/24 risk assessment</u>. We published <u>engagement plans</u> for every social landlord as well as a <u>summary of the outcome</u> of our annual risk assessment. These plans set out our requirement of each landlord and how we will engage with it. For every RSL, we also provided a single view of its governance, financial well-being and performance in a regulatory status.

We implemented the engagement plans during the year and kept plans up to date to reflect ongoing engagement and assurance sought. During the year, we published 19 updates to engagement plans.

In November 2024 we published information on the <u>focus or our 2024/25 risk assessment</u>. We reported that tenants, other service users and social landlords continue to face a difficult economic context with continued volatility and uncertainty. And the Scottish Government has declared a national housing emergency as a result of the significant challenges facing tenants and landlords. Our risk assessment continued to have a strong focus in particular on how social landlords deliver homes and services for people who are homeless or at the risk of homelessness. We also kept a focus on social landlord performance in how they deliver services, the development of new homes, the quality of homes, tenant and resident safety, and financial health and governance in RSLs.

At the end of March 2025, we published the outcome of our annual risk assessment. Access engagement plans.

No. of RSL engagement plans published		RSL Status	What this means	
31 March 2023	1 April 2024	31 March 2025		
131	128	132	Compliant	The RSL meets regulatory requirements, including the Standards of Governance and Financial Management.
3	3	1	Under review	We have identified or received information that means we are reviewing the regulatory status of the RSL. We will update the regulatory status as soon as this review is complete.
5	7	5	Not compliant: working towards compliance	The RSL does not meet regulatory requirements, including the Standards of Governance and Financial Management, and it is working to achieve compliance.
0	0	0	Non-compliant - Statutory Action	The RSL does not meet regulatory requirements, including the Standards of Governance and Financial Management, and we are using statutory powers to address the non-compliance.

We keep a public Register of Social Landlords ('the Register'). To be admitted, an organisation must meet the registration criteria set out in the Housing (Scotland) Act 2010 and in the Regulatory Framework. During 2024/25 we did not register any new RSLs. We also did not remove any RSLs from the Register of Social Landlords, which consisted of 138 landlords at the end of March 2025. In 2023/24, we also did not register any new RSLs. Two RSLs voluntarily deregistered and transferred to other RSLs in 2023/24.

Landlords can transfer homes to another RSL. We have no statutory powers in relation to transfers and our consent is not required. We focus on compliance with our statutory guidance on Tenant Consultation and Approval. Following the conclusion of a transfer of engagements, we have a process for monitoring the delivery of commitments made during transfers, for example around improvements to tenants' homes and rent increases as part of our regulatory risk assessment and engagement with RSLs.

### Access the register.

During 2024/25 as part of our engagement, we spoke to every local authority to gather further information and assurance about their homelessness services. These conversations focused in particular on how they were delivering appropriate temporary accommodation for people experiencing homelessness. We engaged with Glasgow City Council and City of Edinburgh Council who we regarded as being impacted by systemic failure, and a further eight councils who we regarded were at heightened risk of being impacted by systemic failure.

At 31 March 2025, following our regulatory risk assessment, we will also engage with Fife Council (previously Fife was at heightened risk), which alongside Glasgow and Edinburgh Councils, in our view is also impacted by systemic failure. In addition, we consider that a further seven councils are at heightened risk of being impacted by systemic failure.

By systemic failure we mean that demands on some councils now exceed their capacity to respond. We will continue to monitor, assess and report on councils' performance in discharging their duties to people who are homeless, and we will engage with councils to promote improvement where this is possible. Systemic failure requires a systemic intervention that is beyond our regulatory powers. We continue to work with Scottish Government and stakeholders to identify and implement actions that will address the acute issues in temporary and permanent accommodation for people who are experiencing homelessness. We do this by participating in a range of Scottish Government working groups, providing information and analysis to support Scottish Government's development of its policy response and engaging with stakeholders to understand the barriers to progress.

In August 2024 we published the National Charter Report, updated Landlord Reports and comparison tools. We reported that social landlords performed well against the Charter given the ongoing challenges facing them and their tenants, including the cost-of-living crisis and acute issues affecting local authority homelessness services. In 2023/24 Scottish social landlords provided 630,732 homes to rent, up 1% from the year before. The number of LA homes increased by 2,398, while the number of RSL homes increased by 4,366.

Almost 9 out of 10 tenants are satisfied with the homes and services their social landlord provides (same as at 2023)

In the areas that tenants tell us matter most:

- Emergency repairs response time improved slightly to 4 hours (was 4.2 hours)
- Tenants satisfied with the quality of their homes remained at 84%
- Tenants satisfied that their rent is good value for money remained at 82%
- Average weekly rent in 2023/24 increased to £91.81 (was £87.59)
- Tenants satisfied with their landlord's contribution to neighbourhood management increased to 85% (was 84%)
- Anti-social behaviour cases which were resolved remained at 94%
- First stage complaints responded to in full remained high, increasing slightly to 97% (was 95%)
- Average rent increase applied in 2024/25 was 6% (was 5.1%)

We also published a suite of performance information including individual landlord reports, a comparison tool, and all of the statistical information landlords provided under the Charter.

We updated the National Charter Report in October to reflect the publication of the Scottish Government's annual homelessness statistics. We use this information in our annual risk assessment of all social landlords.

Read the National Report on the Scottish Social Housing Charter - Headline Findings 2023/24
Read the landlord reports and use the comparison tool
See all of the statistical information about landlord performance

During the year we published a range of thematic reviews and national reports that look in depth at specific areas of landlords' work. We publish these to share information with all of our stakeholders, inform our regulatory approaches and our annual risk assessment. A summary is detailed below and also under priority two.

We published a high level report in the level of empty homes/voids which RSLs had at 28 February 2025 to allow the Scottish Government to better understand the potential contribution of bringing empty homes/voids back into use in tackling the national housing emergency, which the Scottish Parliament declared in May 2024.

Our analysis shows that the rate at which RSLs are building new homes has fallen and is projected to remain at a lower level for the next five years. Alongside that, social landlords have seen a drop in the last couple of years in the number of homes becoming empty. Taken together, this means that social landlords have significantly fewer homes available to let to people in need, including those who are experiencing homelessness. Despite the lower number of homes available to let, both RSLs and local authorities have increased both the number and percentage of homes they let to people who were homeless. Read our analysis.

Related to this, in February 2025 we wrote to all RSLs to request information, on behalf of the Scottish Government, on empty homes/voids. We will share this data with Scottish Government and publish our findings early in 2025/26. Read our letter.

In July 2024 we published the findings of our thematic review on how social landlords assure themselves about their compliance with regulatory requirements, and how this helps them inform their Annual Assurance Statements. We visited nine RSLs and four local authorities (in 2023/24 we visited 13 landlords – 9 RSLs and 4 local authorities) with a particular focus on tenant and resident safety duties and also for RSLs financial planning and the assumptions that underpin financial plans. To help ensure a good mix, the landlords we visited are located across Scotland, and are of different sizes, structures, and level of complexity. We also selected the landlords to reflect the different types of Statement that were submitted. Our report sets out areas that landlords told us work well for them, as well as areas for improvement and recommendations for all landlords to consider. Preparing Annual Assurance Statements - a thematic review

In November 2024, we published the Annual Assurance Statements landlords submitted. In their statements many local authority landlords told us again about the difficulties that they face meeting their statutory duties in relation to homelessness. We used these Statements as part of our annual risk assessment, and we published the outcome of this on 31 March 2024.

Read the Annual Assurance Statements

In March 2025 we wrote to social landlords asking them to again provide specific assurance around their compliance with relevant obligations in relation to tenant and resident safety in their statements that will be submitted in the autumn of 2025. In particular we asked for specific assurance around gas safety, electrical safety, water safety, fire safety, asbestos, damp and mould and lift safety.

In follow up to a previous update, we published information on the presence of reinforced autoclaved aerated concrete (RAAC) in social housing in <a href="November 2024">November 2024</a>. Following further updates from landlords, 148 social landlords have now confirmed that there is no RAAC present in their tenants' homes. Seventeen landlords have identified the presence of RAAC in some of the homes they provide to tenants, with 2464 homes affected. We have engaged with the landlords that have identified RAAC in their homes and have assurance that they have management plans for the affected homes. We will continue to monitor landlords' management of RAAC through our engagement with landlords when required.

In October 2024 we published our analysis of RSL loan portfolio returns for the period April 2023 to March 2024. The report highlighted that 19 RSLs arranged new finance during 2023/24, totalling £198 million, bringing the total agreed borrowing facilities in Scottish RSLs to £6.84 billion. RSLs also plan to increase their borrowing by £1.5 billion over the next five years. We said that it is important that RSLs maintain the confidence of current and potential lenders and investors. When RSLs show indications of low liquidity we will engage with them.

### Read our annual analysis of RSLs' annual loan portfolio 2024

In November 2024 we published RSLs' audited financial statements for 2023/24 for RSLs and others to use for their own analysis and benchmarking.

<u>See all the statistical information for all RSLs</u> See the audited accounts for individual RSLs

In December 2024 we published a summary of the aggregated financial plans of RSLs for the next five years. We reported that RSLs' annual turnover is forecast to increase by an average of 1.7% (2023 was 1%) more than operating costs.

Shaun Keenan, Assistant Director of Financial Regulation, said: "Whilst RSLs have worked to weather the challenges and the financial projections indicate a slight improvement in the medium term, finances at the aggregated level have weakened. We are engaging with more RSLs on financial matters than in the past, but most are still managing the financial pressures, albeit with tightening finances. As a result, RSLs have reduced capacity to respond to emerging costs, like National Insurance increases, which are not included in these projections. This means that Governing Bodies will continue to face some difficult choices and trade-offs as they prioritise expenditure. We will continue to engage with RSLs as they work to tackle the challenges ahead.

Read our summary of social landlord financial projections.

On 7 March 2025 we published our analysis of RSL audited financial statements for the year to 31 March 2024. We reported in this that RSLs had to operate in tough economic and operating conditions in 2023/24 and most had to deal with a range of financial pressures, so their finances are increasingly constrained.

### Read our analysis of RSLs Audited Financial Statements

During 2024/25 we handled two requests for a review of our regulatory decisions, both regarding serious concerns raised about Gypsy/Travellers sites in Perth and Kinross. We upheld our original decision in each case and met our target ten-day response timescales. We handled no requests for reviews in the previous year 2023/24. We did not receive any appeal requests during 2024/25 and to date have only handled one appeal, which was back in 2018.

SHR is a "prescribed person" under whistleblowing legislation.

Read more information about whistleblowing for potential whistleblowers

Read how we deal with whistleblowing concerns about a social landlord

During 2024/25, five whistle-blowers contacted us. None qualified as a protected disclosure. We sought further assurance from social landlords in four cases. Since 1 April 2019, we have required through our Regulatory Framework that all social landlords have effective arrangements and a policy for whistleblowing by staff and governing body/elected members which they make easily available and which they promote.

# 4.3 To listen to tenants and service users, use their feedback to inform effective regulation, and empower them by publishing useful performance information about their landlord.

Actively including tenants, people experiencing homelessness, other people who use services of social landlords and their representatives in what we do is key to our work. We explain how we do this in our publication <a href="How we include tenants and service users in our work 2023-2026">How we include tenants and service users in our work 2023-2026</a>. Our three objectives are to understand priorities and views; involve tenants in our work and communicate with tenants and service users about our work. We primarily achieve this by working with the <a href="Tenants Together (Scotland">Tenants Together (Scotland)</a> SHR Liaison Group, our <a href="National Panel of Tenants and Service Users">National Panel of Tenants and Service Users</a> and also with our <a href="Tenant Advisors">Tenant Advisors</a>. We are very grateful to all those involved and we value their input and insight.

We work with tenant representatives through the Tenants Together (Scotland) SHR Liaison Group. In addition to our regular meetings, the group also participated in our review of the Charter indicators and in our scrutiny by the Scottish Parliament. We refreshed the terms of reference for the Group during the year to reflect the new constitution for <u>Tenants Together (Scotland)</u>. The Liaison Group is now chaired by our Board member Helen Trouten Torres, who is a tenant herself. We welcomed a presentation from Tenants Together Scotland to our Board in early 2025 about its priorities and we look forward to continuing to work closely with it.

Helen Trouten Torres said "I know from my own experience as a tenant just how important social housing and the services that social landlords provide are and how much value my family places on a safe, secure and affordable home. Having a direct, effective connection between our Board and this Group is very valuable to us. Our work with the Group allows us to hear directly from tenants and service users. We gather their views in early and use these, to inform our own decision making and help us focus our work on the things that matter most to them."

Read minutes from the Liaison Group meetings.
Read the terms of reference for the Tenants Together (Scotland) Liaison Group

We also work directly with a our National Panel of more than 420 tenants and service users. It is one of the ways that we find out what matters most to them and it helps us focus on the things that are important to tenants and service users. National Panel membership is open to tenants or people using housing or homelessness services. Membership is diverse and includes people from urban and rural areas, across age bands, local authority and RSL tenants.

In July 2024 we published the findings of the 2023/24 programme of Panel research. This highlighted the continuing financial difficulties that tenants are experiencing.

Helen Shaw, the Regulator's Director of Regulation, said: "Feedback from the National Panel shows the scale of the ongoing financial pressures tenants and their families continue to face. The research, alongside our other engagements with tenants and service users, helps us to understand the priorities, experiences and views of people who use social landlords' services. We will use the research to help inform our work, including our review of Charter indicators."

Read the Panel research report for 2023/24
Read other research from our National Panel of Tenants and Service Users.
Find out how to join the panel

We will publish the findings of our 2024/25 programme in early summer 2025.

We have recruited a group of independent, volunteer tenant advisors. It includes tenants from both local authorities and RSLs. Their feedback provides a us with a tenant perspective. This year our advisors helped us with our review of the ARC Indicators by taking part in focus groups to discuss what they thought about our proposed changes to the ARC indicators and what was important to them. They also helped us with a review of landlords' websites to check for accessibility of documents. We are currently working with the Advisors to get their views on our plans for future work and how to encourage further interest in becoming a Tenant Advisor. We are extending the term of our current Advisors until the end of 2025/26.

Find out more about our Tenant Advisors

We also meet with stakeholders that represent tenants and service users. We welcomed Tenants Together Scotland and a representative from the Tenant Information Service (TIS) to meet with our Board during the year. Our Board member Lindsay Paterson hosted three meetings with a wide-ranging group of advice agencies during the year and we have used their feedback to inform our approach and focus. Discussions during 2024/25 focussed mainly on homelessness.

We also spoke at the TIS annual conference.

We publish a range of written and video information about our work that is directly targeting tenants and service users. During the year we published:

- How we regulate: A guide for tenants and service users | Scottish Housing Regulator
- <u>Video: About the Scottish Housing Regulator</u>
- Complaints and serious concerns information for tenants and service users of social landlords & report form
- Video: How to make a complaint or raise a serious concern about a social landlord

We also publish a range of performance information about landlords that is designed to empower tenants and inform their landlords. <u>Find out about a landlord</u>

In September 2024 we published a thematic review of the provision of British Sign Language services by social landlords. We commissioned the British Deaf Association to get an insight into BSL users' experience of accessing landlord services. We reported on the challenges

experienced and encouraged all landlords to consider the report. We also reviewed our own arrangements, and we have reported more about those under strategic priority four. Read our thematic report.

In November 2024, we published a thematic review of tenant and Gypsy/Traveller participation in Scottish social housing. We commissioned independent tenant representatives Tenant Participate Advisory Services (TPAS) Scotland to carry out this work on our behalf. We reported that both the landlords and the tenants and residents who took part said landlords use a range of ways to reach out to tenants and service users including face to face and digital options to better meet needs. Both groups noted that building trust is key to successful participation. But we also found that some landlords could do more to ensure they understand the needs of Gypsy/Travellers, the barriers they face, and to enable them to better assess how successful their tenant participation strategy is for Gypsy/Travellers. Read our thematic review.

In November 2024 we also reported on serious failings in one of Fife Council's Gypsy/Traveller sites. We investigated and took action there following a reported serious concern. The Council accepted our findings and delivered the necessary improvements including progressing remedial actions, improvements and redevelopment work.

George Walker, Chair of the Regulator, said "Bringing a serious concern to us is an important way for social housing tenants to tell us about serious problems they are experiencing, where their landlord regularly and repeatedly fails to achieve the regulatory requirements for social housing and this failure affects a group of the social landlord's tenants. It sits alongside other routes for tenants and service users to complain to their landlord and the Scottish Public Services Ombudsman."

### Read more about the serious failings in Fife Council Gypsy/Traveller site

Later in the year we reported on further serious failings at two of Perth and Kinross Council's Gypsy/Travellers sites. We investigated and took action. This also followed reported serious concerns. The Council requested a review. We upheld our original decision and published information on the concern and are engaging with the Council and the site residents around improvements.

Read more about the serious failings in Perth & Kinross Council Gypsy/Travellers sites.

In both these cases we worked closely with the Gypsy/Travellers impacted, the representative body Making Rights Real and the Scottish Human Rights Commission. We are grateful to everyone involved and to the landlords for working to deliver the necessary improvements to meet their obligations under the Scottish Social Housing Charter and the Scottish Government's Minimum Site Standards.

Find out more about serious concerns and what we will do.

Clare MacGillivray, Director of Making Rights Real said "The Scottish Housing Regulator has listened to Gypsy Traveller tenants in three communities in Scotland about their human rights concerns, particularly around the right to culturally appropriate housing, and found that two Local Authorities breached the Charter and Minimum Site Standards.

The findings of these investigations highlight how important an independent regulator is for tenants."

We expect landlords to be open and transparent about their work, to publish relevant performance information, and to provide tenants and service users with easy and effective ways to provide feedback and raise concerns.

We also want it to be easy for tenants and service users to be able to find out about us and what we do. Landlords' websites can play an important role in this by providing information and signposting to our own website.

During the year we reviewed all landlords' websites to find out what sort of information landlords make available to tenants and service users digitally in addition to the direct communications that they have in place. We wrote to landlords to remind them of the key information we expect to be available including:

- its Annual Assurance Statement
- its Engagement Plan
- our report on its performance (our Landlord Report)
- information on raising serious concerns with us, including our leaflet.

Positively, we found that the vast majority of social landlords do this and we encouraged all landlords to signpost to us.

We are continuing to explore how we ensure we can engage effectively with tenants and service users, and this will be a priority for us going into 2025/26 as we refresh our strategy on how we include tenants and residents in our work.

# 4.4 To work closely with, and listen to, all our stakeholders, to help us understand the challenges they face, and to promote a wider understanding of the current and emerging risks that may impact on social housing.

The input of our stakeholders is very important. We have very regular engagement at all levels with Scottish Government colleagues, the Scottish Federation of Housing Associations, Association of Local Authority Chief Housing Officers (ALACHO) and Glasgow and West of Scotland Forum of Housing Associations. We also speak regularly with UK Finance, Shelter, Scottish Human Rights Commission and OSCR and engage with other scrutiny bodies including, HSE and Care Inspectorate as appropriate.

This year we have participated in a range of round table and working groups alongside our stakeholders including Scottish Government's Housing to 2040 Strategic Scrutiny Board and covering themes including Grenfell phase two response, housing emergency response, RAAC, Net Zero, Rent affordability & homelessness.

We host regular meetings with groups of stakeholders to discuss important and topical issues in social housing in Scotland. We published blogs to share some of these discussions with a wider audience. The groups include:

- Urban landlord group, which includes 13 landlords who are both GWSF and SFHA members hosted by our Chair George Walker and we published blogs on the themes covered;
- Rural and Islands group, which includes 9 landlords hosted by our Deputy Chair Andrew Watson and we published blogs on the themes covered:
- Advice Agencies hosted by Board member Lindsay Paterson, which met three times; and
- Systemically Important RSLs, which includes 20 landlords hosted by our Chair, George Walker and we published blogs on the themes covered.

Learn more about our landlord groups

Read blogs from our landlord group meetings

Read our Deputy Chair, Andrew Watson's blog, on the Systemically Important Landlord forum in June 2024

Read our Chair, George Walker's blog on the Systemically Important Forum in November 2024

Our Board have welcomed a range of stakeholders to meet with it during the year. This is an important way for us to understand and discuss strategic policy issues. This has included: the Auditor General, Scottish Human Rights Commission, Tenants Together Scotland, Minister for Housing, Professor Ken Gibb, ALACHO and Scottish Government. We are very grateful to everyone who took the time to meet with our Board. We aim to continue to welcome a range of stakeholders during 2025/26 so all of our Board members can engage with them directly.

During the year we spoke at a range of stakeholder conferences.

At the SFHA Finance Conference in November 2024, SHR Director of Regulation Helen Shaw said: "While this certainly feels the most challenging context that I can recall in all of my time working in housing, we believe that the sector will be as well placed as it can be to respond to these challenges and continue to provide the much needed homes for their tenants."

At the SFHA's conference for Governing Body members in January 2025 SHR Chair George Walker said: "Social landlords are community anchors, providing key services for a significant part of Scotland's population right across the country. Working together, we all have a shared interest in supporting tenants and sustaining thriving communities..... The challenges are real, but it is worth reflecting that social landlords in Scotland have weathered many storms over the years in which they have been building homes and sustaining communities."

We also spoke at the SHARE conference, Housemark Leadership Forum, Scottish Housing Network annual event, Social Housing Regulation & Governance conference, Harper Macleod virtual housing conference, TIS rent setting and affordability conference, SFHA Housing Quality conference, a Scotland's Housing Network online event, a Housing Diversity Network event, TIS conference, a British Deaf Association event, APSE and SHARE young professionals. We also attended conferences as delegates including the Chartered Institute of Housing Festival.

We use all our interactions with our stakeholders to inform how we regulate and the areas that we focus on.

To support this, we aim to be open and accessible and publish as much information and data as we can on website. We share periodic updates on or work to more than 1700 subscribers to our SHR Update newsletter. We also tweet about our work on X (formerly twitter). <u>Visit our website</u>

We continued to use X (formally twitter) to promote our work to our 1800 followers, and more than 1700 subscribers kept up to date with all our news via our SHR Update e-zine. Read our past SHR Update electronic newsletters

During 2024/25 we welcomed the opportunity to give evidence to the Scottish Parliament's Local Government, Housing and Planning Committee on our annual report. The Committee expanded its approach this year to include a call for views and evidence sessions with our stakeholders. We welcome this scrutiny and continue to work with the Committee to provide information on our work and approaches.

Read about the Scottish Parliament's scrutiny of our work We also keep the Scottish Parliament Committees updated on all our publications and news throughout the year.

# 4.6 To be an effective, efficient and open public body and contributing constructively to the Scottish Government's public service reform agenda.

We spent £5.147 million of our £5.307 million budget. We responded to Scottish Government's in-year spend controls and achieved savings during the year. We were able to return £73.5k of revenue funding and £63.8k of capital funding to the Scottish Government during the year to support the wider financial challenges facing Government.

In July 2024 we successfully completed a move to a new permanent office, where we share space with Social Security Scotland in its Glasgow office. This move followed an option appraisal of Glasgow public body options concluding in March 2024. Our move brought to an end a period of occupying interim accommodation. It brings us future stability and will deliver significant recurring annual revenue savings of more than £120k. Our new arrangement demonstrates our commitment to Best Value and public service reform, working effectively in collaboration with another public body and delivering savings. We continued to support our staff to work effectively from home and from our office.

We sought feedback from our staff on our new office arrangements and flexible working approach six months into our new permanent office space, to ensure that our staff have access to good quality office facilities, have the support they need to work flexibly, meet business needs and do so in a way that maximises the benefits of lower emissions from less commuting. We are currently reviewing staff feedback and will consider any improvements needed in 2025/26.

We report here on climate-related financial disclosures and compliance in relation to <a href="https://example.com/HM Treasury's Taskforce on Climate-related Financial Disclosures (TCFD)">HM Treasury's Taskforce on Climate-related Financial Disclosures (TCFD)</a>, covering governance, risk management, and metrics and targets. We will further develop our reporting in future years. More detailed information is available in our Climate Change Report, which we submitted to the Scottish Government in November 2024.

Our Board oversees major decisions relating to climate-related issues. Each Board report includes a 'risks and impacts' section including environmental considerations. The Board is responsible for agreeing our budget, risk management approach and climate change emissions targets.

In 2022 we had agreed climate change targets for achieving net zero for "scope 1" direct emissions and "scope 2" indirect emissions by 2025. That decision was based on our planned move to a newbuild office which operates with zero emissions, sub-letting from another public body. However, we had to adjust our plans because the other public body changed its position and no longer had space to accommodate us. After moving instead to Social Security Scotland's office in July 2024, we reviewed the emissions position for our new office. In autumn 2024 our Board agreed a revised target to align with that of Social Security Scotland to reflect the operating circumstances of its Glasgow office, to 2045 for achieving net zero for both scope 1 and scope 2 targets. We will continue to work with Social Security Scotland. We reflected this change in targets in our Climate Change Report.

We take account of the impact of climate change in our regular risk reviews. Our Board and Audit and Risk Assurance Committee review our risk register monthly, and our management team review it monthly. Two of our current strategic risks - landlord systemic failure and public body compliance - feature climate change-related issues as factors which could lead to those risks crystalising. Our management team reviewed our approach to climate change adaptation in March 2025. As an outcome our risk register has a more specific focus on climate-related disruption to our own activities and to tenants' homes and social landlords' services. When the Scottish Government concludes consultation and publishes new guidance on public bodies' climate change duties we will consider the implications for our work and appropriate actions we can take.

We continued to promote biodiversity awareness to our staff during the year. Our work included carrying out a successful volunteering day at Richmond Park, Glasgow where our staff cleared a nature path and weeded to support wildlife.

The duty of Best Value applies to all public bodies in Scotland and is structured around seven themes. Since 2023, to help us monitor and demonstrate this in a systematic way, we have considered how the proposals and issues we bring to our Board contribute to Best Value. We report on progress once a year to our Audit and Risk Assurance Committee. We continue to share a Data Protection Officer with Transport Scotland, which contributes to both Best Value and public service reform.

Cyber resilience remains a priority for us. During 24/25 year we conducted two tests of our cyber incident response planning, one focusing on our Business Intelligence system, the other on the Scottish Government shared IT systems we use. We maintained a high level of staff awareness of cyber risk through regular updates and simulated phishing exercises. We retained our Cyber Essentials accreditation in March 2025, and at the end of the March 2025 we were working to renew our Cyber Essentials Plus accreditation to provide assurance both to us and to the landlords that use our social landlord portal. We successfully renewed our Cyber Essentials Plus accreditation in early May 2025. We continue to participate in a range of Scottish Government groups relating to digital and cyber resilience.

Read more about Cyber Essentials Plus accreditation

We commissioned a website accessibility audit to test our site against the Website Content Accessibility Guidelines 2.2. We worked with our website suppliers to make fixes identified by the audit and update our accessibility statement.

In January 2025 we published our second draft British Sign Language Plan (BSL) for consultation, and in March we published the final plan for 2025-31. This explains how we will promote and support BSL in accordance with the BSL (Scotland) Act 2015. We have published a series of BSL videos that cover the plan, our thematic review, how we regulate and how to make a complaint or raise a serious concern. Watch the BSL and other SHR videos

Read our draft BSL plan 2025 - 2031

We are a corporate parent under the Children and Young People (Scotland) Act 2014, and we are required to publish a plan every three years to explain how we fulfil our duties. In July 2024 we published a new action plan setting out the range of actions we would take to support the implementation of our Corporate Parenting Plan and Children's Rights Report, which we published in December 2023. We began actively planning for meeting the new requirements of the United Nations Convention on the Rights of the Child (UNCRC), including through our new action plan and by participating in relevant public body groups to collaborate on our duties and opportunities.

Read our plan and report

In April 2024, we reported on our contribution to gender equality on public boards in Scotland. At March 2025 we have four women and five men on our Board. We welcomed Dr Abhi Agarwal to our Board in October 2025. Andrew Watson retired from the position of Deputy Chair on 31 March 2025 to be succeeded by Ewan Fraser. We look forward to welcoming a new Chair and member later in 2025 as George Walker, Andrew Watson and Siobhan White come to the end of their appointment terms in June 2025. We are grateful for their eight-year input and leadership. Read more about our Board.

We built on the skills audit and Learning and Development Strategy we completed in late 2023/24. During the year we embedded new learning and development initiatives including a staff learning and development group, a corporate learning plan and signposting for staff to available resources. Our staff also completed mandatory training on topics such as information security, data protection and security essentials.

We are one of around 30 public bodies who use Scottish Government shared services for the IT systems that underpin our HR, finance and purchasing systems. During 2024/25 the Scottish Government introduced a new Oracle IT system for these services. This was a major programme, and we committed significant resources to supporting the transition to the new system. The transitional issues have been resource-intensive and continue to be so for our small corporate team, both for the planning phase ahead of the switch in October and during implementation in the second half of the financial year.

Our staff team is made up of two groups, each with a Director. Our Chief Executive and Directors form our Executive Team, which is responsible for providing strategic management and leadership. Our Management Team supplements the Executive Team and is responsible for the overall oversight of operational management. It comprises of the Executive Team along with our four Assistant Directors of Regulation and our Assistant Director of Digital. During 2024/25, in alignment with the Scottish Government, we transitioned to a 35-hour working work. Our staff are all civil servants.

We support out staff through our Health, Safety and Wellbeing Committee, which has both staff and trade union representation. During the year we reviewed our lone working policy and our health and safety risk assessment policy.

Our staff participated in the Civil Service people survey. Our overall "engagement index" score for the survey is the equal highest of all the 100+ participating organisations across the UK. Read all our results from 2020 - 2024 here.

Our Board and Management Team monitor our performance against our Corporate and operational plans, including the targets set out below.

Туре	Response Time	Target	2024/25	2023/24	2022/23
General	8 working days	95%	Met	met	Met
Correspondence					
Complaints about SHR	5 – 20 working days depending	95%	Met (4 cases)	Met (4 cases)	Met (2 cases)
	on stage				
FOI Requests	20 working days	100%	Met (33 requests)	Met (29 requests)	Not met (for 2 out of 26 requests)
FOI Reviews	20 working days	100%	Met (2 reviews )	None received	Not met (for 1 out of the 3 requests)
Serious Concerns	5 working days	100%	Met	Met	Met
Invoice payments	10 working days	100%	Not met (for 5 out of 119 invoices)	Met	Met

In 2024/25 we achieved substantial assurance from our internal auditor and an unqualified opinion from or Audit Scotland.

We had to reschedule some of our original work plans for the year. We postponed some corporate work while we transitioned to the new Oracle HR and Finance IT systems and we hope to pick up on this in 2025/26, although system challenges remain. We were unable to review our MOUs with HSE and the Care Inspectorate. We planned to self-assess compliance with the Scottish Government's Public Sector Cyber Resilience Framework, but as publication of this was delayed significantly, we prioritised other cyber activities and will consider the Framework in 2025/26. We will also review the Charter Indicators in light of the Scottish Government's review of Energy Efficiency Standard for Social Housing when it is available. Work relating to the housing emergency declared by the Scottish Parliament and the Phase 2 Grenfell report will also continue into 2025/26. We published our 2023/24 Statement of Compliance with the Public Service Reform (Scotland) Act 2010 in mid-April 2025, later than planned.

### 4.7 Looking ahead

We will continue to implement our 2024-27 Strategy, taking time to review it at the mid-point during 2025/26. We will remain agile and responsive, recognising the very complex and challenging environment for tenants, people who use social housing services and the landlords that deliver them. We set out these challenges in the introduction to this report. We will continue to use our approach to risk

management to remain responsive to the changing environment and mitigate the risks that could impact how we deliver against our objectives and priorities. For 2025-26 we have a budget settlement of £5.343 million revenue, £0.1 million capital, non-cash £0.1 million non-cash and £0.2m UK-funded Annual Managed Expenditure. At 31 March there are some uncertainties around elements of our future costs: the annual Scottish Government pay settlement (which applies to our staff) has not been agreed, and the scale of Scottish Government support to offset the uplift in employer National Insurance contributions, has not been confirmed. We look forward to welcoming a new Chair and Board member during the coming year as we continue to work to achieve our statutory objective to protect the interest of tenants and those you use services provided by social landlords in Scotland.

Michael Cameron

Michael Cameron, Chief Executive

07 October 2025

## 5. Accountability report

## **Corporate Governance Report**

## Directors' Report

#### Introduction

We have prepared these accounts for the financial year 2024-25 in accordance with the Accounts Direction given by Scottish Ministers and section 19(4) of the Public Finance and Accountability (Scotland) Act 2000.

### **Statutory Background**

The Scottish Housing Regulator (SHR) was established on 1 April 2011 under the Housing (Scotland) Act 2010. We are a Non-Ministerial Department (NMD), part of the Scottish Administration and directly accountable to the Scottish Parliament. We commenced our full regulatory powers, duties and corporate responsibilities under the 2010 Act in April 2012.

Our relationship with Scottish Ministers is set out in a published **Framework Agreement**, available on our website <a href="https://www.housingregulator.gov.scot">https://www.housingregulator.gov.scot</a>

#### **Our Board**

Our organisation is led by a Board of non-executive members, appointed by Scottish Ministers following an open public appointments process. The Board sets our strategic direction and is responsible for oversight of our aims, objectives and performance.

Membership of the Board during the reporting period April 2024 to March 2025 is provided below:

- George Walker, Chair. Continues as Chair until retirement in June 2025
- Andrew Watson, Deputy Chair. Stepped down as Deputy Chair in March 2025, continues as a member until retirement in June 2025
- Ewan Fraser, Deputy Chair from April 2025 and Audit and Risk Assurance Committee (ARAC) Chair from January 2025
- Siobhan White, ARAC Chair. Stepped down as ARAC Chair in December 2024, continues as a member until retirement in June 2025
- Abhishek Agarwal. Appointed in October 2024
- Marieke Dwarshuis
- Lindsay Paterson
- Colin Stewart
- Helen Trouten Torres

Details of our governance framework for Board appointments, appraisal and reviewing the Board's effectiveness are described in the Governance Statement of this report.

#### **Our Executive Team**

Our Executive Team is made up of our Chief Executive and Directors and is responsible for providing strategic management and leadership.

Our Executive Team is:

- Michael Cameron, Chief Executive
- Iain Muirhead, Director of Digital and Business Support
- Helen Shaw, Director of Regulation

Each member of the Executive Team has confirmed that so far as they are aware, there is no relevant audit information of which the auditor is unaware.

Details of Executive Team remuneration can be found in the Remuneration Report.

### **Register of interests**

Our Board members and Executive Team have to complete a declaration of interests. No significant company directorships or other interests were held which may have conflicted with their management responsibilities, and there were no related party interests.

Our Board members' declarations of interest are published on our website.

### Our resources

Our budget as set out in the Budget (Scotland) Act for 2024/25 was £5.307 million, comprising £0.100 million capital and £5.207 million revenue, and representing a decrease of £0.300 million in our capital funding and £0.111 million in our revenue funding from 2023-24 (£0.400 million capital and £5.318 million revenue). In the context of reduced budgets, we had forecast an overspend at the beginning of the year. In August 2024 the Scottish Government announced Emergency Spending Controls and we implemented an interim approval framework to manage expenditure which was agreed by the Board at its September 2024 meeting. We undertook our mid-year budget review in the context of the spending controls, we revised our capital budget and were able to return £0.050 million at the mid-year review point. During the year we made savings due to staff movements, reductions in accommodation and office costs following relocation to our new office and through applying our interim framework for spending implemented in response to the Emergency Spending Controls. We spent £5.147 million (2023-24, £5.000 million) and the remaining budget was returned to the Scottish Government. Our non-cash budget was £0.300 million (2023-24, £0.093 million). Non-cash budget is only drawn down when required.

Around 87% of our revenue costs were staff costs, 5% were IT equipment and support and less than 1% were accommodation. In July 2024 we

moved from our temporary office to our new office within the Glasgow office of Social Security Scotland, where we are sharing space and services. Both our previous and current space allow for effective home and office-based working and contribute to Best Value and Public Service Reform agendas.

Our Business Intelligence System represents the majority of our IT costs. This system supports our regulatory data collection, data analysis and our engagement with the bodies we regulate.

Our revenue budget for 2025-26 is £5.343 million. This is a cash increase of £0.136 million from 2024-25, however this is in the context of our 2024-25 budget having decreased £0.111 million from the year before and before taking account of the impact of inflation on staff salaries and other costs.

### Reporting of personal data related incidents

During 2024-25 there were no incidences of data loss which required to be reported to the Information Commissioner.

### **Appointment of auditors**

Audit Scotland have been appointed to audit our annual accounts. A notional audit fee of £26,010 is shown at note 10. Audit Scotland supplied no other services to us during the year. The Scottish Government Internal Audit and Assurance Directorate provided internal audit services.

### **Contingent liabilities**

We have no contingent liabilities.

### Post-balance sheet events

In August 2025, Garry Coutts was appointed as the new Chair of the Scottish Housing Regulator. This follows the retirement of our previous Chair at the end of his term of office in June 2025.

### Supplier payment policy

Our policy is to pay all invoices not in dispute within 10 days of receipt. We aim to pay 100% of invoices on time under these terms. This includes disputed invoices once the dispute has been settled. We process invoices on the Scottish Government's Accounting System, prior to October 2024 this was SEAS, in October 2024 existing procurement, accounting and HR systems were replaced with the Oracle system by Scottish Government. We are reliant upon the financial information and management system provided by the Scottish Government for all our financial functions.

For the year ended 31 March 2025, we paid 96% of all invoices received within the terms of our payment policy.

## Statement of Accountable Officer's Responsibilities

In accordance with section 19(4) of the Public Finance and Accountability (Scotland) Act 2000, Scottish Ministers have directed the SHR to prepare a statement of accounts for each financial year in the form and on the basis set out in the Accounts Direction at the end of these financial statements.

We prepare the accounts on an accruals basis and they give a true and fair view of our state of affairs at the year end, and of our operating costs, recognised gains and losses, and cash flows for the financial year.

The Permanent Secretary of the Scottish Administration has appointed me, the Chief Executive, as the Accountable Officer for SHR.

In preparing the accounts, I am required to comply with the requirements of the Government Financial Reporting Manual and in particular to:

- observe the Accounts Direction issued by Scottish Ministers, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- make judgements and estimates on a reasonable basis;
- state whether applicable accounting standards, as set out in the Government Financial Reporting Manual, have been followed, and disclose and explain any material departures in the financial statements; and
- prepare the accounts on a going-concern basis.

The responsibilities of the Accountable Officer, including responsibility for the propriety and regularity of the public finances for which I am answerable, for keeping proper records and for safeguarding SHR's assets, are set out in the Accountable Officer's Memorandum issued by Scottish Ministers.

As Accountable Officer, I am not aware of any relevant audit information of which our auditors are unaware. I have taken all necessary steps to ensure that I am aware of any relevant audit information and to establish that our auditors are also aware of this information.

I confirm that the annual report and accounts as a whole are fair, balanced and understandable. I take personal responsibility for the annual report and accounts and the judgements required for determining that they are fair, balanced and understandable.

### Governance Statement

### Scope of responsibility

As Accountable Officer, I am responsible for sound governance and internal controls that help us to achieve our statutory objective. I am also responsible for safeguarding SHR's public funds and assets.

As Accountable Officer, I am responsible for:

- the propriety and regularity of financial transactions which have taken place under my control;
- the economic, efficient and effective use of our resources;
- ensuring that arrangements are made to secure Best Value;
- signing our annual accounts;
- ensuring that effective governance and management systems are in place; and
- ensuring that all risks are identified, assessed and managed appropriately.

### Our governance, internal control and Best Value arrangements

Our governance framework is made up of the systems, processes, cultures and values by which we manage and control our organisation. It enables us to monitor progress against our objectives and to ensure that we use our resources efficiently and effectively.

We have a clearly defined governance framework which fits with best practice principles. I am satisfied that this framework works well.

The Board approved SHR's annual report and accounts for 2023-24 for the Chief Executive as Accountable Officer to sign on 20 August 2024. The Chair and Chief Executive presented SHR's Annual Report & Accounts 2023-24 to the Scottish Parliament's Local Government, Housing and Planning Committee on 17 December 2024.

During the year, the Board hosted guest speakers from Scottish Government, Association of Local Authority Chief Housing Officers (ALACHO), Professor Ken Gibb, Tenants Together Scotland, Scottish Human Rights Commission and the Auditor General. The Board also met with the Minister for Housing in November 2024.

The Board monitored work plans and the budget each quarter in the context of managing risks to achieving SHR's objective. The Board also considered Board membership succession planning in preparation for forthcoming appointments during 2024 and 2025.

In March 2024, the Board agreed a new three-year Strategy for 2024-2027, work plans and budget for 2024-25. Our system of internal control is an important part of this framework. We identify, evaluate and manage risk to a reasonable level, rather than attempt to eliminate all risk. Our approach is proportionate and provides reasonable assurance of effectiveness.

#### **Our Board**

Our organisation is led by a Board of non-executive members, appointed by Scottish Ministers following an open public appointments process.

Board appointments are made by Scottish Ministers and overseen by the Commissioner for Ethical Standards in Public Life in Scotland. We commenced work to support Scottish Ministers with forthcoming Chair and Member appointments that will take place during 2025-26.

The Board met ten times in 2024-25, including Board workshops. All meetings were quorate. We publish <u>our Board and Audit and Risk Assurance Committee minutes</u>, our <u>Board Code of Conduct</u> and <u>Board members' registers of interest</u> on our website.

The Scottish Government's Director for Housing appraises our Chair's performance annually. Our Chair appraises each Board Member's performance annually. The Chair and Board Members participate in regular training.

#### **Audit and Risk Assurance Committee**

Our Audit & Risk Assurance Committee (ARAC) provides assurance to our Board and to me, as Accountable Officer, that appropriate risk, control and governance structures are in place. ARAC met four times in 2024-25. Our ARAC meeting minutes are published on our website alongside information about membership and the terms of reference.

Membership comprised the following members of the Board:

- Siobhan White, Chair. Stepped down as ARAC Chair in December 2024, continues as a member until retirement in June 2025
- Ewan Fraser, Chair from 1 January 2025
- Lindsay Paterson
- Abhishek Agarwal. Appointed in October 2024

I have considered the matters raised and discussed by the Board and ARAC when preparing this statement.

#### **Executive Team and Management Team**

I am joined by our Directors to form our Executive Team. We are responsible for providing strategic management and leadership. We have two Groups, each with a Director.

Our Management Team supplements the Executive Team and is responsible for oversight of operational management. Our Management Team comprises the Executive Team along with our four Assistant Directors of Regulation and our Assistant Director of Digital. I chair the Management Team. Throughout 2024-25 our Board, Executive Team and Management Team received regular reports to monitor progress against our statutory objective, the objectives in our strategy and annual operating plan, and to ensure we are managing risk effectively.

#### Risk framework

Our risk management strategy, along with our risk register, identifies the key risks to the delivery of our statutory, strategic and corporate objectives.

During 2024-25 our Management Team reviewed the risk register regularly and reported to both the ARAC and the Board on a quarterly basis. These reviews enable us to:

- discuss and evaluate key risks that could affect our ability to deliver our statutory objective;
- assess existing controls (i.e. measures in place to reduce or limit risk);
- determine the appropriate response to each risk;
- profile our risks by scoring them in terms of overall risk exposure (in terms of likelihood and impact).

In 2024-25 we had one overarching risk, which is that we do not achieve our statutory objective. Below that we identified the following strategic risks as those potentially having the greatest impact on our activities:

- a significant reduction in quality or change in agreed delivery of shared services from Scottish Government, which impacts on our ability to operate effectively;
- our regulatory framework not working effectively;
- losing stakeholder support;
- suffering a serious business failure;
- suffering a cyber incident;
- failing to comply with the duties and expectations on us as a public body;
- impact of a systemic failure in social landlords
- suffering reputational damage as a result of a development out with our control;
- · insufficient resources to deliver effectively.

Our risk register is aligned to the activities in our operating plan. This ensures we are targeting our activities at areas that address the risks we face, so far as this is possible. I am satisfied that our arrangements have enabled us to identify and manage risk effectively during 2024/25.

We reviewed our Risk Management Strategy in 2024 and will review it again in 2027.

For data and information handling risks, I am assisted by our Senior Information Risk Owner and five Information Asset Owners. There were no significant data incidents in 2024-25 that required us to report to the Information Commissioner. We share a Data Protection Officer with Transport Scotland. We provided training and awareness-raising for our staff. Our Data Protection Officer completed a data protection compliance review in early 2025 and reported that we retained a good level of compliance with data protection legislation.

We have fraud, whistleblowing and anti-bribery policies in place, and a fraud response plan, to ensure the effective management of risks associated with these issues.

#### Review of effectiveness of internal control and risk management

As Accountable Officer, I have responsibility for reviewing the effectiveness of our systems of internal control and risk management arrangements. My review is informed by:

- annual certificates of assurance and internal control checklists from the Director of each of our Groups;
- the work of our internal auditors, who submitted regular reports to our ARAC;
- comments made by our external auditors, Audit Scotland, in their management letters and other reports; and
- quarterly reports to our Board from the Chair of ARAC.

Our systems of internal control have been supported by:

- regular Board meetings and workshops;
- · meetings of our Executive and Management Teams; and
- regular monitoring and reporting of performance against our operating plan and other areas of corporate performance, including finance and risk management.

We use and rely on the core financial management systems of the Scottish Government to carry out accounting and payment functions. I have received assurances from the Scottish Government that reliance can be placed on the central systems they provided in 2024-25.

The implementation of the Oracle Cloud platform is one of the largest transformation projects the Scottish Government has undertaken in years. It has brought our HR, Finance and Procurement data into one integrated solution.

The platform was implemented in the Scottish Government and 32 public sector organisations in October 2024. The platform was implemented

in response to the recognition that the previous Finance and People platforms, SEAS and e-HR respectively, were approaching the end of their useful lives and had not kept pace with the scale or functions of the organisation.

We are committed to a process of continuous improvement and we develop our systems in response to any relevant reviews and advancements in best practice. In the period covering the year to 31 March 2025 and up to the signing of the accounts, we liaised with Scottish Government Internal Audit and Assurance Directorate, Audit Scotland and Scottish Government Finance colleagues to ensure that our internal control procedures were fit for purpose and compliant.

During 2024-25, our internal auditors completed their risk-based internal audit plan with specific assurance work on the processes for securing of our new office accommodation and on Notifiable Events. Internal Audit and Assurance Directorate has provided substantial assurance in relation to both of these reviews. Overall, we received a rating of substantial assurance from Internal Audit and Assurance Directorate.

I am satisfied that no significant control weaknesses or issues have arisen during 2024-25. There have been no significant failures in expected standards for good governance, risk management and control.

## **Remuneration and Staff Report**

#### Remuneration policy (unaudited)

Our staff are civil servants and our Chief Executive is a senior civil servant.

The remuneration of senior civil servants is set in accordance with the Civil Service Management Code (available at www.civilservice.gov.uk) and with independent advice from the Senior Salaries Review Body (SSRB). Information about the work of the SSRB can be found at www.ome.uk.com. Within the Scottish Government, the Top Level Pay Committee ensures that the Pay and Performance Management System (PPMS) policy falls within the parameters set by the SSRB and Cabinet Office.

#### Remuneration (audited)

		Salary (£000)	Bonus	payments (£000)	Benefi	its-in-kind (£000)	Pensio	n benefits (£000)		Total (£000)
	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24	2024-25	2023-24
Officials										
Chief Executive										
Michael Cameron	90 - 95	85 - 90	-	-	-	-	65 - 70	25 - 30	160 - 165	110 - 115
Executive Team										
lain Muirhead	85 - 90	80 - 85	-	-	-	-	60 - 65	0 - 5	145 - 150	85 - 90
Helen Shaw	85 - 90	85 - 90	-	-	-	-	75 - 80	-	165 - 170	85 - 90
Board Members Fees										
Abhishek Agarwal (appointed Oct 2024)	5 - 10	-	-	-	-	-	-	-	5 - 10	-
Marieke	10 - 15	5 - 10	-	-	-	-	-	-	10 - 15	5 - 10
Ewan Fraser	10 - 15	5 - 10	_	_	_	_	_	_	10 - 15	5 - 10

Lindsay Paterson	10 - 15	5 - 10	-	-	-	-	-	-	10 - 15	5 - 10
Colin Stewart	10 - 15	5 - 10	-	-	-	-	-	-	10 - 15	5 - 10
Helen Trouten Torres	10 - 15	5 - 10	-	-	-	-	-	-	10 - 15	5 - 10
George Walker (Chair)	20 - 25	20 - 25	-	-	-	-	-	-	20 - 25	20 - 25
Andrew Watson (Deputy Chair)	10 - 15	10 - 15	-	-	-	-	-	-	10 - 15	10 - 15
Siobhan White	10 - 15	5 - 10	-	-	-	-	-	-	10 - 15	5 - 10

During 2024-25, total expenses paid to members was £2.2k. Members do not receive pension payments as part of their role.

#### **Annualised salaries**

There were no changes to the Executive Team during the year and the annualised salaries are as per the table above.

One new member, Abhishek Agarwal, joined the Board during 2024-25, and the banded full time equivalent salary in 2024-25 was £10,000 - £15,000 (2023/24, nil). No members retired during 2024-25.

#### Pensions

	Accrued pension (P) and lump sum (LS) at pension age as at 31/03/25 £000 Band	Real increase in pension (P) and lump sum (LS) at pension age £000 Band	CETV at 31/03/25 £000	CETV at 31/03/24 £000	Real increase in CETV £000
Michael Cameron Chief Executive	45 - 50 (P) 125 - 130 (LS)	2.5 - 5 (P) 2.5 - 5 (LS)	1,195	1,087	62
lain Muirhead Director of Digital and Business Support	30 - 35 (P) 80 - 85 (LS)	2.5 - 5 (P) 2.5 - 5 (LS)	749	664	53
Helen Shaw Director of Regulation	40 - 45 (P) 105 - 110 (LS)	2.5 - 5 (P) 5 - 7.5 (LS)	1,005	890	75

#### Salary

Salary includes gross salary, overtime and any other allowance to the extent that it is subject to UK taxation. This report is based on accrued payments made by SHR and recorded in these accounts.

#### The Cash Equivalent Transfer Value (CETV)

A Cash Equivalent Transfer Value (CETV) is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost.

#### The real increase/(decrease) in the value of the CETV

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation,

contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

#### Pay multiples

The banded remuneration of our highest-paid director in 2024-25 was £90,000 - £95,000 (2023-24, £85,000 - £90,000). This was 1.70 times (2023-24, 1.62) the median remuneration of the workforce, which was £54,419 (2023-24, £54,162). The banded mid-point of our highest paid director in 2024-25 was £92,500 (2023-24, £87,500) which represented an increase of 5.7% on the previous year (2023-24, 0%). Although staff continued to move up the respective salary scales and the annual pay award was applied, a movement in the banded mid-point of our highest paid director meant a drop in the ratio to all staff FTE pay and benefits and a change from the recent trend. The median pay ratio reflects the pay, rewards and progression policy for employees as a whole.

A summary of the pay multiples for 2024-25 and the prior year comparative figures is provided in the table below.

	2024-25 25 <sup>th</sup> %	2023-24 25 <sup>th</sup> %	2024-25 50 <sup>th</sup> %	2023-24 50 <sup>th</sup> %	2024-25 75 <sup>th</sup> %	2023-24 75 <sup>th</sup> %
Highest paid director (band midpoint) (£)	92,500	87,500	92,500	87,500	92,500	87,500
All staff FTE pay and benefits (£)	46,773	44,557	54,419	54,162	71,243	69,846
Ratio	1.98	1.96	1.70	1.62	1.30	1.25

The average annualised FTE salary for all employees (excluding the highest paid director) in 2024-25 was £58,291 (2023-24, £56,673), which represented an increase of 2.8% on the previous year (2023-24, 3.1%).

In 2024-25, no employees (2023-24, 0) received remuneration in excess of the highest-paid director. Annualised remuneration ranged from £29,957 - £94,383 (2023-24, £27,513 - £89,887).

Total remuneration includes salary, non-consolidated performance-related pay and benefits-in-kind. It does not include severance payments, employer pension contributions and the cash equivalent transfer value of pensions.

#### **Employment contracts**

Staff covered by this report hold appointments which are open-ended. Early termination, other than for misconduct, would result in the individual receiving compensation as set out in the Civil Service Compensation Scheme. Further information about the work of the Civil Service Commission can be found at <a href="https://www.civilservicecommission.org.uk">www.civilservicecommission.org.uk</a>.

## Staff Report

#### **Employee engagement, learning and development**

We ensure that our staff are kept informed and engaged in our work through a range of activities. These include staff briefing sessions, regular meetings, intranet updates and a range of other internal and external events.

Each of our Groups focuses on contributing to the delivery of our corporate strategic objectives. To support this, our performance management system ensures that all staff agree annual objectives with their line manager which are closely linked to our Strategy and annual operating plan.

We are committed to investing in our staff, using our resources as effectively as possible to achieve our objectives and maximising value for money. In 2023-24 we completed an organisation-wide skills audit, reviewed our Learning and Development Strategy and started a programme of corporate learning. In 2024-25 we refreshed our Learning and Development Strategy and re-established our staff Learning and Development Group which meets quarterly and informs our annual Corporate Learning Plan. Our staff have also completed mandatory training covering topics such as cyber security, fraud and bribery, information security and data protection.

We participated in the 2024 Civil Service People Survey. The level of positive feedback across all survey themes remained high. The overall SHR employee engagement index increased to 80% from 77% in the 2023 survey, and our engagement index is again the joint highest of all participating organisations and departments across the UK Civil Service. The headline results also improved in eight of the survey's nine key themes, with one remaining the same.

#### **Trade unions**

We are party to the Scottish Government's Partnership Agreement with trade unions recognised by the Scottish Government. Our staff are part of Scottish Government Main for the purposes of pay, terms and conditions. None of our staff have spent any part of their working week on trade union duties.

#### **Employee recruitment**

We carry out our recruitment and promotion activities on the basis of fair and open competition, selection on merit and in accordance with Scottish Government guidance.

#### **Equal opportunities and diversity**

We treat all staff equally. We are committed to increasing the diversity of staff within the organisation to reflect the people of Scotland, and to valuing positively the different perspectives and skills of all staff and making full use of these in our work.

#### **Health & safety**

We aim to provide a safe and healthy working environment for all staff. We act in accordance with our Health & Safety Policy Statement and have policies on particular matters available to support managers and staff. We offer a place on our staff Health & Safety Committee to a Trade

Union Health & Safety Representative.

#### Staff Costs (audited)

	Permanently Employed Staff £000	Others £000	2024-25 Total £000	2023-24 Total £000
Wages and salaries	3,279	-	3,279	3,075
Social security costs	382	-	382	358
Other pension costs	932	-	932	859
Inward secondments	-	-	-	-
Temporary staff	-	_	_	_
Movement in short term employee benefits	25	-	25	24
Total net costs	4,618	<u> </u>	4,618	4,316

Pension benefits are provided through the Civil Service pension arrangements. The Principal Civil Service Pension Scheme (PCSPS) is an unfunded multi-employer defined benefit scheme. SHR is unable to identify its share of the underlying assets and liabilities. The Scheme Actuary valued the scheme as at 31 March 2020. You can find details in the resource accounts of the Cabinet Office: Civil Superannuation <a href="https://www.civilservicepensionscheme.org.uk/knowledge-centre/resources/resource-accounts/">https://www.civilservicepensionscheme.org.uk/knowledge-centre/resources/resource-accounts/</a>.

During the year ended 31 March 2025, employers' contributions of £0.932 million (2023-24, £0.859 million) were payable to the PCSPS at 28.97 per cent of pensionable pay. The Scheme Actuary reviews employer contributions usually every four years following a full scheme valuation. The contribution rates are set to meet the cost of the benefits accruing during 2023-24 to be paid when the member retires and not the benefits paid during this period to existing pensioners.

#### Average number of persons employed

	Permanently employed		2024-25	2023-24
	staff	Others	Total	Total
Directly employed	55.5	0	55.5	53.28
Other	-	-	-	-
Total	<u>55.5</u>	<u></u>	<u>55.5</u>	<u>53.28</u>

### Number of Senior civil service staff employed

	2024-25	2023-24
Band	Total	Total
SCS - Deputy Director 1	1	1

#### **Gender Balance**

At the end of the 2024-25 financial year, the number of persons of each sex who were Board Members, Senior Managers and employees was as follows:

	<u>Female</u>	<u>Male</u>
Board Members	4	5
Employees: Executive Team (including	1	2
Chief Executive)		
All Employees (including Executive Team)	37	18

#### Sickness absence data

The average total number of sick days per full time employee in 2024-25 was 9.5 days (2023-24, 11.1 days).

#### **Employment of disabled people**

We adhere to Scottish Government recruitment policies which ensure that all disabled applicants who meet the minimum advertised criteria for a job vacancy will be invited to interview. Disabled candidates are guaranteed the chance to be judged along with everyone else on their abilities.

#### Reporting of Civil Service and other compensation schemes – exit packages (audited)

None of our staff received exit packages in 2024-25 (2023-24, none).

#### **Expenditure on consultancy**

We incurred expenditure of £42.6k on external consultancy in 2024-25 (2023-24, £84.7k). This equates to 0.8% of our total revenue expenditure (2023-24, 1.7%). This includes our legal advice costs, a programme of work with our National Panel of Tenants and support for procurement of our legal services and web hosting and support contracts.

## Parliamentary Accountability & Audit Report

SHR is a Non-Ministerial Department (NMD) and part of the Scottish Administration, with direct accountability to the Scottish Parliament. Whilst our accounts are not consolidated with those of the Scottish Government, we liaise with Scottish Government Finance colleagues on a regular basis to provide them with information relating to our expenditure and anticipated outturn. Our Framework Agreement sets out our relationship with Scottish Ministers.

#### Statement of Losses and Special Payments

No losses or special payments were incurred by SHR during the year ended 31 March 2025.

These accounts were authorised for issue on 07 October 2025.

Michael Cameron

Michael Cameron Chief Executive

07 October 2025

# 6. Independent auditor's report to Scottish Housing Regulator, the Auditor General for Scotland and the Scottish Parliament

### Reporting on the audit of the financial statements

#### **Opinion on financial statements**

I have audited the financial statements in the annual report and accounts of the Scottish Housing Regulator for the year ended 31 March 2025 under the Public Finance and Accountability (Scotland) Act 2000. The financial statements comprise the Statement of Comprehensive Net Expenditure, the Statement of Financial Position, the Statement of Cash Flows, the Statement of Changes in Taxpayers' Equity and notes to the financial statements, including material accounting policy information. The financial reporting framework that has been applied in their preparation is applicable law and UK adopted international accounting standards, as interpreted and adapted by the 2024/25 Government Financial Reporting Manual (the 2024/25 FReM).

In my opinion the accompanying financial statements:

- give a true and fair view of the state of the body's affairs as at 31 March 2025 and of its net expenditure for the year then ended;
- have been properly prepared in accordance with UK adopted international accounting standards, as interpreted and adapted by the 2024/25 FReM; and
- have been prepared in accordance with the requirements of the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers.

#### **Basis for opinion**

I conducted my audit in accordance with applicable law and International Standards on Auditing (UK) (ISAs (UK)), as required by the Code of Audit Practice approved by the Auditor General for Scotland. My responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of my report. I was appointed by the Auditor General on 2 December 2022. My period of appointment is five years, covering 2022/23 to 2026/27. I am independent of the body in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and I have fulfilled

my other ethical responsibilities in accordance with these requirements. Non-audit services prohibited by the Ethical Standard were not provided to the body. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

#### Conclusions relating to going concern basis of accounting

I have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the body's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

These conclusions are not intended to, nor do they, provide assurance on the body's current or future financial sustainability. However, I report on the body's arrangements for financial sustainability in a separate Annual Audit Report available from the <u>Audit Scotland website</u>.

#### Risks of material misstatement

I report in my Annual Audit Report the most significant assessed risks of material misstatement that I identified and my judgements thereon.

#### Responsibilities of the Accountable Officer for the financial statements

As explained more fully in the Statement of Accountable Officer's Responsibilities, the Accountable Officer is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Accountable Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Accountable Officer is responsible for using the going concern basis of accounting unless there is an intention to discontinue the body's operations.

#### Auditor's responsibilities for the audit of the financial statements

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. I design procedures in line with my responsibilities outlined above to detect material misstatements in respect of irregularities, including fraud. Procedures include:

- using my understanding of the central government sector to identify that the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers are significant in the context of the body;
- inquiring of the Accountable Officer as to other laws or regulations that may be expected to have a fundamental effect on the operations of the body;
- inquiring of the Accountable Officer concerning the body's policies and procedures regarding compliance with the applicable legal and regulatory framework;
- discussions among my audit team on the susceptibility of the financial statements to material misstatement, including how fraud might occur; and
- considering whether the audit team collectively has the appropriate competence and capabilities to identify or recognise noncompliance with laws and regulations.

The extent to which my procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of the body's controls, and the nature, timing and extent of the audit procedures performed.

Irregularities that result from fraud are inherently more difficult to detect than irregularities that result from error as fraud may involve collusion, intentional omissions, misrepresentations, or the override of internal control. The capability of the audit to detect fraud and other irregularities depends on factors such as the skilfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those individuals involved.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website <a href="https://www.frc.org.uk/auditorsresponsibilities">www.frc.org.uk/auditorsresponsibilities</a>. This description forms part of my auditor's report.

## Reporting on regularity of expenditure and income

#### **Opinion on regularity**

In my opinion in all material respects:

- the expenditure and income in the financial statements were incurred or applied in accordance with any applicable enactments and guidance issued by the Scottish Ministers, the Budget (Scotland) Act covering the financial year and sections 4 to 7 of the Public Finance and Accountability (Scotland) Act 2000; and
- the sums paid out of the Scottish Consolidated Fund for the purpose of meeting the expenditure shown in the financial statements were applied in accordance with section 65 of the Scotland Act 1998.

#### Responsibilities for regularity

The Accountable Officer is responsible for ensuring the regularity of expenditure and income. In addition to my responsibilities in respect of irregularities explained in the audit of the financial statements section of my report, I am responsible for expressing an opinion on the regularity of expenditure and income in accordance with the Public Finance and Accountability (Scotland) Act 2000.

#### Reporting on other requirements

#### Opinion prescribed by the Auditor General for Scotland on audited parts of the Remuneration and Staff Report

I have audited the parts of the Remuneration and Staff Report described as audited. In my opinion, the audited parts of the Remuneration and Staff Report have been properly prepared in accordance with the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers.

#### Other information

The Accountable Officer is responsible for the other information in the annual report and accounts. The other information comprises the Performance Report and the Accountability Report excluding the audited parts of the Remuneration and Staff Report.

My responsibility is to read all the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in

the financial statements themselves. If, based on the work I performed, I conclude that there is a material misstatement of this other information, I am required to report that fact. I have nothing to report in this regard.

My opinion on the financial statements does not cover the other information and I do not express any form of assurance conclusion thereon except on the Performance Report and Governance Statement to the extent explicitly stated in the following opinions prescribed by the Auditor General for Scotland.

#### Opinions prescribed by the Auditor General for Scotland on Performance Report and Governance Statement

In my opinion, based on the work undertaken in the course of the audit:

- the information given in the Performance Report for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers; and
- the information given in the Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Public Finance and Accountability (Scotland) Act 2000 and directions made thereunder by the Scottish Ministers.

#### Matters on which I am required to report by exception

I am required by the Auditor General for Scotland to report to you if, in my opinion:

- · adequate accounting records have not been kept; or
- the financial statements and the audited parts of the Remuneration and Staff Report are not in agreement with the accounting records; or
- I have not received all the information and explanations I require for my audit.

I have nothing to report in respect of these matters.

#### Conclusions on wider scope responsibilities

In addition to my responsibilities for the annual report and accounts, my conclusions on the wider scope responsibilities specified in the Code of Audit Practice are set out in my Annual Audit Report.

## Use of my report

This report is made solely to the parties to whom it is addressed in accordance with the Public Finance and Accountability (Scotland) Act 2000 and for no other purpose. In accordance with paragraph 108 of the Code of Audit Practice, I do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.

Louiss Yule

Louisa Yule CPFA Audit Scotland 8 Nelson Mandela Place Glasgow G2 1BT

07 October 2025

# 7. Financial Statements

For the year end 31 March 2025

## **Statement of Comprehensive Net Expenditure**

For the year ended 31 March 2025

The Scottish Housing Regulator (SHR) has made no gains or losses during the period, other than as reported above.

The results for the year ended 31 March 2025 derive from the ordinary activities of the SHR, all of which are continuing.

	Note	2024-25 £000	2023-24 £000
Administration costs:			
Staff costs Purchase of goods and services Depreciation and impairment charges Other operating expenditure	2 2 2 2	4,618 532 145 -	4,316 682 93
Total		5,295 	5,091 
Net operating expenditure		5,295 ====	5,091 ====

The notes on pages 62 to 65 form part of the financial statements.

## **Statement of Financial Position**

As at 31 March 2025

	Note	2024-25 £000	2023-24 £000
Non-current assets:			
Property, plant and equipment	3	119	33
Intangible assets	4	195	298
Total non-current assets		314	331
Current assets:			
Trade and other receivables	6	14	1
Cash and cash equivalents	7	0	0
T. (1)			
Total current assets		14	1
Total assets		328	332

Continued overleaf

The notes on pages 62 to 65 form part of the financial statements.

## Statement of Financial Position Cont'd...

As at 31 March 2025

Michael Cameron

#### **Michael Cameron**

Chief Executive

07 October 2025

The financial statements have been authorised for approval on 07 October 2025

	Note	2024-25 £000	2023-24 £000
<b>Current liabilities:</b> Trade and other payables	8	(616)	(545)
Total current liabilities		(616)	(545)
Total assets less current liabilities		(288)	(213)
Non-current liabilities: Other creditors > 1 year		(162)	(106)
		(162)	(106)
Net assets		(450) ====	(319) ====
Taxpayers' equity: General Fund		(450)	(319)
Total taxpayers' equity		(450) ====	(319) ====

## **Statement of Cash Flows**For the year ended 31 March 2025

The notes on pages 62 to 65 form part of the financial statements.

	Note	2024-25 £000	2023-24 £000
Cash flows from operating activities Net operating expenditure		(5,295)	(5,091)
Adjustments for non-cash transactions:			
Depreciation and amortisation Auditor's remuneration	3,4 10	145 26	93 26
Movement in working capital: (Increase)/decrease in trade and other receivables	6	(13)	(1)
Increase/(decrease) in trade and other payables	8,9	128	197
Net cash outflow from operating activities		(5,009) 	(4,776) 
Cash flows from investing activities Purchase of net current assets Purchase of intangible assets		(129)	- (180)
Net cash outflow from investing activities		(129) 	(180) 
Cash flows from financing activities Scottish Government funding		5,138	4,956
Net financing		5,138 	4,956 
Net increase/(decrease) in cash and cash equivalents		- ====	- ====

Cash and cash equivalents at	7	-	-
beginning of period	7	-	-
Cash and cash equivalents at end of period			

## **Statement of Changes in Taxpayers' Equity**For the year ended 31 March 2025

The notes on pages 62 to 65 form part of the financial statements.

	Note	General Fund £000	Total Reserves £000
Balance at 31 March 2023		(210)	(210)
Net financing Non-cash charges – auditor's remuneration	10	4,956 26	4,956 26
Comprehensive net expenditure for the year		(5,091)	(5,091)
Balance at 31 March 2024		(319)	(319)
Net funding Non-cash charges – auditor's remuneration	10	5,138 26	5,138 26
Comprehensive net expenditure for the year		(5,295)	(5,295)
Balance at 31 March 2025		(450) ====	(450) ====

#### **Notes to the Accounts**

#### 1. Accounting Policies

The financial statements have been prepared in accordance with the 2024-25 Government Financial Reporting Manual (FReM). The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of the SHR for the purposes of giving a true and fair view has been chosen. The particular policies adopted by the SHR are described below and have been applied consistently in dealing with items considered material to the accounts.

#### 1.1 Accounting Convention

These financial statements have been prepared under the historical cost convention, modified to account for the revaluation of intangible assets where material, at their value to the organisation by reference to their current costs.

#### 1.2 Going Concern

The financial statements for the year ended 31 March 2025 show a deficit on the general fund of £0.450m (23-24 –£0.319m). This has arisen as a result of the requirement to account for the activities of the SHR on an accruals basis, whilst recording the receipt of Scottish Government funding on a cash basis. Net liabilities will be funded by the Scottish Government as they arise. As a consequence, these financial statements have been prepared on a going concern basis.

#### 1.3 Administration and Programme Expenditure

The Statement of Comprehensive Net Expenditure is analysed

between administration and programme expenditure. The classification of expenditure as administration or programme follows the definition of administration costs set out in Consolidated Budgeting Guidance 2024-25 by H M Treasury.

#### 1.4 Non-Current Assets

#### 1.4.1 Property, Plant and Equipment

The minimum level for capitalisation of non-current assets is £7,500. Where multiples are purchased together, and individual values are less than £7,500, they are capitalised if their collective value exceeds £7,500.

Non-current assets are depreciated on a straight line basis at rates sufficient to write off their cost over their estimated useful lives, which are considered to be:

ICT equipment4 yearsBespoke ICT equipment7 yearsFixtures & fittings4 years

ICT assets are carried at valuation in existing use. Depreciated historical cost has been used as a proxy for valuation in existing use for ICT equipment as it is not practicable to obtain valuations due to the low values and high volumes of this class of asset.

#### 1.4.2 Intangible Assets

The minimum level for capitalisation of intangible assets is £7,500. Where multiples are purchased together, and individual values are less than £7,500, they are capitalised if their collective value exceeds £7,500.

Intangible assets are recognised initially at cost, comprising all directly attributable costs needed to create, produce and prepare

the asset to the point that it is capable of operating in the manner intended. Subsequently, they are measured at amortised replacement cost, a proxy for fair value.

Software licences are disclosed separately as intangible assets in accordance with the FReM. However, the SHR only hold the Business Intelligence System as an intangible asset.

Intangible assets are amortised on a straight line basis at rates sufficient to write off their cost over their estimated useful lives, which are considered to be:

Internally developed software

5 years

Software licences

3 years, or life of licence if

shorter

The Business Intelligence System will be fully amortised by 31 March 2026.

#### 1.5 Right of use assets

#### Scope

In accordance with IFRS 16, contracts, or parts of a contract that convey the right to use an asset in exchange for consideration are accounted for as leases. The FReM expands the scope of IFRS 16 to include arrangements with nil consideration. The standard also applies to arrangements with other public sector organisations which share accommodation, often through Memorandum of Terms of Occupation (MOTO) agreements.

Contracts for services are evaluated to determine whether they convey the right to control the use of an identified asset, as represented by rights both to obtain substantially all the economic benefits from that asset and to direct its use. In such cases, the relevant part is treated as a lease. Contracts for low-value items, in line with the capitalisation levels for PPE noted above in note 1.4.1,

and contracts with a term shorter than twelve months, are excluded.

#### **Initial recognition**

At the commencement of a lease, a right-of-use asset and a lease liability are recognised. The lease liability is measured at the present value of the payments for the remaining lease term, net of irrecoverable VAT, discounted either by the rate implicit in the lease, or, where this cannot be determined, the rate advised by HM Treasury for that calendar year. The liability includes payments that are fixed, or in-substance fixed, excluding, for example, changes arising from future rent reviews or changes in an index. The right-of-use asset is measured at the value of the liability, adjusted for any payments made or amounts accrued before the commencement date, lease incentives received, incremental costs of obtaining the lease and any costs related to restoration at the end of the lease.

#### Lease expenditure

Expenditure includes interest, straight-line depreciation, any asset impairments and changes in variable lease payments not included in the measurement of the liability during the period in which the triggering event occurred. Lease payments are debited against the liability. Rental payments for leases of low-value items or with a term shorter than twelve months are expensed.

#### 1.6 Provisions

Provisions are made to the extent that the SHR meets the additional costs of benefits beyond the normal Principal Civil Service Pension Scheme (PCSPS) benefits in respect of employees who retire early by paying the required amounts annually to the PCSPS over the period between early departure and normal retirement date. The SHR provides for this in full when the early retirement programme becomes binding by establishing a provision for the estimated future years' payments.

#### 1.7 Trade Payables

The SHR's policy is to pay all invoices not in dispute within 10 days of receipt. The SHR aims to pay 100% of invoices, including any disputed invoices, once any dispute has been resolved, on time in these terms.

#### 1.8 Value Added Tax

Operating costs are stated net of Value Added Tax (VAT) where VAT is recoverable by the SHR.

The SHR is registered for VAT as part of the Scottish Government, which is responsible for recovering VAT from HM Revenue & Customs.

#### 1.9 Pensions

Present and past employees are covered by the provisions of the PCSPS. The defined benefit scheme is unfunded and is non-contributory except in respect of dependants' benefits. The SHR is unable to identify its share of the underlying assets and liabilities. The scheme actuary valued the scheme as at 31 March 2020. Details can be found in the resource accounts of the Cabinet Office: Civil Superannuation

(https://www.civilservicepensionscheme.org.uk/knowledgecentre/resources/resource-accounts/).

The SHR recognises the expected cost of these elements on a systematic and rational basis, over the period during which it benefits from employees' services, by payment to the PCSPS of amounts calculated on an accruing basis. Liability for payment of future benefits is a charge on the PCSPS. In respect of the defined contribution scheme, the SHR recognises the contributions payable for the year.

#### 1.10 Income

The SHR does not undertake any income generating activities.

#### 1.11 Cash and Cash Equivalents

Banking arrangements are undertaken by the Scottish Government on behalf of the SHR. As a result, cash and cash equivalents are £nil at the year end.

#### 1.12 Short Term Employee Benefits

A liability and an expense are recognised for annual leave, holiday pay, bonuses and other short-term benefits when the employees render service that increases their entitlement to these benefits. As a result, accruals have been charged for annual leave and flexi time earned but not taken at the year end.

#### 1.13 Critical Accounting Estimates

Accounting estimates are used to determine the valuation of property, plant and equipment, intangible assets and provisions. Details of the estimates are included in notes 1.4 and 1.6.

#### 1.14 Post Balance Sheet Events

In August 2025, Garry Coutts was appointed as the new Chair of the Scottish Housing Regulator. This follows the retirement of our previous Chair at the end of his term of office in June 2025.

## 1.15 Impact of new accounting standards issued but not yet in effect

International Accounting Standard (IAS) 8 requires the disclosure of information on the expected impact of applying new accounting standards issued but not yet in effect.

The only new standard that has been issued that effects the SHR is IFRS 18 Presentation and Disclosure in Financial Statements. The effective date for IFRS 18 is 1 January 2027 and is likely to impact some of the disclosures in the financial statements. This will be reflected in the updated FreM at that time.

#### 2. Administration Costs

Auditor's remuneration relates to a charge notified by Audit Scotland in respect of external audit work carried out during 2024-25. No other services were supplied by Audit Scotland during 2024-25.

	2024-25 £000	2023-24 £000
Wages and salaries	3,279	3,075
Social security costs	382	358
Other pension costs	932	859
Movement in short term employee benefits	25	24
Depreciation and amortisation	145	93
IT costs	256	269
Accommodation expenses	45	48
Non-executive board members fees and expenses	101	93
Support and consultancy	43	85
Office expenses	21	51
Auditors remuneration (notional charge - note 10)	26	26
Conferences training and seminars	12	37
Professional fees and subscriptions	6	8
Stakeholder engagement	10	23
Travel and subsistence	9	16
HR and marketing	0	13
Catering	3	13
	5,295	5,091

## 3. Property, Plant and Equipment

	Buildings - Leased £000	Information Technology £000	Furniture & Fittings £000	2024-25 Total £000
Cost At 1 April 2024 Additions Disposals	- 129 -	54 - (28)	9 - (9)	63 129 (37)
At 31 March 2025	129 	26 	 - 	155 
Depreciation At 1 April 2024 Charged in year Disposals At 31 March 2025 Carrying value at 31 March 2025 Carrying value at 31 March 2024	16  16  113 	26 22 (28)  20  6  28 ====	4 5 (9)  -  5 ====	30 43 (37)  36  119  33 ====
Asset financing: Owned Leased	- 113	6		6 113
Carrying value at 31 March 2025	113 ====	6 ====	 - ====	119 ====

## 3. Property, Plant and Equipment cont'd

	Buildings- Leased £000	Information Technology £000	Furniture & Fittings £000	2023-24 Total £000
Cost At 1 April 2023 Additions Disposals	- - -	54 - -	9 -	63 - -
At 31 March 2024		54 	9	63 
<b>Depreciation</b> At 1 April 2023 Charged in year Disposals	- - -	16 10 -	2 2	18 12 -
At 31 March 2024	 - 	26 	 4 	30
Carrying value at 31 March 2024	-	28	5	33
Carrying value at 31 March 2023	 - ====	38 ====	7 ====	45 ====
Asset financing: Owned	_	28	5	33
Carrying value at 31 March 2024	 - ====	28 ====	5 ====	33 ====

## 4. Intangible Assets

	Information Technology £000	Software Licences £000	2024-25 Total £000
Cost At 1 April 2024 Additions Disposals	332	180	512
	-	-	-
	-	-	-
At 31 March 2025	332	180	512
Amortisation At 1 April 2024 Charged in year Disposals	199	15	214
	66	36	102
	-	-	-
At 31 March 2025	265	51	316
Carrying value at 31 March 2025	66	129	195
Carrying value at 31 March 2024	133	165	298
	====	====	====
Asset financing: Owned	66	129	195
Carrying value at 31 March 2025	66	129	195
	====	====	====

Continued overleaf

## 4. Intangible Assets Cont'd

Information Technology £000	Software Licences £000	2023-24 Total £000
332 - -	- 180 -	332 180
332 	180	512 
133 66 -	- 15 -	133 81 -
199 	15 	214 
133	165	298
199 ====	 - ====	199 ====
133	165	298
133 ====	165 ====	298 ====
	332 332 332 133 66 199 133 199 ====	Technology £000         Licences £000           332         -           -         180           -         -           332         180           -         -           133         -           66         15           -         -           199         15           -         -           199         -           ====         ====           133         165           -         -           133         165           -         -           133         165

#### 5. Financial Instruments

IFRS 7, Financial Instruments: Disclosures, requires disclosure of information about the significance of financial instruments held by the entity over the year and the nature and extent of risks arising from those financial instruments. The SHR is not exposed to the same degree of financial risk faced by many other business entities because of the non-trading nature of its activities and the way in which it is funded. Moreover, financial instruments play a much more limited role in creating or changing risk than would be typical of the listed companies to which IFRS 7 mainly applies. Financial assets and liabilities are generated by day to day operational activities and are not held to change the risks facing the entity in undertaking its activities.

#### Liquidity Risk

The Scottish Parliament makes provision for the use of resources by the SHR in a Budget Act for each financial year. Cash authorisation is provided by the Scottish Government to the extent that expenditure is covered by budget authority. The SHR is therefore not exposed to liquidity risks.

#### Fair Values

Assets and liabilities are carried at fair value in the Statement of Financial Position. The SHR's financial assets comprise trade receivables, financial and other assets (Note 6) and cash and cash equivalents (Note 7). The financial liabilities comprise trade payables, accruals and other current liabilities (Note 8) and non-current liabilities (Note 9).

## 6. Trade Receivables, Financial and Other Assets

	2024-25 £000	2023-24 £000
Amounts falling due within one year: Prepayments Other receivables	- 14	- 1
	14 ====	1 ====
Intra-government balances Balances with other central government bodies Balances with bodies external to government	- 14	1
	 14 ====	1 ====

## 7. Cash and cash equivalents

	2024-25 £000	2023-24 £000
Balance at 1 April 2024 Net change in cash and cash equivalent balances	-	-
Balance at 31 March 2025	 - ====	
The following balances were held at 31 March 2025:		
Commercial banks and cash in hand	-	-
B		
Balance at 31 March 2025		
Balance at 31 March 2024		
Balance at 61 March 2021	====	====

## 8. Trade Payables and other current liabilities

	2024-25 £000	2023-24 £000
Trade payables	23	79
Accruals	328	233
Other payables	265	233
Balance at 31 March	616	545
	====	====

### Intra-government balances

Balances with other central government bodies Balances with bodies external to government	22 594	- 545
	616	545

#### 9. Non-current liabilities

	2024-25 £000	2023-24 £000
Provisions Other creditors > 1 year	- 162	106
Balance at 31 March	162 ====	106 ====
Intra-government balances Balances with other central government bodies Balances with bodies external to government	92 70	106
	162 ====	106 ====

## 10. Notional Charges

The following notional charge has been included in the accounts:

	2024-25 £000	2023-24 £000
Auditor's remuneration	26	26
	26	26
	====	====

#### 11. Related Party Transactions

The SHR is a Non-Ministerial Department within the Scottish Administration. The Scottish Government is regarded as a related party. During the year, the SHR had various material transactions with the Scottish Government, and with other entities, for which the Scottish Government is regarded as a parent body.

The SHR also had a small number of material transactions with other government departments, central government bodies, local government, non-departmental public bodies and similar organisations.

During the year, apart from their service contracts, no Board member, key manager or related party has undertaken any material transactions with the SHR. In addition, no Board member, key manager or related party received any benefits in kind. Further details are set out in the Remuneration and Staff Report that accompanies these financial statements.

#### 12. Capital Commitments & Contingent Liabilities

No contracted capital commitments or contingent liabilities existed at 31 March 2025 (2024, none).

#### 13. Leasing Commitments

The SHR shares office space with Social Security Scotland under the basis of a Memorandum of Understanding. The arrangement is for a five year fixed term until November 2029, is treated as a lease and has been capitalised in line with IFRS 16. At 31 March 2025, the total of future minimum lease payments under non-cancellable leases for each of the following periods was as noted.

2023/24 reflected the early termination of the SHR's previous lease arrangements for Buchanan House.

2024-25	2023-24
£000	£000
28	-
102	-
-	-
130 ====	 - ====
-	-
-	-
-	-
-	-
====	====
	28 102 - 

#### 14. Other Financial Commitments

The SHR has entered into contracts (which are not leases) for the provision of support services for the Business Intelligence System. The contracts are for an initial fixed term, with the option to add additional years. The total future payments for which the SHR is budgeting are as shown:

	2024-25 £000	2023-24 £000
Not later than one year Later than one year and not later than five years Later than five years	121 346 -	117 16 -
	467 ====	133 ====



#### SCOTTISH HOUSING REGULATOR

#### DIRECTION BY THE SCOTTISH MINISTERS in accordance with section 19(4) of the Public Finance and Accountability (Scotland) Act 2000

- The statement of accounts for the financial year ended 31 March 2009 and subsequent years shall comply with the accounting principles and disclosure requirements of the edition of the Government Financial Reporting Manual (FReM) which is in force for the year for which the statement of accounts are prepared.
- The accounts shall be prepared so as to give a true and fair view of the income and expenditure, recognised gains and losses, and cash flows for the financial year, and of the state of affairs as at the end of the financial year.
- 3. This direction shall be reproduced as an appendix to the statement of accounts.

Signed by the authority of the Scottish Ministers

Dated 11 March 2009



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Laid before the Scottish Parliament SG/2025/18

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