Bield Housing and Care Response to: Our regulation of social housing in Scotland: a consultation October 2023

#### Introduction

Bield Housing and Care helps more people live their best lives surrounded by a supportive community. Currently, we provide housing and services to older people in 21 local authority areas, encompassing approximately 4,200 tenancies.

We welcome the opportunity to offer our perspective on the Regulatory Framework as outlined in the consultation document.

### **Annual Assurance Statement**

### Q1 Do you agree with our proposed approach on specific assurance in Annual Assurance Statements?

We support the proposal to maintain the requirements in the Regulatory Requirements. While we tentatively welcome the introduction of 'explicit assurance', we suggest that any additional assurance requirements are clearly defined. Furthermore, sufficient notice should be provided to landlords to ensure effective compliance.

## Q2 Do you agree with our proposal to initiate a comprehensive review of the Annual Return on the Charter which we will consult on next year?

Tenant safety and wellbeing are paramount to us, and we concur that a careful review is necessary for meaningful operational indicators. We welcome the proposed work with landlords on measurement indicators for damp and mould and as a systematically important landlord would be happy to contribute staff to assist with this. Considering our commitment to these aspects, we propose that a transition year be considered if the review takes place in 2024/5 allowing landlords to gather and test data before implementing new indicators in 2025/6.

## **Emphasis on Landlord – Tenant Communication**

Question 3: Do you agree with our proposed amendments to strengthen the emphasis on landlords listening to tenants and service users to include a requirement that landlords:

- provide tenants, residents and service users with appropriate ways to provide feedback and raise concerns, and
- ensure that they consider such information and provide quick and effective responses?

We support the proposed amendments, as placing tenants at the heart of our services and decisions aligns with our strategy. We are actively exploring ways to enhance tenant engagement as part of our workplan and welcome the opportunity to benchmark our progress against other social housing providers.

# Notifiable events and regulatory status

Question 4 - 6: Do you agree with our proposed approach to Notifiable Events, regulatory status and significant performance failures?

We welcome the proposed approach to Notifiable Events and regulatory statuses, including amendment to language. We are committed to enhancing our understanding of Notifiable Events and support the proposed measures for addressing Significant Performance Failures.

### **Guidance on Various Topics**

Question 7 - 18: Do you agree with our proposed changes to the guidance on Annual Assurance Statements, Consultation, Determination, Financial Viability, Group Structures, Appeal and New Processes, Notifiable Events, Preparation of Financial Statements and Tenant Consultation and Approval?

We support the proposed approach to changes to the guidance on Annual Assurance Statements.

#### Conclusion

We welcome the opportunity to contribute to this consultation process, and we commend the regulator's commitment to transparency and stakeholder engagement.

As providers of social housing to older people, we recognise the importance of a robust and responsive regulatory framework. The proposed changes, as outlined within the consultation document, resonate with our organisational ethos of promoting wellbeing, ensuring effective communication, and maintaining financial viability.

As stakeholders invested in the provision of housing and care services to older people, we remain dedicated in upholding the highest standards and embracing necessary amendments for the benefit of our tenants.

#### Contact:

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