Scottish Housing Regulator

Determination of Accounting Requirements 2025

Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our consultation paper on our website at www.housingregulator.gov.scot
Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **Friday 14 November 2025.**

By email @: consultations@shr.gov.scot

Or post to: Scottish Housing Regulator
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Glasgow G4 0QW

Name/organisation name

Yoker Housing Association Limited

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How you would like your response to be handled
To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

Are you happy for your response to be published on our website?

Yes ☒ **No** ☐

If you are responding as an individual:

Please tell us how you would like your response to be published.	***Pick 1***
Publish my full response, including my name	☒
Please publish my response, but not my name	☐

1. Do you agree with the proposed changes in sections 1 to 5 of the draft Determination (introduction, interpretation, application, specified form, materiality)?

Yes ☒ No ☐

Do you have any comments on sections 1 to 5 of the draft Determination?

2. We are proposing to withdraw the Preparation of Financial Statements guidance note and the Statement of Internal Financial Controls advisory guidance. The relevant requirements from both documents will be incorporated into Sections 6 and 7 of the revised Determination.

Do you agree with our proposals to add these requirements to the Determination?

Yes ☒ No ☐

Do you have any comments on sections 6 and 7 of the draft Determination?

3. Do you agree with the proposed changes to sections 8 to 12 of the draft Determination (true and fair view, housing activities, signature, notes, additional statements)?

Yes ☒ No ☐

Do you have any comments on sections 8 to 12 of the draft Determination?

4. We propose to add an additional requirement in relation to pension schemes setting out disclosure requirements for defined benefit schemes. Do you agree with our proposal to add this in section 13?

Yes ☐ No ☒

Do you have any comments on section 13 of the draft Determination?

The need for this change is unclear.

Neither the revisions to FRS 102 nor the draft SORP make reference to changes in the disclosure requirements for defined benefit pension schemes.

Paragraph 13.1 in the draft would add nothing to the existing position as the true and fair view override would still be applicable. Organisations that consider the information provided by a pension administrator to fall short of full defined benefit accounting per FRS 102 could and should use the true and fair view override to the "valuation basis".

For example, in the case of the Scottish Housing Associations' Pension Scheme (SHAPS) many organisations use the "defined benefit accounting information" provided by the pensions administrator (TPT) to provide accounting disclosures on a "valuation basis" within their financial statements. While this information may provide a reasonable estimate of liabilities on an individual employer basis, it does not reflect actual experience with respect to individual employer contributions, individual employer investment returns and individual employer cash flows. Scheme contributions and disbursements are co-mingled for investment purposes and as such cannot be attributed to or ring-fenced to an individual employer. Assets are apportioned on a share of liabilities basis. The information generated is therefore a hybrid that falls short of full defined benefit accounting as recognised by FRS 102. It may therefore be considered that accounting for the pension scheme on a "valuation basis" in these circumstances provides a distorted view of the position to a reader of the financial statements.

Paragraph 13.2 does not acknowledge that in exceptional circumstances FRS 102 does allow a pension scheme asset to be recognised. As such, and in those exceptional circumstances, implementation in accordance with this paragraph may be subject to challenge by the Financial Reporting Council.

5. Do you agree that there are no requirements for changes on the form or content of notes 1 and 2 in part 1 of the schedule?

Yes ☒ No ☐

Do you have any comments on the form or content of notes 1 and 2 in part 1 of the schedule?

6. Do you agree with the proposed additions to the categories in note 3 in part 1 of the schedule?

Yes ☒ No ☐

Do you have any comments on the form or content of note 3 in part 1 of the schedule especially on the proposed additions to the categories or any additional categories that we should consider?

7. We are proposing to add an additional mandatory note 4 into part 1 of the schedule in relation to accommodation owned. Do you agree with our proposal to add this note and its form and content?

Yes ☒ No ☐

Do you have any comments on the content or form of note 4 in part 1 of the schedule?

8. We have removed the requirements on disclosure of key management personnel emoluments and consideration for services of key management personnel as these are now required by the SORP. Do you agree with the proposal to remove these requirements?

Yes ☒ No ☐

Do you have any comments on the proposal to remove these requirements?

9. We have made amendments to part 2 of the schedule at sections 4 (employees) and 7 (interest payable) to provide additional clarity to the disclosures. Do you agree with the amendments made?

Yes ☒ No ☐

Do you have any comments on the amendments being proposed for section 6 and 9 in part 2 of the schedule?

10. We have added additional disclosure requirements to part 2 of the schedule at sections 7 (contracted out services) and 16 (heat with rent where a new requirement has been added to increase the transparency around the costs of these schemes). Do you agree with the proposal to add these sections?

Yes ☒ No ☐

Do you have any comments on the additional disclosure requirements at sections 7 and 16 in part 2 of the schedule?

11. Do you agree with the changes proposed to the other disclosure requirements in part 2 of the schedule?

Yes ☒ No ☐

Do you have any additional comments on any of the other disclosure requirements in part 2 of the schedule?

12. Do you agree with the proposed changes in the Financial Viability guidance note and the proposal to withdraw the Preparation of Financial Statements guidance note and the Statement of Internal Financial Controls advisory guidance?

Yes ☒ No ☐

Do you have any comments on the changes made to the Financial Viability guidance note or the proposal to withdraw the Preparation of Financial Statements guidance note and the Statement of Internal Financial Controls advisory guidance?

13. Do you have any other comments in relation to the draft Determination or guidance notes?

Thank you for taking the time to give us your feedback