

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
5th Floor, 220 High Street
Glasgow G4 0QW

Name/organisation name

Trust Housing Association

Address

12 New Mart Road

Edinburgh

Postcode EH14 1RL

Phone

Email

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?

Re 8.2 “...of the surplus or deficit achieved...” “achieved” doesn’t seem to be the right terminology, particularly in respect of a deficit. Would “reported” or “delivered” be more appropriate?

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?

Re 13.2: FRS102 states that if a pension scheme is in an asset position it should be accounted for as an asset. 13.2 goes against this guidance by stating it should be included at 'nil'. Therefore, if the determination is followed then unable to comply with FRS102. Our view is that 13.2 should be deleted.

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?

It would be helpful to include clear guidance on what should be classified as "Affordable letting activity" and "other activities". This could either be as a footnote to Schedule Part 1 or included in the determination under section 2, interpretation.

For example;

- "Affordable letting activity" should include any income, and associated expenditure, from activity which forms part of the tenancy agreement i.e. rent and all service charges which are detailed in the tenancy agreement.
- "other activities" includes all other income and associated expenditure.

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?

Re Energy distribution/supply; for Trust these are services charges, as detailed in the tenancy agreement (i.e. Heat with Rent and Communal Energy service charges). As such, would be included in affordable letting activity.

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?

Additional guidance as to how the note should look to list managing bodies and amounts payable to them would be useful. This should maybe be completely separate note.

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?

Section 5 - Contracted out services – we don't agree that these costs should be separately disclosed in the accounts for public viewing. If these details are required, they could be collected as part of the AFS return. Can the reason for requiring these amounts be confirmed?

Section 14 – Heat with Rent – asked for the amount “collected”, does this mean the HWR charges less void properties rather than cash collected i.e. also net of bad debts/arrears? We also have Communal Energy service charges for heat and light in entrance ways, closes and corridors, communal lounges, kitchens and laundries etc – can you confirm these Communal Energy service charges are to be excluded from this section please?

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?

2. Administration details – re bankers, can you confirm if this is just the RSL's main day-to-day bank or if this should include any banks with whom the RSL has loans or deposits with also?

4. Employees

4.4(d) – amounts paid in relation to past service pension deficit do not hit the SOCI, they are cash items only, is it therefore correct to include within this note?

4.4 / 4.5(b) – can guidance be included for pension salary sacrifice please – under salary sacrifice the wages and salary would be reduced and pension cost increased by the amount of the employee pension contribution, can you confirm that is the intended reporting?

Note 4.5 refers to paragraph 6.4 should be 4.4.

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