

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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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?

No.

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?

We agree more user friendly to have these requirements in one place.

In relation to the requirement to produce an individual SIFC for each RSL in a Group at 7.2, it is not our understanding that individual SIFCs are required to be included in the Group financial statements, as these are already included in the individual RSL financial statements. Could this requirement therefore be clearer, as currently it may be read as the SIFCs for each RSL need to be included in the Group financial statements.

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?

No.

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?

We would question whether this section is required at all as this is already covered by FRS102 and the Housing SORP.

If the section remains then section 13.1 could be much clearer, tying into the existing wording in FRS102 and SORP i.e. *'In relation to multi-employer defined benefit pension schemes, where an RSL has been provided with sufficient information from the scheme administrator to enable the RSL to account for the scheme obligations on a defined benefit basis, that is at fair value, then the RSL must adopt this basis.'*

13.2 – *'If the scheme valuation shows an asset position, this must be disclosed as a 'nil' valuation.'*

This requirement should be removed as it is not in line with UK Generally Accepted Accounting Practice. Accounting standards already stipulate the accounting treatment for a defined benefit pension asset. The requirements are complex and in certain circumstances an asset is restricted to £nil, however this depends on the defined benefit scheme and its rules.

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?

No.

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?

We would question whether there is a need for specific items to be added to this note. As the note stands, our view is that it is clear that RSLs can add in other activities as they fit to their specific RSL and its activities. Might it be more user friendly to make it clear for RSLs that any other activities that are relevant can be added, even if below the materiality threshold?

It might be useful to note that if an RSL does not undertake any of the activities in this note then they can remove them in their entirety.

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?

We have an observation in relation to the use of the terms '*number of units sold*' and '*number of other units lost*'. We are unclear why there needs to be two separate lines here – could this be included as one line '*number of units disposed*'.

Could a further table be included in relation to the additional requirement in relation to the number of units managed by others (i.e. the detail required under *) so that a consistent format is adopted by all RSLs.

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?

Seems sensible as covered by the SORP.

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?

5.2 – should refer to paragraph 5.1 rather than 7.1

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?

No.

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?

No.

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?

No.

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

No.

Thank you for taking the time to give us your feedback