

Our regulation of social housing in Scotland

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 **15 December 2023**.

By email @: regulatoryframeworkreview@shr.gov.scot

Or post to: Scottish Housing Regulator
2nd floor , George House
36 North Hanover Street, G1 2AD

Name/organisation name

Grampian Housing Association

Address

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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 our proposed approach on specific assurance in Annual Assurance Statements?

We agree with this specified approach, because in practice this is already a common requirement. We however support the need for advance notice of any organisation specific issues/assurance where that is possible and practical.

2. 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?

Yes for those reasons stated. Having a considered approach including working groups is welcomed.

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?

As we currently provide a number of ways for tenants and residents to raise concerns and provide feedback and a variety of mechanisms for responding to this information, we agree with this amendment.

4. Do you agree with our proposed approach to Notifiable Events?

We agree with this. We have however prior to this contacted our Regulation Manager for further advice in this area, so inclusion of this within revised guidance is welcomed.

5. Do you agree with our proposed approach to regulatory status?

We agree with maintaining the current approach of having three regulatory statuses, and to amend the language in the second and third statuses to make clear that these are non-compliant statuses.

6. Do you agree with our proposed approach to Significant Performance failures?

We agree with the proposal to provide more clarity on a clear, plain language statement of the routes of redress available to tenants, to include:

- complaining to their landlord;
- complaining to the SPSO; and,
- what, how and when to bring to us.

7. Do you agree with our proposed changes to the guidance on *Annual Assurance Statements*?

We would welcome revised guidance on the AAS and in particular, around any additional areas where specific assurance is sought.

8. Do you agree with our proposed changes to the guidance on *Consultation where the Regulator is directing a transfer of assets*?

We welcome the proposed improvement to strengthen the references to relevant statutory provisions where the SHR is directing a transfer of assets

9. Do you agree with our proposal to maintain *the Determination* at this time?

Yes and we agree that it would be more appropriate to await the planned review of the current SORP in 2024.

10. Do you agree with our proposed changes to the guidance on *Determination of what is meant by a step to enforce a security over an RSL's land?*

Yes

11. Do you agree with our proposal to maintain the guidance on *Financial viability of RSLs?*

Yes

12. Do you agree with our proposed changes to the guidance on *Group structures?*

Yes and reflecting the emergence of more complex group structures.

13. Do you agree with our proposed changes to the guidance on *How to request an appeal of a regulatory decision?*

Yes

14. Do you agree with our proposal to maintain the guidance on *How to request a review of a regulatory decision?*

Yes

15. Do you agree with our proposed changes to the guidance on *Notifiable events?*

Yes

16. Do you agree with our proposed changes to the guidance on *Preparation of financial statements?*

Yes

17. Do you agree with our proposal to maintain the guidance on *Section 72 reporting events of material significance?*

Yes

18. Do you agree with our proposed changes to the guidance on *Tenant consultation and approval?*

Yes. The consideration of equality matters here aligns with other guidance and requirements.

19. Would you like to give feedback on any aspect of our impact assessments? Are there other potential impacts that we should consider?

Annex 4 is comprehensive and nothing is identified which should be added. The extensive use of acronyms in this annex may be worth reviewing though.

Thank you for taking the time to give us your feedback!