

GLASGOW AND WEST OF SCOTLAND FORUM OF HOUSING ASSOCIATIONS

WRITTEN SUBMISSION

Ahead of the Scottish Housing Regulator's appearance before Holyrood's ICI committee on 24 June, this note updates the Committee on GWSF's work with and view of the Regulator since we last gave evidence to Committee in November 2014.

Transparency

When we appeared before the Committee in late 2014 we noted that we were looking forward to the production of guidance from SHR on how it engages with associations when potentially serious issues or allegations arise. We met a number of times with SHR to discuss drafts of their Information Note and were pleased to see it published in April.

The Note followed publication by GWSF of our own advice note for housing association committee members, specifically covering situations where committee members cannot turn to the senior officer because the senior officer is one of the subjects of the issues or allegations which have arisen. Our note can be seen [here](#).

We believe that the SHR's Information Note, which we now know is the first in what is intended to be a series, improves the transparency of the SHR's way of working. We have suggested to SHR that a forthcoming Note should cover the role of Special Managers who are appointed to an association by SHR but are accountable to both SHR and the association's committee/board. There are some grey areas around this role and this is a good example of an area which would benefit from greater transparency.

Performance assessment process

SHR met with GWSF in March 2015 to provide a helpful explanation of the criteria used to assess the overall performance of housing associations. As SHR works towards the annual process of reviewing its assessment criteria in summer 2015, we look forward to meeting with them again to explore the scope for some modest changes, for example in the way in which gas safety performance is assessed.

GWSF has concerns about the inconsistent language used by SHR in their judgement of the respective Charter performance of housing associations and local authorities. We recognise that the regulatory system is different for councils because it involves assessments made by a number of scrutiny bodies.

However, specifically on landlords' Charter performance, consistency is absolutely essential as both housing associations and local authorities are assessed against the same indicators and tenants are entitled to expect that descriptions of performance are meaningful and comparable. But it is often the case that an association's performance is described as 'poor' when a local authority with an inferior performance on the same indicators is described in much less critical terms, or even that the "poor" performance of the local authority is not commented on at all.

This is an issue we are raising with the SHR and which we expect some housing associations would also want to raise if they consider that they have been subjected to an inconsistent assessment process.

SHR appeals process

GWSF is pleased to have been contacted very recently by SHR to discuss early ideas around the development of an appeals system, ahead of the more formal consultation later in the year.

Value for Money

Along with other landlord bodies, GWSF attended a session arranged by SHR in May to discuss what approach it might take to value for money. Landlord bodies were united in suggesting that whilst VFM was indeed very important to tenants, the Scottish Social Housing Charter now offers the basis on which to make ongoing assessments of what tenants think of the services they receive and pay for.

With only one year's worth of Charter data currently in the public domain, GWSF and other bodies strongly believe that now is not the time for SHR to introduce a further layer of bureaucracy into their assessment process, and so we hope SHR will reflect on our views and rethink the merits of introducing a separate focus on VFM.

Any over-zealous approach to VFM will also accentuate the existing tension between the SHR's keenness to see minimal rent increases and the Scottish Government's belief that rents have to bear some of the strain of the cost of building new social rented housing.

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