



Consultation on the future of our regulatory approach in response to the COVID-19 pandemic:

CIH Scotland welcomed the Scottish Housing Regulator's (SHR) swift response to the Coronavirus pandemic, allowing greater flexibility for social landlords to focus resources where they were most needed to support tenants, homeless households and often benefiting the wider community as well.

Our members have been working incredibly hard to deliver essential services to people during a very difficult time. They have had to adapt quickly to new ways of working, dealing with higher than average rates of staff absences and with many having to juggle family and work commitments.

While we broadly agree with the principles set out in the consultation document, some of our members have expressed concern that while deadlines have been pushed back for data reporting, it is suggested that Annual Assurance Statements should be submitted within the normal timescales.

The social housing sector is very diverse, providing a wide range of services and different delivery models. Landlords will have been impacted very differently by the pandemic depending on the location of their stock, the profile of their tenants and customers and how staffing levels have been impacted by illness, caring obligations, or the need to make use of the 'furlough' scheme. While some landlords will be confident that they can meet the existing deadline for submitting Annual Assurance Statements, others may have been focussing stretched resources on other areas, particularly to ensure essential service delivery.

For some, when Management Committees and Governing Boards would ordinarily have been reviewing assurance processes, these meetings have either been cancelled, postponed, or changed focus to the emergency response to the pandemic. Governing body annual reviews, internal audit programmes and business planning activities which contribute to compliance with the assurance framework have also been disrupted.

Guidance to support landlords to comply with the framework would certainly be welcome. We also note that the consultation document states an intention to work with landlords that indicate they may find the deadline for Annual Assurance Statements difficult and we hope that adequate flexibility is allowed for within this work. Extensions to the deadline should be granted where necessary to ensure that social landlords are not penalised for having to deal with extraordinary circumstances out with their control.