



The Social Housing Safety Network Scotland



E-BULLETIN: SHR THEMATIC REVIEW 2024

Scottish Housing Regulator Thematic Review 2024 - Preparing Annual Assurance Statements



Scottish Housing
Regulator

All social landlords are required to submit to the Scottish Housing Regulator an Annual Assurance Statement (Statement) about their compliance with regulatory requirements; the most recent Statement was provided by landlords by the end of October 2023.

On 31st July, the Regulator shared a thematic review which sets out their findings following their recent visits to nine Registered Social Landlords (RSLs) and four local authority landlords to find out more about the self-assurance work they did to enable them to submit their Statement.

One aspect of the visits for the Regulator was to focus particularly on how landlords assured themselves about meeting their tenant and resident safety duties.

In this e-bulletin, we focus on the tenant and resident safety element of the thematic review and pull out some of the key findings. You can, however, find the [full review here](#).

SHR visits

In April this year, the Regulator announced that it would visit 13 social landlords to understand how they prepare their Annual Assurance Statement. To help ensure a good mix, the landlords that were visited are located across Scotland, and are of different sizes, structures, and level of complexity. The Regulator also selected the landlords to reflect the different types of Statement that were submitted.

In advance of the visits, the Regulator requested that landlords provide them with the following information around tenant and resident safety:

- The evidence and information the management committee/governing body or local authority committee saw to assure itself about compliance with requirements on tenant and resident safety. This could include:
 - Management committee/governing body/committee reports and minutes
 - Evidence from independent sources such as internal audit, consultant work and/or your corporate risk register.

Organisations selected were:

- Ark Housing Association
- Berwickshire Housing Association
- Cloch Housing Association
- East Ayrshire Council
- Govanhill Housing Association
- Home in Scotland
- North Lanarkshire Council
- Renfrewshire Council
- Rosehill Housing Co-operative
- Rutherglen and Cambuslang Housing Association
- West Dunbartonshire Council
- West Granton Housing Co-operative
- Whiteinch and Scotstoun Housing Association

The Regulator found that tenant and resident safety was considered a key priority by **all** of the landlords that were visited and many landlords described the processes they had in place to assure themselves about their compliance with their tenant and resident safety duties. These included robust recording and reporting mechanisms, dedicated roles to monitor compliance, and seeking independent expert advice.

There were several areas for improvement noted within the thematic review, including that some of the landlords visited *lacked sufficient evidence to provide the SHR with assurance on their approach to tenant and resident safety*, including **out of date policies and procedures** and irregular reporting, preventing appropriate oversight by governing bodies.

One of the benefits of being a Member of The Social Housing Safety Network Scotland is a 'Big 6' Policy and Procedure 'Sense Check'. One of our specialist practitioners will carry out a confidential review of a members tenant/resident safety policies and procedures, spending up to two hours reviewing policies and procedures and following this up with a confidential feedback session (virtual).

As part of that review, we'll take a look at whether your policies and procedures:

- Are up to date in terms of current legislation
- Cover the key points expected in terms of recognising statutory obligations
- Cover the key work streams and arrangements
- Set out clearly defined accountabilities & responsibilities within the organisation
- Sufficiently define how you will deliver and evidence compliance
- Document assurance and oversight arrangements.

It's really simple to arrange the review – just get in touch by emailing network@housingcompliance.co.uk

[Find out more about this benefit here.](#)



What landlords said worked well for them and supported them in submitting their Statement

There were some good examples provided, in relation to tenant and resident safety, from those organisations that were visited by the Regulator:

Ark Housing Association introduced a tenant and property compliance officer role following an external audit and internal review to support its commitment to prioritising tenant and resident safety, bringing expertise and improved monitoring and reporting. Ark also provided training to governing body members on tenant and resident safety, ensuring the governing body understand the relevant requirements and are able to provide effective scrutiny. Ark also carries out annual home visits to each of its tenants to assist it in monitoring the condition of its stock, as well as aiding early identification of any potential safety issues.

Berwickshire Housing Association operate a comprehensive approach to tenant and resident safety reporting and assurance. Its approach includes; bi-annual reporting to the governing body based on the Health and Safety Executive's seven principles of leadership, quarterly reporting to the Risk and Audit Committee and its dedicated Health and Safety Advisory Group, and project based reporting to the Operations Committee on a quarterly basis.

Renfrewshire Council take a proactive approach to providing training to elected members to ensure it has the knowledge and confidence to fully engage with the assurance process. This has included training sessions relating to both compliance with regulatory requirements and health and safety legislation.

West Dunbartonshire Council took a proactive approach to addressing damp and mould within its properties, installing sensors which allow tenants to monitor moisture levels within their properties. The data from the sensors can also be monitored remotely, allowing West Dunbartonshire Council to quickly identify at risk properties, and take any required action at the earliest opportunity. West Dunbartonshire has prioritised installing the sensors into property types which are more prone to damp and mould, with a tranche of 2,000 being installed in 2023-24, and 10,000 planned in total.

General process for completing Statement - Tenant and Resident Safety

The Regulator asked questions around the process for completing the Statement, including:

- How do you gain assurance that the organisation's overall safety compliance regime meets legislative and regulatory compliance? E.g. internal advice, independent advice, internal/external audit.
- How do you gain assurance that your organisation's working practices ensure the robust implementation of your safety compliance strategies, policies, and procedures? E.g. internal advice, independent advice, internal/external audit.

- How regularly are policies and procedures reviewed to ensure they comply with legislative and regulatory requirements?
- How do you test the validity of your information relating to tenant and resident safety?
- What assurance did the association obtain in relation to compliance with gas safety, electrical safety, lift safety, legionella, asbestos, fire safety, damp & mould?
- What assurance did the association obtain in relation to compliance with the completion of the new requirements of smoke and heat detectors and Electric Installation Condition Report (EICR) checks?
- Did either of these identify any elements of non-compliance? If so, how was this addressed?

Being a member of The Social Housing Safety Network Scotland brings many EXCLUSIVE benefits, including:

- Self-assessment checklist for all tenant and resident safety compliance areas
- Legislation Tracker & KPI Scorecard
- Training matrix template (tenant and resident safety)
- Free webinars, training and networking
- Quick guides and briefings
- Online library and [much more](#)....

Plus, Network Members can benefit from access to subject specialists from the Housing H&S Compliance UK Ltd brand, all of whom are dedicated to supporting the social housing sector; this includes undertaking process audits and validity checks of data as well as aspects of the wider compliance programmes.



You can find out more about the services they provide, [here](#).

SHR recommendations

The SHR rounded off the thematic review with a series of recommendations, including this one relating to tenant and resident safety:

- Landlords should consider the frequency and level of information being providing to its governing body regarding tenant and resident safety, to provide it with sufficient assurance about compliance with requirements.

Note:

SHR reviewed all Statements as part of their annual risk assessment of all social landlords and reflected the outcome in engagement plans published at the beginning of April 2024; [all of which can be found here](#).