

Scottish Housing Regulator (SHR)

‘The risks we will focus on - November 2025’

Each year the Scottish Housing Regulator assesses risk in social landlords to determine what assurance it needs from them and what they may need to improve.

The latest publication from SHR sets out which risks they will focus on; we have summarised the content of the risk assessment over the following pages, specifically focusing on tenant and resident safety, but you can read the full information [here](#).



Scottish Housing Regulator

As in previous years, SHR will continue their focus on:

- Tenant and resident safety: whether and how landlords meet their statutory obligations on tenant and resident safety
- Quality of homes: how landlords ensure that the homes they provide to tenants are good quality, and whether they have a good understanding of the condition of those homes

Landlords assuring themselves, their tenants and SHR is central to the Regulator's approach to regulation. Good governance is even more important than ever to ensure that social landlords can manage the challenges they face. All landlords must prepare and publish an Annual Assurance Statement (Statement) in accordance with the Regulator's statutory guidance to confirm if the landlord complies with:

- Regulatory requirements at Chapter 3 in the Framework;
- Standards and outcomes in the Charter ;
- all relevant legislative duties;
- for RSLs, the Standards; and
- any specific assurance requirements SHR have asked landlords to cover in their Statement.

For 2025/26, SHR issued advisory guidance on preparing the Statement, advising landlords to confirm whether they meet all duties in relation to tenant and resident safety, and in particular that they have obtained appropriate assurance about compliance with all relevant safety requirements including gas, electrical, water, fire and lift safety along with asbestos management and their approach to damp and mould. SHR will consider these statements as part of its risk assessment.

Stock quality and tenant and resident safety

Stock quality and tenant and resident safety are intrinsically interlinked. SHR's main source of intelligence for this area of its risk assessment is landlords' compliance with the Scottish Housing Quality Standard (SHQS); the criteria for which cover a range of stock quality and tenant and resident safety standards.

Stock condition

All landlords must have effective systems and reliable information about the condition of all of their homes. In previous years SHR has considered when a landlord had last carried out a stock condition survey and the extent of this assessment. This year, SHR will focus on the percentage of stock assessed fully for SHQS compliance in the last five years.

SHR will also review the other information provided by landlords in their ARCs including:

- dates of their last and next survey;
- age profile of the housing stock from the stock data;
- volume of repairs; and
- tenant satisfaction with quality of home.

SHQS compliance

SHQS is the main measure of the quality of homes social landlords provide for tenants.

Compliance with SHQS first dropped in 2021/22. SHR know this was primarily because of the new requirement for interlinked smoke and heat detectors to be installed in every home and for Electrical Installation Condition Reports (EICRs) to be carried out every five years. Compliance with these was due by February and March 2022, respectively.

As landlords have continued to work through a backlog of outstanding EICRs and smoke and heat detectors, compliance with SHQS has gradually increased. By 31 March 2025, 87% of homes were compliant with SHQS.

SHR will again review landlords' ARCs and Statements to identify the scale of any outstanding EICRs and smoke and heat detectors for each landlord. SHR will engage with landlords who either have a significant volume of checks to undertake and/or SHR has concerns about the landlord's capacity to complete checks as quickly as possible.

SHR will also analyse the data on the percentage of properties meeting SHQS and seek to understand the reason/s for properties not meeting SHQS, by reviewing the level of fails, abeyances and exemptions and any comments provided by each landlord in their ARC.

Reinforced autoclaved aerated concrete (RAAC)

For landlords that have, or may have, RAAC, SHR will engage with landlords that do not satisfy the following criteria:

- all RAAC investigations are completed;
- where RAAC has been identified, the risk to tenant and resident safety has been either temporarily or permanently mitigated; and
- where RAAC has been identified, there is a long-term strategy in place to manage the RAAC, and there are no significant barriers to delivering this (e.g. impact on financial capacity).

Cladding

SHR are currently engaging with a small number of landlords about the impact of unsafe cladding. The Scottish Government has undertaken a data collection on cladding to better understand the scale and nature of any issues. This was issued via SHR earlier in 2025 to RSLs, asking for the returns to be submitted to the Scottish Government by the end of June 2025. The Scottish Government already has information on LA homes through the high-rise domestic buildings inventory and high pressure laminate cladding data collection.

The request issued to RSLs was part of Scottish Government's Cladding Remediation Programme, which includes a Single Open Call scheme to apply for government funding for a Single Building Assessment to be carried out.

In August 2025, the Scottish Government published the 'Next phase plan of action' for the remediation programme, which confirmed that the information gathering exercise from RSLs would conclude in October 2025. The Scottish Government is continuing to liaise with SHR on the remediation programme and what it means for RSLs and has said that the information provided by RSLs may be shared with SHR. Once received SHR will consider this information as part of its risk assessment.

Damp and mould

Landlords should have systems in place to ensure their tenants' homes are not affected by damp and mould and that they have appropriate, proactive systems to identify and deal with any reported cases timeously and effectively. SHR will start gathering information on damp and mould on an annual basis from March 2026 which landlords have been collecting since April 2025. SHR will use this information to monitor and assess the extent of damp and mould, the causes and the effectiveness of how landlords respond.

Annex A: Strategic context and landscape

Effective asset management / tenant and resident safety

Some of the Regulator's engagements in recent years have revealed that a small number of landlords have (and/or):

- under-invested in their homes;
- not invested in the correct areas or priorities;
- not adequately understood their tenant and resident safety obligations; and
- not had any meaningful or strategic approach to asset management.

SHR's advisory guidance on integrated asset management outlines a principles-based approach to help social landlords manage their housing assets effectively and sustainably. It encourages landlords to take a long-term view, ensuring that homes remain fit for purpose and continue to meet tenant needs in the short, medium, and long term. Five key principles underpin the guidance:

- **Strategic Leadership:** Governing bodies and committees should lead the strategic response to asset management and be assured that assets are managed effectively;
- **Comprehensive Understanding:** Landlords should maintain a detailed and up-to-date understanding of their housing stock, including condition, performance, and demand;
- **Value Assessment:** There should be a clear approach to evaluating the value of assets, considering financial performance, social impact, and alignment with organisational goals;
- **Evidence-Based Decision Making:** Outcomes from asset management activities should be used to inform future investment decisions, ensuring resources are directed where they deliver the greatest benefit; and
- **Strategy Development:** Asset management outcomes should shape the organisation's overall asset strategy, supporting long-term planning and financial sustainability.

A small number of landlords have told SHR that some EICRs were carried out more than five years after the last one.

It is essential that landlords have effective and robust policies, procedures and systems in place to ensure that they meet their tenant and resident safety duties – including electrical safety – on time. This is particularly the case for some LAs who continue to be non-compliant.

Following the Grenfell tragedy in 2017, legislation to ban combustible cladding on high-risk buildings, and the highest risk metal composite cladding material from all buildings, was passed by the Scottish Parliament on 22 April 2022. **It remains important that landlords have a full understanding of their stock including whether any homes or buildings have combustible cladding. If and where identified the landlord should take immediate action to ensure the safety of tenants and residents.**

Data accuracy

Landlords must have complete and accurate information about the homes they provide to tenants including stock condition, their performance and their finances to comply with regulatory requirements and the Charter and ensure that any decisions they make are informed by robust data and evidence.

Landlords should seek to assure themselves that their decisions are based on good quality data and that their systems and quality control processes provide robust audit trails.