

Scottish Housing Regulator (SHR)

publishes outcome of its annual risk assessment of social landlords

On 2nd April 2026 the SHR published a summary of the outcome of its annual risk assessment of social landlords, along with engagement plans for registered social landlords (RSLs) and local authorities. In total, 134 RSLs are compliant while two are not compliant and working towards compliance.

The summary report sets out the key strategic areas the Regulator will focus on in its engagement with social landlords this year and, this year, the report also highlights the importance of landlords ensuring that they have robust information on the condition of their homes and are assured they are complying with all of their tenant and resident safety obligations

In this briefing note SHR highlight the key outcomes relating to tenant and resident safety, although you can [read the full publication here](#).

The annual risk assessment

The annual risk assessment is a principal way in which the SHR carries out its statutory functions including how it plans the engagement needed with social landlords. SHR publish information on the approach and the risks to be focused upon in the annual risk assessment ('The risks we will focus on') published in November 2025.

For both local authorities and RSLs, SHR monitor, assess, report and intervene (as appropriate) on their performance of housing activities.

SHR publishes information on its assessment and planned engagement in an engagement plan for each social landlord and publishes a regulatory status for every RSL. The regulatory status shows whether an RSL complies with regulatory requirements, is non-compliant and working towards compliance or where the landlord is non-compliant and statutory action is being taken. SHR also highlights where a regulatory status is under review.

Key strategic risks

Persistent non-compliance with tenant and resident safety for local authorities.

Most homes provided by social landlords meet the Scottish Housing Quality Standard (SHQS) and statutory tenant and resident safety requirements. However, landlords must still maintain a robust and current understanding of their housing stock and its condition.

This will help ensure that the landlord's business plan, financial projections, asset management strategy and investment plans are based on reliable, and up to date information.

Stock condition surveys can also support landlords' achievement of the outcomes and standards in the Scottish Social Housing Charter (the Charter), particularly:

- Quality of housing – tenants' homes must be clean, tidy, in good repair, meet SHQS and any other applicable standards throughout the tenancy, and meet the Energy Efficiency and Zero Emission Heat Standard.
- Repairs, maintenance and improvements – tenants' homes must be well maintained, with repairs and improvements carried out when required.

Under Element 35 of the SHQS, landlords must ensure electrical systems are safe. To demonstrate this, they must carry out an Electrical Installation Condition Report (EICR) every five years. A property passes SHQS if the EICR confirms the electrical system is safe; if not, it fails until remedial work is completed. The five-year requirement was introduced to SHQS in 2020, with the Scottish Government allowing landlords until March 2022 to complete any outstanding EICRs because of the pandemic.

Element 11A requires landlords to install interlinked smoke and heat detectors in all homes by February 2022.

Some local authorities continue to fall short of these obligations. At the end of last year's risk assessment, SHR engaged with 14 landlords about EICR compliance, or about both EICRs and smoke detectors. 13 of these were local authorities.

This year, SHR will engage with 10 landlords on these issues; all of these are local authorities. All non-compliant local authorities must have urgent and credible plans to achieve full compliance and they must do better.

Identifying issues relating to RAAC and cladding

SHR wrote to all social landlords in October 2023 to request information about RAAC; information was requested to help provide a clear national assessment of RAAC in social housing in Scotland and to assist Scottish Government in the development of an appropriate policy response. Updates were published by SHR in December 2023 and March 2024.

Following the Grenfell Tower Fire 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. The Grenfell Inquiry's final report was published in September 2024. In June 2024, the Scottish Government published the Single Building Assessment (SBA) specification including the methodology for carrying out an assessment of cladding risk, and in January this year the SBA standards.

Some RSLs may have undertaken detailed assessments before the publication of the SBA or the **British Industry Standard PAS 9980**. The Scottish Government encourages landlords to understand what assessments have been carried out for buildings over 11 metres in height. Where no assessment has taken place, or where the landlord is not satisfied with its quality, they should consider undertaking a robust assessment using the SBA specification and standards.

The Scottish Government has also announced that it will consider funding SBAs for social housing buildings that meet eligibility criteria, including building height and age.

Landlords must maintain a complete and up-to-date understanding of their housing stock, including the presence of RAAC or potentially unsafe cladding. Where issues are identified, landlords must take immediate action to ensure the safety of tenants and residents.

Other strategic risk areas

SHR's annual risk assessment identified a number of notable risk areas, some of which have been evident for a while and others which have arisen more recently.

Mould and damp

SHR wrote to all social landlords in December 2022 about mould and damp emphasising that landlords should continue to ensure they have systems in place to ensure their tenants' homes are not affected by mould and damp and that they have appropriate, proactive systems to identify and deal with any reported cases of mould and damp timeously and effectively.

SHR introduced new indicators to the Annual Return on the Charter (ARC) which landlords will provide information to us on by May 2026.

Awaab's Law is a set of forthcoming legal duties in Scotland designed to ensure that landlords investigate and respond to reports of damp and mould within strict timescales. The Law builds upon existing obligations that are placed upon social landlords. The expected date of commencement of the additional duties is 6 October 2026 preceded by guidance provided by Scottish Government. SHR will consider then whether their indicators remain appropriate and consult as required.

Data accuracy

It is critical that social landlords have good quality data on their performance, their compliance with obligations and on the condition of their homes. SHR continues to find that some social landlords had not accurately reported their compliance with the SHQS in the ARC or have a clear record of their compliance with their tenant and resident safety obligations.

To enable social landlords to make the best decisions for their tenants and other service users, it is essential that they maintain robust and accurate data, and effective data management systems in place.

Governance (including notifiable events)

SHR reviewed all social landlords' Annual Assurance Statements and found that the vast majority of social landlords reported compliance with regulatory requirements and other obligations. All Annual Assurance Statements, as provided by the landlord, were published.

SHR identified further instances where a small number of RSLs had not met the statutory guidance on Notifiable Events and also found that they continue not to report notifiable events when they should. In some instances SHR found out about material or serious matters months after the event.

SHR also identified a small number of landlords who have not complied with their constitution in how they appoint members to their governing body and how they manage governing body members attendance which resulted in the governing body not being properly constituted. This can seriously impact the effectiveness of the governing body, the reputation of the RSL and risks the possibility that decisions already taken could be challenged.

SHR took steps to engage with RSLs to seek assurance where it identified concerns.

An annual report on notifiable events was published in response to feedback from landlords which highlights the key issues that landlords notified the SHR about during 2024/25, this included governance and organisational issues, tenant and resident matters and funding and financial matters.

Engagement with RSLs and local authorities about tenant safety

In total SHR are engaging with the following:

- Five RSLs about tenant and resident safety (four last year);
- 12 local authorities about tenant and resident safety (14 last year).