

27 November 2025

### **ALACHO response to request for views on the Scottish Housing Regulator**

- The Committee heard conflicting views on the treatment of RSLs by the SHR, and whilst it was not able to determine the causes of those, nonetheless asked the SHR to take steps to improve relationships. In your view, have there been improvements in the Regulator's relationships with RSLs?

For the most part local authorities have enjoyed a positive relationship with the SHR though it is in the nature of the regulatory function that some degree of disagreement is to be expected. In fact, if there were no tension in the relationship, the committee would be entitled to ask if the regulator is being sufficiently diligent in its oversight of the sector. We do speak to colleagues in the RSL sector regularly and I'm not aware of any specific concerns being expressed recently. Our view is that the level of concern raised previously is entirely consistent with a normal and properly functioning relationship between the SHR and the sector and to a significant degree, many of the sharper criticisms that the Committee heard were driven by special pleading on behalf of organisations that had failed to meet regulatory standards. They would have served tenants better by looking to themselves rather than complaining about the SHR.

- The Committee's inquiry noted that stakeholders have concerns around approachability, consistency in attitude towards RSLs, and communication with the SHR. In your view, has the SHR made improvements in each of those areas?

As I think we said at the time, we were not previously aware of these problems, and our members have not raised them with us. The SHR has, as the committee will be aware, been critical of councils in relation to a number of areas of performance particularly in relation to services to homeless people. These criticisms have been clearly based on evidence and on the whole properly set in the operational context (a highly dysfunctional housing system and significant funding challenges). But they have always been delivered appropriately. None of our members have raised concerns about the approachability of the regulator or how they communicate with the sector.

- The Committee noted the importance of SHR's relationships and engagement with tenants. Do you have any views on whether their communications with tenants have further developed?

The SHR has always put significant effort into engaging with tenants though the effectiveness of this is limited by the need to function at a Scotland wide level and the often patchy nature of tenant engagement at all levels. It is one of the features of the current housing emergency that the voice of social housing tenants has been

relatively muted. That said, much of the focus of the current discussion has been around homelessness rather than any failure in the delivery of day-to-day housing management services. On issues like affordability or damp and mould more could be done to ensure that the voices of tenants are heard more clearly but the primary responsibility for that rests with landlords working with tenants and the organisations that seek to represent them.

ALACHO