

Ariane Burgess MSP
Convener, Local Government, Housing and Planning Committee
Scottish Parliament

14 November 2025

Dear Ariane

Scrutiny of Scottish Housing Regulator

Many thanks for your letter of 9 October 2025, and we welcome the opportunity to provide further comment.

SFHA continues to recognise the crucial role that regulation plays within the sector, providing vital assurances to tenants, service users and lenders. As such, our regular dialogue with the SHR is crucial to ensure we can feedback the views of our members in a constructive way.

You had asked SFHA three questions regarding the SHR, following up from our evidence to the committee last year and the [committee's letter to the SHR in March](#). The SHR subsequently [responded to the Committee in June](#), so it is important to note that there has not really been much time since their response to notice any meaningful changes. In terms of each of your questions:

1. SHR's relationship with RSLs

As we highlighted in our evidence last year, the 20 recommendations from the SFHA's Regulatory Framework in Practice research published in June 2023 centred around further enhancing the SHR's relationship with the sector, particularly in terms of approachability, consistency of approach and communication. SFHA continues to liaise with the SHR regarding these recommendations, and the SHR has made a number of amendments to its approach since.

For instance, the SHR will shortly be consulting RSLs on changes to its landlord groups – with a view to increasing membership. For many years, the only Landlord Group that the SHR operated was one for those it defines as “Systemic” RSLs – which are predominantly the larger RSLs. We had called for all RSLs to have a similar opportunity to engage with the SHR, which led to the formation of two additional landlord groups – “urban” and “Rural”. Membership to these groups is currently restricted to a maximum amount of 9 in the rural group and 13 in the urban group. We would like to see this membership expanded and more organisations given the opportunity to join. We have encouraged the SHR to find ways to accommodate all those who express an interest.

2. Consistency and approachability of SHR

In addition to the landlord groups, the SHR now produces an annual report on Notifiable Events it has received - providing examples of how it has responded in

certain circumstances and explaining its reasoning. This has been really helpful and welcomed by our members. We are continuing to liaise with the SHR to identify additional methods of further developing the mutual understanding between the sector and the SHR.

Since the beginnings of the SHR in 2011, SFHA has asked that a truly independent appeals process for regulatory decisions be implemented – and this was also included as part of our evidence to the Committee last year. We were therefore delighted that the upcoming Housing Act will create such a mechanism and look forward to engaging further with the Committee and SHR as this develops.

3. Relationship and engagement with tenants

SFHA has no further comment relating to the SHR's relationship with tenants, although we would certainly recommend organisations such as the Tenant Participation Advisory Service (TPAS) and the Tenants Information Service (TIS) to provide their thoughts on this point.

Please get in touch if you have any further queries, and thanks again for the opportunity to comment further.

Yours sincerely
Richard

Richard Meade
Chief Executive
Scottish Federation of Housing Associations