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**To: Communities and Housing Policy Board**

**On: 16 January 2024**

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**Report by: Director of Environment, Housing and Infrastructure**

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**Heading: Social Housing Charter Performance: 2023/24 Half Year Update**

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## **1. Summary**

- 1.1 Local Authorities and Registered Social Landlords are required to submit an Annual Return on the Charter relating to service performance to the Scottish Housing Regulator by the end of May each year.
  - 1.2 This report provides an update on performance against the Charter indicators for the first six months of 2023/24.
  - 1.3 We only report on 18 indicators for the six-month report, as opposed to 32 for the Annual report on the Charter. Of these 9 have improved since April 2023, the remainder have remained relatively stable or performance has dipped.
  - 1.4 There is also a summary report on the response to the Scottish Housing Regulator's consultation on the Single Regulatory Framework
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## **2. Recommendations**

It is recommended that the Communities and Housing Policy Board

- 2.1 notes the 2023/24 Half Year Update Report on Scottish Social Housing Charter Performance attached as appendix 1.
  - 2.2 notes our response to the Scottish Housing Regulator on the consultation on the Single Regulatory Framework.
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### **3. Six Month Update on Charter Report for 2023/24**

#### **3.1 The Half Year Update on Scottish Social Housing Charter Performance provides information on the first two quarters of 2023/24:**

- Section 1 provides performance information against the Charter indicators along with comparative data for the last three years. For ease of reference, indicators which are only reported on an annual basis are not included in this report (these annual indicators were reported to the Policy Board in August 2023).
- Section 2 reports on management information for key areas of the housing service – allocations and managing tenancy change; repairs; homelessness and housing advice; rent arrears.

#### **3.2 The six month data for 2023/24 displays improved or stable performance in nine of the indicators, the key areas of improved performance are:**

- Gas servicing has improved, although there were 6 occasions a service was not carried out before the anniversary date (Charter Indicator 11). All of these were in April and there have been no instances of 'gas failures' since then. All 6 have been completed since.
- The average time to complete emergency repairs has improved from 9.8 hours to 7.8 hours.
- Similarly, there has been improvement in repairs satisfaction from 73.3% to 75.6%,
- Letting activity, there were 512 properties re-let taking an average of 46.5 days. This is an improvement from the year end figure of 60 days; however, this will remain a priority area for the service for further improvement (Charter Indicator 30).
- Improving re-let performance has been reflected in a reduction in the percentage of rent due lost through properties being empty during the last year (Charter Indicator 18) from 1.95% in April to 1.48% at the end of September.

#### **3.3 Within the six month data for 2023/24 there are also areas where performance has declined, reflecting the challenges faced by the Council in continuing to provide core housing services during the current challenging economic climate. Some of the key areas of performance are:**

- Tenancy sustainment (Charter Indicator 16) has dipped from 95.3% to 91.2%. These figures relate to tenancies which commenced between October 2021 and September 2022.
- Similar to the same time last year, there has been a slight reduction in the rent collection rate. This is a consistent pattern for the first six months of the financial year – the amount collected usually increases in the second half of the year and this should be reflected in the arrears figure at the year end. The rent collected in the first six months of the year represented 96.4% of the total rent due, compared with 98.2% in 2022/23 (Charter Indicator 26).

- The gross rent arrears figure has increased – up to 9.46% at the end of September from 8.6% at April 2022/23 (Charter Indicator 27). This reflects a similar pattern at the same point last year and as collection rates increase in the second part of the year the level of arrears should reflect this.

3.4 The Management information in appendix 1 notes the following:

- The number of applicants for housing at the end of September is down slightly from the year end (22/23).
- In the first six months of 2023/34 we let 512 properties, which is approximately in line with our annual figure.
- Most of these lets (72.5%) were made through the group system, we have exceeded our target of lets to homeless applicants for the first six months of the year (57.1%) and lets due to the Regeneration programme make up almost 60% of lets out with the group system.
- Overall repairs completed within target has dipped slightly, however there have been improvements in the emergency and urgent categories amongst others.
- Our performance in homelessness assessment continues to be positive, more than 90% of assessments are completed within 28 days.
- Satisfaction with Housing Options advice remains high.
- An increase in court activity is highlighted following the Scottish Government lifting of the ban on evictions.

## 4 **Scottish Housing Regulator, Consultation on the Single Regulatory Framework**

4.1 The Scottish Housing Regulator (SHR) issued a Discussion Paper earlier this year on the Single Regulatory Framework. It advised there would be a further consultation on this topic. In October 2023, they issued their consultation document with a response closing date on 15 December 2023. The key elements affecting local authorities are:

- A requirement for specific assurance, we responded that this would be appropriate if advised through our Engagement Plan.
- The SHR have suggested that they intend to review the indicators for the Scottish Social Housing Charter. We advised that we would be keen to participate in a review when this occurs.
- How landlords respond to tenants and tenants' concerns, we noted that Renfrewshire Council has a range of ways in which tenants, residents and service users can provide feedback and raise concerns. As such we welcome any methods that would support tenants and residents in providing feedback to their landlord.

A copy of our response is attached at appendix 2.

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## Implications of the Report

1. **Financial** – None
2. **HR & Organisational Development** - None
3. **Community/Council Planning**

*Building strong, safe, and resilient communities – Improving and maintaining neighbourhoods and homes.*

*Working together to improve outcomes – Increasing resident satisfaction with neighbourhoods and communities.*

4. **Legal** – None
5. **Property/Assets** – None
6. **Information Technology** – None
7. **Equality & Human Rights** –

The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because it is for noting only. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website

8. **Health & Safety** – None
  9. **Procurement** – None
  10. **Risks** – None
  11. **Privacy Impact** – None
  12. **COSLA Policy Position** – N/A
  13. **Climate Risk** – None
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## Background Papers

- Report to the Communities, Housing and Planning Policy Board on 22 August 2023, '*Scottish Social Housing Charter: Annual Return 2022/23*'.

The foregoing background papers will be retained within Communities, Housing and Planning Services for inspection by the public for the prescribed period of four years from the date of the meeting.

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# **Scottish Social Housing Charter**

6 Month Update 2023/2024

[www.renfrewshire.gov.uk](http://www.renfrewshire.gov.uk)



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## 1. SECTION 1: OUTTURN REPORT (April-September 2023-2024)

No.	Indicator	20/21	21/22	22/23	23/24 Six Month position	Notes
Complaints						
3/4	The percentage of all complaints responded to in full at Stage 1	100%	95.1%	97.9%	97.8%	Out of 378 Stage 1 complaints received, 370 were responded to in full, in an average of 6.32 days
	The average time in working days for a full response at Stage 1	4.97 days	6.56 days	5.76 days	6.32 days	
	The percentage of all complaints responded to in full at Stage 2.	100%	96.2%	84.6%	88.0%	Out of 25 Stage 2 complaints received, 22 were responded to in full, in an average of 15.73 days
	The average time in working days for a full response at Stage 2.	13.9 days	16.6 days	14.5 days	15.73 days	
Repairs, maintenance and improvements						
8	Average length of time taken to complete emergency repairs. (hours)	6.2	7.1	9.8	7.8 hours	The average time to complete emergency repairs has improved over the first six months of 23/24.
9	Average length of time taken to complete non-emergency repairs. (days)	10.7	14.6	6.1	6.6 days	Performance has remained relatively stable
11	How many times in the reporting year did you not meet your	1471	142	58	6	The six ‘fails’ were in April and there have been no missed safety



No.	Indicator	20/21	21/22	22/23	23/24 Six Month position	Notes
	statutory obligations to complete a gas safety check within 12 months of a gas appliance being fitted or its last check?					checks since then. All the safety checks have been completed.
12	Percentage of tenants who have had repairs or maintenance carried out in last 12 months satisfied with the repairs and maintenance service.	92.0%	95.0%	73.3%	<b>75.6%</b>	There has been a slight improvement in repairs satisfaction. 1266 repairs customer surveys were completed between April-Sept 23 and of these 958 said they were very or fairly satisfied with the repairs service
<b>Neighbourhood and community</b>						
14	Percentage of tenancy offers refused during the year.	24.1%	39.6%	39.3%	<b>39%</b>	Performance has remained stable since April
15	Percentage of anti-social behaviour cases reported in the last year which were resolved.	99.8%	99.7%	98.0%	<b>94.88%</b>	Figure slightly lower due to small number of investigations (7) commencing in week of 25 September 2023.
<b>Access to housing and support</b>						
16	Percentage of new tenancies sustained for more than a year, by source of let.					
	Existing tenants	95.5%	93.5%	95.2%	<b>93.22%</b>	Overall 919 properties let with 838 having sustained for more
	Homeless applicants	88.4%	89.4%	91.6%	<b>88.33%</b>	

No.	Indicator	20/21	21/22	22/23	23/24 Six Month position	Notes
	Housing List applicants	92.8%	94.5%	94.5%	<b>92.35%</b>	than a year. These figures relate to tenancies which commenced between October 2021 and September 2022. Sustainment across all applicant types has dipped over this period by 4.2 percentage points. Notably, tenancy sustainment by homeless applicants has decreased by 3.3 percentage points. However, in many circumstances there are positive reasons for tenancies not exceeding one year, for example: families re-uniting or young homeless applicant returning to stay with relatives.
	Other	0.0%	0.0%	0.0%	<b>0.0%</b>	
	<b>Overall</b>	92.0%	92.2%	95.3%	<b>91.19%</b>	
17	Percentage of lettable houses that became vacant in the last year.	6.6%	8.3%	7.2%	<b>3.74%</b>	428 properties have become void in the first six months of 2023/24.
18	Percentage of rent due lost through properties being empty during the last year.	1.58%	2.0%	1.9%	<b>1.48%</b>	Performance in area is consistent with Q1 and demonstrates improvement when compared to Q2 last year where figure was 1.95%.
22	Percentage of the court actions initiated which resulted in eviction and the reasons for eviction.					
	Non-payment of rent	0.0%	0.0%	4.4%	<b>13%</b>	191 cases called
	Anti-social behaviour	0.0%	0.8%	0.6%	<b>0.05%</b>	
	Other	0.0%	0.0%	0.0%	<b>0</b>	

No.	Indicator	20/21	21/22	22/23	23/24 Six Month position	Notes
	All	0.0%	0.8%	5.0%	13.05%	
<b>Homelessness</b>						
24	Homelessness (LAs only) – the percentage of homeless households referred to RSLs under section 5 and through other referral routes.	32.1%	32.0%	28.2%	18.9%	82 homeless households referred to RSLs under Section 5  433 homeless households to whom the local authority has a statutory duty to secure permanent accommodation
<b>Rents and service charges</b>						
26	Rent collected as percentage of total rent due in the reporting year.	99.0%	98.2%	100.0%	98.46%	Performance is consistent in line with collection rate in previous years – Q2 position in 22/23 was 96.36%
27	Gross rent arrears (all tenants) as at 31 March each year as a percentage of rent due for the reporting year.	6.4%	8.0%	8.6%	9.46%	Performance continues to improve in both current and former tenant rent collection in line with collection rates at this point in the financial year – Q2 position in 22/23 was 10.07%
30	Average length of time taken to re-let properties in the last year. (days)	85.7	66.0	60.6	46.5	Performance continues to improve, and number of properties let has increased from Q1.

## 2. SECTION 2: MANAGEMENT INFORMATION

### 2.1. Allocations and Managing Tenancy Change

Table 1 notes the number of applicants on housing list. The number of applicants at the end of September is down slightly from the year end (22/23).

	20/21	21/22	22/23	23/24 Six Month position
Number of applicants on housing list - at 30 Sept 2023	5,901	5,672	4,951	<b>4,678</b>
Of which, number who have their application on hold	1,034	983	788	<b>726</b>

Table 2 provides the source of housing applicant from the allocation policy which notes that the source of the applications remain relatively unchanged from previous years.

Group	20/21		21/22		22/23		23/24 Six Month position	
	Applicants	%	Applicants	%	Applicants	%	Applicants	%
Statutory Homeless	254	4.3%	215	4%	245	4.9%	231	4.9%
Mobility	435	7.4%	479	9%	571	11.5%	617	13.2%
General Applicants (not landlord's own tenant)	3,859	65.4%	3,400	63.6%	2,995	60.5%	2,801	59.9%
Transfer Applicants (with housing need)	745	12.6%	676	12.6%	624	12.6%	573	12.2%
Transfer Applicants (no housing need)	608	10.3%	577	10.8%	516	10.4%	456	9.7%
<b>Total</b>	<b>5,901</b>	<b>100%</b>	<b>5,347</b>	<b>100%</b>	<b>4,951</b>	<b>100%</b>	<b>4,678</b>	<b>100%</b>

Table 3, 4 and 5 shows lets made through and out with the group system. There were 512 properties let by the Council, this is on par with the annual figure for lets. Most of these lets (72.5%) were made though the group system. We have exceeded our target of lets to homeless applicants for the first six months of the year ((57.1%). Lets due to the Regeneration programme make up almost 60% of lets out with the group system.

	20/21		21/22		22/23		23/24 Six Month position	
	Number	%	Number	%	Number	%	Number	%
Lets through group system	500	83%	426	90.3%	764	81%	371	72.5%
Lets outwith group system	99	17%	46	9.7%	181	19%	141	27.5%
<b>Total Lets</b>	599	100%	472	100%	945	100%	512	100%

Table 4 shows lets to each group and the target for lets to each group.

	20/21		21/22		22/23		22/23 Six Month position		Targets
	Lets	%	Lets	%	Lets	%	Lets	%	%
Statutory Homeless	245	49%	368	42.9%	316	41%	212	57.1%	49%
Mobility	74	14.8%	117	13.6%	98	13%	47	12.7%	10%
General Applicants (not landlords' own tenant)	128	25.6%	255	29.8%	265	35%	87	23.4%	23%
Transfer Applicants (with housing need)	47	9.4%	93	10.9%	72	9%	24	6.5%	15%
Transfer Applicants (no housing need)	6	1.2%	24	2.8%	13	2%	1	0.3%	3%
<b>Total</b>	968	100%	857	100%	316	41%	371	100%	100%

Table 5 gives details for lets outwith the group system.

	20/21		21/22		22/23		23/24 Six Month position	
Category	Lets	%	Lets	%	Lets	%	Lets	%
Sheltered	25	25.2%	39	46.2%	42	23%	20	14.2%
Special Lets	25	25.2%	40	48.9%	66	36%	38	26.9%
Regeneration	49	49.5%	4	4.9%	73	40%	83	58.9%
<b>Total</b>	<b>99</b>	<b>100%</b>	<b>83</b>	<b>100%</b>	<b>181</b>	<b>100</b>	<b>141</b>	<b>100%</b>

Table 6 shows lets by house type.

House Type	20/21		21/22		22/23		22/23 Six Month position	
	No.	%	No.	%	No.	%	No.	%
Tenement Flat	232	39%	210	44.5%	418	44.2%	236	46.1%
Own Door Flat	122	20%	94	19.9%	153	16.2%	108	21.1%
Multi-storey Flat	42	7%	54	11.4%	95	10.1%	35	6.8%
House	122	20%	48	10.2%	139	14.7%	51	10%
Other	80	14%	66	14%	140	14.8%	82	16%
<b>Total</b>	<b>599</b>	<b>100%</b>	<b>472</b>	<b>100%</b>	<b>945</b>	<b>100%</b>	<b>512</b>	<b>100.00%</b>

Table 7 shows Section 5 and Nomination Lets information. The percentage of lets to Section 5 nominees and overall lets to the Council remains broadly similar to the previous year end position.

Table 7 Nomination & S5 Lets						
	Council nomination lets		% of overall lets to Council nominations	Section 5 lets	% lets to Section 5	% overall lets to Council
	General stock	Specialist/sheltered /supported		Total stock		
20/21	19	1	3.3%	165	31.8%	30%
21/22	74	3	8.6%	174	24.2%	28%
22/23	48	11	7.6%	171	26.5%	29.6%
23/24 Six Month	15	2	5%	80	28.8%	28.6%

*Section 5 = general stock only (excludes specialist housing)*

## 2.2. Repairs

Overall repairs completed within target has dipped slightly, however there have been improvements in the emergency and urgent categories amongst others.

Table 8- Category of Repair completed within target	20/21	21/22	22/23	23/24 Six Month position
Emergency Completed	98.7%	97%	95%	97%
Right to Repair Completed	99.5%	100%	95%	97%
Urgent Completed	87%	86%	61%	74%
Routine Completed	90%	87%	92%	88.5%
Programmed Completed	98.8%	100%	99%	99.1%
Total Repairs Completed	96.2%	93.6%	93.1%	92.1%

Table 9 provides information on Customer Contact Centre performance in relation to housing repairs calls. This shows the volume of calls for the first six months of 2023/24 and the outcomes for calls received. Almost 32,000 calls were made to report repairs and 94% of these were answered.

Table 9 - Customer contact centre		
Indicator	Number	Percentage
Total calls attempted	31,799	
Calls answered	29,837	94%
Calls abandoned	1,563	5%
Calls answered within 40 second target time	22,413	
% of all attempted calls answered within 40 sec target (service level)		70%



## 2.3. Homelessness and Housing Advice

Table 10 provides information on the number of applications that were assessed as being statutorily homeless or threatened with homelessness. Performance in terms of time taken to complete assessments continues to compare well with other Scottish Local Authorities.

Table 10 Applications and Decision Making	20/21	21/22	22/23	23/24 Six Month position
Number of homeless applications requiring assessment	832	909	935	525
Total number of service users – those who were homeless, threatened with homelessness, or requiring housing options advice.	2,084	2,256	2,384	1,396
Number of applications assessed as ‘homeless or threatened with homelessness’ (i.e. the Council had a duty to rehouse)	682	712	766	433
Proportion of assessments completed within 28 days	99.7%	100%	99.70%	93.2%

Table 11 measures satisfaction with Housing options service. Satisfaction with Housing Options advice remains high.

Table 11 – Satisfaction	20/21	21/22	22/23	23/24 Six Month position
% pleased with the quality of advice and information they were given	96.3%	100%	94.6%	91.4%
% pleased with the overall quality of the service they received.	96.3%	100%	94.6%	91.4%
% Satisfied with temporary accommodation	94.7%	98.3%	94.7%	96.4%

## 2.4. Rent Arrears

Table 12 shows that the rental due to be collected between April and September was over £25 million. At the end of September 2023, £3.103 million was owed in current tenant arrears, which excludes former tenant arrears.

Table 12 - Current Tenant Rent Arrears				
	20/21	21/22	22/23	23/24 Six Month position
Annual Rental Income	£47,627,600	£47,658,100	£48,238,167	£50,638,912
Number of Tenants	11,121	11,036	11,005	11,004
Total Arrears Owed All	£1,849,868	£2,334,578	£2,322,033	£3,103,242

Table 13 shows the recovery action taken. The six month figures demonstrate an increase in court activity following the lifting of evictions ban by the Scottish Government.

Table 13 – Recovery Action				
	20/21	21/22	22/23	23/24 Six Month position
NPRP issued	4	106	622	334
All Cases calling at Court	67	22	158	129
Decrees Granted	0	3	38	51
Evictions enforced S/Officer	0	0	0	4
Average time first calling	11 weeks	n/a	12 weeks	10 weeks
Average time recalled at court	23 weeks	4 weeks	8 weeks	5 weeks

Table 14 provides a profile of arrears by value. The level of arrears has increased in all categories with the exception of arrears over £1,000. This is reflected in the increase of the arrears percentage.

Table 14 – Profile of Arrears by Value				
	20/21	21/22	22/23	23/24 Six Month position
Under £250	£109,500	£110,600	£111,919	£234,663
Between £250 & £500	£187,500	£186,500	£181,078	£401,117
Between £500 & £1,000	£333,700	£336,800	£307,683	£503,306
Over £1,000	£1,219,200	£1,700,600	£1,721,353	£1,148,222
TOTALS	£1,849,900	£2,334,500	£2,322,033	£3,103,242

Table 15 shows the status of arrears debt.

Table 15 – Status of Rent Debt				
	20/21	21/22	22/23	23/24 Six Month position
Arrears Pre-Court	£1,493,900	£1,839,500	£2,868,200	£2,524,178
Arrears Post Court	£201,800	£241,800	£288,500	£500,822
Arrears Rent Direct	£154,200	£253,200	£106,900	£78,242
TOTALS	£1,849,900	£2,334,533	£3,263,600	£3,103,242

Table 16 shows the amount owed in rent by the age of tenants. There has been an increase across all age ranges.

Table 16 – Profile of Arrears by Age				
	20/21	21/22	22/23	23/24 Six Month position
Under 25 years	£112,700	£137,600	£168,165	£218,784
Between 25 & 49 years	£1,230,100	£1,565,100	£1,511,231	£2,033,214
Between 50 & 60 years	£358,100	£453,200	£436,090	£608,858
Over 60	£149,000	£178,600	£206,547	£242,386
<b>TOTALS</b>	<b>£1,849,900</b>	<b>£2,334,500</b>	<b>£2,322,033</b>	<b>£3,103,242</b>

Table 17 provides summary information on benefit levels compared to previous years. Benefit uptake remains at 76% in the first six months of 2023/24.

Table 17– Housing Benefit				
	20/21	21/22	22/23	23/24 Six Month position
Number of tenants	11,121	11,036	11,005	11,004
Tenants with benefit	8,498	8,408	8,392	8,404
Tenants without benefit	2,623	2,628	2,613	2,600
% in receipt of Housing Benefit	76%	76%	76%	76%

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# Our regulation of social housing in Scotland

## Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our consultation paper on our website at [www.housingregulator.gov.scot](http://www.housingregulator.gov.scot)  
Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **15 December 2023**.

By email @: [regulatoryframeworkreview@shr.gov.scot](mailto:regulatoryframeworkreview@shr.gov.scot)

Or post to: Scottish Housing Regulator  
2<sup>nd</sup> floor, George House  
36 North Hanover Street, G1 2AD

### Name/organisation name

Louise Feely, Renfrewshire Council

### Address

Renfrewshire House		
Cotton Street		
Paisley		
Postcode <b>PA1 1JD</b>	Phone	Email

### How you would like your response to be handled

To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

### Are you happy for your response to be published on our website?

Yes ☒ No ☐

### If you are responding as an individual ...

Please tell us how you would like your response to be published.	Pick 1
Publish my full response, including my name	<input checked="" type="checkbox"/>
Please publish my response, but not my name	<input type="checkbox"/>

1. Do you agree with our proposed approach on specific assurance in Annual Assurance Statements?

We agree that a provision for a requirement for specific assurance may be required in certain circumstances. We welcome the suggested approach that in some circumstances, specific assurance may be requested through the Engagement Plan.

2. Do you agree with our proposal to initiate a comprehensive review of the Annual Return on the Charter which we will consult on next year?

Yes, we would welcome a comprehensive review of the Annual Return on the Charter and look forward to participating in it.

3. Do you agree with our proposed amendments to strengthen the emphasis on landlords listening to tenants and service users to include a requirement that landlords:

- a. provide tenants, residents and service users with appropriate ways to provide feedback and raise concerns, and
- b. ensure that they consider such information and provide quick and effective responses?

Renfrewshire Council has a range of ways in which tenants, residents and service users can provide feedback and raise concerns. As such we welcome any methods that would support tenants and residents in providing feedback to their landlord.

We provide a quick and effective responses to service users but believe that it should be recognised some requests for information are more complex and that response times would need to be proportionate. There may remain some work to do on differentiating between complaints and serious issues. It could be concluded that a serious issue for a tenant is a complaint, which we would address using our complaints process. We would not welcome additional timebound measures from the regulator.

4. Do you agree with our proposed approach to Notifiable Events?

Although local authorities are not required to declare a notifiable event, we have as a rule of thumb, contacted our regulation manager to determine whether something should be considered a Notifiable Event.

5. Do you agree with our proposed approach to regulatory status?

We note that this applies to RSLs and as such will not comment.

6. Do you agree with our proposed approach to Significant Performance failures?

The proposed approach seems reasonable. We look forward to the revised document on Significant Performance Failures.

7. Do you agree with our proposed changes to the guidance on *Annual Assurance Statements*?

Yes, this appears reasonable. However, if there is a specific requirement for explicit assurance by individual landlords then the landlord should be advised of this at the Engagement Plan stage.

8. Do you agree with our proposed changes to the guidance on *Consultation where the Regulator is directing a transfer of assets*?

We note that this applies to RSLs and as such will not comment.

9. Do you agree with our proposal to maintain *the Determination* at this time?

We note that this applies to RSLs and as such will not comment.

10. Do you agree with our proposed changes to the guidance on *Determination of what is meant by a step to enforce a security over an RSL's land?*

We note that this applies to RSLs and as such will not comment.

11. Do you agree with our proposal to maintain the guidance on *Financial viability of RSLs?*

We note that this applies to RSLs and as such will not comment.

12. Do you agree with our proposed changes to the guidance on *Group structures?*

We note that this applies to RSLs and as such will not comment.

13. Do you agree with our proposed changes to the guidance on *How to request an appeal of a regulatory decision?*

We note that this applies to RSLs and as such will not comment.

14. Do you agree with our proposal to maintain the guidance on *How to request a review of a regulatory decision?*

We note that this applies to RSLs and as such will not comment.

15. Do you agree with our proposed changes to the guidance on *Notifiable events?*

We note that this applies to RSLs and as such will not comment.

16. Do you agree with our proposed changes to the guidance on *Preparation of financial statements?*

We note that this applies to RSLs and as such will not comment.

17. Do you agree with our proposal to maintain the guidance on *Section 72 reporting events of material significance?*

We note that this applies to RSLs and as such will not comment.

18. Do you agree with our proposed changes to the guidance on *Tenant consultation and approval?*

We note that this section titled 'Tenant Consultation and approval' applies to RSLs and as such will not comment.

19. Would you like to give feedback on any aspect of our impact assessments? Are there other potential impacts that we should consider?

No

Thank you for taking the time to give us your feedback!