

Self-assurance toolkit update April 2024 – key changes at a glance

The following table provides an overview of some of the key changes to the toolkit in April 2024. Please note this is only intended as an at a glance summary of the most significant amendments. For a full list of revisions please refer to the tracked changes version of the updated toolkit.

Ref	Amended Self-Assurance Factors
AN1	<p>Have we gathered and reviewed sufficient evidence to provide us with appropriate assurance of the landlord's RSL's compliance prior to signing off our assurance statement?</p> <p><u>Have we gathered and reviewed sufficient evidence to enable us to confirm, if required, specific assurance in any areas identified by the SHR?</u></p> <p>Have we <u>communicated</u> engaged with tenants about the content of the AAS?</p>
AN3	<p><u>Do we consider equality and human rights impacts under each relevant GB / committee report?</u></p> <p><u>Does the GB / committee receive reports of the types of complaints / concerns raised by tenants and service users and resulting action?</u></p> <p><u>How do we gain assurance that our housing stock is being maintained in accordance with safety standards?</u></p> <p>How are we implementing and taking account of the impact of the provisions of the Cost of Living (Tenant Protection) Scotland Act 2022?</p>
AN4	<p><u>Are we satisfied that we are adopting a risk-based approach to resolving identified areas of non-compliance (e.g. EICRs) and that risks are being monitored and managed effectively?</u></p>
CH1	<p>Do we undertake benchmarking to compare our performance with other landlords <u>and with national averages</u>? How do we use the results of such comparisons to influence service delivery?</p> <p>How do we consult/engage with tenants about <u>assessing</u> our performance?</p>
CH2	<p>Are we assured that tenants have had opportunities to contribute to <u>how performance is monitored?</u> monitoring our performance?</p> <p><u>Are we assured that tenants and service users are actively and meaningfully involved in providing feedback on performance and/or scrutinising it through tenant panels or scrutiny groups etc? Do we receive reports on the results from tenant scrutiny exercises?</u></p> <p>How have we taken account of the views of tenants and service users <u>about our performance</u> in the preparation of the AAS? Have we considered whether we should engage with tenants specifically in connection with the preparation of our AAS?</p>
CH3	<p>How <u>regularly do</u> did we consult with tenants and service users about the format of our annual Charter Report?</p>
LR1	<p><u>How do we encourage feedback from tenants, service users and other customers?</u></p> <p><u>Have our arrangements been developed in consultation with them? Have we conducted an Equality Impact Assessment on our arrangements?</u></p> <p><u>How do we gain assurance that these methods are effective?</u></p> <p><u>Do we include periodic reminders in our newsletters and other communications?</u></p> <p><u>How do we gain assurance that responses are delivered quickly?</u></p>

Ref	Amended Self-Assurance Factors
	<u>How regularly does the GB / committee receive reports about the feedback received and the actions prompted?</u>
LR3	How have the response timescales been agreed locally? Have tenants been consulted and have their comments informed the agreed timescales?
LR4	How do we use the information that we receive about complaints <u>and other feedback about the services we provide</u> ? Are we assured that we respond effectively to complaints <u>and feedback</u> and that we learn from them?
EH1	<u>How are we assured that our policies and practices do not allow harassment or victimisation? How confident are we that any instances will be identified or reported and addressed quickly and effectively?</u>
SG1	Are we satisfied that the requirements of the NE guidance are well understood by staff and GB members? <u>Have we reviewed our policies and updated practices to reflect the 2024 statutory guidance?</u>
SG2	<u>Are we assured that the governance and activities of charitable members of the group comply with charity legislation? How do we gain this assurance?</u> Where a subsidiary is an RSL, are we assured that there are sufficient members of the <u>subsidiary</u> GB to form a quorum who are independent of <u>the parent other group members</u> ? <u>Are we assured that each member of the Group has a different Chair?</u> <u>Are we assured that there are formal and comprehensive agreements in place between members of the group to support e.g. service delivery, performance & compliance monitoring, financial arrangements and governance (intra-group agreements (IGAs))?</u> <u>Are we assured that up to date and comprehensive registers are maintained covering all intra-group lending and covenants? Are we assured that any lending involving members of the group with charitable status is compliant with the charitable objects of the parties?</u> <u>How do we monitor intra-group loan agreements and ensure they are compliant with regulatory requirements (Statutory Guidance 2024: Group Structures)?</u> <u>Are we assured that accurate and comprehensive asset registers are maintained for each member of the group?</u> <u>Are any payments that are made to GBMs of group members provided for by a suitable group policy?</u> For a parent RSL: How do we monitor the affairs of our subsidiaries to ensure that we are able to take appropriate action in the event of a failure or breach that requires step-in action? <u>How do we monitor the operation of the contractual terms of any guarantees that the parent has provided to support a subsidiary? Are we assured that the interests of tenants are protected and that the terms of guarantees do not jeopardise the parent or tenants?</u>
SG3	<u>How are we satisfied that the necessary consents (e.g. from OSCR) were / will be secured within the required timescales?</u>
1.3	<u>Does the GB's composition comply with its Rules / Articles and constitutional requirements (membership / co-options / attendance / application of nine-year rule / Chair's term of office, etc)?</u>

Ref	Amended Self-Assurance Factors
	<u>How does the GB gain and maintain assurance about the RSL's compliance with legal obligations relating to tenant and resident safety, housing and homelessness, equality and human rights?</u>
2.1	<p><u>How well informed is the GB about the range of methods used and their success / effectiveness? Have we carried out an Equality Impact Assessment on the way we engage and communicate with tenants and other service users? Do we tailor our communications to meet the needs, expectations, preferences of specific groups of tenants (e.g younger / older tenants; tenants affected by specific proposals)?</u></p> <p><u>Do we make it easy for tenants and service users to communicate with us?</u></p> <p><u>Do we know what tenants want to hear from us about?</u></p> <p>How well informed is the GB about the range of methods used and their success / effectiveness? Have we carried out an Equalities Impact Assessment on the way we engage and communicate with tenants and other service users?</p>
2.2	<u>Do we encourage tenants and service users to give feedback on our performance? How do we use feedback? Do we use it as effectively as we could?</u>
2.3	<p><u>Is the information that we are required to publish easily accessible from our website? Do we know how well our website is used?</u></p> <p>Are the minutes of GB meetings <u>over the last 2 years</u> published on our website?</p>
2.4	<p><u>Do we ask tenants and service users for their views about our plans and services? Do we reflect their feedback in our business plan priorities? How do we demonstrate that we have taken account of feedback?</u></p> <p><u>Does feedback from tenants and service users influence the design / conduct of surveys and consultations?</u></p> <p>Have effective arrangements been made to seek out and act on customer feedback during the last year?, taking account of ongoing restrictions / changing service delivery and working practices</p> <p><u>How do we use the feedback that tenants give us? How is feedback reported to the GB? How do we report to tenants about our actions in response to feedback? Does the feedback from tenants and service users form part of the evidence that supports our assurance – and the preparation of the AAS?</u></p> <p>How have the findings from the TSS and other customer feedback influenced service delivery and performance <u>over the last year?</u></p> <p><u>Does the GB feel well-informed about the views of tenants and service users? Is the GB well-informed about their views?</u></p> <p><u>How do we encourage tenants and service users to tell us what they think of our plans and service delivery?</u></p> <p>Do we provide options, or assess the merits of providing options, for tenants to consider as part of the annual rent consultation? <u>Do we explain how the proposals for the annual rent increase have been calculated? Have we discussed our approach to rent setting with tenants?</u></p> <p><u>How do we feed back to tenants about the outcome of consultation exercises?</u></p>

Ref	Amended Self-Assurance Factors
2.5	Are GBMs and senior staff familiar with the notifiable events requirements of SHR and OSCR? How do they keep up-to-date? <u>Has information / training been provided to ensure that the revisions to the Regulatory Framework and statutory guidance introduced in April 2024 have been effectively communicated to the GB and senior staff?</u>
3.1	How is the annual consultation on rents carried out? <u>Are tenants presented with options to consider where costs and services are explained? If we did not offer options about rent increases to tenants – how was that decision informed? Did we discuss our consultation plans with tenants (e.g. via a tenants' panel or scrutiny group) in advance?</u> How does the association decide what its liquidity requirements are? How are these requirements reported to/considered/monitored by the GB? <u>Have these requirements been reviewed to take account of the current economic and operating climates?</u>
3.3	What is the GB's role in setting and monitoring performance targets and outcomes? <u>What account is taken of tenant and service user feedback in monitoring performance?</u> How often is progress reported to the GB?
3.4	Are we assured that appropriate modelling has been undertaken to test a realistic range of scenarios (e.g. <u>statutory restrictions on rent increases</u> ; increases in arrears; inflation fluctuations; <u>increased component / labour costs</u> ; increased <u>borrowing costs</u> ; <u>uncertain</u> interest rates; <u>altered liquidity requirements</u> ; <u>uncertain development plans</u> ; <u>increased construction costs</u> ; increased insurance costs; <u>uncertain costs of net-zero compliance</u>)?
3.7	How does the GB gain assurance that all statutory and regulatory returns have been completed accurately and submitted on time? Is the GB assured that the data submitted is robust / reliable? <u>How does the GB gain that assurance?</u>
4.1	Are decisions, recommendations, risks, tenant and financial impact, <u>safety and compliance considerations and equality impacts</u> -highlighted? Do staff have sufficient <u>and appropriate</u> delegated authority and do they exercise it effectively?
4.2	<u>See also Standard 2.4</u> <u>Do we have an effective Tenant Engagement Strategy? Is the GB involved in monitoring its implementation to deliver intended outcomes? Is the strategy informed by our Equality Strategy?</u> <u>Do we ask tenants and service users for their views about our plans and services? How easy is it for tenants and service users to tell us what they think?</u> <u>Do we carry out frequent customer feedback exercises for key areas of our service delivery (e.g. repairs?) Do we get a good response? How are these exercises reported: to the GB; to tenants and service users?</u> <u>Have effective arrangements been made to seek out and act on customer feedback during the last year? How do we use the feedback that tenants give us? How is feedback reported to the GB? How do we report to tenants about our actions in response to feedback? Does the feedback from tenants and service users form part of the evidence that supports our assurance – and the preparation of the AAS?</u> <u>How do we know that our methods for receiving feedback are effective and encourage tenants and service users to contact us?</u> <u>Are we satisfied that our timescales for service delivery and responding to feedback and complaints are realistic and informed by our tenants' and service users' expectations?</u> <u>Do our tenants and service users trust us to listen and to put things right?</u>

Ref	Amended Self-Assurance Factors
4.3	Is the Scheme of Delegation (SoDA) between the GB and officers clear? <u>Are the respective roles of the GB and senior staff accurately reflected in the SoDA? Do the reporting arrangements balance effective oversight with operational effectiveness?</u>
4.4	<p>How do you learn from your organisation's own experience <u>and tenant and service user feedback?</u></p> <p><u>Are we satisfied that our stock condition information is sufficiently robust to support realistic risk-assessment associated with the condition of our properties?</u></p> <p><u>Are we satisfied that any risks to our tenants related to the physical quality / condition of their homes have been accurately identified? Are we satisfied that any such risks are being managed effectively? Are we satisfied that any necessary remedial measures are being progressed as quickly as they need to be?</u></p> <p><u>Are our cyber security measures as strong as they need to be? Have we considered the merits of relevant accreditations to manage and mitigate risks associated with cyber security?</u></p>
4.5	<p><u>Is there an Intra-Group Agreement (IGA) that clearly describes the relationship and respective responsibilities between members of the Group?</u></p> <p><u>Is there an up to date Service Level Agreement (SLA) in place to define the services that are provided to / between members of the group?</u></p> <p><u>Are any financial transactions between the parent and subsidiary (e.g., intra-group loans, recharges) adequately documented and effectively monitored?</u></p> <p><u>Are such arrangements compliant with the organisation's rules, charitable status, financial covenants etc?</u></p> <p><u>How is compliance monitored? How regularly?</u></p> <p><u>Are any financial transactions between the parent and subsidiary (e.g., intra-group loans, recharges) adequately documented and effectively monitored?</u></p> <p><u>Are such arrangements compliant with the organisation's rules, charitable status, financial covenants etc?</u></p> <p><u>How is compliance monitored? How regularly?</u></p> <p><u>How familiar are officers and GBMs with the requirements of SHR statutory guidance on Group Structures and Notifiable Events? How do we gain assurance that the Group operates and is governed in accordance with regulatory and constitutional requirements? What arrangements / processes support our assurance?</u></p> <p><u>What arrangements are in place to ensure the requirements are met?</u></p>
4.6	<p><u>Does the GB / audit committee have access to an appropriate range of skills, knowledge and experience to support it in its role / remit?</u></p> <p>How is the annual internal audit programme planned? Have you reviewed the internal audit plan to reflect current / anticipated priorities (e.g. associated with remote working; digital service delivery; organisational resilience; economic / inflationary pressures; <u>tenant and resident safety</u>;))</p>

Ref	Amended Self-Assurance Factors
5.1	Has consideration been given to relevant external accreditation (such as Living Wage, Disability Friendly, Happy to Translate, <u>Fair Work First</u>) to demonstrate ethical commitment?
5.3	Are all policies assessed (using an Equality ies Impact Assessment) to ensure that there is no risk of discrimination, <u>harassment or victimisation</u> ? <u>Is training provided to staff to ensure awareness of the RSL's culture, values and policies? Are there effective mechanisms in place to prevent and, where necessary, identify instances of harassment or victimisation? Do our policies adequately reflect both our responsibilities as a landlord and as an employer?</u>
5.4	Where interests are declared that create a potential conflict in respect of an agenda item or business activity, are there agreed processes to be followed? Are the actions taken recorded (e.g. in minutes where a GBM is involved or file notes where staff are involved)? <u>Do these comply with constitutional and regulatory requirements?</u>
5.5	<u>Has the senior officer's appraisal been carried out and reported to the Board in the last year?</u>
5.6	<u>Has the policy been reviewed to ensure that it covers allegations of bullying, harassment and/or victimisation?</u>
5.7	<u>Do our policies and procedures ensure that any / all severance payments and settlement agreements are reported to SHR as Notifiable Events?</u>
6.1	What is the process for recruiting GBMs <u>and how is the GB involved? ?</u> Is there an agreed <u>GBM</u> role description? How was that developed and how is it updated? How are recruitment priorities identified? Are these priorities informed / influenced by the Equality ies Strategy? <u>Have we carried out an EIA on our GBM recruitment and succession planning arrangements?</u> What kind of information is provided to potential candidates as part of the recruitment process? <u>Do we explain the expectations of the role realistically?</u> Are there opportunities to observe meetings before an <u>applicant makes a</u> decision is made ? How are selection decisions made? <u>Do we ask potential candidates (whether recruited or nominated at the AGM) for consistent information about their relevant experience, knowledge etc?</u>
6.2	Has the GB identified the range of skills, knowledge, experience and diversity it requires to fulfil its responsibilities effectively <u>during the last year</u> ? <u>When was the most</u> Has a recent skills assessment been carried out? Does the business planning process include consideration of any additional skills or knowledge that the GB might require <u>to support the achievement of strategic priorities?</u> Does the annual GBM review include consideration <u>of</u> of the effectiveness of individual contributions the GB's collective effectiveness ?
6.3	Is there a formal/agreed succession plan? Does it include succession for office bearers? <u>Is it annually reviewed and updated?</u>
6.5	Do GBMs attend <u>or participate in</u> external events (meetings, training conferences)? Do GBMs share feedback about their attendance with colleagues?
6.7	Is there a an <u>formal and</u> effective process for the performance of the senior officer to be annually appraised? Is the appraisal process the same for the senior officer as for other senior staff?

Ref	Amended Self-Assurance Factors
	Is the senior officer's performance appraised against agreed targets and goals and with reference to the role description? Is the appraisal documented <u>/ recorded. Is it and</u> reported (in summary form) to the GB?
	<u>How does the GB support the senior officer during the year?</u>
7.1	<p><u>If the GB has considered (or been considering) any proposals for organisational change during the last year, is it Is the GB</u> clear about the objectives of the proposal? What are the implications for current and future tenants? <u>How have these been assessed? Were alternative proposals considered? How was the preferred option selected? Was specialist, independent advice obtained to support consideration of the options and proposals?</u></p> <p>How will the proposed changes deliver improvement? <u>How will success be measured? How will tenants and service users be involved in assessing success and monitoring performance?</u></p> <p>How has the GB been involved in developing the proposals? Has there been consultation with tenants? <u>Have tenants had access to independent advice?</u></p> <p><u>Were the proposals subject to an Equality Impact Assessment?</u></p> <p><u>Were the proposals amended to reflect tenant feedback and / or the EIA?</u></p> <p>Was the SHR <u>(and any other Regulator)</u> notified in accordance with regulatory requirements?</p>
7.2	<p>Has the GB considered how the proposed organisational change will affect the strength and effectiveness of its governance? <u>Will the organisational change alter the status of the RSL (e.g. through merger or by becoming a subsidiary of another RSL)? How will this impact the GB (e.g. if establishing a subsidiary or joining a group will there be increased reporting requirements / additional skills / increased time required)?</u></p> <p>Is the GB satisfied that the proposed governance structure will deliver effective governance? Are remits and reporting and delegation arrangements clear? <u>How will our assurance processes be impacted: what changes will be required?</u></p> <p>Does the proposed change have implications for shareholding members? <u>Have these been communicated clearly?</u></p>
7.4	What will be the benefits for tenants? <u>What will be the impacts on affordability and compliance?</u>
7.6	<u>Was specialist advice obtained and shared with the GB?</u>
7.7	<p><u>Are we confident that there is a good level of understanding about the implications of any disposals and acquisitions? Are we assured that all of the RSL's investments comply with our strategic objectives and the Treasury Management Strategy?</u></p> <p>Is the GB satisfied that it has the legal <u>and constitutional</u> capacity to make the disposal/investment?</p> <p><u>Is the GB satisfied that any acquisition complies with the RSL's constitution?</u></p>
7.8	<p><u>Were the proposals discussed at an early stage with tenants and how did their views inform the final proposal?</u></p> <p><u>Have tenants been provided with independent advice?</u></p> <p><u>If a ballot was required, are we satisfied that it was conducted in accordance with regulatory requirements?</u></p>

Ref	Amended Self-Assurance Factors
7.9	<p><u>Does the RSL have a policy to support disposals and acquisitions?</u></p> <p><u>Does the Scheme of Delegation make adequate provision for authorising disposals, (including by way of lease) and acquisitions?</u></p> <p>Has the GB been notified <u>of any</u> that the disposals has been completed?</p> <p><u>How does the GB ensure that regulatory requirements on disposals are well understood throughout the organisation?</u></p> <p>How has the GB been <u>assured</u> advised that the organisation is compliant <u>with requirements about disposals</u>?</p>