



The Scottish Parliament
Pàrlamaid na h-Alba

Local Government, Housing and Planning Committee

Garry Coutts, Chair
Michael Cameron, Chief Executive
Scottish Housing Regulator

9 February 2026

Dear Garry and Michael

Committee scrutiny of the Scottish Housing Regulator (SHR)

Thank you for attending the meeting of the Local Government, Housing and Planning Committee on [9 December](#) and for your subsequent letter to the Committee on [18 December 2025](#).

The Committee would appreciate further information from you based on our consideration of the evidence the Committee has received during its annual scrutiny of the SHR over the past two years, in particular a number of concerns raised with us in 2024.

Informal engagement

In our letter of [23 October 2025](#) we asked [SHR](#) for an outline of the various types of informal engagement that take place with RSLs, and how these are monitored and recorded.

In your response on [24 November 2025](#) you advised that engagement plans created for each RSL by the SHR are published and transparent. These plans appear to outline the actions the SHR expects from RSLs in each year, along with assurance statements of the actions RSLs will take.

During the evidence session on [9 December 2025](#) Committee members raised concerns about the SHR's potential use of informal engagement to influence action by RSLs where no formal statutory intervention has been triggered.

As we set out in our letter of [18 March 2025](#), the Committee heard concerns during our annual scrutiny of the SHR in 2024 that some RSLs were fearful of engaging with the SHR, and there is the perception that the SHR pushes a 'merger culture' which favours larger housing associations. We concluded that we were not able to determine whether those concerns arose from the relative power imbalance

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between the SHR and some RSLs or from their treatment by the SHR, and noted the negative impact on RSLs.

In particular, the Committee is concerned to understand whether informal engagement has, in practice, been used to exert influence or direction over RSL governing bodies in circumstances where no formal statutory intervention has been initiated, and how the SHR ensures this does not occur in future.

The SHR's response in [June 2025](#) outlined how you intended to address our concerns, and this year the Committee was keen to assess progress. To inform our subsequent annual scrutiny of the SHR in 2025 we invited written submissions from [Share](#), [ALACHO](#), [SFHA](#), and [GWSE](#), who provided positive responses.

In your oral evidence to the Committee on [9 December 2025](#) you noted that the SHR works constructively with RSLs through voluntary engagement,

Nonetheless, the Committee remains concerned about the transparency of that voluntary engagement

The Committee would welcome clarity on:

- **How the SHR defines the boundaries of its informal engagement with RSLs.**
- **How the SHR ensures that informal engagement does not, in practice, circumvent the safeguards, thresholds and transparency requirements that apply to the use of statutory regulatory intervention powers under part 5 of the Housing (Scotland) Act 2010, and meets the standards set out in its [Regulatory Framework](#), namely that regulation is:**
 - **proportionate**
 - **consistent**
 - **accountable**
 - **transparent**
 - **targeted only where needed.**
- **Could you advise if there is a suitable process for RSLs to provide or withhold consent to informal instruction by the SHR and one which records the result?**
- **The Committee would appreciate details of how the actions in engagement plans are monitored and whether details of progress and evaluation against these plans are also published?**
- **If so, do the results of outcomes monitoring provide details of how the SHR interacted with the RSL each year?**

Regulatory engagement

In our letter to the SHR on [18 March 2025](#) we highlighted that we had heard concerns that there are inconsistencies in the approaches taken by SHR's regulation

managers, and that interventions can “snowball” into something “unnecessarily large”, leaving RSLs fearful of engagement with SHR.

We also noted our serious concern that RSLs at times feel intimidated and even “bullied” by the SHR, although we concluded that we were unable to determine whether this was the result of perceived or actual behaviour by the SHR. In either case, this has been to the detriment at times of relationships between RSLs and the SHR.

In the response to us on [3 June 2025](#) the SHR said that those concerns were not reflected in the engagement which you have with RSLs, and that they relate to historic cases.

Regardless of whether such concerns are characterised as historic or perceptual, the Committee is seeking assurance about how the SHR currently ensures that regulatory engagement is conducted in a manner that does not give rise to intimidation, fear of escalation or loss of confidence among RSLs.

The Committee would welcome information on the following.

- **What mechanisms are in place for raising and investigating complaints about regulatory engagement?**
- **How do you ensure that such engagement by regulation managers meets the standards set out in the SHR’s Regulatory Framework as outlined above?**
- **How any learning taken from complaints or feedback from RSLs inform your practice.**

Use of consultants

In our letter of [18 March 2025](#) we noted the evidence we had heard about the significant costs of the use of consultants in statutory interventions by the SHR, and that these costs are ultimately borne by tenants.

During the evidence session on [9 December 2025](#) members raised concerns about the barriers to housing experts becoming approved consultants for the SHR and the perception that it favours a narrow group of consultants who promote mergers of housing associations.

In response Chief Executive Michael Cameron indicated that the next review of the list, which takes place every three years, will be in 2026 and the criteria would be reviewed by the SHR.

The Committee is also concerned to understand whether the criteria for inclusion on the approved consultants list sufficiently value long-term senior leadership, governance and sector experience, as opposed to primarily short-term intervention or “fire-fighting” expertise, and how this may influence the nature and outcomes of regulatory intervention.

- **Will that review incorporate examination of qualification criteria, routes on to and off the list, and diversity of professional background and experience?**
- **Could you provide information on how consultant fee levels are set, how the SHR assures itself that they represent value for money, and what comparisons are made with other public sector appointments?**
- **The Committee requests an update on the scope and outcome of this review is provided to the Scottish Parliament upon completion.**

Budget

The Committee notes the funding for the SHR was reduced compared to last year in the Budget for 2026-27.

- **What impact do you envisage this having on your functions?**

Statistics on homelessness

You undertook to provide the Committee with data on homelessness and, in particular, whether there was sufficient information on the links between homelessness applications and the reasons for becoming homeless. We also asked whether you could provide this as compared to the private rented sector. We welcome the information you provided on [18 December 2025](#).

- **You suggested that you would discuss the granularity of homelessness data with the Scottish Government and the Committee would welcome an update on this.**

On behalf of the Committee, I request a response by 27 February 2026.

Yours sincerely,

Ariane Burgess MSP
Convener

Annexe: Timeline of Committee scrutiny

3 December 2024: Oral evidence from stakeholders

17 December 2024: Oral evidence from SHR

18 March 2025: Committee letter to SHR

3 June 2025: Written response from SHR

23 October 2025: Letter to SHR

24 November 2025: Written response from SHR

9 December 2025: Oral evidence from SHR

18 December 2025: Letter from SHR