

**Abbeyfield Scotland response
Housing (Amendment) (Scotland) Bill, Financial Memorandum (FM)**

Abbeyfield Scotland is a Registered Social Landlord and registered Scottish charity providing housing and support to older people across the country.

Finance and Constitution Committee Questionnaire

In addition to the questions below, please add any other comments you may have which would assist the Committee's scrutiny of the FM.

Consultation

1. Did you take part in any consultation exercise preceding the Bill and, if so, did you comment on the financial assumptions made?

No

2. If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

Not applicable

3. Did you have sufficient time to contribute to the consultation exercise?

Not applicable

Costs

4. If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM? If not, please provide details

Yes. Abbeyfield Scotland already undertakes due diligence before making the kind of decisions which would previously have required the Regulator's consent, e.g. disposal So no additional cost should arise out of the proposed change requiring notification rather than application for consent.

5. Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?

These largely reflect the needs which the SHR considers will arise so it is difficult for us to comment.

6. If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

Yes

7. Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise?

Yes

Wider Issues

8. Do you believe that the FM reasonably captures any costs associated with the Bill? If not, which other costs might be incurred and by whom?

Yes

9. Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

It would be of concern if the removal of requirement for SHR consent in certain circumstances was to be replaced by a disproportionate rise in the administrative burden on the SHR and RSLs in post-hoc review and engagement. We are optimistic that this will not happen.

We are not aware of potential plans for subordinate legislation and could not quantify the costs arising from this or the above concern crystallising.

The Scottish Parliament's Local Government and Communities Committee

Call for evidence on the Housing (Amendment) (Scotland) Bill

Responder: Abbeyfield Scotland Ltd.

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Do you agree that measures should be taken to influence the ONS to reclassify RSLs as private sector bodies; and if not, please explain why?

Yes

Do you have any views on the appropriateness of the measures proposed in this Bill to bring about this reclassification?

No, these appear appropriate

Do you have views on whether the aims of the Bill could be achieved by other means?

A wider deregulation of RSLs would obviously achieve the aims of the Bill but it is accepted that this might be viewed as running counter to the government objective of safeguarding and promoting the interests of tenants and other users of the services of social landlords, currently exercised through the Regulatory Framework and the Scottish Social Housing Charter.

Any other issues relating to the Bill which you wish to bring to the attention of the Committee?

No