1. East Fife Federation of Tenants & Residents Associations (EFFTRA) and Glenrothes Area Residents Federation (GARF) wish to submit the following views on the Housing (Scotland) Bill introduced by the Scottish Government to the Scottish Parliament on 13th January 2010.

The Scottish Housing Regular
2. EFFTRA and GARF support the introduction of the Scottish Housing Regulator (SHR) as an Independent Organisation. When ministers are setting up the Board we wish to see tenant representation on the Board. In addition, tenants should be consulted on the remit of Board members.

3. EFFTRA and GARF strongly agree with the proposal that the Regulator must involve tenant representatives in the performance of its general functions.

4. The Regulator must have sufficient financial and staff resources to carry out the work of the SHR and housing inspections.

5. We consider the SHR having the powers to carry out stop checks on Councils and Registered Social Landlords to be helpful as it would make sure that landlords' performance is of good quality, rather than just at the time of inspection.

6. We have concerns about landlord self assessment as a means of the regulator monitoring performance and would like to see tenant involvement in self assessment processes.

7. We agree to the proposal that tenants should be able to approach the Regulator where there is a “significant service failure”, however, more detail is required about what this means in consultation with tenants.

8. EFFTRA and GARF agree to the proposal for the Regulator to have broader intervention powers, we feel that where there is improvement plans, tenants should be fully involved in the development of an Improvement Plan.

Scottish Social Housing Charter
9. EFFTRA and GARF support the introduction of the Scottish Social Housing Charter as a means of assessing and reporting on landlord performance. The Scottish Government and Regular must make sure that there is meaningful tenant involvement in the development of the Charter.

Reforms to the Right to Buy & Designation of Pressured Area status
10. EFFTRA and GARF support the introduction of the reforms to the Right to Buy, as well as, the changes to the proposed Pressured Area Status. We strongly agree that
there must be tenant involvement with the Council in discussing, and agreeing, specific areas and house types before designating them as Pressured Areas.

**Definition of Local Connection**  
11. EFFTRA and GARF agree that the existing homelessness legislation should be amended to include ex-service men and women.

**Private Landlord registration Changes**  
12. EFFTRA and GARF feel very strongly about the need to make sure that Private Landlords carry out their responsibilities for the maintenance and upkeep of their properties and welcome legislation which enforces this.

Glenrothes Area Residents Federation and East Fife Federation of Tenants and Residents Associations

3 March 2010