



Scottish Housing
Regulator

Factoring services in Scotland

A thematic inquiry

May 2016

About Us

We are the independent Regulator of just under 200 social landlords – around 160 Registered Social Landlords (RSLs) and 32 local authorities. We are led by a Board of non-executive members and directly accountable to the Scottish Parliament.

Our one objective is **to safeguard and promote the interests of:**

- nearly 600,000 **tenants** who live in homes provided by social landlords;
- around 118,000 **owners** who receive services from social landlords;
- around 40,000 **people and their families** who may be homeless and seek help from local authorities; and
- over 2,000 **Gypsy/Travellers** who can use official sites provided by social landlords.

Our role is to gather, monitor, assess and report on social landlords' performance of housing activities and RSLs' financial well-being and standards of governance, and to intervene where appropriate to achieve our objective. We also keep a public register of social landlords.

You can see more on how we regulate social landlords in our published [Regulatory Framework](#) available on our [website](#).

The Scottish Government's [Social Housing Charter](#) sets out the standards and outcomes which social landlords should aim to achieve. We monitor, assess and report landlords' performance against the Charter, through our regulatory assessments, published analysis and thematic work.



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Overview

Introduction

1. This report provides an assessment of social landlords' provision of factoring services for owners. Our inquiry looked at the type of services that social landlord factors (factors) provide to owners, how they calculate charges, how they measure value for money and how they inform and consult with owners. It involved a review of statistical and performance information, a survey of social landlords, interviews with owners and a review of guidance and other publications on factoring services. Our report highlights positive practice by social landlords.

Factoring services

2. Factoring is the provision of a management service to the owners of properties. This usually relates to services that need to be carried out for the general maintenance or improvement of common aspects of property or land such as the cleaning of common areas and repairs and maintenance services. Local authorities and Registered Social Landlords (RSLs) will charge owners for the cost of administering services. A definition of a property factor can be found in the [Property Factors \(Scotland\) Act 2011](#)
3. 15 local authorities and 130 Registered Social Landlords (RSLs) provide factoring services. Local authorities factor 27,574 homes and RSLs factor 90,617.

 **27,574**
homes

Factored by
15 Local authorities

 **90,617**
homes

Factored by
130 Registered Social Landlords

4. The Scottish Government, through the [Scottish Social Housing Charter 2012](#) (the Charter), has set standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Charter took effect from 1 April 2012 and requires that social landlords manage all aspects of their business so that tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.
5. The Charter also sets out standards on equalities, communication and participation which apply equally to both tenants and other service users, such as owners.
6. We have set two indicators relating to factoring which social landlords report to us in the Annual Return on the Charter (ARC). These indicators are:
 - the average annual management fee per factored property (indicator 32); and
 - the percentage of owners satisfied with the factoring service they receive (indicator 33).
7. In addition to the outcomes and standards of the Charter, the Property Factors (Scotland) Act 2011 came into force on 1 October 2012 and applies to all factors,

including local authorities and RSLs. It aims to protect homeowners by providing minimum standards that all factors must achieve.

8. The Act sets out the minimum standards for factors across Scotland, and has three main elements:
 - a Code of Conduct with minimum standards of practice for registered factors;
 - a register of all factors operating in Scotland (it is a criminal offence to operate as a factor without registering); and
 - a dispute resolution mechanism, the Homeowner Housing Panel.
9. We commissioned [research in 2012](#) into the priorities of owners who receive factoring or common repairs services from social landlords. This research found that the key concerns for owners were around value for money of the service being provided, how they were consulted, and how quickly factors resolved queries and carried out repairs. In this inquiry we have involved both factors and owners to better understand how services are being delivered.

Main findings

10. The average annual management fee charged by RSLs is £95.50 and the average fee charged by local authorities is £46.10. 64% of RSL owners are satisfied with the services they receive, compared to 55% of local authority owners. We found management fees charged by factors ranged from £26.75 to £204.00.
11. In relation to the **Charter standards and outcomes** we found:



Value for money

- Some, but not all, factors have carried out a robust assessment of the cost of providing their factoring service; we saw that there were significant differences between the level of management fees charged for broadly similar services.
- There was no standard method used to increase management fees. Some factors increase management fees following comparison with other factors, some increase in line with rent increases and others in line with inflation.
- Factors used a range of ways to assess value for money, such as comparisons with other factors, tendering for services, only charging actual costs and through owners' satisfaction with the service.



Communication

- Some factors had a well-developed approach to ensuring owners were given good quality information about the factoring service.
- Factoring invoices were generally clearly laid out and showed what owners were being charged for. But for a minority of factors the quality of information on the invoice was poor.



Participation

- Some factors had a good approach to consulting with owners and set up regular owners' meetings, owners' forums and produced good quality newsletters.

12. Factors take different approaches to determine charges for owners. Typical charging methods include:
 - a management fee for the cost of staffing and administration, with services such as close cleaning, landscape maintenance and common repairs charged separately;
 - a percentage charge on top of the actual cost of services and repairs;
 - a management fee with an additional percentage charge for the cost of common repairs; or
 - a variation on the above.
13. We found that the most common and clearest of these approaches involved setting a management fee to cover staffing and administration costs and charging owners their share for the cost of services such as cleaning, landscape maintenance and dealing with common repairs.
14. Owners who we interviewed had mixed views on their understanding of charges and how they were being applied. When it was not clear how factors had determined charges, owners had a negative view on the value for money for the services they received. Owners also highlighted the need for landlords to provide greater transparency around charges and that owners should be given a full breakdown of costs. We found some landlords were better than others at providing a breakdown of the charges.

Recommendations

15. Social landlords who provide a factoring service must ensure that they meet the requirements of the Property Factors (Scotland) Act 2011, the Code of Conduct for Property Factors and the standards and outcomes of the Scottish Social Housing Charter.
16. Factors should:
 - » have a clear and transparent approach to setting and increasing management fees that demonstrates that costs are accurately identified, apportioned and recovered;
 - » have a robust process to assess and demonstrate that owners are receiving a value for money service;
 - » provide good quality information to owners on the factoring service;
 - » ensure that owners are given detailed information on any charges;
 - » undertake meaningful and regular consultation with owners to understand their needs and priorities;
 - » give owners opportunities to participate in the factor's decision making process; and
 - » develop and implement robust action plans in response to the findings of satisfaction surveys and consultation work.

About this thematic inquiry

17. There were four main strands to our inquiry:
 - a telephone discussion with owners;
 - a survey of a selection of social landlords who provide a factoring service;
 - follow-up inquiries with social landlords about their survey returns; and
 - analysis of the information social landlords submitted in their ARC about factoring.
18. The owners who were involved in the research came from our [National Panel of Tenants and Service Users](#). We established the National Panel in 2013 as a way of helping us understand the opinions and experiences of tenants and others who use the services of social landlords. There are 20 owner occupiers on the panel and 14 were interviewed as part of this inquiry. This gave us qualitative information on the

owner's experience of the services they receive. The interviews focussed on the quality of the information they receive, their views on value for money of fees and services, and general strengths and weaknesses of factoring services.

19. We selected the factors for the inquiry to achieve a mixed balance in the size of factoring services and the level of factoring charges. We accessed this information from the ARC data. We sent questionnaires to 10 RSLs and five councils. These were:

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| <ul style="list-style-type: none">• Barrhead Housing Association• Bridgewater Housing Association• Castle Rock Edinvar Housing Association• Clyde Valley Housing Association• Grampian Housing Association• Hillcrest Housing Association• Kingdom Housing Association• New Gorbals Housing Association• Port of Leith Housing Association• Southside Housing Association | <ul style="list-style-type: none">• Angus Council• East Renfrewshire Council• North Ayrshire Council• South Lanarkshire Council• West Dunbartonshire Council |
|--|--|

20. We asked factors about:
- the level of the management fee;
 - what individual elements make up the fee;
 - what services they provided;
 - how they assessed value for money;
 - what type of information they provided to owners; and
 - how they consulted with owners.
21. We also asked some factors a number of supplementary questions to verify their survey responses and gather further evidence where necessary.
22. We used the most recent ARC data, 2014/15, to inform our national figures. This provided an overview of the average factoring charges, the average level of satisfaction and the number of social landlords who provide factoring services.
23. We have not considered any comparable information for private companies that provide factoring services.
24. Where we have identified positive practice by a factor we have highlighted this and named the factor concerned. We have not directly assessed the positive practice.

Local authorities' and registered social landlords' factoring services in Scotland

Context

25. In this section we provide some statistical and contextual information about factoring services provided by social landlords in Scotland.

Numbers

26. We know from the ARC data in 2014/15 that of the 193 social landlords in Scotland, 145 provide a factoring service either directly, or through a subsidiary. 15 out of 32 local authorities and 130 out of 161 RSLs provide a factoring service.
27. The Homeowner Housing Panel [Annual Report](#) (2014) identifies that there were 571,293 properties in Scotland factored by commercial factors, local authorities and RSLs. ARC data for 2014/15 shows that local authorities factor 27,574 properties and RSLs factor 90,617, a total of 118,191. Factoring plays a significantly smaller part of local authorities' and RSLs' business than renting properties. Local authorities rent 92% more properties than they factor and RSLs rent 75% more. In some organisations factoring is a major consideration. For one RSL the number of properties factored is 68% compared to 32% rented. However, even for this RSL the income generated from management fees is approximately £90,000 compared to rental income of approximately £3.8 million.

Table 1: Comparison between the number of properties factored and rented by local authorities and RSLs

	Properties factored	Properties rented
Total	118,191	584,811
RSL	90,617	273,924
Local authority	27,574	310,887

Source: Scottish Housing Regulator

28. The average management fee charged by all social landlords was £83.99. The average charge by local authorities was £46.10 and the average by RSLs was £95.50. The management fee charged will depend on a number of elements such as the type of property involved and the number and level of services being provided.
29. The total amount of management fees invoiced to owners in local authorities and RSLs in 2014/15 was almost £10 million. This compares to the total rent due to social landlords of over £2 billion. In RSLs, management fees account for 0.8% of combined income and in local authorities they account for 0.1%.

Table 2: Comparison between local authorities' and RSLs' rental income and management fee income

	Rent due	Management fee due	Average Management fee
Total	£2,172,078,256	£9,926,379	£83.99
RSL	£1,116,976,490	£8,654,006	£95.50
Local authority	£1,055,101,766	£1,272,373	£46.10

Source: Scottish Housing Regulator

30. The percentage of owners satisfied with the factoring service they receive is 63%. For RSLs the average is 63.8% and for local authorities it is 55%. We did not find a correlation between the management fees and satisfaction with the factoring service. Although RSLs charge on average a significantly higher fee, satisfaction levels with the service provided is higher than that of local authorities.

Table 3: Comparison between local authorities' and RSLs' management fee charged and satisfaction levels

	Average Management fee	Satisfaction with factoring service
Total	£83.90	63%
RSL	£95.50	64%
Local authority	£46.10	55%

Source: Scottish Housing Regulator

Charitable RSLs

31. The vast majority of RSLs, over 90%, are charities. There are a number of requirements for charities, one of these is that charities must ensure their assets can only be used for purposes which are charitable in terms of both the Charities and Trustee Investment (Scotland) Act 2005 and tax law. Charitable RSLs providing a factoring service must assure themselves that charitable assets are not used for activities which are non-charitable.

The Scottish Social Housing Charter

32. The Scottish Parliament through the Charter has set out the standards and outcomes all social landlords should aim to achieve when performing their housing activities. The Charter requires that:

“Social landlords manage all aspects of their business so that tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.”

Scottish Social Housing Charter Outcome 13: Value for money

33. There are a number of other Charter standards and outcomes which apply to owners such as:

“Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.”

Scottish Social Housing Charter Outcome 2: Communication

“Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord’s decisions at a level they feel comfortable with.”

Scottish Social Housing Charter Outcome 3: Participation

The Property Factors (Scotland) Act 2011

34. The [Property Factors \(Scotland\) Act 2011](#) was introduced to create a statutory framework to protect homeowners who use factoring services by providing minimum standards for property factors. All provisions of the Act came into force on 1 October 2012 and apply to all residential property and land managers, whether they are private sector businesses, local authorities or RSLs.

35. The Act has three main elements:

- A compulsory register of all property factors operating in Scotland. Registration helps to ensure that property factors are aware of the relevant standards and comply with them. It is a criminal offence to operate as a property factor in Scotland if unregistered;
- A [code of conduct](#) that sets out minimum standards of practice with which all registered property factors are statutorily obliged to comply;
- A route for redress to the [Homeowner Housing Panel](#) (hohp). The hohp is an independent judicial body which is separate from Scottish Ministers and local authorities. Homeowners are able to apply to the panel if they believe that their registered property factor has failed to comply with the code of conduct or otherwise failed to carry out their factoring duties. Before making an application to the hohp, homeowners must notify their factor in writing of their complaint and allow their factor an opportunity to resolve the matter. The code of conduct requires factors to have an in-house complaints handling procedure which homeowners would be expected to follow.

Good practice

36. There is a range of material available that examines the role of factors in Scotland and identifies good practice in the provision of services. One of the most recent publications is the *Factoring Guidance (2015)* produced by the [Scottish Federation of Housing Associations](#). There is also a report on [Addressing the challenges for the management, maintenance and repair of residential properties in Glasgow](#) (2014) by the Glasgow Factoring Commission. The Office of Fair Trading (2009) produced [Property Managers in Scotland. A market study](#) that also considers a number of good practice approaches, some of which are reflected in current legislation. And the ohp produces an [Annual Report](#) on its work that includes among other things key statistics and an overview of cases and general trends. Other information, particularly aimed at owners, is available from organisations such as [Govan Law Centre](#) and from advice agencies such as [Shelter](#) and [Citizens Advice Scotland](#). A list of relevant publications is contained in the reference section of this report. We have had regard to relevant good practice in considering our findings and recommendations.

2. Our findings

“Social landlords manage all aspects of their business so that tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay”

Scottish Social Housing Charter Outcome 13: Value for Money

37. We found management fees charged by factors ranged from £26.75 to £204.00 and covered houses, flats and multi-storey properties. The average management fee charged by factors in Scotland was £83.99. Factors told us that the level of fee charged was a set charge based on the property type or the number of services received. Flats had a higher fee, with multi storey properties attracting the highest fee due to the significant services provided to this type of property. From the information we saw we could not identify why there was such a significant range of charges being applied under, what appeared to be, similar circumstances. For example, it was unclear why one factor would charge £81.11 for flatted properties while another charged £132.00.
38. The majority of factors told us that the management fee was based on the actual cost of running the service. This included staffing costs and administration costs such as stationery, telephones, IT support and office costs. Owners were then also charged separately for their share of costs for additional services such as cleaning, common repairs and landscape maintenance. One factor did not charge a management fee but charged an administration fee of 10% which was added to the cost of any repair and maintenance work carried out. Two other factors charged a management fee and then a 15% administration charge on top of any other works that were carried out. No factor provided owners with an itemised breakdown of the costs attributable to the management fee.
39. We also found that where factors did not charge a management fee but applied a percentage charge on top of the cost of services, there did not appear to be a clear basis for the level at which the percentage charge was set. We could not establish that all factors were setting management fees or percentage charges that reflected the cost of running the service.
40. Three factors also applied a one-off float or deposit to owners when they joined the factoring service. This charge ranged from £75 to £150 and was used in the event of non-payment of maintenance charges.
41. The majority of factors charged management fees on an annual basis. They were payable in a number of ways, including weekly, monthly and bi-annually. We found that factors were generally willing to make repayment arrangements that suited individual owners.
42. The owners we spoke to confirmed that most were charged a management fee and a share of other costs such as repairs, landscape maintenance and cleaning services. However, owners highlighted the need for greater transparency about factoring charges and common repair costs. They also said that they would like to be given a full breakdown of costs and regular information on service activity and planned works.

43. We found that there was a range of approaches to increasing management fees. These included:
- in line with the rent increase;
 - in line with inflation; or
 - in comparison with other factors' charges.
44. Many factors did not provide evidence that increases in charges were based on increased costs of running the factoring service. This, along with the limited information available on the actual costs making up the management fee, means that we could not confirm that all factors were either covering the costs of the service, or that owners were always being correctly charged for the services they received.



Positive practice

Southside Housing Association's subsidiary Southside Factoring and Related Services (SFARS) considers all applicable costs related to running the service when setting and increasing the management fee each year. This includes all office costs, such as heating and lighting, telephone costs, rates, IT, staff salaries and direct costs such as arranging and hosting meetings. SFARS does not set out to make a profit from the service although it aims to generate a small surplus to ensure the business operates with an appropriate level of cashflow.

45. Factors identified various ways through which they assessed value for money. A few factors identified that they achieved value for money through the tendering process and/or using an approved list of contractors. One identified that this was achieved through the contractor using a schedule of rates. Some factors noted that they compared their costs with other factors and some identified owner satisfaction as a measure. We did not always find a robust approach to assessing value for money which took into account a range of information such as, consideration of how to minimise costs, owners' satisfaction with the service, and comparisons with other factors. We could not conclude that all social landlords demonstrated that owners received continually improving value for the charges they pay.



We recommend that factors

- » have a clear and transparent approach to setting and increasing management fees that demonstrates that costs are being identified, apportioned and recovered accurately; and
- » have a robust process to assess and demonstrate that owners are receiving a value for money service.

“Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about the landlord, how and why it makes decisions and the services it provides”

Scottish Social Housing Charter Outcome 2: Communication

46. In order to meet statutory responsibilities arising from the Property Factors (Scotland) Act 2011, all factors must provide owners with a written statement of services in a prescribed format. We found that all factors in our survey provided this.
47. We found that the information provided to owners included:
- the written statement of services;
 - factoring newsletters;
 - press releases;
 - owners’ handbooks;
 - invoices; and
 - schedules of maintenance work.
48. Some factors also provide owners with a range of useful information on their website. Most factors also placed articles for owners in housing newsletters and some have produced a dedicated owners’ newsletter. However, we found the quality of the information provided to owners was variable.



Positive practice

East Renfrewshire Council provides information for owner occupiers through a well-designed written statement of service and has produced an informative factoring service newsletter.

49. We found that some factors produced invoices that clearly laid out what owners were being charged for. We also saw examples of invoices that lacked sufficient detail on charges being made. In one case the factor issued a letter that noted the annual management fee, a total common service charge and how to pay. There was no detail on what the common service charges related to. There was also no other useful information that would assist owners to better understand the services they received, or what to do if they were encountering financial difficulties.



Positive practice

Bridgewater Housing Association has a good quality approach to invoicing. The association's invoices contain a breakdown of all applicable charges to the owner, such as landscape maintenance, planned maintenance and the management fee. And it details the type and level of landscape maintenance undertaken, balance on the account and the amount owed. There is an additional covering letter that accompanies the invoice containing clear details of what the charges and management fee covers. It also advises owners what to do in relation to any financial difficulties being experienced and advises on five different methods of payment.

Castle Rock Edinvar's subsidiary Places for People Scotland produces invoices detailing each individual charge including insurance, quarterly factoring fee, individual repairs ordered and work completed, and other services provided such as stair cleaning, lift maintenance and ground maintenance. The invoice details total costs for each item, the owner's percentage share and the amount to be paid. This invoice is followed by a quarterly statement detailing all charges, payments made and any outstanding charges.

50. We found that all factors publicised how to make a complaint and provided owners with information on the service provided by the Home Ownership Housing Panel. None of the owners we spoke to had made a complaint about their factoring service. However, they raised a number of points in relation to owners' understanding of the process. Some owners remembered having been provided with information on how to make a complaint about their service. And other owners were comfortable that they would know how to contact the factor to make a complaint. Most saw their factor as approachable and thought any complaints would be dealt with effectively. None of the participants had heard of the Home Ownership Housing Panel as a means of resolving complaints between owners and factors.
51. We found that factors provide a wide range of services. The range of services provided generally depends on the type of properties factored; houses, flats or multi storey properties. The typical services factors provided were:
- close cleaning;
 - garden and open space maintenance;
 - minor repairs;
 - communal lighting and utility charges;
 - buildings insurance; and
 - bin-store cleaning.

52. Some factors told us they provide enhanced services, particularly where they owned multi storey properties. Enhanced services included:
- welfare and financial advice;
 - fire safety checks;
 - lift maintenance;
 - water hygiene servicing/legionella testing;
 - provision and maintenance of communal washing equipment;
 - concierge services; and
 - district heating systems.
53. In addition to these services, service charges include the cost of administering the factoring service in relation to staff time and office costs.
54. Owners we spoke to were generally more positive about the factoring service when the factor undertook frequent maintenance of communal areas. They were also more positive when the factor provided a good quality landscape and gardening service and generally when they were kept informed of service activity and potential costs.
55. Improvements owners told us they would like to see included:
- costs reducing and improved efficiency;
 - greater transparency around factoring charges and/or common repairs costs;
 - more control for owners, and/or more input to how the factoring service is delivered; and
 - more regular information being provided for owners on service activity and planned works.
56. Some factors have taken positive steps to improve the quality of the service they provide by:
- carrying out estate inspections in conjunction with owners;
 - giving owners access to financial and energy advice services;
 - extended office opening hours;
 - carrying out regular property inspections; and
 - developing weekly or monthly budget payment schemes by direct debit.



Positive practice

Bridgewater Housing Association carries out annual surveys of internal and external communal areas. It advises owners when this has been done and provides a property inspection report. It also issues repair receipts after communal repairs have been completed and provides five year planned and cyclical maintenance programmes which it intends to develop and provides estimated costs for the identified work.



Positive practice

Clyde Valley Housing Association's subsidiary Clyde Valley Property Services Ltd writes to owners to inform them about all works that will cost £50.00 or more. It also liaises closely with solicitors when properties are being sold to ensure factoring agreements and the written statement of services are issued to the new owner so new owners are aware of the factoring service and their responsibilities. The association also takes the opportunity to collect a repairs deposit from the new owner via the solicitor.



We recommend that factors

- » provide good quality information to owners on the factoring service; and
- » ensure that owners are given detailed information on any charges.

“Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord’s decisions at a level they feel comfortable with.”

Scottish Social Housing Charter Outcome 3: Participation

57. All factors, except one, told us that they consulted with owners. Most would meet with owners to discuss maintenance work that was to be carried out if it was over a certain monetary level. This level varied, but tended to be when repairs and maintenance cost in the region of £100 to £250 per property. Some factors told us this was a requirement arising from the owner’s title deeds.



Positive practice

Barrhead Housing Association's subsidiary Lavern Property Services met with owners to provide information and assess owners’ priorities to have work undertaken in relation to reactive maintenance and short to long term planned maintenance.

58. Only a small number of factors told us that they developed improvement/action plans following satisfaction surveys. Some noted that they carried out satisfaction surveys but did not say that they implemented any follow-up actions. Others told us that they undertook consultation through providing information, in letters, newsletters and information packs for new owners. However, in these examples it was not clear what consultation was taking place, beyond providing information.



Positive practice

Clyde Valley Housing Association's subsidiary Clyde Valley Property Services Ltd consults customers/owners through a variety of methods. It:

- develops action plans following customer surveys;
- reviews owners' complaints and identifies service improvements, reported as 'you said, we did';
- introduced a customer panel;
- involves owners in estate walkabouts; and
- following customer feedback it has started to send letters to all owners informing them of all work that is to be carried out over £50. This helps owners budget for extra costs.



We recommend that factors

- » undertake meaningful and regular consultation with owners to understand owners' needs and priorities;
- » give owners opportunities to participate in the factor's decision making process; and
- » develop and implement robust action plans in response to the findings of satisfaction surveys or consultation work.

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Terms we use in this report

Factor	A local authority or registered social landlord (RSL) which manages the common parts of land used to any extent for residential purposes and owned by two or more persons or by the local authority or RSL and one or more other person
Happy to Translate	An initiative to improve the quality of life of people in Scotland who speak or read little English or who use a non-verbal language. Member organisations display a logo to indicate that they will provide language assistance in the form of confidential translation and interpretation.
Inquiry	The Housing (Scotland) Act 2010 gives the Scottish Housing Regulator powers to obtain information and carry out inquiries. An inquiry can be used to get assurance about an issue, assess an issue or concern with a landlord, or scrutinise or investigate a landlord's performance.
Registered Social Landlord (RSL)	A social landlord registered and regulated by the Scottish Housing Regulator, such as a housing association or housing cooperative.
Value for money	Value for money is about obtaining the maximum benefit with the resources available.

