

## **Item: 10**

**Education Leisure and Housing Committee: 9 September 2020.**

**Housing Service – Annual Assurance Statement.**

**Report by Executive Director of Education, Leisure and Housing.**

### **1. Purpose of Report**

To consider the Annual Assurance Statement for submission to the Scottish Housing Regulator.

### **2. Recommendations**

The Committee is invited to note:

#### **2.1.**

The requirement to submit an Annual Assurance Statement to the Scottish Housing Regulator by October.

**It is recommended:**

#### **2.2.**

That the Annual Assurance Statement, attached as Appendix 1 to this report, together with supporting Annexes 1 and 2, be approved for submission to the Scottish Housing Regulator.

### **3. Introduction**

#### **3.1.**

In March 2019, the Scottish Housing Regulator published its new Regulatory Framework and associated guidance relating to housing services' performance.

#### **3.2.**

From April 2019, there has been a requirement for all local authorities and registered social landlords to prepare an Annual Assurance Statement covering housing services' performance and submit it to the Scottish Housing Regulator between April and October.

## **4. Background on Performance Structures**

### **4.1.**

Members have previously been advised of the broad range of performance measures that are in place across Housing Services, with the following performance reports presented annually to the Education, Leisure and Housing Committee:

- Homelessness update.
- Energy Efficiency Standard for Social Housing (ESSH).
- Housing Performance.

#### **4.1.1.**

As a result of the COVID-19 crisis, the Homelessness update and the annual report on ESSH have been circulated by way of Members' briefing notes.

### **4.2.**

A broad range of returns are submitted by Housing Services including:

- Quarterly submission of homelessness returns to Scottish Government (HL1, HL2, HL3 and Prevent 1).
- Completion of quarterly and annual returns for Scotland's Housing Network.
- Completion of annual return to Scottish Government "Housing Statistics Annual Return".
- Membership of Scotland's Housing Network and benchmarking against peer authorities and also national benchmarking.

### **4.3.**

Housing Services undergo a range of inspections including:

- Care Inspectorate – Sheltered Housing.
- Care Inspectorate – Homelessness and Housing Support Services.
- National Standards for Information and Advice Providers (nationally recognised accreditation).
- Undertakes How Good is our Council Self-Assessment.

#### **4.3.1.**

The outcome of inspections, together with action plans where required, are reported to the relevant committee.

### **4.4.**

Additionally, the following are in place across Housing Services:

- Housing Services is subject to an annual assessment against eight specific criteria to determine the level risk posed by relevant services and consequently any need for an internal audit.

- An annual pre-submission audit of the Council's Annual Return against the Charter is undertaken by an independent organisation.
- A quarterly meeting of key staff to consider, analyse and discuss improvements relating to the performance across Housing Services in relation to the indicators underpinning the Annual Return against the Charter.

#### **4.4.1.**

The above are in addition to corporate processes such as the monitoring of indicators through the Council's corporate performance monitoring system Aspireview.

#### **4.5.**

Some areas of Housing Services' performance are regulated and required by the Scottish Housing Regulator, including:

- Submission of Annual Return against the Charter.
- Publication of Annual Report for Tenants.
- Three Yearly Customer Satisfaction Survey with specific questions and requires a 40% return rate.

#### **4.5.1.**

While required on a three-yearly basis, the Council undertakes its Customer Satisfaction Survey every two years in order to ensure views collected are representative of the current tenant base.

#### **4.6.**

The Scottish Housing Regulator has produced an engagement plan for all social housing providers. Individual engagement plans highlight performance indicators which the Scottish Housing Regulator has identified as being areas where they may initiate some engagement with the organisation concerned. An update to their engagement plan is expected for 2020 but has been delayed as a result of the COVID-19 crisis.

## **5. Annual Assurance Statement**

### **5.1.**

The Annual Assurance Statement requires to be submitted annually between April and October and it is necessary for the Education, Leisure and Housing Committee to be assured that performance structures and assessments are appropriately robust.

### **5.2.**

The Scottish Housing Regulator has produced guidance which is available from <https://www.housingregulator.gov.scot/for-landlords/statutory-guidance/annual-assurance-statement#>

### **5.3.**

The Scottish Housing Regulator's guidance requires that the Annual Assurance Statement should be completed and agreed by the relevant local authority committee and should:

“Confirm that you have appropriate assurance that you comply with:

- All relevant regulatory requirements set out in Chapter 3 of the Regulatory Framework. (<https://www.housingregulator.gov.scot/for-landlords/regulatory-framework#section-3> )
- All relevant standards and outcomes in the Scottish Social Housing Charter.
- All relevant legislative duties”.

### **5.4.**

Although the Scottish Housing Regulator has provided a prescriptive template to be submitted, the Regulator has not been prescriptive in respect of the structure of the information to accompany this. Attached as Appendix 1 to this report is the completed template.

### **5.5.**

Given that the appropriate Council committee is required to issue assurance on the performance of the Housing Service to the Scottish Housing Regulator, it is crucial that Elected Members are provided with sufficient information to be satisfied that performance processes are sufficient.

### **5.6.**

Annex1 draws out the salient points in respect of performance areas, highlighting where performance has declined or would warrant additional explanation.

### **5.7.**

The onus is on the Council to highlight areas where it recognises its performance could be improved or where there are contextual factors which would limit its ability to compete at a national level. This information is also contained in Annex 1.

### **5.8.**

Scotland's Housing Network, the organisation which provides benchmarking services and good practice guidance to the housing sector, has developed an action plan which organisations may choose to complete as part of their assurance process, ahead of submission. Attached as Annex 2 to this report is the action plan with local statistics and comments.

## **5.9.**

Annual Assurance Statements are required by the Scottish Housing Regulator for all social housing providers, namely both local authorities and registered social landlords. Consequently, some areas covered in Annex 3 are corporate responsibilities as opposed to being limited to those within Housing Services.

## **6. Corporate Governance**

This report relates to governance and scrutiny and therefore does not directly support and contribute to improved outcomes for communities as outlined in the Council Plan and the Local Outcomes Improvement Plan.

## **7. Financial Implications**

There are no significant financial implications arising directly from the recommendations to this report.

## **8. Legal Aspects**

### **8.1.**

The Housing (Scotland) Act 2010 established the creation of the Scottish Housing Regulator and introduced its function as a regulatory body. It also sets the Scottish Housing Regulator's statutory objective, functions, duties and powers.

### **8.2.**

The purpose of the Annual Assurance Statement is to ensure that the housing authority complies with regulatory standards in relation to governance and financial management set down by the Scottish Housing Regulator.

## **9. Contact Officers**

James Wylie, Executive Director of Education, Leisure and Housing, extension 2401, Email [james.wylie@orkney.gov.uk](mailto:james.wylie@orkney.gov.uk).

Frances Troup, Head of Housing, Homelessness and Schoolcare Accommodation Services, extension 2177, Email [frances.troup@orkney.gov.uk](mailto:frances.troup@orkney.gov.uk).

## **10. Appendix**

Appendix 1: Annual Assurance Statement.

Annex 1: Key points relating to the Council's performance.

Annex 2: Action Plan, originally developed by Scotland's Housing Network, containing the Council's information.

Appendix 1.

# Annual Assurance Statement

Organisation: Orkney Islands Council's Housing Service  
School Place  
Kirkwall  
Orkney  
KW15 1NY

## Annual Assurance Statement

We achieve all of the following standards and outcomes for tenants, people who are homeless and others who use our services:

- All relevant regulatory requirements set out in Chapter 3 of the Regulatory Framework.
- All relevant standards and outcomes in the Scottish Social Housing Charter.
- All relevant legislative duties.

Where additional explanatory information is required, this is included in Annex 1 of the attached report and will be reproduced in the contextual information provided with the Annual Return against the Charter to the Scottish Housing Regulator.

I confirm that the Council's Education, Leisure and Housing Committee have seen and considered appropriate evidence to support the level of assurance we have at the meeting of 9 September 2020.

Signed .....

(Chair of Education, Leisure and Housing Committee).

Annex 1.

## **Key points relating to the Council's performance**

The information in this appendix relates to performance areas of the report. Explanatory information has been provided to explain either a change in performance or areas where Orkney's context is particularly important.

### **Annual Return Against the Charter**

The Annual Return against the Charter for financial year 2019 to 2020 has been completed for Orkney Islands Council for submission to the Scottish Housing Regulator by 31 May 2020. Areas of performance which required additional explanation are as follows (the indicators referred to are nationally required):

#### **Satisfaction Survey**

The Council undertook a wholesale tenant survey in 2020 in line with the Scottish Social Housing Charter. It was determined that it was appropriate to do this every 2 years as opposed to every 3 to ensure closer alignment with the current tenant base. This recorded high levels of tenant satisfaction with the majority of indicators relating to satisfaction recording improvements from the previous survey.

The tenant survey was undertaken by an independent body to ensure tenants felt able to openly express their views. This exercise has been undertaken jointly with Orkney Housing Association Ltd to share costs.

The tenant survey has been completed during lockdown with a proportion of surveys being completed by telephone. The Customer Satisfaction Survey is the topic of another report being presented to this cycle of meetings.

As regards the indicator "opportunities to participate", there has been a significant rise in satisfaction from 63.22% in 2018 to 2019 to 83.78% in 2019 to 2020. During 2019 to 2020, the Council undertook a significant review of its lettings policy and also its policy on suspensions. There was a sizeable consultation process as part of that and tenants were involved through surveys and two meetings, one in Kirkwall and one in Stromness.

In addition to the wholesale survey, the Council undertakes a range of satisfaction surveys covering different parts of the service and these generally show good levels of satisfaction, although the response rate is low (with the exception of repairs customer satisfaction).

This information is used to inform the Housing Service's relevant Service Delivery Plan.

Given that the repairs customer satisfaction survey is run as a rolling programme, this data has been used for the Annual Return against the Charter rather than the wholesale tenant survey.

## **Indicator 6 (Scottish Housing Quality Standard Compliance)**

The Council has assessed 31.2% of its stock over the last 5 years as a result of surveys undertaken relative to energy performance and new build completion. In addition, a rolling programme of stock condition / assessment of compliance will be undertaken on 10% of housing stock annually.

Data has been compiled on the renewal cycle for core property elements such as windows, doors, kitchens and bathrooms. This provides accurate data based on historic renewal data and update surveys are carried out while Building Inspectors are in the properties. The data is then reviewed and prioritised to ensure the properties are maintained to a good standard, both affordable and planned. This process will be further automated over the next period subject to issues with gaining access due to COVID-19 guidance regarding social distancing. Undertaking works on core property elements should also assist with improving tenant satisfaction with the quality of tenant homes (indicator 7) in older stock, and satisfaction has risen from 75.99% in 2018 to 2019 to 87.76% for 2019 to 2020.

The Council's in-house resource incorporates accredited Energy Assessors (Scotland) staff and has resulted in a significant survey programme and modern EPCs are held for the majority of the housing stock. The Council also complies with statutory testing procedures – for example, electrical periodic inspection reporting, legionella, radon etc – which ensures that it is reviewing and inspecting properties at regular intervals.

The Council has focused on ensuring it delivers the Scottish Housing Quality Standard as far as is practicably possible. The Council has a strong knowledge of its stock and data held on properties is at an individual level. A process of cloning is not used as a general rule, although recently there has been a movement towards having a small number of cloned properties.

A specific module has been developed in the asset management system, Concerto, which now facilitates recording of the Scottish Housing Quality Standard. While the module was being developed, the opportunity was taken to undertake a refresh of data and an initial stock review with a view to reducing the level of abeyances and exemptions and ensuring data held was appropriately robust. At the same time the depth of information held on Concerto has been enhanced. This has led to a sustained reduction in abeyances and exemptions. It has however resulted in an increase in the number of properties failing the Scottish Housing Quality Standard. However, most of these are marginal fails and the intention would be to address nearly all to a Scottish Housing Quality Standard pass in 2020 to 2021.

The properties which currently fail the Scottish Housing Quality Standard have been reappraised and a detailed plan agreed regarding relevant measures. There is some overlap with properties which are currently Energy Efficiency Standard for Social Housing fails and these will be addressed as one process to ensure whichever is the higher of the standards, is the priority to allow a pass. An updated report of current fails is provided regularly and as the opportunity arises, these are addressed. The hard to treat properties are being looked at on the basis of fitting positive pressure heat pump systems, however there were difficulties with finding a contractor who was able to progress this over the last year.



There is a recognition that challenges may arise in an island context given that contractors have recently resumed work following lockdown and relatively small contractors now have a backlog of work whether non-emergency repairs, Scottish Housing Quality Standard / Energy Efficiency Standard for Social Housing works and a short timescale for completion. However, currently this remains an aspiration and discussions with contractors will be ongoing.

## **Indicator 9**

The installation and development of the new computer system, Concerto, has been completed. Possibilities surrounding a handheld app to be shared with contractors are being investigated which would further enhance the current functionality. While this continues to be investigated, currently it cannot be rolled out due to COVID-19 restrictions.

The time to complete emergency repairs decreased from 8.34 hours for financial year 2018 to 2019 to 6.28 hours for 2019 to 2020. New processes have been implemented where the Council's in-house Building Inspectors / Clerk of Works undertake some of the emergency repairs themselves where they are able to do so. This has been a key factor in reducing the time taken to undertake emergency repairs.

The Council continues to work closely with its contractors to ensure the performance management culture remains central to service provision despite significant pressures on services and Orkney's remote and rural context.

The time to complete non-emergency repairs increased from 10.27 days for financial year 2018 to 2019 year to 11.53 days in 2019 to 2020. The Council continues to work closely with contractors and aims to improve its performance indicators wherever possible. One of the main factors in the decline in performance for non-emergency repairs relates to contractors being very busy and there being difficulties in obtaining sub-contractors with availability. Some of the contractors have been successful in expanding their staff teams and tried to restructure their processes which is positive. In general terms, prior to the COVID-19 crisis, Orkney held the lowest unemployment level in the UK so recruitment can be challenging.

Some analysis of cases has been undertaken where the time to complete the repair was in excess of 20 days to determine what the key issues were in such cases. While this relates to a minority position (approximately 12% of non-emergency repairs), it is generally as a result of shortages in key trades including electricians. This has impacted negatively on our overall timescales. The contractors have endeavoured to increase their staffing but recruitment can remain challenging given the traditionally low unemployment level in Orkney.

Repairs customer satisfaction is high at 91.04% which is very positive. Our recorded number of completed surveys for this year is lower than previously recorded for this indicator. This is because it was identified as an area for improvement in our last audit by an independent assessor, and this related to ensuring that the data used definitely related purely to the last repair which had been undertaken.

## **Indicator 14**

The percentage of offers of housing refused has risen from 34.75% for financial year 2018 to 2019 to 37.17% for 2019 to 2020.

Previously operational procedures were enhanced to ensure that the prospective tenants were being contacted prior to an offer being made, and this had greatly reduced the number of refusals received. Over the last year 60% of prospective tenants either could not be reached by telephone or were homeless applicants who were being offered in relation to discharge of duty and therefore issues with being given 4 area choices were not applicable.

However, while these operational procedures will continue in relation to contacting prospective tenants ahead of offer, the Council's lettings policy was substantially reviewed during 2019 to 2020 and therefore a new lettings policy will be implemented, based on the principles of choice, by April 2021.

## **Indicator 15**

The Council has neighbourhoods which are clean and attractive. The level of anti-social behaviour in Orkney remains very low. Along with Orkney Housing Association Ltd joint work is undertaken closely with the Council's corporate Anti-Social Behaviour Co-ordinator and the Police in order to take a multi-agency approach to any issues which arise.

Orkney has a very low level of anti-social behaviour with few cases of serious anti-social behaviour. The Council's anti-social behaviour policy was significantly reviewed in 2019 with the addition of realistic and proportionate targets.

## **Indicator 16**

Statistics relating to the Council's overall tenancy sustainment (indicator 16) shows either improved or sustained performance. As regards the indicator relating to tenancy sustainment (others) this relates to the Syrian Resettlement Programme. Given the small statistical group, the reasons for this are not detailed in this paper.

As regards tenancy sustainment generally, the Council is keen to assist tenants to sustain their tenancies and employs a qualified Social Worker within Housing Services. This allows specialist Social Work skills to be used to assist those with a range of issues including addiction. In addition, the Council employs a Housing Support worker who works directly with tenants in this respect. The Housing Support and Homelessness aspects of our service are registered with the Care Inspectorate and these obtain good inspection grades and staff are registered with the SSSC accordingly.

## **Indicator 17**

Void (empty property) loss decreased from £40,470 in 2018 to 2019 to £23,480 in 2019 to 2020, which represents a decrease in the percentage of rent due to properties being empty from 1.13% to 0.64%. Various factors contribute to this reduction. Fewer new tenancies have been created totalling 72 in 2019 to 2020 as opposed to 94 in 2018 to 2019 and no new builds have been completed during the year. In addition, improvements have continued in relation to the Council's voids procedures. There are regular joint

meetings between our Building Inspectors and Housing Officers with the specific aim of reducing void periods.

## **Indicator 20**

As regards data relating to medical adaptations, the number of adaptations required is demand led and this totalled just 31 adaptations during financial year 2019 to 2020 as opposed to 50 during 2018 to 2019.

## **Indicator 22**

During 2019 to 2020, the Council recorded one eviction from just three court cases initiated. Eviction is always treated as an absolute last resort. Unfortunately, in this set of circumstances there was simply no alternative after all other options were exhausted.

## **Indicator 27**

The customer satisfaction survey shows that 81% of Council tenants stated they were satisfied or very satisfied with the value for money of their rents.

Indicator 27 covers gross rent arrears as at 31 March each year as a percentage of rent due for the reporting year.

Gross arrears have risen to 11.22% for financial year 2019 to 2020 from 9.09% for financial year 2018 to 2019. A further analysis of this figure shows that current tenant arrears have risen to 7.03% for financial year 2019 to 2020 from 4.72% in 2018 to 2019.

The introduction of Full Service Universal Credit in September 2018 has adversely impacted on the Council's performance in relation to recovery of rent arrears and this has been a factor nationally. The level of housing costs received directly has fallen from £1.49 million in 2018 to 2019 to £1.45 million in 2019 to 2020 and a system of inputting payments manually has impacted on a small staffing resource adding complexities for a small Housing Revenue Account.

Investigations are underway surrounding the potential to automate Universal Credit payments. This project is currently on hold due to COVID-19 restrictions. Future progression of automation will depend on affordability.

In order to endeavour to mitigate the rise in arrears, joint working has been increased with Orkney Citizens Advice Bureau and implemented procedures to refer tenants in arrears for advice at the initial point of contact whether that contact is with Housing Services or Revenues.

A review of the Council's policy on discretionary housing payments has been undertaken so that discretionary housing payments go directly into rent accounts to prevent misdirection by the tenant.

As a result of COVID-19, improvements have been made to IT structures to facilitate home working and accordingly investigations have begun into the potential for an SMS automatic messaging system to interconnect with the rent system to notify tenants as soon as a payment is missed. Again, progression will depend on affordability.

Housing staff have been asked to treat rent arrears as an absolute priority (though from a perspective of support and understanding given the situation currently surrounding COVID-19). Challenges are affecting the ability to recover arrears as a result of the impact of COVID-19. It is likely there will be increased economic impacts on jobs in the near future and staff are ensuring that tenants are given appropriate advice on applying for Universal Credit where this is applicable and are referred for debt counselling as appropriate.

The percentage of former tenant arrears in 2019 to 2020 decreased to 4.2% from 4.37% in 2018 to 2019.

The Council continues to actively and prudently pursue former tenant arrears rather than write-off, although this continues to be detrimental to the overall rent arrears performance. Write-offs for financial year 2019 to 2020 were reduced due to the impact of COVID-19 on a small staff base in late March and otherwise would have been in the region of £15,000.

A specialist post called Housing Officer (Income Collection) was established some years ago to supplement the role of Housing Officers with the aim to reduce the level of rent arrears and other housing debt outstanding. Currently this post is vacant and recruitment difficulties have been experienced as a result of Orkney, prior to the COVID-19 crisis, recording the lowest unemployment rate in the UK. The post is currently being restructured with a view to being able to undertake recruitment shortly and it is hoped there may be greater success with recruitment in the future.

### **Indicator 30**

As regards the average length of time taken to relet properties, a total of 72 properties were relet during financial year 2019 to 2020. The total number of calendar days they were empty was 2,577 giving a relet time of 35.79 days which is lower than financial year 2018 to 2019 which recorded 52.93 days. This figure is affected by a small number of properties which are subject to low demand and consequently were vacant for an extended period of time. During 2019 to 2020 this applied to just two properties with 224 and 287 days void respectively.

### **Annual Report for Tenants**

The annual report for tenants will be produced by 31 October 2020 as required by the Scottish Housing Regulator. This will include key information which is of interest to tenants.

The Council has a joint Residents' Panel with Orkney Housing Association Ltd which consists of tenants / residents of both organisations. They will be asked for their views on the Annual Report ahead of publication and their views will be taken into account in producing the final document. The Council includes a section in the Annual Report which encourages feedback from tenants more generally on how they feel about the report and the information on it.

The Residents' Panel will also be involved in discussions around the Annual Assurance Statement prior to submission. Remote communication methods will be explored accordingly.

## **Customer Satisfaction Survey**

The Council is required to undertake a wholesale tenants' satisfaction survey every 3 years. The Council does this in partnership with Orkney Housing Association Ltd in order to reduce costs and produces the customer satisfaction survey biennially. This is undertaken by an independent body in order to ensure impartiality and was most recently done during 2020.

A range of customer satisfaction surveys are in place across the Service in order to assess the quality of the service on an ongoing basis. These include:

- New tenants' survey regarding quality of home and service.
- Repairs Satisfaction survey.
- Improvements satisfaction survey.
- Exit questionnaires for tenants leaving the Council's accommodation.
- Homelessness service, new tenants' questionnaire.
- Homelessness service, exit questionnaire.
- Housing Advice service, exit questionnaire.

In addition, information is used from complaints and general feedback as encouraged by footnotes on all correspondence etc. The information is used to inform the Service Delivery Plan for the relevant part of the Service to inform any service improvements accordingly.

This links to standard 3.12 in the National Standards for Information and Advice Providers which is part of the Council's accreditation.

While the Council collects data from its wholesale tenant satisfaction survey, this can lead to some distortion in figures. For example, when questions are raised regarding repairs it should be the most recent repair. It is therefore more effective to collect this data immediately following completion of the repair.

The Council intends to use its ongoing customer satisfaction information so it can evidence that the information collected relates to the present day.

## **Scottish Housing Regulator's Engagement Plan**

The Scottish Housing Regulator's engagement plan highlights key indicators, relating to service quality, where they have indicated they wish to engage with the Council. Their engagement plan related to financial year 2019 to 2020 and will be reviewed in due course. Currently the indicators where it has indicated it wishes engagement with the Council are:

- Tenants satisfied with the opportunities to participate in the landlord's decision-making.
- Satisfaction with the quality of home.
- Hours to complete emergency repairs.
- Days to complete non-emergency repairs.
- Anti-social behaviour cases resolved within local targets.
- Average days to re-let properties.

- Gross rent arrears of rent due.

The results of these indicators have been explained in the section above relating to the Annual Return against the Charter and the section on Customer Satisfaction. More detail on the Customer Satisfaction Survey for 2020 is the topic of another report to this cycle of meetings.

COVID-19 has impacted on the production of the Scottish Housing Regulator's Engagement Plan for 2020 to 2021 and it is anticipated that this will be published in due course.

It is anticipated that three areas may be highlighted as requiring additional focus and these are likely to be:

- Days to complete non-emergency repairs.
- Gross rent arrears of rent due.
- Percentage of stock meeting the Scottish Housing Quality Standard.

The results of these indicators have been explained in the section above relating to the Annual Return against the Charter.

## **Impact of COVID-19**

The information above relates to the position surrounding performance predominantly in relation to service delivery in a "normal" operating context.

While Housing Services endeavoured to operate as normally as possible throughout lockdown, there was still significant disruption. Face to face provision of services has been removed currently and throughout the lockdown period the focus was on delivery of essential services including homelessness, housing support and emergency repairs.

While many services have now resumed, COVID-19 is likely to continue to cause disruption for the foreseeable future and consequently the likelihood is that there will be an impact on performance figures for financial year 2020 to 2021.

The impact on the economy, along with a rising number of people either being on furlough (and therefore a reduced income) or facing unemployment is likely to impact negatively on rent arrears. In addition, demand for Council housing is also anticipated to rise.

It is anticipated that homelessness will continue to rise predominantly as a result of family breakdown including domestic abuse, as restrictions are released. Similarly, there is the potential for tenancy sustainment to be affected.

Restrictions on house moves, along with related services being closed including removal firms, carpet layers, furniture stores etc, has meant that for a 3 month period, Council properties were not been allocated as normal.

Contractors resumed operation on 29 June 2020 after three months of being unable to function. Consequently a backlog of work is being progressed including non-emergency repairs, the turnover of void (empty) properties, works required to meet the Scottish

Housing Quality Standard and Energy Efficiency Standard for Social Housing. In addition, delivery of the Council's house build projects will have been delayed.

While every attempt will be made to ensure that performance remains as high as possible, there is a need to recognise that the precise impact on financial year 2020 to 2021 cannot yet be determined and will remain under close scrutiny.

In common with all other social housing providers across Scotland, the Council is currently providing additional performance information to the Scottish Housing Regulator, Scottish Government and COSLA so that the impact of COVID-19 can be appropriately quantified on key indicators including homelessness, repairs, allocations and re-lets.

## Assurance Action Plan

Requirement.	Who.	When.	RAG.	Comments.
<b>Assurance and Notification.</b>				
Prepare an Annual Assurance Statement in accordance with guidance.	Head of Housing, Homelessness and Schoolcare Accommodation Services and Technology Officers.	October 2020.	Green.	Committee report and appendices to be presented to Education, Leisure and Housing Committee on 9 September 2020.
Submit Annual Assurance Statement to Scottish Housing Regulator between April and October each year.	Technology Officers.	October 2019.	Green.	On target to be submitted by October 2020.
Make Annual Assurance Statement available to tenants and other service users.	Technology Officers and Tenant Participation Officer.	October 2020.		To be included in Housing Services' area of website.
Notify Scottish Housing Regulator during the year of any material changes to the assurance in the Annual Assurance Statement.	Head of Housing, Homelessness and Schoolcare Accommodation Services and Technology Officers.	As required.	Green.	



Requirement.	Who.	When.	RAG.	Comments.
<p>Have assurance and evidence that we are meeting all our legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety.</p>	<p>Head of Housing, Homelessness and Schoolcare Accommodation Services and Works and Inspection Manager.</p>	<p>Ongoing.</p>	<p>Green.</p>	<p>This links to Standard 1.5 of National Standards for Information and Advice Providers. Evidence includes a broad range of Council corporate policies including the Health and Safety Policy; Challenging Behaviour by Members of the Public: The Role of Customer Service Advisers and All Staff Using the Customer Services Facility; Housing Services' Staff Training and Development Policy; Library Procedure for Housing Services; staff training logs and internal portal which includes a broad range of information on corporate policy areas. Staff management processes are in place across Housing Services including induction, regular one to ones in line with the Line Management Policy and all staff are required to complete the Personal Development Award for Advisors with Shelter at the next intake after taking up post. In addition, structures such as qualified housing officer are in place to encourage housing staff to complete a housing qualification.</p>
<p>Notify Scottish Housing Regulator of safety matters which have been reported to or investigated by the Health and Safety Executive (HSE) or</p>	<p>Head of Housing, Homelessness and Schoolcare Accommodation Services / Works and Inspection Manager.</p>	<p>In place.</p>	<p>Green.</p>	<p>The Council's Health and Safety Advisor provides guidance on all aspects of health and safety as required. If a report were received from the Health and Safety Executive, immediate steps would be taken to address the issue and the Scottish Housing Regulator would be advised accordingly.</p>

Requirement.	Who.	When.	RAG.	Comments.
reports from other regulatory or statutory authorities or insurance providers, relating to safety concerns.				<p>We have policies covering issues such as Asbestos and procedures in place regarding Radon / Legionella etc. Our Development and Infrastructure Services undertake property inspections and ensure properties are fitted with smoke alarms etc.</p> <p>Recently we have introduced risk assessments and procedural documentation to ensure staff and tenants / service users are appropriately protected and supported throughout the COVID-19 crisis.</p>
Make Engagement Plan easily available and accessible to tenants and service users, including online.	Head of Housing, Homelessness and Schoolcare Accommodation Services and Technology Officers.	May 2019.	Green.	<p>To be included by link to the Scottish Housing Regulator's website from Housing Services' area of the Council's website.</p> <p>Once the revised engagement plan is issued for 2020, this will be updated accordingly.</p>
Register all requirements for providing data to Scottish Housing Regulator and Information Commissioners Office.	Head of Housing, Homelessness and Schoolcare Accommodation Services and Head of Legal Services.	In place.	Green	Housing Services will hold a register of any matters reported to the Scottish Housing Regulator and Legal Services will record all matters reported to the Information Commissioners Office.

Requirement.	Who.	When.	RAG.	Comments.
<b>Scottish Social Housing Charter Performance.</b>				
Submit Annual Return against the Charter to Scottish Housing Regulator in accordance with published guidance.	Head of Housing, Homelessness and Schoolcare Accommodation Services and Technology Officers.	May 2020.	Green.	Submitted by 31 May 2020.
<p>Involve tenants, and where relevant service users, in the preparation and scrutiny of performance information.</p> <ul style="list-style-type: none"> <li>• Agree an effective and meaningful approach with tenants.</li> <li>• Publicise approach to tenants.</li> <li>• Verify approach and evidence involving tenants has happened.</li> <li>• Involve other service users in an appropriate way.</li> </ul>	Tenant Participation Officer.	In place.	Green.	<ul style="list-style-type: none"> <li>• Residents' Panel involved in development of annual report as standard.</li> <li>• Section in the annual report to encourage feedback.</li> <li>• Invite Residents' Panel to annual presentation on performance from Scotland's Housing; Network (from 2019) and discussion at Residents' Panel meeting thereafter.</li> </ul>
<p>Report performance to tenants and other service users no later than October each year:</p> <ul style="list-style-type: none"> <li>• Agree format of performance reporting</li> </ul>	Head of Housing, Homelessness and Schoolcare Accommodation Services and Technology Officers and Tenant Participation Officer.		Green.	The Council has a joint Residents' Panel with Orkney Housing Association which consists of tenants / residents of both organisations. They are asked for their views on the Annual Report ahead of publication and their views will continue to be taken into account in producing

Requirement.	Who.	When.	RAG.	Comments.
<p>with tenants and ensure accessible with plain and jargon free language.</p> <ul style="list-style-type: none"> <li>• Provide assessment of performance in delivering Charter outcomes.</li> <li>• Include relevant comparison including previous years, other landlords and with national performance.</li> <li>• Set out how we intend to address areas for improvement.</li> <li>• Give tenants and service users a way to feedback views on style and form of reporting.</li> </ul>				<p>the final document. The Council includes a section in the Annual Report which encourages feedback from tenants more generally on how they feel about the report and the information on it.</p>
<p>Make Scottish Housing Regulator report on our performance easily available to tenants including online.</p>	<p>Head of Housing, Homelessness and Schoolcare Accommodation Services and Technology Officers.</p>	<p>When produced by SHR.</p>	<p>Green.</p>	<p>To be included as a link to the Scottish Housing Regulator's website from Housing Services' area of the Council's website.</p>

Requirement.	Who.	When.	RAG.	Comments.
<b>Whistleblowing.</b>				
Ensure effective arrangements and a policy for whistleblowing for staff and elected Members.	Head of HR and Performance.	In place from October 2015.	Green.	Policy on Whistleblowing is available on internal portal or in either electronic or hard copy from HR on request. Trade Unions are also aware of this. There is a monthly meeting with Trade Unions which is corporate and each individual service holds regular meetings with the Trade Unions as well.
Make Whistleblowing policy easily available and promote its existence.	As above.	In place. As above.	Green.	As above.

Requirement.	Who.	When.	RAG.	Comments.
<b>Tenants and Service Users Redress.</b>				
Make information on reporting any significant performance failures, including the Scottish Housing Regulator's leaflet, available to our tenants.	Head of Housing, Homelessness and Schoolcare Accommodation Services and Tenant Participation Officer.	June 2019.	Green.	A link will be provided to the Scottish Housing Regulator's leaflet from the Council's website.
Provide tenants and service users with the information they need to exercise right to complain and seek redress.	Team Leader (Policy and Planning).	In place.	Green.	The Council's corporate complaints process is used and corporate policy in line with the guidance from the Scottish Public Services Ombudsman. Information is available through our website and in hard copy on request.
Respond to tenant complaints within our service standards timescales and in accordance with the Scottish Public Services Ombudsman guidance.	Team Leader (Policy and Planning).	In place.	Green.	Reporting against timescales is included in the Annual Return against the Charter.
Ensure we have effective arrangements to learn from complaints and other tenant and service user feedback, in accordance with SPSO guidance.	Head of Housing, Homelessness and Schoolcare Accommodation Services and Head of Legal Services.	In place.	Green.	This links with standard 3.12 of the National Standards for Information and Advice Providers which covers using feedback to inform service provision. Information collected through complaints, comments and customer satisfaction surveys is used to inform the update of the Service Delivery Plan for the relevant service area.

Requirement.	Who.	When.	RAG.	Comments.
<b>Equality and Human Rights.</b>				
Have assurance and evidence we consider equality and human rights issues properly when making decisions, in the design and review of internal and external policies, and in our day to day service delivery.	Senior Management Team of the Council.	In place.	Green.	<ul style="list-style-type: none"> <li>• All policies within Housing Services contain a section on equalities.</li> <li>• The Housing Service has a specific Equalities Policy and one on Accessibility.</li> <li>• Committee reports on policy matters contain a section on equality.</li> <li>• Completion of equality impact assessments is standard.</li> <li>• The Council monitors its website and ensures it meets website accessibility requirements.</li> <li>• The Council employs a specialist equalities officer to ensure compliance.</li> </ul>
Collect data relating to protected characteristics for existing tenants, new tenants, people on waiting lists and elected Members and staff.	Head of Housing, Homelessness and Schoolcare Accommodation Services.	In place.	Green.	<ul style="list-style-type: none"> <li>• Equalities criteria does not apply to Elected Members given that they are democratically elected.</li> <li>• Equalities monitoring information is collected for new tenants along with information relating to requirements for information in a range of formats. Information collected includes age, disability, race and sex. We do not collect this for all protected characteristics on the basis of data protection. We have to be clear on the reason why we need the information.</li> </ul>

Requirement.	Who.	When.	RAG.	Comments.
				<ul style="list-style-type: none"> <li>We will review the information collected on a regular basis and will follow best practice.</li> </ul>
Collect data on protected characteristics of people who apply as homeless.	Head of Housing, Homelessness and Schoolcare Accommodation Services.	In place.	Green.	<ul style="list-style-type: none"> <li>Equalities monitoring information is collected for people who apply as homeless as follows: <ul style="list-style-type: none"> <li>Age, disability, marriage, race, sex, pregnancy and maternity.</li> </ul> </li> <li>We do not collect this for all protected characteristics on the basis of data protection. We have to be clear on the reason why we need the information.</li> <li>We will review the information collected on a regular basis and will follow best practice.</li> </ul>
Collect data on protected characteristics of people who use our Gypsy / Traveller services.	N/A.	N/A.	N/A.	N/A.