

Item: 13

Education, Leisure and Housing Committee: 7 September 2022.

Housing Service – Annual Assurance Statement.

Report by Corporate Director for 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 31 October.

It is recommended:

2.2.

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

3. Background

3.1.

The Scottish Housing Regulator has published its 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.

3.3.

Accordingly, in order to meet the Scottish Housing Regulator's requirements in respect of publication of an Annual Assurance Statement, on 3 April 2019, the Education, Leisure and Housing Committee noted that a report on the Housing Service's performance would be submitted annually.

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.
- Housing Performance.

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. The outcome of the National Standards for Information and Advice Providers reaccreditation process is the topic of another report to this cycle of meetings.

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 of 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, Pentana.

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. The Customer Satisfaction Survey results is the topic of another report to this cycle of meetings.

4.6.

From the beginning of the pandemic in March 2020 until April 2022, in common with all social housing providers across Scotland, the Council was required to provide additional performance information to the Scottish Housing Regulator, Scottish Government and COSLA so that the impact of COVID-19 could be appropriately quantified on key indicators including homelessness, repairs, allocations and re-lets. A specific staffing return continues to be provided to the Care Inspectorate for all registered services.

4.7.

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.

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 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.
- All relevant standards and outcomes in the Scottish Social Housing Charter.
- All relevant legislative duties”.

5.3.

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.

5.4.

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 information to be satisfied that performance processes are sufficient.

5.5.

Annex 1 draws out the salient points in respect of performance areas, highlighting where performance has declined or would warrant additional explanation.

5.6.

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.

5.7.

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 completed with local statistics and comments.

5.8.

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 2 are corporate responsibilities as opposed to being limited to those within Housing Services.

6. Corporate Governance

This report relates to the Council complying with 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

There are no legal implications arising directly from this report.

9. Contact Officers

James Wylie, Corporate Director for Education, Leisure and Housing, extension 2477, Email james.wylie@orkney.gov.uk.

Frances Troup, Head of Community Learning, Leisure and Housing, extension 2450, Email frances.troup@orkney.gov.uk.

10. Appendix

Appendix 1: Annual Assurance Statement.

Appendix 1 to Annual Assurance Statement Report

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 held on 7 September 2022.

Signed

Chair of Education, Leisure and Housing Committee

Annex 1 – Key points relating to the Council’s performance

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 (ARC) for financial year 2021/22 has been completed for Orkney Islands Council and was submitted to the Scottish Housing Regulator by 31 May 2022. Areas of performance which required additional explanation are as follows (the indicators referred to are nationally required):

Satisfaction Survey

The Council has recently undertaken a wholesale tenant survey in line with the Scottish Social Housing Charter. The Council does this every 2 years as opposed to every 3 to ensure closer alignment with the current tenant base. Results were timed to align with submission of the ARC and accordingly results have been very recently received. This time the survey was undertaken by electronic and paper surveys and fewer telephone surveys were undertaken than was the case during the 2020 pandemic period. Last time the interviewing and fieldwork took place at the very start of the pandemic and the experience of the company which undertook the survey, was that service providers were getting very positive ratings at that point in time. The company undertaking the survey advised in 2022, that they were noticing a drop in customer satisfaction results for Councils undertaking surveys at present. For Orkney, the difference in results for 2022 is predominantly about a shift in the “neither / nor” responses rather than an increase in outright dissatisfaction. Given that the levels of tenant satisfaction are lower than has previously been the case, these results will be examined shortly and the necessary steps required to address these issues, will be taken.

The tenant survey was undertaken by an independent body to ensure tenants felt able to openly express their views.

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, though 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 accordingly.

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.

Indicators 3 and 4 (Complaints)

During financial year 2021/22, of the 11 stage 2 complaints received, 3 were during March 2022 which were not concluded before year end. Without these the Housing Service’s percentage responded to in full would have been 87.5%. Some complex

stage 2 complaints have been received during the financial year which have taken longer to conclude than the required timescale. These were about property condition and the approach taken was to ensure that the situation was fully addressed and appropriate remedial action was in place before closing the complaint.

Indicators 8 and 9 (Repairs)

Previously, information was provided around the installation and development of the new computer system, Concerto. This has been completed. As regards the handheld app being shared with contractors to further enhance the functionality, unexpected problems were encountered. The app was effective in relation to recording the main contractor's information but didn't work when they sub-contracted work. The Council's measured term contractor sub-contracts electrical and plumbing work particularly. This can be as much as 85 – 90% of emergency repairs. The supplying company, Concerto, were unable to find a solution and therefore regrettably there was a need to accept the app wasn't a viable option for the Council. Instead, regular spot checks of worker's timesheets are undertaken to ensure the audit trail between them finishing a job and the main contractor inputting that time in the system, matched. This process has been agreed as appropriate with the company which undertakes the independent review of our ARC data, C D Consultancy.

The time to complete emergency repairs, increased from 6.18 hours for financial year 2020/21 to 10.05 hours for 2021/22. An analysis of emergency repairs figures shows that 47 of 252 (18.7%) were in excess of the 24 hour limit. The vast majority, 38 of 47 (81%) were completed between 24 and 29 hours.

The remainder are as follows:

- 5 were 30 - 49 hours.
- 2 were 50 - 99 hours.
- 2 were 100+ hours

If these worst 9 cases (3.6%) were removed our average would drop from 10.05 hours down to 8.06 hours.

The reasons for some repairs being out of time included contractors, especially on the isles, reporting incorrect dates and times of completions or failing to raise second orders or stopping the clock once an emergency has been addressed but further parts require to be ordered to further address the issue. An additional complexity involved mainland contractors undertaking works on the isles and the above issues being exacerbated with weather and travel disruption. There have been some changes in key personnel and a process has been set in place to ensure all work orders are reviewed on a monthly basis and information is actively used in meeting with contractors.

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 decreased to 15.34 days for 2021/22 from 17.14 days in 2020/21. A detailed analysis of the cases which are most in excess of the 20 working day limit, has highlighted similar issues to those outlined above for emergency repairs. There have also been issues common nationally such as serious supply issues. In addition, some tenants remain uncomfortable with the idea of workmen accessing their home despite all the COVID mitigations which have been put in place and attempts to reassure tenants accordingly. Contractors have experienced a range of other issues as a result of working and travelling in a manner required to reduce COVID-19 risks, and endeavouring to catch up with a backlog of general construction works. If all repairs above 76 days which are generally due to supply issues, were removed, this would bring the figures down to 13.22 days.

The Council continues to work closely with its contractors and aims to improve performance indicators wherever possible. Despite the continued impact of the COVID-19 situation during 2021/22, contractors remain very busy and there are difficulties in obtaining sub-contractors with availability. Some contractors have been successful in expanding their staff teams and tried to restructure their processes which is positive. Recruitment remains challenging.

Indicator 12 (Repairs Satisfaction)

Repairs customer satisfaction remains high at 90.85%, which is very positive.

Indicator 14 (Tenancy Offers Refused)

The percentage of offers of housing refused has risen to 32.64% for financial year 2021/22 from 25.00% for 2020/21. In general, work has been underway to reduce the numbers of offers refused and this has continued. However, there were issues with a newly completed housing scheme during financial year 2021/22, specifically the numbering of the properties concerned and involvement of other bodies – an issue not within the control of the Housing Service. In order to correct this, 16 offers had to be recorded as being made in error thereby distorting the figure on offers refused. If these were removed, figures on offers refused would have been 47 and 24% which shows continued improvement.

A new lettings policy, based on the principles of choice, was approved for implementation by April 2021. While delayed as a result of COVID-19, this is now being progressed with a view to it being implemented during this financial year.

Indicator 15 (Anti-Social Behaviour)

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 Limited, 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 (Tenancy Sustainment)

Statistics relating to the Council's overall tenancy sustainment (indicator 16) shows sustained performance.

An assessment of cases where a tenancy had not been sustained indicated reasons such as death, hospitalisation and leaving Orkney as well as those who had sought housing in another sector.

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 its service are registered with the Care Inspectorate and these obtain good inspection grades and staff are registered with the Scottish Social Services Council.

Indicators 18 and 30 (Empty Property Rental Loss and Time taken to Relet Properties)

Void (empty property) loss increased from £48,924 in 2020/21 to £54,453 in 2021/22, which represents an increase in the percentage of rent loss due to properties being empty from 1.32% to 1.42%. Various factors contribute to this increase. In 2021/22, there were more relets, 78 in 2021/22 as opposed to 68 in 2020/21 and 40 new builds were completed during the year. In addition, national guidance on COVID-19 meant that void properties were held for 72 hours following keys being returned, before staff went in to deal with the void and significantly increased cleaning was implemented. Consequently, there was an extended void period for a couple of months of the financial year. There have also been general supply issues affecting a range of items including internal doors and issues with electricity meters.

As regards the average length of time taken to relet properties (indicator 30), a total of 78 properties were relet during financial year 2021/22. The time taken to relet properties has also been affected by COVID-19 as outlined above in relation to voids. The total number of calendar days the properties were empty was 4,064 giving a relet time of 52.10 days which is significantly lower than financial year 2020/21 which recorded 62.46 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 2021/22 this applied to two sheltered properties which together accrued 539 days and 2 isles properties subject to low demand which were void for 140 days each. Five further properties had extended void periods due to issues including attractiveness, level of refusal and one unfortunate miscommunication. If these were removed, the average would drop to 37.7 days. 11.5% of cases contribute to 27.6% of void loss.

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

Gross arrears were challenging as a result of the COVID-19 impact, throughout financial year 2021/22. The figures at year end show a decrease to 14.35% from 14.44% for financial year 2021/22.

A further analysis of this figure shows that current tenant arrears have declined slightly to 8.64% for financial year 2021/22 from 8.92% for 2020/21.

Throughout the COVID-19 pandemic, a strong focus was placed on the recovery of arrears. A supportive approach was taken through the initial stage of the pandemic, including undertaking welfare checks for all Council tenants throughout the initial lockdown, working with tenants to ensure that those who needed assistance to claim Universal Credit Housing Costs/Housing Benefit, were assisted to do so. Throughout, there was also close joint working with Orkney Citizen's Advice Bureau in relation to income maximisation and money advice/debt assistance. Every attempt was made, and continues to be made, to recover outstanding arrears where this is possible. This has included senior management prioritising the pursuit of arrears and significant levels of staffing resource being focused on this aspect.

Although the overall level of arrears remains high, the rent collected as a percentage of rent due in the year increased to 99.50% for financial year 2021/22 from 96.59% for 2020/21. This is a positive indication that the sustained focus on reducing rent arrears is starting to net results.

The level of housing costs received directly from Universal Credit/Housing Benefit remains broadly similar to the previous financial year. However, this rose significantly in 2020/21 to £1.52m from £1.45m in 2019/20. A system of inputting payments manually has impacted on a small staffing resource adding complexities for a small Housing Revenue Account.

Steps are currently being taken to progress the automation of Universal Credit and bank payments. Arrangements have been made for the relevant software suppliers to remedy this during summer 2022.

Discretionary Housing Payments (DHP) continue to be publicised through the Council's website, social media etc in an attempt to reach more tenants who are struggling.

The percentage of former tenant arrears in 2021/22 increased to 5.71% from 5.53% in 2020/21.

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. Statistics and anecdotal evidence suggests that practice in other organisations is to write-off the majority of former tenant debt. Write-offs for financial year 2021/22 were progressed again following the COVID-19 lockdown but remained low at £15,577, or 6.99%, of the former tenant arrears outstanding.

The Housing Service has a specialist post called Housing Officer (Income Collection). The post was restructured during last financial year to endeavour to address recruitment difficulties and an officer has been in post since June 2021. This is to supplement the role of Housing Officers with the aim to reduce the level of rent arrears and other housing debt outstanding. An additional resource has been sourced through an agency from April 2022 to assist with pursuing rent arrears.

Indicator C9 (Scottish Housing Quality Standard Compliance)

The Council has assessed 20% 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. The reasons for the fall in the inspections of properties in the last year (from 37.75 % to 20%) has been partially due to the retiral of one of the Council's Building Inspectors during the year. That left 75% of the Building Inspector resource for a period of 4 weeks until a new Building Inspector was recruited, who has required further time to be trained since joining the Council in March 2022. A further reason remains the ongoing COVID-19 situation for a large part of the previous year where, through risk assessments, it was recommended that Building Inspectors only went inside properties when necessary. There has also been some reluctance amongst tenants to allow access to the Building Inspectors, despite mitigations being in place.

Data has been compiled on the renewal cycle for core property elements such as windows, doors, kitchens, bathrooms. This provides accurate data based on historic renewal data and update surveys done 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 gaining access due to COVID-19 guidance. Undertaking works on core property elements should also assist with improving tenant satisfaction with the quality of tenant homes (indicator 7).

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, periodic electrical inspection reporting, legionella, radon etc – that ensures that we are 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, though recently there has been a movement to 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 minimising the level of abeyances and exemptions and ensuring data held was appropriately robust. The depth of information held on Concerto has been enhanced. There has been a process of seeking to reduce the number of properties failing the Scottish Housing Quality Standard. Most of these are marginal fails and this was most commonly around a need for a more modern Energy Performance Certificate. These are now being progressed.

A plan to progress Scottish Housing Quality Standard fails is in place. 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 remain difficulties with securing works within the identified budget. In addition, a number of properties require a new Energy Performance Certificate which was difficult to arrange, partially due to tenant concerns around access. It is anticipated that this will move forward now.

An additional complexity during financial year 2021/22 involved the requirement to meet revised standards for smoke alarm systems. A contract was placed with a local contractor allowing sufficient time for this to be delivered. There have been some unexpected difficulties due to supply issues, access issues etc and accordingly there are a number of properties (113) recorded as failing on this basis. The contractor has been requested to provide a more recent update to the schedule for the works being carried out. Where there are issues with access being provided, consideration will be given to whether there is a need to force entry in order to undertake the works. This is being taken forward as a priority.

Often there are additional challenges in an island context and this has been more pronounced through the context of COVID-19. Contractors continue to address a backlog of work whether non-emergency repairs, Scottish Housing Quality Standard / Energy Efficiency Standard for Social Housing works and all have a short timescale for completion. Discussions with contractors will be ongoing.

Annual Report for Tenants

The annual report for tenants will be produced by 31 October 2022 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 Limited 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.

Customer Satisfaction Survey

The Council is required to undertake a wholesale tenants' satisfaction survey every three years. This was undertaken most recently during 2022 by an independent body in order to ensure impartiality.

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.

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. The Scottish Housing Regulator's engagement plan relates to financial year 2022/23 and indicates it wishes to engage with the Council in relation to:

- The Council's services for people who are homeless.

During 2021/22, the Scottish Housing Regulator reviewed and compared the data for all Councils from the Scottish Government's national homelessness statistics and the Annual Returns on the Charter. They also spoke to all Councils to gather further information and assurance about their homelessness services. To assess the risks to people who are threatened with or experiencing homelessness they have advised they will engage with all Councils during 2022/23.

Data on homelessness is not included within the Annual Return against the Charter generally. Instead, this information is provided through returns outlined at section 4.2 of the committee report and is reported to the Council's Education, Leisure and Housing Committee, specifically a report is presented to the June cycle of meetings.

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 have endeavoured to operate as normally as possible throughout the COVID-19 pandemic, there has still been significant disruption. This disruption was lower during financial year 2021/22 than was the case the previous year. Face to face provision of services have been removed throughout the COVID-19 pandemic. During the initial lockdown period the focus was on the delivery of essential services including homelessness, housing support and emergency repairs. From August 2021, small numbers of home visits resumed in essential situations.

COVID-19 may well cause disruption going forward due to staff absences and uncertainty around whether there may be any restrictions in the future. Supply issues remain a significant issue, as do rising costs. Therefore, the likelihood is that there will also be an impact on performance figures for financial year 2022/23. The precise extent of this cannot be pre-judged currently but may become clearer over the coming months.

The impact of the cost of living crisis, whether caused by COVID-19 or war in Ukraine, is likely to impact negatively on rent arrears. Demand for Council housing has risen and is likely to continue to do so given the likely impact of the cost of living crisis on private sector accommodation whether rented or owned.

Homelessness will continue to be monitored closely to determine whether it will rise further. It is anticipated there will be ongoing difficulties with permanently rehousing homeless households due to supply issues.

It is anticipated that supply issues and recruitment issues for contractors will impact on work requiring to be progressed, and rising costs will impact on delivery of the services. This is likely to impact on 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 (2). In addition, the Council's house build projects will also be affected.

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 2022/23 cannot yet be determined and will remain under close scrutiny.

Annex 2: Assurance Action Plan

Assurance and Notification

Requirement.	Who.	When.	RAG.	Comments.
Prepare an Annual Assurance Statement in accordance with guidance.	Head of Community Learning, Leisure and Housing and Data Analysts.	October 2022.	Green.	Committee report and appendices to be presented to Education, Leisure and Housing Committee on 7 September 2022.
Submit Annual Assurance Statement to Scottish Housing Regulator between April and October each year.	Data Analysts.	October 2022.	Green.	On target to be submitted by October 2022.
Make Annual Assurance Statement available to tenants and other service users.	Data Analysts and Tenant Participation Officer.	October 2022.	Green.	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 Community Learning, Leisure and Housing and Data Analysts.	As required.	Green.	
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.	Head of Community Learning, Leisure and Housing and Team Manager (Maintenance and Heritage).	Ongoing.	Green.	This links to Standard 1.5 of National Standards for Information and Advice Providers. We have been re-accredited by the Scottish Legal Aid Board during 2022. Evidence includes a broad range of Council corporate policies including the Health and Safety Policy; Challenging Behaviour by Members of the Public:

Requirement.	Who.	When.	RAG.	Comments.
				<p>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.</p> <p>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>During 2021 we undertook a review of our equalities policy and the processes relating to equalities data collection and human rights. Our revised Equalities Policy and Action Plan was approved by our Education, Leisure and Housing Committee in June 2021. We have sought equalities information from all existing tenants and housing</p>

Requirement.	Who.	When.	RAG.	Comments.
				<p>applicants, in relation to 9 protected characteristics in line with the Scottish Housing Regulator's Regulatory Framework and Scottish Federation of Housing Association Ltd's Guidance. Equalities data requested has been expanded across all housing and homelessness service areas accordingly and data will be used as required to ensure continued improvement of service provision.</p>
<p>Notify Scottish Housing Regulator of safety matters which have been reported to or investigated by the Health and Safety Executive (HSE) or reports from other regulatory or statutory authorities or insurance providers, relating to safety concerns.</p>	<p>Head of Community Learning, Leisure and Housing / Team Manager (Maintenance and Heritage).</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> <p>We have policies covering issues such as Asbestos and procedures in place regarding Radon / Legionella etc. Our Neighbourhood Services and Infrastructure undertake property inspections and ensure properties are fitted with smoke alarms etc.</p>

Requirement.	Who.	When.	RAG.	Comments.
				Risk assessments and procedural documentation have been in place throughout the COVID-19 pandemic to ensure staff and tenants / service users were / are appropriately protected and supported throughout the COVID-19 crisis.
Make Engagement Plan easily available and accessible to tenants and service users, including online.	Head of Community Learning, Leisure and Housing and Data Analysts.	May 2022.	Green.	To be included by link to the Scottish Housing Regulator's website from Housing Services' area of the Council's website.
Register all requirements for providing data to Scottish Housing Regulator and Information Commissioners Office.	Head of Community Learning, Leisure and Housing 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.

Scottish Social Housing Charter Performance

Requirement.	Who.	When.	RAG.	Comments.
Submit Annual Return against the Charter to Scottish Housing Regulator in accordance with published guidance.	Head of Community Learning, Leisure and Housing and Data Analysts.	May 2022.	Green.	Submitted by 30 May 2022.
Involve tenants, and where relevant service users, in the preparation and scrutiny of performance information.	Tenant Participation Officer.	In place.	Green.	<ul style="list-style-type: none"> Residents' Panel involved in development of annual report as standard. Section in the annual report to encourage feedback.

Requirement.	Who.	When.	RAG.	Comments.
<ul style="list-style-type: none"> • Agree an effective and meaningful approach with tenants. • Publicise approach to tenants. • Verify approach and evidence involving tenants has happened. • Involve other service users in an appropriate way. 				<ul style="list-style-type: none"> • Residents' Panel are invited to an annual presentation on performance from Scotland's Housing; Network (from 2019) and discussion at Residents' Panel meeting thereafter.
<p>Report performance to tenants and other service users no later than October each year:</p> <ul style="list-style-type: none"> • Agree format of performance reporting with tenants and ensure accessible with plain and jargon free language. • Provide assessment of performance in delivering Charter outcomes. • Include relevant comparison including previous years, other landlords and with national performance. • Set out how we intend to address areas for improvement. • Give tenants and service users a way to feedback 	<p>Head of Community Learning, Leisure and Housing and Data Analysts and Tenant Participation Officer.</p>		<p>Green.</p>	<p>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 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>

Requirement.	Who.	When.	RAG.	Comments.
views on style and form of reporting.				
Make Scottish Housing Regulator report on our performance easily available to tenants including online.	Head of Community Learning, Leisure and Housing and Data Analysts.	When produced by SHR.	Green.	To be included as a link to the Scottish Housing Regulator's website from Housing Services' area of the Council's website.

Whistleblowing

Requirement.	Who.	When.	RAG.	Comments.
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.

Tenants and Service Users Redress

Requirement.	Who.	When.	RAG.	Comments.
Make information on reporting any significant performance failures, including the Scottish Housing	Head of Community Learning, Leisure and Housing and Tenant Participation Officer.	In place from June 2019.	Green.	A link will be provided to the Scottish Housing Regulator's leaflet from the Council's website.

Requirement.	Who.	When.	RAG.	Comments.
Regulator's leaflet, available to our tenants.				
Provide tenants and service users with the information they need to exercise right to complain and seek redress.	Team Manager (Infrastructure and Information).	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 Manager (Infrastructure and Information).	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 Community Learning, Leisure and Housing 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.

Equality and Human Rights

Requirement.	Who.	When.	RAG.	Comments.
Have assurance and evidence we consider equality and human rights	Senior Management Team of the Council.	In place.	Green.	<ul style="list-style-type: none"> All policies within Housing Services contain a section on equalities.

Requirement.	Who.	When.	RAG.	Comments.
<p>issues properly when making decisions, in the design and review of internal and external policies, and in our day to day service delivery.</p>				<ul style="list-style-type: none"> • The Housing Service has a specific Equalities Policy and one on Accessibility and reviewed its Equalities Policy during 2021. Equalities monitoring across 9 protected characteristics has been taken forward in line with the national guidance. We have sought equalities information from all existing tenants and housing applicants, in relation to 9 protected characteristics in line with the Scottish Housing Regulator's Regulatory Framework and Guidance from the Scottish Federation of Housing Associations. Equalities data requested has been expanded across all housing and homelessness service areas accordingly and data will be used as required to ensure continued improvement of service provision. • Committee reports on policy matters contain a section on equality. • Completion of equality impact assessments is standard. • Island communities impact assessments are undertaken as required.

Requirement.	Who.	When.	RAG.	Comments.
				<ul style="list-style-type: none"> The Council monitors its website and ensures it meets website accessibility requirements. The Council employs a specialist equalities officer to ensure compliance.
Collect data relating to protected characteristics for existing tenants, new tenants, people on waiting lists and elected Members and staff.	Head of Community Learning, Leisure and Housing	In place.	Green.	<ul style="list-style-type: none"> Equalities criteria does not currently apply to elected Members given that they are democratically elected. Equalities monitoring information across 9 protected characteristics is now collected for new tenants and applicants and information has also been sought in relation to existing tenants also. This is sought along with information relating to requirements for information in a range of formats. As regards staff, our HR Service collect information relating to 9 protected characteristics for staff when they apply for any post whether when they initially come into the organisation or where an internal application is submitted. Updates are requested re equalities data through the MyView portal and annual communications are issued to remind staff to update details. The

Requirement.	Who.	When.	RAG.	Comments.
				staff survey also requests information relating to the 9 protected characteristics and an annual report is produced on staff diversity which in turn is used to inform any relevant changes to policy required.
Collect data on protected characteristics of people who apply as homeless.	Head of Community Learning, Leisure and Housing.	In place.	Green.	<ul style="list-style-type: none"> • Equalities monitoring information is collected for people who apply as homeless. • Our homelessness interview form has been updated to include all 9 protected characteristics.
Collect data on protected characteristics of people who use our Gypsy / Traveler services.	N/A.	N/A.	N/A.	N/A.