

Item: 9

Education, Leisure and Housing Committee: 8 September 2021.

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 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, at its meeting on 3 April 2019, the Education, Leisure and Housing Committee noted that a report on the Housing Service's performance would be submitted annually, to the June cycle of meetings.

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.

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 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.

4.6.

Currently, in common with all social housing providers across Scotland, the Council is 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. A specific staffing return is being 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 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.

Annex 1 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 completed 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 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, Executive Director of Education, Leisure and Housing, extension 2401, Email james.wylie@orkney.gov.uk.

Frances Troup, Head of Community Learning, Leisure and Housing, extension 2177, Email frances.troup@orkney.gov.uk.

10. Appendices

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 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 8 September 2021.

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 for financial year 2020/21 has been completed for Orkney Islands Council and was submitted to the Scottish Housing Regulator by 31 May 2021. 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. The Council does 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 Limited to share costs.

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 2020/21 there were some notable differences to data surrounding complaints. This included that 39% fewer stage 1 complaints were received than was the case the year before.

Under normal circumstances, 80% of stage 1 complaints come in via repairs monitoring forms. During financial year 2020/21, due to COVID-19 restrictions there was a period when non-emergency repairs were unable to be undertaken due to Scottish Government guidance. Therefore, repairs monitoring forms were not being issued. This has led to fewer stage 1 complaints.

Conversely stage 2 complaints rose by 80% over the same period. These are a mix of repairs timescales, condition of property, process and policy, and one each of neighbour nuisance and attitude of a staff member.

One of the stage 2 complaints, was received in mid-March and therefore not responded fully by year end. Instead, it was completed inside timescale by mid-April. However, this led to 8 of the 9 stage two complaints being recorded as responded to fully during the year, giving a total of 88.89%.

Indicators 8 and 9 (Repairs)

The installation and development of the new computer system, Concerto has been completed. The handheld app was shared with contractors to further enhance the current functionality. The launch began in financial year 2021/22 and a trial involving the Council's measured term contractor is currently underway with a view to involving sub-contractors in the near future.

The time to complete emergency repairs, decreased from 6.28 hours for financial year 2019/20 to 6.18 hours for 2020/21. New processes were implemented involving in-house Building Inspectors/Clerk of Works undertaking 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. It is anticipated the handheld app will allow further efficiencies in relation to time recording, allowing recording to the exact minute rather than to within 15 minutes.

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 11.53 days for financial year 2019/20 to 17.14 days in 2020/21. For the first quarter of 2020/21, the lockdown due to COVID-19 meant that it was not possible to undertake non-emergency repairs under Scottish Government guidance. This amounts to 2,100 days. If this period were removed the figure would be 14.92 days. However, COVID-19 restrictions continue to impact on timescales. A backlog of non-emergency repairs remained once lockdown was lifted in late June 2021. Some tenants remained uncomfortable with workmen accessing their home despite having all COVID-19 mitigations in place and attempts to reassure tenants accordingly. Supplies have also been affected by COVID-19. Access to isles properties to undertake repairs were restricted with reduced numbers able to travel on ferries, bookings required a day in advance and segregation in transport to and from the ferry etc. Contractors also experienced a range of 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.

Joint working continues with contractors and improvements in performance are sought wherever possible. Despite the COVID-19 situation, contractors remain very busy and there are 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. Recruitment remains challenging.

Indicator 12 (Repairs Satisfaction)

Repairs customer satisfaction remains high at 91.15% being slightly higher than 91.04% for the year before, which is very positive. The number of completed surveys reduced in financial year 2019/20 for this indicator as an area identified for improvement in our last audit by an independent assessor, included ensuring that the data used definitely only related to the last repair which had been undertaken.

Indicator 14 (Tenancy Offers Refused)

The percentage of offers of housing refused has declined from 36.61% for financial year 2019/20 to 25.00% for 2020/21 which is positive. Previously only offers which had a refusal or acceptance were counted, rather than those which remained open. Feedback from an independent audit undertaken last year was that open offers should still be included. Therefore, this process has been adjusted accordingly.

The introduction of a new lettings policy, based on the principles of choice, was planned for April 2021, but is currently delayed, as a result of COVID-19.

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 Committee.

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

Void (empty property) loss increased from £23,480 in 2019/20 to £48,924 in 2020/21, which represents an increase in the percentage of rent loss due to properties being empty from 0.64% to 1.32%. Various factors contribute to this increase. In 2020/21, there were fewer relets, 68 in 2020/21 as opposed to 72 in 2019/20 and no 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. Together these increased the timescales for turning around void properties. In addition, a proportion of voids were on the isles. Following the initial lockdown, there was a period of time where travel to the isles was prohibited. Following that there were operational difficulties with access to public conveniences for staff welfare purposes. There have also been general supply issues affecting a range of items including internal doors.

As regards the average length of time taken to relet properties (indicator 30), a total of 68 properties were relet during financial year 2020/21. The time taken to relet properties is also affected by COVID-19 as outlined above in relation to voids. The total number of calendar days the properties were empty was 4,247 giving a relet time of 62.46 days which is significantly higher than financial year 2019/20 which recorded 35.79 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 2020/21 this applied to three properties with 392, 210 and 182 days void respectively without which the average would be reduced to 50.91 days. In addition, there were 14 isles voids during the financial year. Given additional complexities around travel to the isles, mainland properties were prioritised.

Indicator 27 (Rents)

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 were challenging as a result of the COVID-19 impact, throughout financial year 2020/21. The figures at year end show a rise to 14.64% for financial year 2020/21 from 11.22% for financial year 2019/20. A further analysis of this figure shows that current tenant arrears have risen to 8.92% for financial year 2020/21 from 7.03% in 2019/20.

Throughout the COVID-19 pandemic, a strong focus was placed on the recovery of arrears. This included 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 increased, the rent collected as a percentage of rent due in the year increased to 96.59% during 2020, having fallen to 94.66% in 2019. 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 have risen significantly from £1.45m in 2019/20 to £1.52m in 2020/21 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. While this project was on hold due to the COVID-19 situation, it is anticipated that there will be the potential to move this forward shortly. Progression will depend on affordability.

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

It is anticipated there will continue to be significant impacts from restrictions affecting employers and therefore a likelihood of ongoing economic impacts on jobs etc.

The percentage of former tenant arrears in 2020 increased to 5.53% from 4.2% in 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 2020/21 were progressed again following the COVID-19 lockdown but remained low at £14,210, or 6.85% of the former tenant arrears outstanding.

Recruitment difficulties impacted on a specialist post in rent arrears recovery. The post was restructured during financial year 2020/21 and a new postholder took up employment in early June 2021.

Indicator C9 (Scottish Housing Quality Standard Compliance)

The Council has assessed 37.75% of our stock over the last 5 years as a result of surveys undertaken relative to energy performance and new build completion. In addition, we will undertake a rolling programme of stock condition / assessment of compliance on 10% of our stock annually.

Data has been compiled on the renewal cycle for core property elements such as windows, doors, kitchens, bathrooms. This provides us with 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 and tenant concerns. 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 2018/19 to 87.76% for 2019/20.

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. While most of these are marginal fails and the intention would have been to have progressed most to a Scottish Housing Quality Standard pass in 2020/21, this has been delayed due to COVID-19. These are now being progressed.

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 currently fail the Energy Efficiency Standard for Social Housing and these will be addressed as one process to ensure whichever is the higher of the standards, is the priority to allow a pass. Regular reporting and review is undertaken. Properties which are classified as hard to treat properties are being looked at on the basis of fitting positive pressure heat pump systems. However, difficulties with sourcing contractors with availability is an issue. In addition, a number of properties require a new Energy Performance Certificate which was difficult to arrange, partially due to tenant concerns around access, while Orkney was in a higher tier under COVID-19 restrictions.

There is a recognition that there may be challenges in an island context due to issues such as a backlog of works, and challenges involving staffing and supplies. However, discussions with contractors will be ongoing.

Annual Report for Tenants

The annual report for tenants will be produced by 31 October 2021 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. The Council does this in partnership with Orkney Housing Association Limited 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 re 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 2021/22 and indicates it wishes to engage with the Council in relation to:

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

Specifically, this relates to COVID-19 having significantly impacted the services provided by social landlords since 2020. The Scottish Housing Regulator have advised they will continue to monitor, assess and report upon how each landlord is responding and they will keep their regulatory engagement under review so that they can continue to respond to the challenges of COVID-19.

They have stated that they have reviewed the information on homelessness in the COVID-19 monthly returns. They will discuss with the Council the impact of the pandemic on outcomes for people who are threatened with, or are experiencing, homelessness, how it is working with its Registered Social Landlord partners to provide accommodation and review their engagement.

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. 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 have resumed in essential situations.

COVID-19 is likely to continue to cause disruption for the foreseeable future and consequently the likelihood is that there will also be an impact on performance figures for financial year 2021/22. The precise extent of this cannot be pre-judged given that further limitations by guidance may well impact over the coming months.

The impact on the economy and outcomes for people currently on furlough or potentially facing unemployment is likely to impact negatively on rent arrears. The suspension on evictions has now been lifted and therefore legal action will be

progressed in cases where all other alternatives have been exhausted. In addition, demand for Council housing is also anticipated to rise.

It is anticipated that homelessness will rise predominantly as a result of family breakdown including domestic abuse, as restrictions are eased. It is further anticipated there will be ongoing difficulties with permanently rehousing homeless households due to supply issues. There is also the potential for tenancy sustainment to be affected.

It is anticipated that supply issues and recruitment issues for contractors will impact on work requiring to be 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 (2). In addition, delivery of the Council's house build projects will also be subject to delay.

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 2021/22 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.

Annexe 2: Assurance Action Plan

Requirement.	Who.	When.	RAG.	Comments.
Assurance and Notification				
Prepare an Annual Assurance Statement in accordance with guidance.	Head of Community Learning, Leisure and Housing and Data Analysts.	October 2021.	Green.	Committee report and appendices to be presented to Education, Leisure and Housing Committee on 8 September 2021.
Submit Annual Assurance Statement to Scottish Housing Regulator between April and October each year.	Data Analysts.	October 2021.	Green.	On target to be submitted by October 2021.
Make Annual Assurance Statement available to tenants and other service users.	Data Analysts and Tenant Participation Officer.	October 2021.	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 Works and Inspection Manager.	Ongoing.	Green.	<p>This links to Standard 1.5 of National Standards for Information and Advice Providers. We are undergoing the re-accreditation process during 2021.</p> <p>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;</p>

				<p>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>During 2021 we are undertaking 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 and this outlines how we will progress with expanding our data collection relating to equalities and human rights accordingly</p>
Notify Scottish Housing Regulator of safety matters which have been reported to or investigated by the Health and Safety Executive	Head of Community Learning, Leisure and Housing / Works and Inspection Manager.	In place.	Green.	The Council's Health and Safety Advisor provides guidance on all aspects of health and safety as required. If a report were received from

<p>(HSE) or reports from other regulatory or statutory authorities or insurance providers, relating to safety concerns.</p>				<p>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 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>
<p>Make Engagement Plan easily available and accessible to tenants and service users, including online.</p>	<p>Head of Community Learning, Leisure and Housing and Data Analysts.</p>	<p>May 2021.</p>	<p>Green.</p>	<p>To be included by link to the Scottish Housing Regulator's website from Housing Services' area of the Council's website.</p>
<p>Register all requirements for providing data to Scottish Housing Regulator and Information Commissioners Office.</p>	<p>Head of Community Learning, Leisure and Housing and Head of Legal Services.</p>	<p>In place.</p>	<p>Green.</p>	<p>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.</p>

Requirement	Who	When	RAG	Comments
Scottish Social Housing Charter Performance				
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 2021.	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"> • 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. 	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; • 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; 	Head of Community Learning, Leisure and Housing and Data Analysts 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 the final document. The Council includes a section in the Annual Report which encourages

<ul style="list-style-type: none"> • 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 views on style and form of reporting 				<p>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 Community Learning, Leisure and Housing and Data Analysts.</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.
Whistleblowing.				
<p>Ensure effective arrangements and a policy for whistleblowing for staff and elected Members.</p>	<p>Head of HR and Performance.</p>	<p>In place from October 2015.</p>	<p>Green.</p>	<p>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</p>

				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.
Tenants and Service Users Redress.				
Make information on reporting any significant performance failures, including the Scottish Housing Regulator's leaflet, available to our tenants.	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.
Provide tenants and service users with the information they need to exercise right to complain and seek redress.	Team Leader (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 Leader (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.
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Requirement.	Who.	When.	RAG.	Comments.
Equality and Human Rights.				
<p>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.</p>	<p>Senior Management Team of the Council.</p>	<p>In place.</p>	<p>Green.</p>	<ul style="list-style-type: none"> • All policies within Housing Services contain a section on equalities; • The Housing Service has a specific Equalities Policy and one on Accessibility, has reviewed its Equalities Policy during 2021 and has work ongoing around the area of expanding equalities and human rights monitoring in line with anticipated national guidance; • Committee reports on policy matters contain a section on equality; • Completion of equality impact assessments is standard; • The Council monitors its website and ensures it meets website accessibility requirements; • The Council employs a specialist equalities officer to ensure compliance.
<p>Collect data relating to protected characteristics for existing tenants, new tenants, people on waiting lists and elected Members and staff.</p>	<p>Head of Community Learning, Leisure and Housing</p>	<p>In place.</p>	<p>Green.</p>	<ul style="list-style-type: none"> • Equalities criteria does not apply to elected Members given that they are democratically elected; • Equalities monitoring information is collected for new tenants along

				<p>with information relating to requirements for information in a range of formats. Information collected includes age, disability, race and sex. We don't 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;</p> <ul style="list-style-type: none"> • As mentioned above we have work ongoing around the area of expanding equalities and human rights monitoring in line with anticipated national guidance
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 as follows: • Age, disability, marriage, race, sex, pregnancy and maternity. We don't 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; • As mentioned above we have work ongoing around the area of expanding equalities and human rights monitoring in line with anticipated national guidance

Collect data on protected characteristics of people who use our Gypsy / Traveler services.	N/A.	N/A.	N/A.	N/A.
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