ORKNEY
ISLANDS COUNCIL

Item: 7

Education, Communities and Housing Committee: 9 September 2026.

Housing Service – Annual Assurance Statement.

Report by Director of Education, Communities and Housing.

1. Overview

1.1. This report presents the Annual Assurance Statement, for approval.

1.2. The Council is required to submit an Annual Assurance Statement to the Scottish Housing Regulator by 31 October. The Annual Assurance Statement must provide assurance that the Council, in delivering its services in relation to social housing, is compliant with all aspects of legislation, including housing and also health and safety and meets appropriate performance and quality assurance standards.

1.3. The Scottish Housing Regulator enhanced its requirements in respect of assurance in relation to equalities, as well as tenant and resident safety, for Assurance Statements to be submitted after 31 October 2023. Further enhancements were made in relation to damp and mould for Assurance Statements to be submitted by 31 October 2025.

2. Recommendations

2.1. It is recommended that members of the Committee:

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

3. Performance Structures

3.1. 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, Communities and Housing Committee:

- Homelessness update.
- Energy Efficiency Standard for Social Housing.

- Housing Performance.

3.2. 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.

3.3. 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).
- Until 2019, Housing Services, in common with other Council Services, undertook How Good is our Council Self-Assessment. This process will be replaced with a suitable corporate alternative following approval by the Council's Corporate Leadership Team and the Extended Corporate Leadership Team.

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

3.5. 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.

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

3.7. 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.

3.8. While required on a three yearly basis, the Council undertakes its Customer Satisfaction Survey every two years to ensure views collected are representative of the current tenant base. This was undertaken in April 2026 and is being reported to this cycle of meetings.

3.9. The Scottish Housing Regulator has published its Regulatory Framework and associated guidance relating to housing services' performance.

3.10. 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. The engagement plan for Orkney Islands Council is available here.

4. Annual Assurance Statement

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

4.2. 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".

4.3. 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.

4.4. 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.

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

4.6. 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.

4.7. 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.

4.8. 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.

For Further Information please contact:
Frances Troup, Head of Strategic Housing, Housing Operations and Homelessness, extension 2450, Email: frances.troup@orkney.gov.uk.

Implications of Report

1. **Financial:** None arising directly from this report.
2. **Legal:** None arising directly from this report.
3. **Corporate Governance:** None arising directly from this report.
4. **Human Resources:** None arising directly from this report.
5. **Equalities:** An Equality Impact Assessment is not required for performance reporting.
6. **Island Communities Impact:** An Island Communities Impact Assessment is not required for performance reporting.

7. **Links to Council Plan:** The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Council Plan strategic priorities:
   ☐Growing our economy.
   ☐Strengthening our Communities.
   ☐Developing our Infrastructure.
   ☐Transforming our Council.
8. **Links to Local Outcomes Improvement Plan:** The proposals in this report support and contribute to improved outcomes for communities as outlined in the following Local Outcomes Improvement Plan priorities:
   ☐Cost of Living.
   ☐Sustainable Development.
   ☐Local Equality.
   ☐Improving Population Health.
9. **Environmental and Climate Risk:** None arising directly from this report.
10. **Risk:** None arising directly from this report.
11. **Procurement:** None arising directly from this report.
12. **Health and Safety**: Compliance with legislation including health and safety legislation is central to this report. Appendix 1, Annex 2, clearly states the Council's position in relation to compliance with health and safety legislation in Council properties.
13. **Property and Assets:** This report relates directly to Council housing.
14. **Information Technology:** None arising directly from this report.
15. **Cost of Living:** None arising directly from this report.

Background Papers

None.

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
- We are compliant with all aspects of tenant and resident safety.

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 9 September 2026.

Signed …….

Chair of Education, Communities 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 2025/26 has been completed for Orkney Islands Council and was submitted to the Scottish Housing Regulator by 31 May 2026. Areas of performance which required additional explanation are as follows (the indicators referred to are nationally required):

Satisfaction Survey

The Council undertook a wholescale tenant satisfaction survey in line with the Scottish Social Housing Charter in April 2026. 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 results are being presented to the Council's Education, Communities and Housing Committee in September 2026, along with an action plan for improvement. The survey was carried out by an independent contractor so tenants could respond openly. A mix of telephone and postal methods was used, with more phone surveys than before to ensure parity with the approach used by most social landlords. While it is slightly more expensive, the cost benefit analysis is positive in that stronger data is obtained. The tenant survey was undertaken by an independent body to ensure tenants felt able to openly express their views.

In addition to the wholescale 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).

The Tenant Participation Officer continues to focus on increasing tenant involvement and improving communication. This has included working with Orkney Housing Association Ltd on events at community groups, starting up an armchair panel, and producing a leaflet to help promote it. A social media page has also been developed to help make information more accessible across the island group and to different age cohorts.

Information obtained from customer surveys and other means of obtaining 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, that data was used for the Annual Return against the Charter rather than the wholescale tenant survey.

Indicators 3 and 4 (Complaints)

During financial year 2025/26, 28 stage 1 complaints and 12 stage 2 complaints were received during the year. There were 4 stage 2 complaints carried over from 2024/25. There were 3 open stage 2 complaints at the end of the year which will be carried forward

into 2026/27. The average response times for both stage 1 and 2 have increased on last year. Stage 1 complaints increased from 3.38 to 6.93 days this year. The average for stage 2 complaints rose from 17.40 to 30.08 days. The longest response time recorded at stage 1 was 43 days and at stage 2 it was 89 days. The stage 1 complaint was initially handed to the wrong department which caused the long response time.

A manual audit of complaint handling has been completed, and targeted training is being rolled out for Housing Officers and Building Inspectors to improve complaint recording and resolution within the Concerto computer system.

This training is expected to have a positive knock-on effect for stage 2 complaints, as it frees up managers' time to concentrate on the more complex cases.

Indicators 8 and 9 (Repairs)

Delivery of property management services is undertaken by our Infrastructure and Organisational Development Services for the Housing Service.

During 2025/26, 374 emergency repairs were completed with an average completion time of 7.23 hours and a median of 3.58 hours. This is a decrease from last year's average of 9.72 hours. The majority (95.71%) of emergency repairs were completed within target timescales, with 282 completed in under 7 hours (75.40%).

A total of 16 repairs exceeded the 24-hour limit, with 3 taking more than 30 hours. The longest repair (48.5 hours) related to a heat pump, where completion was delayed due to severe weather conditions impacting access.

Overall, delays were limited and generally due to external factors or the need for more complex repairs. Performance has improved compared to the previous year, with faster average completion times and a high proportion of repairs completed within target.

At 31 March 2026, there were 6 open emergency repairs. Continued monitoring and regular engagement with building inspectors and contractors supports early intervention and helps maintain performance.

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.

As regards non-emergency repairs, during 2025/26, 1704 were completed with a total of 24,877 working days, resulting in an average completion time of 14.60 days. This is a decrease from 2024/25, when the average was 15.62 days.

The majority of repairs were completed within target timescales, with 1,300 (76.29%) completed within 20 working days and 764 (44.84%) delivered within the first 7 days, demonstrating continued efficiency in service delivery.

A total of 404 repairs exceeded 20 working days, with 7 taking longer than 100 days to complete. The longest repair took 172 days and related to a wet room floor repair, where works were delayed due to capacity issues with the flooring contractor.

Longer-duration repairs were limited and generally related to access constraints, contractor scheduling, or cases requiring additional coordination or approvals. These represent a small proportion of overall activity but have a disproportionate impact on average completion times. Overall, performance has improved compared to the previous year, with reduced average completion times and the majority of repairs delivered within target. Continued monitoring and engagement with contractors supports ongoing performance management and timely completion of works.

As regards the indicator on "Right First Time" (RFT), during 2025/26, a total of 1,677 reactive repairs were completed, of which, 1,209 were recorded as completed right first time, giving an overall right first time rate of 72.09%. The accuracy of this measure is dependent on consistent reporting and appropriate use of follow-on orders where additional works are required. A review of data at the 9-month stage of the year by Scotland's Housing Network / CD Consultancy highlighted concerns around how right first time data was being recorded and the need for clearer links between initial repairs and any subsequent visits. In response, a manual review of recorded right first time jobs has been carried out to identify discrepancies, particularly where follow-up work may not have been properly linked. Targeted in-house training is being delivered to reinforce how best to categorise repairs and record right first time outcomes, particularly in light of new Annual Return against the Charter requirements relating to damp and mould. The training needs of staff are kept under review to ensure staff have the knowledge and confidence to apply these definitions consistently. This work will support improved reporting accuracy in future years.

Contractors undertaking repair work for the Council remain very busy and there remain difficulties in obtaining sub-contractors with availability. Some trades are particularly scarce including painters. Some of our contractors have been successful in expanding their staff teams and tried to restructure their processes which is positive. Recruitment remains challenging generally, and this inter-connects with the piece of work the Council is progressing in relation to increasing the supply of housing by bringing in an additional housing provider with financial capacity to deliver increased levels of housing.

Indicators 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 Ltd, joint work is undertaken with Police Scotland in order to take a multi-agency approach to any issues which arise.

Orkney continues to maintain a very low level of anti-social behaviour, with few cases of serious incidents. The Council's anti-social behaviour policy, significantly reviewed in 2019, introduced realistic and proportionate targets. An appendix, added to the anti-social behaviour policy on harassment, was introduced in 2023/24 to ensure appropriate processes are in place to address any issues, which may arise specifically as a result of harassment, and this is related to the enhancement of equalities processes.

There were just 9 cases of anti-social behaviour, during financial year 2025/26 and all of these were resolved within the required timescale.

Indicators 16 (Tenancy Sustainment)

Overall, tenancy sustainment (indicator 16) shows sustained performance.

An assessment of cases where a tenancy which began within the year previous and had not been sustained for longer than a year, indicated reasons such as death, hospitalisation and leaving Orkney as well as those who had sought housing from another provider.

A total of 82 tenancies were sustained for more than a year – 29 from the waiting list, 10 existing tenants and 43 homeless households. This was from a total of 90 tenancies, being 34 from the waiting list, 10 existing tenants and 46 homeless households. Of the tenancies which were not sustained for longer than a year, 3 were as a result of death, 4 were renunciations, and 1 was rehoused by OIC. In percentage terms these were as follows:

- Existing tenants - 100%.
- Homeless households – 93.48%.
- Waiting list – 85.29%.
- Overall tenancy sustainment – 91.11%.

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

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

Void (empty property) loss increased from £66,946 in 2024/25 to £80,517, representing an increase in the amount of rent due to properties being empty and a percentage increase from 1.47% to 1.65%. There were 69 relets in 2025/26, compared to 71 in the previous year. This reflects the reality of managing a dispersed rural stock and a small number of long-term, low-demand voids and challenges around availability of contractors.

Regarding the indicator on the average length of time taken to relet properties, a total of 69 properties were relet during the financial year 2025/26. The time taken to relet properties increased. The total number of calendar days they were empty was 5,360, resulting in an average relet time of 77.68 days. This represents a significant increase from the previous financial year 2024/25, where the average relet time was 60.65 days. There were two complex voids which took 511 days and 231 days to be relet, this will have impacted the average relet time.

We again experienced a small number of voids with extended relet times due to low demand, particularly in isles stock. There were three properties categorised as low demand which took a combined 812 days to relet. Excluding the five longest properties, the adjusted average relet time would be 59.47 days, compared to 50.81 days the previous year. There continues to be a focus on minimising delays in relet processes, improving void turnaround times, and refining demand analysis for specialist properties to inform future lettings strategy.

Indicator 27 (Gross Rent Arrears as at 31 March each year as a Percentage of Rent Due for the Reporting Year)

Gross arrears continued to be challenging throughout the financial year 2025/26. The figures at year-end show an increase to 12.12% from 9.43% in 2024/25. We continue to maintain strong oversight of arrears performance. This approach includes early intervention by Housing Officers, close joint working with Orkney Citizen's Advice Bureau on income maximisation and debt advice, and escalation of complex cases to our dedicated Housing Officer (Income Collection). A second officer has remained in post throughout 2025/26 to support arrears recovery and supplement the wider Housing Management team. Performance is monitored closely and reported regularly to senior officers and elected members.

The percentage of rent collected as a percentage of rent due in the year was 99.07% compared to 98.84% for financial year 2024/25. The number of households for which the Council received housing cost payments directly decreased to 460, down from 479 in 2024/25. However, the total value increased to £1,834,872 from £1,708,909 the year before, reflecting higher average entitlement. Manual inputting of Universal Credit and bank payments continues to place pressure on a small staffing resource and the Housing Revenue Account. The automation of this process has very recently been completed, which will reduce administrative workload and improve data accuracy.

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

The Council previously actively and prudently pursued former tenant arrears rather than writing these off, however this had a detrimental impact on overall rent arrears performance - statistics and anecdotal evidence suggested that the practice in other organisations is to write off the majority of former tenant debt. This approach has been reconsidered to ensure resources are targeted at bringing in current arrears, and that tenants who are in arrears are ensuring their focus is on resolving their current arrears as opposed to former tenant arrears from the past. Currently a process is underway in relation to the consideration of a wider programme of write-off. Work is being undertaken with our Finance Service to seek approval for this. This will take time to affect our statistics, however.

The percentage of former tenant arrears (Indicator C7) decreased to 0%, down from 18.26% in 2023/24. This reflects the fact that no write-offs were processed during 2024/25, as our focus remained on recovering historic debt where feasible. However, we are

working with Finance Service colleagues to implement a wider and more structured write-off programme in 2025/26. This approach aligns more closely with common practice across the sector and will ensure a more consistent and sustainable focus on current arrears.

"Mandatory" Box

Enhanced information is now required for the area of tenant and resident safety. Specific information is required on the number of properties which failed electrical safety checks and the provision of interlinked heat and smoke alarms, data must also be included to show the number of properties which fell out of compliance during the year. A total of 13 EICRs were out of compliance at some point during the year, one fell out of compliance during the year and 6 remained out of compliance at the end of the financial year – all as a result of other issues. Many of those who had otherwise been out of compliance, were as a result of being purchased during the year. Just one LD2 fell out of compliance during the year and four were non-compliant at year end – again due to other issues preventing works from being undertaken. This included 2 new properties undergoing works, 1 in abeyance due to hoarding and 1 abandonment due to legal issues.

The last full stock condition survey was undertaken in 2007 by Savills, an independent surveyor. The Housing Service intends to undertake a full stock condition survey in 2026/27 and a procurement process is being undertaken accordingly. It is anticipated that the stock condition survey will be undertaken over a period of around 3 years.

We will continue to maintain ongoing evidenced assessment of at least 10% of total stock per year following the conclusion of the full stock condition survey.

Currently work is being undertaken on internal processes for assessing SHQS compliance to ensure we have appropriately robust written procedures and that these are undertaken and appropriately evidenced by Building Inspectors for all void properties. A contract has been issued in order to ensure that current compliance with interlinked smoke alarms to LD2 standard can be fully evidenced.

As at 31 March 2025, the Council held 1,045 properties which were in scope for the Scottish Housing Quality Standard (SHQS).

One-criterion fails: A total of 40 properties failed on a single SHQS criterion (3.83% of total stock). Of these, 37 relate to Energy Performance Certificates (EPC), 1 relates to LD2 smoke and heat alarm compliance, 1 relates to secure common front door entry and 1 relates to rising or penetrating damp.

Two-or-more-criteria fails: A further 5 properties fail on two or more SHQS criteria (4.31% of total stock). These include combinations such as EICR (electrical installation condition reports), LD2 alarms, bathroom standard and lead-free pipework.

In addition, 11 properties are recorded as being in abeyance, and 8 are recorded as exempt. The exemptions consist of three former schoolhouses for which formal Committee approval has been given for disposal once they become vacant, and one

property where legal constraints prevent the necessary compliance works from being undertaken and four where disproportionate costs are stopping compliance works.

These figures represent our final reported position for year-end, following a comprehensive internal review and a 9-month data audit conducted by Scotland's Housing Network / CD Consultancy in 2025/26. As part of this process it was identified that a number of properties had previously been recorded as exempt without fully meeting the criteria outlined in the ARC Technical Guidance. These cases have since been reviewed and reclassified to ensure the return is fully compliant. The total number of properties reported excludes those considered out of scope.

Annual Report for Tenants

The annual report for tenants will be produced by 31 October 2026 as required by the Scottish Housing Regulator. This will include key information which is of interest to tenants.

The Council has a joint Residents' Panel with Orkney Housing Association Ltd which consists of tenants / residents of both organisations. They will be asked for their views on the Annual Report ahead of publication and their views will be taken into account in producing the final document. The Council includes a section in the Annual Report which encourages feedback from tenants more generally on how they feel about the report and the information in 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 wholescale tenants' satisfaction survey every three years. This was undertaken most recently in April 2026 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 which underpins 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 wholescale 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 stock quality and tenant and resident safety where they have indicated they wish to engage with the Council.

Specifically, they will engage with Orkney in relation to the following areas:

- The Scottish Housing Regulator's Engagement Plan states that in January 2023, the Council advised the Scottish Housing Regulator that it had identified weaknesses in the quality of the evidence underpinning the data used to report on Scottish Housing Quality Standard (SHQS) compliance. In December 2023 the Council confirmed that the SHQS data remained unvalidated, and that there were inaccuracies in the data held. The Council advised it is progressing an improvement plan to address these weaknesses.
- The Council last carried out a stock condition survey in 2007. It will undertake a stock condition survey starting from 2026/27 which will fully assess SHQS compliance in all of its homes. Until then, it will continue to perform SHQS checks to validate its data.
- The Engagement Plan further states that in January 2025, the Council told them that a number of planned legionella risk assessments had not been completed. The Council investigated this and found that it had only completed legionella risk assessments for a small number of its homes. The Council is planning to carry out legionella risk assessments in all of its homes.

Accordingly, the Council must:

- Send the Scottish Housing Regulator information required in relation to its stock condition survey and approach to asset management.
- Provide regular updates on progress to validate and improve the quality of its data used to report compliance with the SHQS and send monthly updates on its progress with completing legionella risk assessments and any required actions in its homes.

The position relating to the other areas referred to above, is outlined at the relevant parts of this annex.

Annex 2: Assurance Action Plan

Assurance and Notification

Requirement.	Who.	When.	RAG.	Comments.
Prepare an Annual Assurance Statement in accordance with guidance.	Head of Strategic Housing, Housing Operations and Homelessness and Data Analysts.	October 2026.	Green.	Committee report and appendices to be presented to Education, Leisure and Housing Committee on 9 September 2025.
Submit Annual Assurance Statement to Scottish Housing Regulator between April and October each year.	Data Analysts.	October 2026.	Green.	On target to be submitted by October 2026.
Make Annual Assurance Statement available to tenants and other service users.	Data Analysts and Tenant Participation Officer.	October 2026.	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 Strategic Housing, Housing Operations and Homelessness 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	Head of Strategic Housing, Housing Operations and Homelessness and Team	Ongoing.	Green	In general compliance with our legislative duties links to Standard 1.5 of National Standards for Information and Advice Providers. We were re-accredited by the Scottish Legal Aid Board during 2022 and

Requirement.	Who.	When.	RAG.	Comments.
and human rights, and tenant and resident safety.	Manager (Maintenance and Heritage).			are scheduled for re-accreditation during 2026/27. Evidence includes a broad range of Council corporate policies including the Health and Safety Policy; Policy on Unacceptable Actions and Challenging Behaviour by Service Users and Complainants; The Role of Customer Service Advisers and All Staff Using the Customer Services Facility; Housing Services' Staff Training and Development Policy; Library Procedure for Housing Services; staff training logs and internal portal which includes a broad range of information on corporate policy areas. Staff management processes are in place across Housing Services including induction, regular one to ones in line with the Line Management Policy and all staff are required to complete the Personal Development Award for Advisors with Shelter at the next intake after taking up post. In addition, structures such as qualified housing officer are in place to encourage housing staff to complete a housing qualification.

Requirement.	Who.	When.	RAG.	Comments.
				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 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 Scottish Federation of Housing Association Limited'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. As regards tenant safety, specifically in relation to the points outlined in the Scottish Housing Regulator's guidance of summer 2023 and updated in March 2025: • Gas safety is not applicable as Orkney has no mains gas;

Requirement.	Who.	When.	RAG.	Comments.
				• As regards electrical safety, we have in place a 5 yearly rolling programme to carry out EICRs and address any remedial works identified from them. An issue arose which affected this in December 2022 and by 31 March 2025 just 9 properties required to have an EICR completed. As at 31 March 2026 our 5 year rolling programme for EICR is in place, up to date and routinely monitored. 6 EICRs remained to be completed, all properties had other issues making completion difficult. • Fire safety - We are also working through a programme of implementing the residual aspects of our contract on interlinked smoke alarms. At 31 March 2026, just 4 properties require LD2s to be fitted. Again, all are properties where there are other issues impacting on the ability to complete the works. These include an abandonment in a remote location, legal issues and hoarding issues affecting the tenant. We also

Requirement.	Who.	When.	RAG.	Comments.
				have a total of 588 properties where a contract is in place to ensure the evidence that LD2 has been fitted has been obtained – note this is specifically different to the fitting of LD2. As at 31 March 2026, 68 of the original 588 properties remained where evidence required to be collected. By 16 July 2026 a total of 33 remain outstanding (92% completion) and currently arrangements are being made with the tenants to ensure access can be facilitated. • Water safety – we have entered into a contract with a contractor who will undertake legionella risk assessments across all of our housing stock. A plan has been developed and implementation began during 2025/26. As at 16 July 2026, 627 risk assessments have been completed which equates to 60% of our stock. • Asbestos – The amount of asbestos in our properties is low and is largely

Requirement.	Who.	When.	RAG.	Comments.
				confined to artex ceilings, external fabric such as soffits, roof sheeting etc, that have been surveyed in accordance with the Control of Asbestos Regulations 2012. • Our asbestos records are held on an external online platform. This is fully accessible to our contractors and allows us to track users access. Details are held on when the property was last surveyed, updates carried out as well as if any asbestos containing materials were identified or removed. The data is updated as asbestos is managed / removed, and historical data maintained. During 2026/27 we have procured a new asbestos contactor and the contract covers a three year term. The new contractor is underway with completing surveys locally. In 2023/24, 4 asbestos surveys required to be completed and 3 were completed accordingly. Access issues affected the fourth and attempts to gain access continue. The property

Requirement.	Who.	When.	RAG.	Comments.
				concerned was previously within our stock, so historic records exist. Some additional properties purchased during 2024/25 require asbestos surveys and accordingly a total of 8 require to be completed in 2025/26. This had risen to 11 by 2025/26, the increase relating to additional properties purchased. Appointments for access have been set up with tenants so that the contractor can undertake the surveys between 5th and 7th August 2026. • The duty to manage asbestos does not apply to domestic properties, (but common areas are covered) however we are responsible for maintaining the buildings' structure and are considered duty holders under the Control of Asbestos Regulations (CAR). • Radon – we previously carried out radon gas testing to 56% of our properties which generated remedial works to 18 properties that have been

Requirement.	Who.	When.	RAG.	Comments.
				subsequently completed. The survey data and remedial actions are captured and maintained in a property tracker held by the Council. • The contractor which undertook the work 10 years ago is no longer in business. In June 2026 a Radon Contractor was contracted - (Radon Scotland) who will begin work later in 2026. • The data will be picked up from 10 years ago with any properties situated in areas of high readings revisited along with a sample of other areas. • Damp and mould – a policy on damp and mould was approved by our Education, Leisure and Housing Committee in September 2023 and relevant Council staff were trained accordingly. Our recording and monitoring processes were enhanced (and continue to improve and develop) to allow focused measures to be implemented to address cases of damp and mould in our social housing.

Requirement.	Who.	When.	RAG.	Comments.
				Where damp and mould has been identified we have put in place joint visits, between Building Inspectors and Housing Officers, to provide our tenants with technical and practical assistance and guidance to address the issue. Where fabric issues have been identified as the cause, remedial works have been carried out. • Damp and mould reporting was introduced as a new reporting requirement for 2025/26. During the year, 44 damp and mould cases were resolved, comprising 33 condensation cases, 2 structural cases and 9 cases attributed to other causes. The average time taken to resolve cases was 28.86 working days. Resolution times include delays where access had to be arranged with tenants. All reported cases involved a joint inspection by a Housing Officer and Building Inspector to identify the underlying cause and agree the appropriate remedial works. Follow-up visits are normally arranged approximately six months after

Requirement.	Who.	When.	RAG.	Comments.
				completion to ensure the issue has been satisfactorily resolved. At 31 March 2026, there were 9 open damp and mould cases, all of which were being actively managed. We will continue to develop our recording and monitoring arrangements to ensure consistent application of the Scottish Housing Regulator's Technical Guidance and to support continuous service improvement. • Tenants are provided with clear and concise advice on damp and mould at tenancy signup and whenever damp and mould issues are identified within existing properties. The aim is to minimise the occurrence of these issues wherever possible and to ensure that any instances that do arise are addressed promptly and effectively. • On 6 October 2026**,** the Investigation and Commencement of Repair (Scotland) Regulations 2026 (Awaab's Law) comes into force, establishing new requirements for the investigation,

Requirement.	Who.	When.	RAG.	Comments.
				categorisation and remediation of damp and mould issues. • In line with forthcoming legislation, all reported cases are prioritised for investigation within 10 working days of identification, with tenants receiving a written statement of the findings within 3 working days of the investigation's conclusion. Any necessary remedial works will commence within 5 working days of the investigation being completed. • This approach ensures compliance with the legislative requirements while also enabling remedial action to be taken as quickly as possible, helping to safeguard tenants' health, wellbeing and enjoyment of their homes. Where health risks are identified; proactive inspections of similar property types or neighbouring homes are undertaken. Where a case is found, data from other relevant cases is used to inform

Requirement.	Who.	When.	RAG.	Comments.
				targeted investment in extractor fans, insulation upgrades and cold-spot treatment etc. This approach ensures a swift response, improvements to the consistency of monitoring processes and use of data to reduce the risk of repeat issues for tenants. • Lift safety – this is not applicable in an Orkney situation as the Council has no social housing which is fitted with lifts. Going forward revised structures will be implemented around monitoring of preventative, protective maintenance.
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.	Head of Strategic Housing, Housing Operations and Homelessness / Head of Property, Asset Management and Facilities and Team Manager (Maintenance and Heritage).	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 the Health and Safety Executive, immediate steps would be taken to address the issue, and the Scottish Housing Regulator would be advised accordingly. We have policies covering issues such as Asbestos and procedures in place regarding Radon / Legionella etc. Our

Requirement.	Who.	When.	RAG.	Comments.
				Infrastructure and Organisational Development Directorate undertakes property inspections and ensures properties are fitted with interlinked smoke alarms etc. Housing Services has quality assured the data on checks to evidence compliance with the Scottish Housing Quality Standard.
Make Engagement Plan easily available and accessible to tenants and service users, including online.	Head of Strategic Housing, Housing Operations and Homelessness and Data Analysts.	May 2026.	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 Strategic Housing, Housing Operations and Homelessness 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 Strategic Housing, Housing Operations and	May 2026.	Green.	Submitted by 31 May 2026.

Requirement.	Who.	When.	RAG.	Comments.
	Homelessness and Data Analysts.			
Involve tenants, and where relevant service users, in the preparation and scrutiny of performance information. • 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.	• 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.
Report performance to tenants and other service users no later than October each year: • 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,	Head of Strategic Housing, Housing Operations and Homelessness 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 feedback from tenants more generally on how they feel about the report and the information on it.

Requirement.	Who.	When.	RAG.	Comments.
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.				
Make Scottish Housing Regulator report on our performance easily available to tenants including online.	Head of Strategic Housing, Housing Operations and Homelessness 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 Regulator's leaflet, available to our tenants.	Head of Strategic Housing, Housing Operations and Homelessness 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 Manager (Housing Strategy, Development and Data).	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 (Housing Strategy, Development and Data).	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 Strategic Housing, Housing Operations and Homelessness 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

Requirement.	Who.	When.	RAG.	Comments.
				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 issues properly when making decisions, in the design and review of internal and external policies, and in our day to day service delivery.	Senior Management Team of the Council.	In place.	Green.	• All policies within Housing Services contain a section on equalities. • 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 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.

Requirement.	Who.	When.	RAG.	Comments.
				• Committee reports on policy matters all contain a section on equality so this is mainstreamed. • Completion of equality impact assessments is standard. • Island communities impact assessments are undertaken as required. • The Council monitors its website and ensures it meets website accessibility requirements. • The Council employs a specialist equalities officer to ensure compliance. • Housing staff and staff within our Infrastructure and Organisational Development Service received refresher training on equalities in the autumn of 2023.
Collect data relating to protected characteristics for existing tenants, new tenants, people on waiting lists and elected Members and staff.	Head of Strategic Housing, Housing Operations and Homelessness	In place.	Green.	• Equalities criteria do 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

Requirement.	Who.	When.	RAG.	Comments.
				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 Human Resources Service collect information relating to 9 protected characteristics for staff when they apply for any post when they initially come into the organisation or where an internal application is submitted. Updates are requested through the MyView portal and annual communications are issued to remind staff to update details. The 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 Strategic Housing, Housing Operations and Homelessness.	In place.	Green.	• Equalities monitoring information is collected for people who apply as homeless. • Our homelessness interview form has been updated to include all 9 protected characteristics.

Requirement.	Who.	When.	RAG.	Comments.
Collect data on protected characteristics of people who use our Gypsy / Traveller services.	N/A.	N/A.	N/A.	N/A.