Housing, Homelessness and Fair Work Committee

10.00am, Thursday, 4 November 2021

The City of Edinburgh Council's Annual Assurance Statement on Housing Services

Executive/Routine	Executive
Wards	All
Council Commitments	

1. Recommendations

1.1 Housing, Homelessness and Fair Work Committee is asked to approve the City of Edinburgh Council's Annual Assurance Statement on housing services and Assurance Statement Summary of Compliance for formal submission to the Scottish Housing Regulator (SHR).

Paul Lawrence

Executive Director of Place

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Report

The City of Edinburgh Council's Annual Assurance Statement on Housing Services

2.   Executive Summary

2.1   The Scottish Housing Regulator (SHR) requires all social landlords to prepare and publish an Annual Assurance Statement (AAS) and Assurance Statement Summary of Compliance to confirm to their tenants and the SHR that they are meeting the requirements of the Regulatory Framework. The deadline for submission is 31 October each year.

2.2   The AAS confirms where the Council meets the required standards and outcomes. It also provides information on areas of improvement and management actions being taken to ensure compliance. The draft AAS for the City of Edinburgh Council is attached in Appendix 1 for Committee approval. Once approved, the AAS will be published on the SHR website.

3.   Background

3.1   The Housing (Scotland) Act 2010 sets out the requirement for a social housing charter and the statutory objectives, functions, duties and powers of the SHR.

3.2   The Scottish Social Housing Charter describes the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The SHR is the regulatory body whose statutory objective is to safeguard and promote the interests of current and future tenants, people who are homeless, factored owners and Gypsy/Travellers.

3.3   All Scottish social landlords are required to report performance to the SHR through the Annual Return on the Charter (ARC) that must be submitted by the end of May each year.

3.4   Landlords provide information across core housing service performance indicators, contextual data sets and performance against Energy Efficiency Standard for Social Housing (EESSH) delivery indicators. Performance data is based on the 12-month period, up to the 31 March of the year of submission.

3.5   The SHR monitors, assesses ARC returns, reports and intervenes (as appropriate) on social landlords' performance of housing activities. Individual

Engagement Plans are normally published for each landlord which focus on areas for improvement. Due to the Covid-19 pandemic, the SHR did not issue engagement plans for the period 2020/21.

3.6 The current regulatory framework came into force in April 2019 and requires all Scottish social landlords to submit an AAS confirming that they comply with the relevant requirements of Chapter Three of the Regulatory Framework.

3.7 The AAS must reflect individual landlord's operating context. The SHR published advisory guidance in August 2020 to assist landlords to adapt their approach to the AAS to reflect the impact of the Covid-19 pandemic and this remains in place for the 2021 AAS.

3.8 As the Covid-19 pandemic continues to impact on social landlords and the services they provide to tenants the SHR issued additional guidance to advise landlords that this year's AAS should identify any non-compliance with regulatory requirements directly due to Covid-19 as distinguished from non-compliance for any other reasons.

3.9 The Council maintains regular dialogue with the SHR on areas of challenge and improvement to ensure services are delivered in accordance with legislation, regulatory standards and best practice guidance.

4. Main report

4.1 Alongside meeting Charter requirements and reporting on performance indicators to the SHR and tenants, social landlords are required to prepare and publish an AAS to confirm to their tenants and the SHR that they are meeting regulatory requirements.

4.2 These requirements are part of the overall regulatory oversight that the SHR has of social landlords; the documents must be made available to tenants and other service users and are published on the SHR website.

4.3 As the governing body for Housing Services, the Housing, Homelessness and Fair Work Committee is required to approve the City of Edinburgh Council Assurance Statement and an Assurance Statement Summary of Compliance (Appendix 1) for submission to the SHR.

4.4 Essential housing services have been maintained for tenants during the Covid-19 pandemic. The lockdown measures have however impacted on some areas of service that had to be revised or, in some cases, suspended for a short time to ensure the safety of tenants, other citizens and Council employees.

4.5 Where services continued to be delivered, or were reinstated following a period of time, safe working practices were put in place. In revising processes for safe working, the Council has followed Scottish Government (SG) and Public Health Scotland guidance and account was also taken of relevant regulatory and best practice guidance.

4.6   In response to the Covid-19 pandemic, the SHR made temporary changes to its regulatory framework in 2020. The annual engagement plan process was suspended for a year and a monthly summary performance return introduced covering key areas of housing service more likely to be impacted by the Covid-19 pandemic.

4.7   This included rent collection, homeless lets and temporary accommodation services. Since the start of 2021/22 the SHR Covid-19 performance information has been changed to a quarterly return and the areas of landlord services being monitored have been broadened to include information on rent loss due to homes being empty/re-let, direct housing payments (Universal Credit, Housing Benefit and Discretionary Housing Payments) and letting times.

4.8   The SHR scrutiny on performance for ARC returns for 2019/20 was less comprehensive than would normally be the case due to a shift in focus to monitoring how landlords had responded and adapted during the Covid-19 pandemic. This included requests for updates on the number of properties with outstanding annual gas safety checks and regular updates on the homeless response.

4.9   The SHR has now published the 2021/22 engagement plan for the City of Edinburgh Council and the SHR's engagement with the Council will continue to focus on services for people who are homeless or at risk of becoming homeless.

4.10   The most recent City of Edinburgh Council Best Value Assurance Report, prepared by the Accounts Commission and published in November 2020, noted examples of the Council understanding where improvements are required and taking action to address areas of lower performance through service improvement plans as in waste, roads and housing services. The improvement plan for housing was noted as being recent but data suggested that there were initial signs of improvement.

4.11   Updates on the Housing Service Improvement Plan (HSIP), Repairs Improvement Plan, Gas Service Improvement Plan and the Rapid Rehousing Transition Plan (RRTP) were considered by Committee in June 2021.

4.12   The SHR recognises that the Covid-19 pandemic significantly impacted services provided in 2020 and will continue to do so during 2021. The SHR will continue to monitor performance impacts through the quarterly Covid-19 return, assess impacts and report on how local authorities are managing.

4.13   Regular dialogue will be maintained with the Council on the areas covered in the engagement plan and on the HSIP workstreams as services continue to adapt and move forward from the challenges of the Covid-19 pandemic.

Performance 2020/21

4.14   The annual ARC performance return to the SHR and has been completed each year since 2013/14. The SHR uses the ARC to compare landlord performance in meeting Scottish Social Housing Charter outcomes.

4.15 Significant changes were made to the Charter in 2018, including the introduction of the AAS followed by the introduction of new and revised performance indicators in 2019/20.

4.16 Comparing performance with 2019/20, the following areas of Council service have been impacted most significantly due to the Covid-19 pandemic and the implementation of safe working. The SHR has instructed landlords to identify these areas as part of their AAS.

4.16.1 The average length of time taken to complete emergency repairs increased from 5.0 to 10.3 hours: Since the first lockdown in March 2020, the repairs service revised processes for safe working and focussed service delivery on critical and essential repairs to help support vulnerable tenants. The average time to complete repairs has increased due to the additional time of around 15 minutes (on average) to complete jobs while enduring safe working. In addition, different jobs are included in calculating this indicator during the Covid-19 pandemic;

4.16.2 The percentage of anti-social behaviour cases reported as resolved dropped from 89% to 75.7%: In line with SG lockdown measures the Family and Household Support Service switched to a home working model in March 2020. Other restrictions constrained the usual approaches used to investigate anti-social behaviour and where applicable to take formal action due to courts not operating during periods of lockdown. Complaints received by the service from residents dissatisfied with a perceived lack of action on their cases increased three-fold between December 2020 and March 2021;

4.16.3 The average time to complete applications for adaptations increased from 167 to 389 days: The adaptions service was impacted by the difficulties in accessing people's homes safely to carry out the required works during the Covid-19 pandemic. Occupational Therapy assessments for properties were only undertaken for urgent and critical cases. Safe access to homes where households are often more vulnerable to assess, and complete adaptation work is increasing with the easing of lockdown measures. A revised approach to tendering is also being put in place to upscale capacity to progress frequently required adaptation types including wet floor showers and ramps;

4.16.4 Percentage of court actions initiated which resulted in eviction dropped from 15% to zero: In line with the overall focus on the safety and wellbeing of tenants during the pandemic and SG guidelines, there were no evictions during 2020/21;

4.16.5 Rent collected as a percentage of total rent due reduced from 99.6% to 96.8% and gross rent arrears as a percentage of rent due increased from 8.6% to 11.1%: The financial impact of the pandemic on households and restrictions on formal debt recovery measures impacted on rent collection. The rent collection service was maintained throughout lockdown to provide

reassurance, advice and assistance to tenants and to maintain income collection to the Housing Revenue Account. The overall approach has continued to be to support tenants to remain in their homes; and

4.16.6 <u>The average length of time taken to re-let properties in the last year increased from 29 to 64 days</u>: Advertising of homes was suspended from the start of lockdown to the end of June 2020 while the Council and partner landlords revised processes to allow safe viewing, tenancy sign-up and essential gas/electrical safety checks to enable households to move into new homes. Safe working practices have meant longer timescales to complete repairs and re-let empty homes. Contractor capacity and adherence to safe working guidelines have also impacted where major/structural works or investment in improvements were underway or required to bring homes up to a lettable standard.

4.17 Notwithstanding the above challenges brought about by the Covid-19 pandemic, staff have worked throughout, on the frontline and homeworking, with a strong emphasis on tenant health and safety, maintaining core services and proactively contacting tenants to provide support and reassurance.

Gas servicing

4.18 Covid-19 significantly impacted gas servicing in Edinburgh with no access to homes where people were shielding and lockdown restrictions in place until March 2021. A Gas Service Improvement Plan to build on and improve the Council's approach to gas safety was presented to the Governance, Risk and Best Value Committee on 23 March 2021 and subsequently referred to the Housing, Homelessness and Fair Work Committee on 3 June 2021. Good progress has been made, as previously reported, which is summarised and updated below:

4.18.1 CORGI have reviewed Housing Property's policy, procedures and processes in relation to all aspects of gas;

4.18.2 The Covid-19 risk plan has been reviewed and gas forced entry has been safely reintroduced. The percentage of 'in date' gas services completed and scheduled by mid-August is over 98%;

4.18.3 CORGI training on the most up to date Gas Safety (Installation and Use) Regulation has been delivered to all gas engineers and team leaders;

4.18.4 Team leaders have also enrolled on an 18-month training programme, facilitated by CORGI, on level 4 Gas Safety Management in Social Housing;

4.18.5 A suite of specific gas meetings has been set up and embedded as business as usual, including e.g. team meetings and toolbox talks; and

4.18.6 An initial assessment has been completed by CORGI and a plan is in place for Housing Property to become CORGI Gas accredited.

Repairs

4.19 Improvements to the repairs service is a key workstream in the agreed [HSIP](). A number of actions have been identified and work is being taken to implement these but monitoring and analysis of service performance is ongoing to ensure the effectiveness of changes being implemented can be measured and data can be used to inform work with tenants on other areas of service for improvement.. With the focus on critical and emergency repairs during the Covid-19 pandemic, the Council has not been fully compliant in meeting usual repair standards during 2020/21.

4.20 Key improvements are being introduced to simplify and streamline the service as well as improve communication with tenants. Training and support are also being provided to staff to ensure that revised processes and IT systems are fully embedded. These are at various stages of development and implementation and include:

    4.20.1 The roll out of digital improvement projects to address constraints identified in current IT systems;

    4.20.2 An improved process for undertaking repairs satisfaction surveys to increase the measurement of tenant satisfaction indicators to support identification of issues, performance trend monitoring and to assess the effectiveness of improvement actions;

    4.20.3 A revised process for managing issues of dampness, mould and condensation, focusing on enhanced tenant communication throughout the process;

    4.20.4 Introducing a complaints resolution team, to seek to resolve complaints at an initial stage, and a process for in-depth analysis of a sample of escalated complaints to gain a full understanding of what went wrong in these cases to inform recommendations for improvement;

    4.20.5 Text messaging to provide updates for tenants on repairs appointments and arrival times for operatives; and

    4.20.6 A Remote Assist Platform to enable tenants to receive basic guidance (where appropriate) from an operative via video call.

Homelessness

4.21 The Council's Homelessness Service continue to be an area of scrutiny for the SHR. The current engagement plan advises that the SHR will continue to monitor information on homelessness in the Council's Covid-19 quarterly returns, in particular the impact on outcomes for people who are threatened with or experiencing homelessness, and how the Council is working with its housing association partners to provide accommodation.

4.22 The engagement plan notes that, in 2019/20, the Council did not offer temporary accommodation to people assessed as homeless in all cases when it had a

statutory duty to do so and the Council's reported figure for breaches of the Unsuitable Accommodation Order was around 375 occasions.

4.23   In 2020/21 the Council did not offer temporary accommodation to homeless people in all cases when it had a statutory duty to do so and the Council breached the Unsuitable Accommodation Order on 16 occasions, a significant decrease from 2019/20.

4.24   New legislation in Scotland will extend the Unsuitable Accommodation Order to all homeless households, meaning that anyone staying in accommodation deemed as 'unsuitable' for more than seven days will constitute a breach of the Order. In Edinburgh this will mean that shared houses and bed and breakfast accommodation will be deemed unsuitable.

4.25   The Extension of the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004 came into force on 1 October 2021. It is estimated that there were over 1,000 households in Unsuitable Accommodation on commencement.

4.26   The SG requires all local authorities to have a RRTP. The second iteration of the Council's plan was agreed at Committee on 18 September 2020 and submitted to the SG, with the annual update on actions agreed by Committee on 3 June 2021 and subsequently submitted to the SG.

4.27   The RRTP is set around four strategic objectives, including a plan to transform temporary accommodation stock. This sets out how the Council will meet the requirements of the Unsuitable Accommodation Order over a five-year period, noting the challenges this presents in Edinburgh particularly if the Covid-19 pandemic continues, with rising numbers of households in temporary accommodation. This includes increasing the supply of suitable temporary accommodation including Private Sector Leasing flats, Home Share and Community Hosting.

4.28   The plan also sets out actions relating to preventing homeless, supporting people to access settled accommodation as quickly as possible and reducing the number of people sleeping rough in the city.

4.29   The number of households accessing temporary accommodation has increased during the period. This has included accommodating a significant number of people who may have No Recourse to Public Funds or who would be ineligible for service, in response to public health requirements.

4.30   Due to the significant demand for social housing in Edinburgh the average time to get a home in Edinburgh with silver homeless priority awarded under the statutory reasonable preference categories for allocations is around 435 days.

4.31   The Council is continuing to work closely with the SHR to review and develop services to tackle homelessness and rough sleeping in the city and ensure robust governance, risk and assurance across the service as a whole.

Protected characteristics

4.32 The Assurance Statement guidance requires all landlords to collect data relating to the protected characteristics of existing tenants, new tenants, people on waiting lists, governing body members and staff, people who apply to the Council as homeless and those who live on the Gypsy/Traveller site.

4.33 It will be important to balance people's right to privacy with the information that they are willing to share. Landlords were initially expected to meet this duty from 2020/21 onwards. At that time the SHR had anticipated that the guidance on equalities data collection would have been available to landlords by now; however, the impact of the Covid-19 pandemic slowed the production of that guidance.

4.34 The guide for social landlords was published at the end of August 2021. The guide is advisory, and social landlords have flexibility regarding how they establish and develop their equality data collection methods to ensure they reflect organisational needs, local context and to consider how equalities data can be used to support landlords in their work to comply with equalities and human rights requirements.

4.35 On 20 April 2021, the Policy and Sustainability Committee agreed an Equality and Diversity Framework – 2021-25, which includes a new set of equality outcomes and mainstreaming actions across key areas of the Council's work.

4.36 The Framework was developed in partnership with NHS Lothian, Midlothian Council, West Lothian Council, Midlothian Health and Social Care Partnership and the East Lothian Integration Joint Board. It reflects a shared commitment to prioritising and addressing inequality while recognising that residents often rely on support from across the range of services. The Framework is a commitment to improving equality, inclusion and diversity across Edinburgh.

Housing Service Improvement Plan

4.37 The Council continues to progress actions set out in the HSIP, which was introduced in 2019 to increase customer satisfaction, improve operating performance and reduce costs. The HSIP is particularly focused on developing more responsive and accessible services for tenants, with housing teams working within an operating model that is flexible and fit for the future.

4.38 The HSIP is driving improvements across a number of workstreams, centred around digital improvements, enhancements to customer communication, service resilience and efficiencies.

4.39 The programme faced some delays in 2020/21 due to Covid-19 and some key programme resources were temporarily re-aligned to prioritise urgent resilience work and maintain essential frontline service delivery, resulting in planned programme activities and recruitment being suspended for a five-month period.

4.40 Since Autumn 2020, there has been an increased focus and assignment of resources across the HSIP workstreams. The HSIP aims to further enhance tenant and staff engagement, recognising that ongoing dialogue is key to ensure

tenants and staff are involved in shaping improvements. This has included setting up a new online tenant group to focus on service improvement.

5. Next Steps

5.1 If agreed by Committee, the City of Edinburgh Council Assurance Statement and an Assurance Statement Summary of Compliance (Appendix 1) will be formally submitted to the SHR for publication.

6. Financial impact

6.1 There are no adverse financial impacts arising from this report. Work on assurance will assist with ensuring best value for tenants and other service users.

7. Stakeholder/Community Impact

7.1 There are no adverse stakeholder/community impact implications arising from this report.

7.2 The ongoing partnership with ETF has assisted with assuring performance throughout the Covid-19 pandemic.

8. Background reading/external references

8.1 Scottish Housing Regulator- Regulatory Framework.

8.2 Scottish Housing Regulator- Annual Assurance Statement Guidance.

8.3 Annual Assurance Statements: advice for landlords on temporary changes to our regulatory approach in response to Covid-19 | Scottish Housing Regulator.

9. Appendices

9.1. Appendix 1 - City of Edinburgh Council Assurance Statement 2021 and Assurance Statement Assessment Summary.

City of Edinburgh Council Assurance Statement

31 October 2021

The City of Edinburgh Council confirms to its tenants and the Scottish Housing Regulator that it complies with the duties, obligations and responsibilities placed on landlords by legislation and through statutory guidance. The Council is working towards consistently delivering the outcomes set out in the Scottish Social Housing Charter for tenants, people who are homeless and others service users.

The exceptions to this duty during the past year have been:

Gas Servicing

The Covid-19 pandemic significantly impacted gas servicing in Edinburgh with no access to people shielding and lockdown restrictions in place until March 2021. A Gas Service Improvement Plan to build on and improve the Council's approach to gas safety was presented to the Governance, Risk and Best Value Committee on 23 March 2021 and referred to the Housing, Homelessness and Fair Work Committee on 3 June 2021.

Work continues on this programme to ensure that gas servicing compliance is fully implemented within the previously agreed timescales.

Repairs

Repairs is a key workstream in the Council's Housing Service Improvement Plan and progress is being made on a range of initiatives to improve the service.

With the focus, during the pandemic, on critical and emergency repairs, the Council has not been compliant in meeting all repair standards during 2020/21. As Covid-19 restrictions have eased, and the Council's repair service is being phased back into full service, some tenants and tenant representative groups have repeated concerns over the standard of service being received.

Senior officer scrutiny is in place for monitoring and analysis of service performance, to ensure implementation of service improvements, and to ensure that effective training is in place to support staff through the changes.

As the governing body for Housing Services, the Council's Housing, Homelessness and Fair Work Committee will continue to scrutinise performance and implementation of improvements in the repairs service through regular reporting on the Housing Service Improvement Plan.

Homelessness

Providing suitable accommodation for homeless people continues to be a challenge in Edinburgh and the Council has breached the Unsuitable Accommodation Order on 16

occasions in 2020/21. Services for people who are homeless is the focus of the SHR's engagement with the Council and a range of areas for improvement including; actions to increase the stock of suitable temporary accommodation; the expansion of a multi-disciplinary early intervention approach; the development and adaptation of pathways for vulnerable households and at key transition points; and, improvements in access to information on how to access services for people at risk of homelessness are being taken forward to prevent homelessness and reduce the number of people requiring temporary accommodation. Regular updates will be provided to the SHR.

Signed _____

Date of signing _____

Councillor Kate Campbell, Convenor of the Housing, Homelessness and Fair Work Committee

Scottish Housing Regulator (SHR) – Annual Assurance Statement (AAS) Assessment of Compliance

Requirements for All Local Authorities

SHR Requirements	Status	Evidence	Action
Covid-19 – quarterly landlord performance return.		These have been completed as required.	Continue to submit the performance returns to the SHR as required.
Prepare an Annual Assurance Statement (AAS) in accordance with published guidance, submit it to the SHR between April and the end of October each year, and make it available to tenants and other service users.		The Council submits an Annual Return on the Charter (ARC) that sets out performance in delivering the standards and outcomes in the Scottish Social Housing Charter. There is ongoing regular dialogue with the SHR on areas for improvement and the plans in place to address these.	The AAS was submitted to the SHR in draft, pending approval by Committee on 4 November 2021. The Statement was signed off and submitted to the SHR on time in previous years. The autumn edition of the Council tenant newsletter advises tenants how to access the AAS.
Notify the SHR during the year of any material changes to the assurance in our Assurance Statement.		There have been no material changes.	Pre Covid pandemic, the Council met the SHR quarterly. Regular dialogue is maintained and Covid performance returns are now provided to the SHR as required.
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.		Services are delivered in accordance with legislation, regulatory standards and taking account of best practice guidance: • Performance against the Scottish Social Housing Charter Indicators informs areas for service improvement and updates on performance. In addition regular dialogue is maintained with the SHR. This will include areas where performance has been impacted by Covid-19 such as	Improving performance is a key element of workstreams being taken forward under the HSIP. Updates on the HSIP will continue to be provided to Committee on a 6-monthly basis. Plans are in place and work ongoing on providing appropriate accommodation for homeless families

		elements of the repairs service, adaptations, resolution of anti-social behaviour and rent collection.	(through the Rapid Rehousing Transition Plan, informed by the Homelessness Taskforce. Regular reports are provided to Committee). Most recently on 3 June 2021.
		• Internal Audit reviews are carried out across areas of Council practice/governance that will include aspects of the housing service and on service specific responsibilities such as Homelessness Services. Audits are reported to Governance Risk and Best Value Committee and Improvement Plans implemented/actions monitored.	Regular engagement with Scottish Government is taking place on actions being taken by the Council to ensure compliance with the duty to offer temporary or emergency accommodation including increasing the stock of Private Sector Leasing flats, Home Share, and the continued development of Rapid Access Accommodation.
		• The Council does not currently comply with its duty to offer temporary or emergency accommodation for people experiencing homelessness, due to the continued reliance on the use of unsuitable accommodation.	
		• The housing service itself carries out annual reviews on key housing and homeless policies. Assurance is reported to Committee.	
		• Benchmarking of services via Housemark, the Scottish Rent Forum, and Scotland's Housing Network. Audit Scotland's Best Value Assessment report (Nov 20) noted improvement actions for housing under the HSIP.	
		• Strategy and policy reports are approved by relevant committees in accordance with the Council's Governance Framework.	
		• An Equality, Diversity and Rights Framework 2021-25 was agreed by the Policy and Sustainability Committee on 20 April 2021; Integrated Impact Assessments (IIAs) are required for projects and policy changes.	
		• Partnership working in Localities model with Police Scotland, including participation in Multi-Agency Risk Assessment Conferences.	
		• A pilot Mixed Tenure Improvement Service (MTIS) has been set up as part of the wider mixed tenure investment strategy to improve tenant satisfaction with the condition of their homes and support owners carry out essential	

		repairs to their block. A shared repairs app has been developed and publicised to assist private residents in wholly owned blocks to manage communal repairs.	
Notify the SHR of any tenant and resident safety matters which have been reported to or are being investigated by the Health and Safety Executive, or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.		No health and safety matters have been reported to the Health and Safety Executive in the last 12 months.	
Make our Engagement Plan easily available and accessible to our tenants and service users, including online.		Due to the Covid pandemic, the SHR did not produce engagement plans in 2020. The 2021/22 Engagement Plan for the Council is available online.	The autumn edition of the tenants' newsletter will be used to notify tenants how to access the Engagement Plan. Information will also be available on the Council website. Information will also be included in the information pack for households accessing homeless services.
Register all requirements for providing data to the SHR with the ICO's as a purpose for which they are acquiring data under the Data Protection Act 2018.		By law, data controllers must pay a fee to register with the UK Information Commissioner who is the data protection regulator within the UK. The City of Edinburgh Council data controller registration number is Z5545409.	
Submit an Annual Return on the Charter to the SHR each year in accordance with the SHR published guidance.		The ARC has been completed and returned to the SHR each year since 2013/14. The last ARC return was submitted on 31 May 2021 and will be published in due course by the SHR on their website.	Improvements in data collection on repairs through the introduction of Total Mobile is helping to support service improvement and inform future service planning. The Covid-19 pandemic has impacted on progress.
Involve tenants, and where relevant, other service users, in the preparation and scrutiny of		The Covid-19 pandemic has meant a shift to online engagement with tenants. Edinburgh Tenants' Federation (ETF) has been assisting tenants to access the resources and support required to get online and the Council has	The latest Tenant Participation Strategy was approved by the City of Edinburgh Council on 20 January 2020 and an updated Tenant Scrutiny

performance information. We must: • agree our approach with tenants • ensure that it is effective and meaningful – that the chosen approach gives tenants a real and demonstrable say in the assessment of performance • publicise the approach to tenants • ensure that it can be verified and be able to show that the agreed approach to involving tenants has happened • involve other service users in an appropriate way, having asked and had regard to their needs and wishes.	provided four Kindle Fires via community benefits to date with discussions ongoing to access more. All sheltered housing community rooms are being provided with digital equipment for use when Covid-19 restrictions allow. Annual funding provided to ETF and the Neighbourhood Alliance (NA) to support tenant participation and engagement A new grants programme is in place with a maximum limit of £10,000 per application. The new programme will fund groups (that include Council tenants) for digital inclusion projects; health and wellbeing activities; running costs for tenant groups, and initiatives which help local communities tackle the negative effects of the Covid-19 pandemic. No applications were made for funding in 2020/21 but since restrictions have eased, five applications have been received. Utilita community benefits have funded chairs for the Fidra Court Community Café in North West locality; trees in the South West; digital equipment for 13 sheltered housing schemes, and equipment for a Residents' Housing Association in the North East. The introduction of defibrillators outside sheltered housing complexes is being explored. https://theedinburghreporter.co.uk/2021/03/utilita-grants-for-community-projects/ A tenant working group provides tenant input into the annual HRA Budget Consultation. Consultation to update the Tenant Scrutiny Framework with ETF is underway. This is a root and branch overhaul of scrutiny and participation processes that is being independently supported through the Tenant Information Service. An online tenant group has been set up to contribute to the Housing Service Improvement Plan. A programme of research with tenants and other service users is in place to ensure customer insight, this includes an annual tenant survey and regular targeted focus groups. The	Framework is being developed in conjunction with ETF. A root and branch review of the Council's approach is underway. A new and wider grants programme has been implemented, which now includes funding opportunities for health and digital activity. Ongoing discussion with tenants and other service users to ensure that their views inform the development of housing services.

		pandemic has limited this work during the past year, although progress has been made in adapting to online/ telephone formats.	
		Tenants receiving the stair cleaning service were consulted on the approach to a new contract and additional deep cleaning has been included in the specification as a result of their feedback.	
		Consultation is carried out with owners in multi-storey blocks on a regular basis and particularly where major investment work is required. Regular meetings held, and newsletters provided as required.	
		Good progress has been made throughout the pandemic keeping in touch with residents of the Gypsy Traveller site to progress site redevelopment: planning application/building warrant process, procurement and award of contract, with an agreed site start date of 18 April 2022. Project group meetings with residents have resumed via Microsoft Teams.	
Report our performance in achieving or progressing towards the Charter outcomes and standards to our tenants and other service users (no later than 31 October each year). We must agree the format of performance reporting with tenants, ensuring that it is accessible for tenants and other service users, with plain and jargon free language.		An annual performance report is provided to tenants. The report is made available online along with the SHR Landlord Report, Assurance Statement and Engagement Plan. The Tenants' Courier provides information on performance in the autumn of each year. The Courier is posted to all tenants and available online. Following a recent consultation, the majority of respondents wanted to continue to receive written performance reports.	
When reporting our performance to tenants and other service users we must: • provide them with an assessment of performance in delivering each of the Charter		The annual performance report is normally included in the autumn edition of the Tenants' Courier newsletter, which is posted to all tenants and made available online. With last year's reporting deadline extended to the end of December 2020, tenants were notified where they would be able to find the report online or how to get a hard copy. In December	The autumn edition of the Tenants' Courier will include performance information, improvement actions and consultation on how tenants want performance to be reported to them in

outcomes and standards which are relevant to the Council • include relevant comparisons – these should include comparisons with previous years, with other landlords and with national performance • set out how and when we intend to address areas for improvement • give tenants and other service users a way to feed back their views on the style and form of the reporting.	2020 a report on performance for tenants was published on the Council's website.	future. The Courier is posted to all tenants and available online.
Make the SHR report on our performance easily available to our tenants, including online.	The report for 2019/20 report is currently online. The 2020/21 report will be made available online once it has been published.	The Tenants' Courier, delivered to every Council home and available online, will include information on how to access the Performance Report, the Landlord Engagement Plan and the Assurance Statement. The 2020/21 SHR report will also be made available online.
Have effective arrangements and a policy for whistleblowing by staff and elected members, which it makes easily available and which we promote.	The Council is committed to ensuring that any allegations or concerns, past or present, are investigated thoroughly and as quickly as possible. On 15 October 2020, councillors agreed to commission an independent inquiry into the Council's whistleblowing culture. This is being carried out by law firm Pinsent Masons and overseen by an independent chair, Susanne Tanner QC. The inquiry will assist the Council to determine whether a positive whistleblowing culture currently exists within the Council and, if not, why not. Recommendations will also be made on improvements. The Council's whistleblowing policy is available online.	Continue to include in the annual mandatory policy refresh for all staff.
Make information on reporting significant performance failures,	Information was included in the autumn edition of the Tenants' Courier (issued in October 2020), which was	A direct link to the website to report significant performance failures has

including the SHR leaflet, available to its tenants.	🟩	delivered to every Council home and will be repeated in a 2021 edition. The Courier is also published and advertised online.	been provided to tenants along with an extract of the leaflet with tenants advised on ways to access further information.
Provide tenants and other service users with the information they need to exercise their right to complain and seek redress and respond to tenants within the timescales outlined in our service standards, in accordance with guidance from the Scottish Public Services Ombudsman (SPSO).	🟧	The Council's complaint procedure was updated in April 2021 to reflect the revised model complaint handling procedure issued by the SPSO, and updated e-learning training is available for staff. The revised procedure is similar in content to the Council's previous complaints procedure, with elements previously considered as best practice becoming mandatory. Performance on responding to complaints on time continues to improve but the process to update the IT system when the complaint has been responded to is an area for further improvement. An end-to-end review of the tenancy sign up process is underway, a project which had been scheduled for 2020 but was delayed due to the Covid-19 pandemic. This project will review the documentation and information to be provided as part of the sign-up process to focus on essential information, timing for providing this and looking at alternative formats. Information for tenants will also be uploaded online for digital access.	Revised guidance is being provided for staff on requirements for recording/updating complaints on the IT system. Ensure complaint information is provided for all new tenants via tenancy start up packs.
Ensure we have effective arrangements to learn from complaints and from other tenant and service user feedback, in accordance with SPSO guidance.	🟩	Complaints performance data is used to inform service improvement, e.g. the Stair Cleaning Board reviews complaints quarterly to inform discussions and Housing Property hold workshops with tenants who have made a recent repair complaint to help with assessing improvements required. Biannual Updates are provided to committee on the Housing Service Improvement Programme.	A sample of escalated complaints relating to repairs were identified and subject to in-depth analysis to identify lessons learned and recommendations for improvement. These will feed into existing plans for service improvement. A complaints resolution team has been set up to seek to resolve repairs complaints at initial stage, and to track

			complaints that require further escalation.
Have assurance and evidence that we consider equality and human rights issues properly when making all of our decisions, in the design and review of internal and external policies, and in day-to-day service delivery.		The Council has an agreed Equality and Diversity Framework – 2021-25, which includes new equality outcomes and mainstreaming actions across key areas of the Council's work.. The Framework is a commitment to improving equality, inclusion and diversity across Edinburgh. The Council uses Integrated Impact Assessments (IIA) to meet the requirements of the Equality Act 2010, human and children's rights conventions, Fairer Scotland Duty 2018 and the Climate Change (Scotland) Act 2009. 4.13. The IIA process incorporates equality, rights, economic and carbon impact assessments as an integral part of its decision-making process enables the Council to identify and address any unintended consequences of its decisions. The Council participates in an IIA quality assurance group with our partner agencies (NHS Lothian, other Lothian local authorities and Health and Social Care Partnerships) to ensure that the IIA process remains fit for purpose and is effectively used and supported.	Participate in the IIA quality assurance group with partner agencies. Reviewing the process as required Provide joint IIA training for staff with partner agencies. Provide support for Equality, Diversity and Rights Advisors across service areas. Carry out a cumulative IIA on budget proposals each year, to inform the decision of the full Council. Use findings from the process to inform plans and strategies.
To comply with these duties, we must collect data relating to each of the protected characteristics of our existing tenants, new tenants, people on waiting lists, governing body members and staff. We must also collect data on protected characteristics for people who apply to us as homeless and those who live on our Gypsy/Traveller site.		• Information on all the protected characteristics is not asked for in all cases (for example applicants are asked about age, ethnicity and gender of involved parties only). Annually information on the ethnicity of EdIndex applicants is shared with the Edinburgh Partnership Board. In contrast additional data is collected on those who are homeless, but not Council tenants. • Information sharing Protocols are in place for sharing sensitive data (EdIndex, SAVOLO). • GDPR/DPIA is considered for projects. A Council Data Privacy Statement is in place. Use of Mandates for individual cases where required.	The practice guidance from the SHR is awaited before making planned changes to systems/practices to support data collection. The Council will review requirements in line with data protection regulations to ensure a consistent approach to collection, that is both reasonable and relevant. This area is identified for further review and follow on action as required once the scheduled guidance from the SHR on the requirement to collect data on all the protected characteristics is

		• An Equality, Diversity and Rights Framework 201/21 was agreed by Corporate Policy and Strategy Committee in February 2019; Integrated Impact Assessments (IIAs) are required for projects and policy changes.	provided. The guidance has been delayed due to Covid pandemic. The Council is reviewing the practice guidance on equalities data collection from the SHR that was published at the end of August 2021 to ensure a consistent approach to collection on all the protected characteristics, that is both reasonable and relevant. Any necessary updates to systems and data collection practices will be progressed