

# Housing, Homelessness and Fair Work Committee

10.00am, Thursday, 3 September 2020

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

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### 1. Recommendations

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- 1.1 It is recommended that the Housing, Homelessness and Fair Work Committee approves the City of Edinburgh Council Assurance Statement on housing services for submission to the Scottish Housing Regulator (SHR) by annual deadline of 31 October 2020.

**Paul Lawrence**

Executive Director of Place

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# Report

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

### 2. Executive Summary

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- 2.1 The [Scottish Housing Regulator](#) (SHR) requires all social landlords to submit an Annual Assurance Statement, by 31 October each year, providing assurance that their organisation complies with the [relevant requirements of chapter 3 of the Regulatory Framework](#).
- 2.2 The Assurance Statement confirms where the Council meets the SHR required standards and outcomes and provides information on areas for improvement and any associated management actions. Following committee approval, the Assurance Statement is published on the SHR website.

### 3. Background

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- 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](#) (SSHC) set the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The SHR monitors, assesses and reports on the Charter. The SHR's 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 [A Regulatory Framework](#) sets out the approach to regulation. The SHR monitors, assesses, reports and intervenes (as appropriate) in relation to Scottish social landlords' performance of housing activities. The current framework came into force in April 2019 and it requires all social landlords to submit an Annual Assurance Statement providing assurance that their organisation complies with the relevant requirements of Chapter Three of the framework.
- 3.4 All Scottish social landlords are required to report performance to the SHR annually (by 31 May) through the [Annual Return on the Charter](#) (ARC) and to tenants by 31 October (the SHR is consulting on extending the deadline this year due to Covid-19 impact). The SHR analyses each charter return and then

publishes an individual Engagement Plan for each landlord, which focuses on areas for improvement. Due to Covid-19, the SHR is not producing engagement plans in 2020.

- 3.5 Following submission of the Council's 2019 Assurance Statement approved by Committee on [31 October 2019](#), the SHR requested further information and assurance on three areas related to homeless services: how people access the service; temporary accommodation; and outcomes for people who are homeless. The SHR subsequently published the Council's [Engagement Plan](#) on its website noting that the Council has taken steps to improve performance, including improving the quality of the temporary accommodation the Council provides and developing a comprehensive improvement plan to cover all aspects of its homelessness service.
- 3.6 The SHR also sought further information and assurance on the Council's progress towards meeting the Energy Efficiency Standard for Social Housing (ESSH), noting that the Council had achieved 56% compliance. Currently 71% of homes meet ESSH with 86% expected to be compliant by the end of 2020. In addition, the percentage of Council homes meeting the Scottish Housing Quality Standard (SHQS) has increased to 89%.

## 4. Main report

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- 4.1 Alongside meeting SSHC requirements and reporting performance to the SHR and tenants, social landlords must prepare an [Annual Assurance Statement](#) on how they meet (or don't meet) their statutory and legal obligations. These statements are part of the overall regulatory oversight that the SHR has of landlords; they must be made available to tenants and other service users and are publicised on the SHR website.
- 4.2 As the governing body, the Housing, Homelessness and Fair Work Committee is required to approve the City of Edinburgh Council Assurance Statement (Appendix 1) and an Assurance Statement Summary of Compliance (Appendix 2).
- 4.3 The Council assures performance continuously and 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.

### **COVID-19**

- 4.4 During the Covid-19 pandemic the SHR introduced requirements for social landlords to provide monthly monitoring information covering income collection; tenancy turnover/available homes; and homelessness. The Council has submitted the reports as required. In addition, a general service update was submitted at the end of March 2020 outlining all Covid-19 emergency initiatives

being implemented by the Council, including the establishment of the local community resilience centres.

- 4.5 Since the start of the Covid-19 lockdown a number of services provided to tenants had to be revised and, in some cases, suspended for a short time, to ensure the safety of tenants, other citizens and Council employees. During the period since the initial lockdown and the phased easing of restrictions the focus for the housing service has been ensuring the health and safety of tenants, maintaining core services and providing proactive reassurance and contact for tenants. In doing this the Council has followed Scottish Government and Public Health Scotland guidance and taken account of relevant regulatory guidance.

#### **Performance Update 2019/20**

- 4.6 During 2019/20, the Council improved performance in tenancy sustainment, reducing evictions and turnover of properties; adaptation completions; reducing the time to re-let homes and tenancy offer refusals. The areas of challenge remain those already identified within the key workstreams in the agreed [Housing Service Improvement Plan](#) (HSIP).
- 4.7 With regards to the areas for improvement identified by the SHR for homelessness services, there has been success in increasing the number of self-contained flats by 21.7%. This is in recognition that due to the housing market in Edinburgh, the numbers presenting as homeless and the shortage of social housing to meet demand, we have relied on the provision of Bed and Breakfast and shared accommodation. The impact of Covid 19 has however increased the challenge for the city, and whilst we were successful in housing all who required to due to the public health crisis, this does leave Edinburgh with an increased challenge in moving away from bed and breakfast accommodation to using more suitable temporary accommodation. Effort continues to be placed on bringing on more temporary flats and a progress report on the Private Sector Leasing Scheme, which was extended last year, will be brought to the next Committee.
- 4.8 The main aim of the plan is to significantly improve customer satisfaction, operating performance and reduce costs over a three-year period. Based on tenant feedback, six improvement workstreams are being prioritised: in particular repairs and maintenance but also rent collection; lettings; estate management; housing quality; and housing development.
- 4.9 The initial phases of a Total Mobile rollout for repairs have improved efficiency through the introduction of an automated appointment system and mobile working for operatives, which is helping to make the service more modern, accessible and responsive to the needs of tenants. Enhancements are also being made to tenant contact channels, with the introduction of text message alerts and appointment reminders scheduled for implementation autumn 2020.
- 4.10 Wider rollout of mobile working to housing/concierge officers is currently being scoped, along with further improvements to systems, contract management, and back-office functions to drive efficiencies, improvements and savings. Estate

management and digital improvements will be a key focus for the HSIP over the coming year, along with ongoing work to improve the tenant experience of moving in to their home and starting a tenancy.

- 4.11 During the Covid-19 pandemic the Council has maintained an essential repairs service with operatives trained to ensure their own and tenant safety. Gas safety checks have been carried out in line with national industry guidance. At 31 March 2020, 99.18% of homes requiring a gas safety check had received this with the remainder scheduled to follow our force of law procedure in March. In accordance with Scottish Government Guidance forced entries are not currently being carried out. The Council is continuing to prioritise checks where it is safe to do so.
- 4.12 During the Covid-19 pandemic, the Council has used significantly more temporary accommodation in order to support vulnerable people and ensure the spread of the virus is minimised amongst the homeless population. Pre Covid-19, the average number of households in temporary accommodation was 2,035. In July 2020, there were 2,394 households in temporary accommodation. Homeless households are continuing to be prioritised for available social rented housing that is starting to be let again following safe working practices being put in place by the Council and other landlords to let homes safely. Separate reports on the Rapid Rehousing Transition Plan Update and the Homelessness Services Update are also being reported to this Committee.
- 4.13 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. Landlords will be expected to meet this duty from 2020/21 onwards. Further guidance on the requirements will be provided in due course by the SHR.

## **5. Next Steps**

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- 5.1 The approved Assurance Statement will be submitted to the SHR and made available to tenants (online and hard copy provided on request). The SHR will publicise the statement on its website.
- 5.2 The SHR will be updated on progress on any improvement actions at regular meetings held between the Council and SHR.
- 5.3 Regular updates on the HSIP continue to be provided for the Housing, Homelessness and Fair Work Committee.

## **6. Financial impact**

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- 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**

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- 7.1 There are no adverse stakeholder/community impact implications arising from this report. Work on assurance will strengthen tenant scrutiny and approaches to involving tenants and other service users.
- 7.2 The Council's SHR Landlord Performance Report, Engagement Plan and Assurance Statement are available online. The Housing Service's newsletter, the Tenants' Courier, delivered to every tenant, advises where the documents can be found and that hard copies can be provided on request.

## **8. Background reading/external references**

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- 8.1 [www.scottishhousingregulator.gov.uk/for-landlords/regulatory-framework](http://www.scottishhousingregulator.gov.uk/for-landlords/regulatory-framework)
- 8.2 [www.scottishhousingregulator.gov.uk/for-landlords/statutory-guidance/annual-assurance-statement](http://www.scottishhousingregulator.gov.uk/for-landlords/statutory-guidance/annual-assurance-statement)

## **9. Appendices**

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- 9.1 Appendix 1 - City of Edinburgh Council Assurance Statement 2020
- 9.2 Appendix 2 - Assurance Statement Assessment Summary

## **APPENDIX 1**

### **City of Edinburgh Council Assurance Statement**

**31 October 2020**

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

The one exception to this is in relation to duty in relation to homelessness, where the Council is not always able to provide accommodation to those who are statutorily homeless and require it. Although there has been a reduction in failures to accommodate, the Council is seeking to reduce this further. A significant number of these instances relate to approaches to the Council out with normal working hours. To tackle this issue the Council has increased the provision of temporary accommodation, including, specifically, rapid access accommodation which can be accessed twenty-four hours a day. The latest version of the Council's Rapid Rehousing Transition Plan, highlights the need for additional accommodation for those with complex needs to further reduce the number of failures to accommodate. In addition to this, the Council is committed to reviewing its procedures for out of hours approaches and working with civil servants and colleagues in other local authorities to share best practice.

Also, the Council has seen significant number of breaches of the Unsuitable Accommodation Order, where families with children are placed in unsuitable accommodation for more than 7 days. These breaches have reduced in number significantly in 2020. The Council has significantly increased the number of self-contained properties available to tackle this and the upcoming extension to the unsuitable accommodation order and service developments and the transformation of temporary accommodation services will maintain this progress.

A Housing Service Improvement Plan (HSIP) is in place to significantly improve customer satisfaction, operating performance and reduce costs over a three-year period. Based on tenant feedback, six improvement workstreams are being prioritised: in particular repairs and maintenance but also rent collection, lettings, estate management, housing quality and housebuilding. The initial phases of a Total Mobile rollout for repairs have improved efficiency through the introduction of an automated appointment system, which is helping to make the service more modern, accessible and responsive to the needs of tenants

Covid-19 means that 2020 has been and is still being an exceptionally challenging year for landlords bringing significant additional pressures: Services have had to be revised and, in some cases, suspended for a short time, to ensure the safety of tenants, other citizens and Council employees. The Council has been and is following UK and Scottish government guidance and has taken account of updated regulatory guidance. The

Council's focus has been on tackling emergencies and maintaining core services while complying with coronavirus restrictions.

As Convenor of the City of Edinburgh Council Housing, Homelessness and Fair Work Committee, I can confirm that the appropriate evidence to support the level of assurance has been considered and confirmed.

Signed \_\_\_\_\_

Date of signing \_\_\_\_\_

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





## APPENDIX 2

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

## Requirements for All Local Authorities

SHR Requirements	Status	Evidence	Action
Covid-19 - monthly landlord performance return.		These have been completed as required.	Continue to provide the reports to the SHR as required.
Prepare an Annual Assurance Statement 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 Assurance Statement is scheduled to be signed off by Committee on 3 September 2020. The Statement was signed off on time last year. 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-19, the Council met the SHR quarterly. Monthly performance reports 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: <ul style="list-style-type: none"> <li>Internal Audit reviews are carried out on the housing service, most recently on contract management arrangements and processes within Housing Property and Homelessness Services. Audits are reported to Governance Risk and Best Value and Improvement Plans implemented.</li> </ul>	The Council does not currently fully comply with its duty to offer temporary or emergency accommodation for people experiencing homelessness, due to the continued reliance on the use of bed and breakfast accommodation.  Plans are in place and work ongoing to providing appropriate accommodation for homeless families (through the Rapid Rehousing Plan and informed by

- 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. The Council completed a self-assessment in advance of Audit Scotland's Best Value audit, which has now been complete. The Council awaits any Audit Scotland recommendations, which will be taken forward as required.
- 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.
- Strategy and policy reports are approved by relevant committees in accordance with the Council's Governance Framework.
- An Equality, Diversity and Rights Framework 2017-21 was agreed by Corporate Policy and Strategy Committee in February 2019; 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 approved 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.

the Homelessness Taskforce. Regular reports are provided to Committee).

There has been a 21.7% increase in the number of self-contained flats secured since March 2020.

The service is now using 463 CEC, 72 RSL and 632 Private self-contained flats for temporary accommodation.

There are 644 Shared House spaces and 378 Bed and Breakfast spaces, 19 additional hotel bed spaces were acquired during Covid lockdown, enquiries are ongoing to source additional hotel accommodation, now Tourist type accommodations have reopened the service is placing people in Premier Inn/Travelodges etc when there are no alternatives and it is safe to do so.

The service secured an additional 208 flats( 154 from the PRS, 27 from CEC/MMR and 27 from RSL partners, , it is expected another 20 private rented flats will be brought into use in the next 3 to 4 weeks.

The Council is also using 160 Hotel Apartments in the tourist sector.

Home Share where 3 to 5 separate individuals share a property is being successfully trialled with 26 people currently sharing, as more opportunities arise for this type of

			<p>accommodation the service will expand this accommodation option.</p> <p>The PSL and Private Rented Temporary Accommodation(STL/IA) contracts will provide additional flats assisting the Council to meet the Unsuitable Accommodation Order.</p> <p>On 1 April 2020 there were 1376 PSL properties which has risen to 1435 despite the Covid-19 lockdown restrictions.</p> <p>55 Housing First properties have now been allocated to people with complex needs and a history of rough sleeping and accessing and leaving the service, this will assist in reducing repeat presentations.</p> <p>68 Rapid Access Accommodation beds are used to accommodate rough sleepers allowing them to engage and work with services transitioning them onto appropriate supported accommodations.</p>
<p>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.</p>		<p>No health and safety matters have been reported to the Health and Safety Executive in the last 12 months.</p>	

<p>Make our Engagement Plan easily available and accessible to our tenants and service users, including online.</p>		<p>The 2019 SHR Engagement Plan for the Council is available online. (Due to Covid-19, the SHR is not producing engagement plans in 2020).</p>	<p>The autumn edition of the tenants' newsletter (issued October 2019) notified tenants how to access the Engagement Plan.</p>
<p>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.</p>		<ul style="list-style-type: none"> <li>• By law, data controllers must pay a fee to register with the UK Information Commissioner who is the data protection regulator within the UK.</li> <li>• The City of Edinburgh Council data controller registration number is Z5545409.</li> </ul>	<p>None</p>
<p>Submit an Annual Return on the Charter to the SHR each year in accordance with the SHR published guidance.</p>		<ul style="list-style-type: none"> <li>• The ARC has been completed and returned to the Scottish Housing Regulator each year since 2013/14.</li> <li>• The last ARC return was submitted on 31 July 2020 and will be published by the SHR in due course.</li> </ul>	<p>Improvements in data collection on repairs through the introduction of Total Mobile is helping to support service improvement and inform future service planning. Covid-19 has impacted on progress.</p>
<p>Involve tenants, and where relevant, other service users, in the preparation and scrutiny of performance information. We must:</p> <ul style="list-style-type: none"> <li>• agree our approach with tenants</li> <li>• ensure that it is effective and meaningful – that the chosen approach gives tenants a real and demonstrable say in the assessment of performance</li> <li>• publicise the approach to tenants</li> <li>• ensure that it can be verified and be able to show that the</li> </ul>		<ul style="list-style-type: none"> <li>• Covid-19 has meant a shift to online engagement with tenants. Edinburgh Tenants' Federation (ETF) has been assisting tenants not online to access the resources required and the Council has provided four Kindle Fires via community benefits to date with discussions ongoing to access more. The latest annual tenant survey has also recently been carried out as a telephone survey rather than face to face.</li> <li>• Annual funding provided to ETF and the Neighbourhood Alliance (NA) to support tenant participation and engagement - SLAs has been approved until 31 March 2022 for ETF and 31 March 2021 for NA.</li> <li>• Eight RTOs were provided with running cost funding in 2019/20. Start up and running cost grants provided.</li> <li>• HRA Scrutiny Group and a programme of tenant led inspections delivered by ETF.</li> </ul>	<p>The latest <a href="#">Tenant Participation Strategy</a> was approved by the City of Edinburgh Council on 20 January 2020 and a Tenant Scrutiny Framework is being developed in conjunction with ETF.</p> <p>Discussions are also ongoing to finalise the implementation of a new and wider grants programme, which will include funding opportunities for health and digital activity.</p> <p>Ongoing discussion with tenants and other service users to ensure that their views inform the development of housing services.</p>

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.

- The Rent Matters Working Group advises on the Housing Budget Consultation.
- Consultation is ongoing to update the Tenant Scrutiny Framework with ETF by the end of 2020.
- An online tenant group is being established to contribute to the Housing Service Improvement Plan.
- A programme of market 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.
- Homelessness service users have been heavily involved in informing changes to the services they receive, especially the introduction of shared housing and a move away from traditional bed and breakfast temporary accommodation.
- 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.
- Service user group established at Gypsy Traveller site. Extensive consultation on site redevelopment. Plans now in place for a site that will meet the needs of Gypsy Travellers as identified by the community themselves. Covid-19 has impacted on progress.

<p>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.</p>		<ul style="list-style-type: none"> <li>• Initial consultation carried out with tenants before the first report in 2014.</li> <li>• 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.</li> </ul>	<p>A decision on how to report performance information to tenants will be made when the SHR confirms the reporting deadline. Previously the Tenants' Courier has included the performance information, improvement actions and consultation on how tenants want performance to be reported to them in future. 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.</p>
<p>When reporting our performance to tenants and other service users we must:</p> <ul style="list-style-type: none"> <li>• provide them with an assessment of performance in delivering each of the Charter outcomes and standards which are relevant to the Council</li> <li>• include relevant comparisons – these should include comparisons with previous years, with other landlords and with national performance</li> <li>• set out how and when we intend to address areas for improvement</li> <li>• give tenants and other service users a way to feed back their</li> </ul>		<ul style="list-style-type: none"> <li>• The annual performance report is normally included in the autumn editions of the Tenants' Courier newsletter, which is posted to all tenants and made available online. This may change following the Regulator's consultation on a reporting timescale for 2020, which is expected to delay the reporting requirement to the end of December 2020.</li> </ul>	<p>The autumn edition of the Tenants' Courier (issued 31 October 2019) included performance information, improvement actions and consultation on how tenants want performance to be reported to them in future. The Courier is posted to all tenants and available online.</p>

views on the style and form of the reporting.			
Make the SHR report on our performance easily available to our tenants, including online.		<ul style="list-style-type: none"> <li>The report for 2018/19 is currently online.</li> <li>The 2019/20 report will be available online by the end of 2020.</li> </ul>	Report available online by the end of 2020. The Tenants' Courier, delivered to every Council home and available online, includes information on how to access the Performance Report, the Landlord Engagement Plan and the Assurance Statement.
Have effective arrangements and a policy for whistleblowing by staff and elected members, which it makes easily available and which we promote.		<ul style="list-style-type: none"> <li>The Council's current whistleblowing policy was agreed in March 2018.</li> <li>Details are available for staff on the Council's intranet site.</li> </ul>	Continue to include in the annual mandatory policy refresh for all staff.
Make information on reporting significant performance failures, including the SHR leaflet, available to its tenants.		<ul style="list-style-type: none"> <li>Information was included in the autumn edition of the Tenants' Courier (issued in October 2019), which was delivered to every Council home and will be repeated in a 2020 edition.</li> <li>The Courier is also published and advertised online.</li> </ul>	A direct link to the website to report significant performance failures has 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).		<ul style="list-style-type: none"> <li>Details on how to complain are available on the Council's website and in Locality offices.</li> <li>There have been some challenges meeting timescales and actions are being taken to improve.</li> <li>Complaints processes are reviewed regularly to ensure compliance with SPSO requirements.</li> </ul>	Provide complaint information for all new tenants via tenancy start up packs.
Ensure we have effective arrangements to learn from complaints and from other tenant		<ul style="list-style-type: none"> <li>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 regular workshops with tenants who have</li> </ul>	The introduction of Total Mobile will enable further in-depth analysis on the types of complaints being made and actions required on recurring issues.

<p>and service user feedback, in accordance with SPSO guidance.</p>		<p>made a recent repair complaint to help with assessing improvements required.</p> <ul style="list-style-type: none"> <li>• Biannual Updates are provided to committee on the Housing Service Improvement Programme.</li> </ul>	
<p>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.</p>		<p>The Council framework for Integrated Impact Assessments (IIA) cover duties in relation to equalities, socio-economic disadvantage, climate change, sustainability, the environment and human rights.</p> <p>Integrated Impact assessments are required when introducing new policies, changes to existing policies, strategies and when implementing service improvements. IIAs are published online.</p>	<p>IIA and action plans are subject to audit to ensure compliance.</p> <p>IIA framework will be applied to ongoing service improvement projects being implemented across the key workstreams in the Housing Service Improvement Plan.</p>
<p>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.</p>		<ul style="list-style-type: none"> <li>• Information on all the protected characteristics is not asked for in all cases. E.g. 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 CEC tenants.</li> <li>• Information sharing Protocols are in place for sharing sensitive data (EdIndex, SAVOLO).</li> <li>• GDPR/DPIA is considered for projects. A Council Data Privacy Statement is in place. Use of Mandates for individual cases.</li> <li>• 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.</li> </ul>	<p>The Council will review requirements in line with data protection regulations to ensure a consistent approach to collection, that is both reasonable and relevant.</p> <p>We await further guidance from the SHR on the requirement to collect data on all the protected characteristics, though this may be delayed due to Covid-19.</p>