Housing, Homelessness and Fair Work Committee

10.00am, Thursday, 29 September 2022

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

Executive/routine	Routine
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 (AAS) on housing services and the Assurance Statement Summary of Compliance for formal submission to the Scottish Housing Regulator (SHR).

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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.

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.

2.3 The Council's draft AAS is attached in Appendix 1 for Committee approval. AASs for all social landlords in Scotland are 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 (SSHC) describes the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The SHR is the regulatory body with a statutory objective 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 that now includes 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.

3.6 The current regulatory framework has been in force since April 2019 and Scottish social landlords are required 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 landlords' operating context. During the height of the pandemic, all social landlords were required to provide quarterly Covid-19 landlord performance reports on certain indicators to the SHR and those for 2021/22 were provided as required.

3.8 This additional reporting requirement has ceased, however, the SHR has advised they will continue to take account of the post pandemic pressures being managed by social housing landlords.

3.9 The Council maintains regular dialogue with the SHR on areas of challenge and improvements being made to ensure services are delivered in accordance with legislation, regulatory standards and best practice guidance. During 2021/22 the SHR engaged with the Council around services for people who are homeless.

3.10 The 2022/23 engagement plan covers complaints, anti-social behaviour, rent collection, rent arrears and the provision of temporary accommodation to people who are homeless. The SHR will also engage with all local authorities during 2022/23 to monitor and assess the risks to people who are threatened with or experiencing homelessness.

4. Main report

4.1 The SHR requires all social landlords to prepare and publish an AAS and an Assurance Statement Summary of Compliance to confirm to their tenants and the SHR that they are meeting the requirements of the Regulatory Framework for social landlords in Scotland.

4.2 The AAS should include any area of material non-compliance that would be reported to the SHR as a notifiable event. The deadline for submission to the SHR is 31 October each year and, as the governing body for housing services, the Housing, Homelessness and Fair Work Committee is required to approve the AAS and the Assurance Statement Summary of Compliance. The Council's draft AAS is attached at Appendix 1 for approval.

4.3 The AAS enables social landlords to declare that they are assured that their organisation complies with regulatory requirements and standards; it also is intended to provide a framework for landlords to highlight any required areas of improvement.

4.4 The SHR has withdrawn the temporary supplementary guidance issued during the Covid-19 pandemic for preparing the AAS, but they have advised landlords that they recognise that recovery from the pandemic may continue to impact on compliance with regulatory requirements and this can be considered in the preparation of the AAS. Appendix 2 provides summary evidence of how the

Council is meeting the SHR requirements and information on actions being taken to improve areas of service to ensure compliance.

4.5 The operating context for the housing service continues to be challenging in terms of rising costs due to the impact of Brexit, the Covid-19 pandemic, the Ukraine war, and the wider cost-of-living crisis.

4.6 A key focus of the service post Covid-19 pandemic has been working to mitigate the worst effects of these major national and international challenges while continuing to provide services and ongoing advice and support for tenants, delivering the new build programme and investing in improvements to existing Council homes.

4.7 Core services continued to be maintained for tenants during the 2021/22 and ongoing improvements are being made to services through the [Housing Service Improvement Plan (HSIP)](#) as reported to August Committee.

4.8 The 2021 tenant survey also evidenced improving tenant satisfaction across most key satisfaction indicators set in the SSHC ranging between 81% and 99%, with benchmarking indicating this is more positive than the national trend.

4.9 The Council has also continued to deliver planned investment in new and existing homes including 247 new builds social rented completions with a further 517 for site start. The Mixed Tenure Improvement Service has continued to expand with a pilot in summer of 2021 to improve the condition and energy efficiency in mixed tenure blocks in Wester Hailes. This programme of work will expand to other areas of the city during 2023.

4.10 To inform decisions on the area for engagement with Councils, the SHR reviews and compares performance data from the Scottish Government's national homelessness statistics and the Annual Returns on the Charter.

4.11 The SHR also spoke with all local authorities to gather further information and assurance on the charter outcomes for homelessness services covering prevention, access to temporary accommodation and advice to help households find and sustain a permanent home.

4.12 Following analysis, and to further assess the risks to people threatened with or experiencing homelessness in Scotland, the SHR took the decision to engage with all local authorities on these areas of service during 2022/23. A particular focus of the engagement with Edinburgh will be the provision of temporary accommodation.

4.13 After reviewing the charter performance data, the SHR is also engaging with the Council as a landlord on the management of complaints, anti-social behaviour, rent collection and rent arrears.

Areas of SHR Engagement 2022/23

Homelessness Services

4.14 Scottish Government requires all Local Authorities to complete statutory returns on a range of performance measures related to the delivery of homelessness services

and to develop Rapid Rehousing Transition Plans (RRTP) as part of Scotland's strategy to end homelessness.

4.15 The second iteration of the Council's RRTP was approved by Committee on 18 September 2020 and the most recent annual update on progress against commitments in the plan was reported to Committee on 4 August 2022. Regular updates on agreed performance measures set out in a Homelessness Services' Performance Dashboard are provided to Committee to monitor and track the impact of improvements.

4.16 A Homelessness Services Performance Dashboard and the annual report on the Scottish Government Statutory Returns are being reported separately to this Committee.

4.17 The context for delivery of homeless services is especially challenging in Edinburgh with its lower-than-average proportion of social housing and very high demand. As of 31 March 2022, there were 5,315 cases where the Council had a duty to provide settled housing, an average of just under 180 bids for each available social rented home and an average wait of around two years for an offer of permanent housing, even with a silver homeless priority status.

4.18 During 2021/22 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 850 occasions.

4.19 This is a significant increase from 2020/21, which is due to changes in legislation from October 2021 that extended the Unsuitable Accommodation Order to all homeless households.

4.20 It has been highlighted in discussions with the SHR that the public health response during the Covid-19 pandemic and supporting refugees from the war in Ukraine has, and will continue, to exacerbate the pressures the Council was already facing in relation to homeless services.

4.21 The actions for improvement agreed and being monitored through the RRTP will continue to be shared with the SHR as part of the ongoing engagement on homeless services.

Management of Complaints

4.22 During 2021/22, 90.1% of Stage 1 complaints were responded to in full and 88.8% of Stage 2 complaints. The average timescales for responses remained above target at 19.6 days and 56.8 days respectively.

4.23 The majority of complaints the housing service deals with relate to repairs and, taking account of feedback from tenants, improving the management of complaints has been identified as a key workstream in the HSIP.

4.24 A revised approach to the recording and monitoring of complaints is being implemented with a Complaints' Resolution Team and a Senior Officer, with an overall responsibility for developing the team and the control processes, embedded in the housing service.

4.25 Information on the revised approach to the management of complaints, including data on the number, stage of resolution and timescales for responses will be provided in the six monthly HSIP updates reported to Committee.

Response to reported anti-social behaviour

4.26 Performance in responding to reported anti-social behaviour shows an improving trend with the number of cases of anti-social behaviour cases open and closed in the same year rising from 75.7% in 2020/21 to 79.2% for 2021/22.

4.27 The lack of on-site visits during the Covid-19 pandemic (due to safe working measures) continued to impact on the way investigations could be carried out by the team but the reintroduction of home and community-based visits in August 2021 has increased direct contact between complainants and the Council's investigating officers. Offers of face to face mediation, which moved online during the pandemic, have also been reintroduced.

4.28 Senior managers responsible for the management of anti-social behaviour will be involved in the ongoing dialogue with the SHR to discuss the improvements being made to the service, and to ensure there is an understanding of the approach to managing anti-social behaviour in Edinburgh.

Rent collection and management of arrears

4.29 The Covid-19 pandemic continues to impact on rent collection and associated arrears management due to ongoing changes in household financial circumstances and the extended period where there were restrictions on court action.

4.30 Formal debt recovery through the Sheriff Court is often required as a last resort measure to get tenants to make contact. Even at this late stage the service will continue to work with tenants to help them with their rent payment responsibilities, and to provide advice and assistance on any wider debt or potential support needs.

4.31 The current cost of living crisis is bringing additional financial challenges for households and tenants who receive assistance with their rent through welfare benefits face further change with the scheduled managed migration by the Department for Work and Pensions of working age claimants on to Universal Credit scheduled by the end of 2024.

4.32 Income collection within this context continues to be challenging but the overall approach remains to keep tenants in their homes wherever possible. Provision for a level of rent arrears debt is therefore made within the annual HRA budget and the 30 year HRA Business Plan.

4.33 During 2021/22 there was a slight improvement in performance in the rental income collected as a percentage of total rent due, which increased to 98.0% compared to 96.8% during 2020/21. Keeping tenants in their homes and allowing reasonable repayments towards arrears has however contributed to the gross rent arrears as a percentage of total rent due (including arrears) increasing from 11.1% for 2020/21 to 12.6% during 2021/22.

4.34 Rent collection and rent arrears management remain key priorities for the housing service with a focus on early intervention, ongoing guidance for staff and ongoing signposting and support to help tenants prevent and manage debt and remain in their home. Rent communications are being reviewed and updated to continue to encourage tenants to come forward to get the advice and help available.

4.35 A rent collection workflow and analytics tool is currently being implemented, which will prioritise rent cases requiring action by Housing Officers, support rent caseload management and provide real time analysis of income collection performance.

Other Areas of Housing Service Performance 2021/22

4.36 The 2020/21 AAS highlighted areas of service performance that had been impacted most significantly by safe working and changes in operations during the Covid-19 pandemic.

4.37 These impacts continued during periods of 2021/22 and getting access to tenants' homes to carry out repairs and other essential visits, due to ongoing concerns from tenants on the potential infection, has also been challenging. Despite this some areas have seen an improvement in performance:

4.37.1 The average time to complete an emergency repair reduced to near pre-pandemic levels of 6.4 hours compared to an average of 10.3 hours during 2020/21. With the focus on maintaining essential repairs the average for non-emergency repairs increased from 11.7 days to 14.4 days.

4.37.2 The average time to complete adaptations increased during the pandemic due to difficulties in accessing homes safely where tenants were often more vulnerable. Performance in 2021/22 improved significantly down to an average of 63.9 days for all adaptations compared to 389 days in 2020/21. The service will continue to focus on ensuring that tenants requiring adaptions to their home have as short a wait as possible to improve their quality of life, reduce risk and increase their independence wherever possible.

4.37.3 The turnaround of homes becoming available for let returned to near pre-pandemic levels during the last performance reporting period however the number of homes requiring more significant repairs and investment and the ongoing operational challenges including workforce capacity, materials and utility meters/supplier issues have led to an increase in the average time to re-let homes. The average increased from 64 days in 2020/21 to 76 days in 2021/22. It is likely to take some time to turnaround performance to pre-pandemic levels and bring empty homes requiring more extensive works back into letting stock.

4.38 The HSIP focuses on all key areas of service covered by the annual assurance requirements with a focus on areas where improvements are required. Committee will continue to be provided with six monthly updates on progress with the HSIP.

5.   Next Steps

5.1   If agreed by Committee, the City of Edinburgh Council AAS and an Assurance Statement Summary of Compliance (Appendices 1 and 2) will be formally submitted to the SHR.

5.2   As agreed by Committee on 4 August, a workshop will be arranged to support the development of a performance dashboard that will be presented to Committee as part of the six monthly update reports on the HSIP.

6.   Financial impact

6.1   There are no adverse financial impacts arising from this report.

6.2   The HSIP aim to improve tenant satisfaction, operating performance and reduce costs, and the continued delivery of improvements will assist with ensuring best value for tenants and service compliance within an increasingly complex statutory and regulatory context.

7.   Stakeholder/Community Impact

7.1   The Council has a programme of ongoing consultation and engagement with tenants that informs the HSIP workstreams and service priorities. This includes opportunities for individual tenants through involvement in surveys, focus groups, working groups, and resident and community meetings as well as regular meetings and engagement through the Edinburgh Tenant Federation (ETF).

7.2   Methods of engagement were adapted during the pandemic with online and telephone methods as required. While face to face contact is slowly beginning again, a mix of hybrid and online arrangements will continue to ensure any meetings remain accessible to as many tenants as possible.

7.3   The SHR recommends that landlords consider their tenants' views on performance. A city-wide tenant survey of 1,000 tenants is carried out annually, capturing feedback on service delivery, new initiatives, and tenant priorities.

7.4   The 2021 tenant survey included the full set of satisfaction indicators set out by the SHR for the SSHC, which enables satisfaction to be monitored over time and benchmarked against other social housing landlords.

8.   Background reading/external references

8.1   [Scottish Housing Regulator- Regulatory Framework.](#)

8.2   [Update on the Housing Service Improvement Plan.](#)

8.3   [Rapid Rehousing Transition Plan – Annual Update on Progress.](#)

8.4   [Homelessness Services' Performance Dashboard.](#)

9. Appendices

9.1   Appendix 1 – Annual Assurance Statement.

9.2   Appendix 2 – Assurance Statement Summary of Compliance.

Appendix 1

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

31 October 2022

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 that are subject to ongoing monitoring and reporting have been:

Homelessness

Providing homelessness services for people who are threatened with or are experiencing homelessness continues to be a significant challenge in Edinburgh. An average of around 25% of households were accommodated in temporary accommodation that breached the Unsuitable Accommodation Order and the Council did not offer temporary accommodation to homeless people in all cases when it had a statutory duty to do so. Regular updates on the actions to prevent homelessness and improve homelessness services including the mix of suitable temporary accommodation as set out in the Council's Rapid Rehousing Transition Plan will continue provided to the Scottish Housing Regulator.

Repairs

Improvements to the repairs service including the management of tenant complaints continues to be a key workstream in the Council's Housing Service Improvement Programme. As the governing body for housing services the Council's Housing, Homelessness and Fair Work Committee will continue to scrutinise performance improvement for this and other areas of service through the biannual update reports on the Housing Service Improvement Plan.

Signed _____

Date of signing _____

Councillor Jane Meagher, Convenor of the Housing, Homelessness and Fair Work Committee

Appendix 2: Scottish Housing Regulator (SHR) – Annual Assurance Statement (AAS) Assessment of Compliance 2021/22

Requirements for all local authorities

SHR requirements	Status	Evidence	Action
Covid-19			
Submit quarterly landlord performance report- (in place during part of 2021/22)	■	These were completed as required.	Covid returns no longer required by the SHR.
Assurance and notification			
Prepare an AAS in accordance with SHR published guidance, submit it to the SHR between April and the end of October each year, make it available to tenants and other service users.	■	AAS 2021 completed and made available to tenants online. A hard copy of the Tenant Courier newsletter (Winter 2021 edition) provided to tenants included information on how to access or request a copy of the AAS. The newsletter is also published online.	Complete and publish future annual statements as required.
Notify the SHR of any material changes to the assurance in the AAS during the year.	■	There have been no material changes from the 2020/21 ASS.	Regular dialogue is maintained with the SHR on areas of engagement and the wider HSIP.
Have assurance and evidence that all legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety are being met.	■	Services are delivered in accordance with the relevant statutory and regulatory standards. Best practice guidance and benchmarking through relevant networks and forums are also used to help inform performance assessments and areas for service improvement. • The Council does not currently comply with its duty to offer suitable temporary or emergency accommodation for people experiencing homelessness.	Improvements in the delivery of homelessness services including actions to improve the mix of temporary accommodation are being taken forward through the RRTP. Progress continues to reported annually to Committee (most recently 4 August 2022) and performance monitored through the Homelessness

SHR requirements	Status	Evidence	Action
		(Unsuitable Accommodation Order commenced in October 2021) • SSHC data and operational performance monitoring information is used to inform area for service improvement for the housing service. • Regular dialogue is maintained with the SHR on areas of engagement, service improvements and to discuss the context for delivery of services in Edinburgh. This will also include areas of service that continue to be impacted post Covid-19 including the repair and letting of empty homes, income collection and let • Strategy, policy, and audit reports are approved by the relevant Committee in accordance with the Council's Governance Framework. • Mixed Tenure Improvement Service is in place and is being expanded to support essential common repairs and investment in existing Council homes within Mixed Tenure Blocks. • Partnership working with Police Scotland and Scottish Fire and Rescue Service on tenant and resident safety. (e.g. joint fire safety inspections, Multi-Agency Risk Assessment Conferences and community initiatives).	Services' Performance Dashboard. Updates on the HSIP will continue to be provided to Committee on a 6 monthly basis. Development of performance monitoring measures for the repairs service and the HSIP to be developed and included in future HSIP update reports.

SHR requirements	Status	Evidence	Action
		• Benchmarking via service and best practice forums e.g. Housemark, the Scottish Rent Forum.	
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.	
The Engagement Plan must be made easily available and accessible to tenants and service users, including online.		The 2021/22 Engagement Plan was made available to tenants online. A hard copy newsletter provided to tenants included information on how to access the Plan. The 2022/23 engagement plan is available on the SHR website.	The autumn edition of the tenants' newsletter will be used to notify tenants how to access the Engagement Plan. Information will also be made available on the Council website. Information will also be included in the information pack for households accessing homeless services.
Data Protection			
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.	
Scottish Social Housing Charter Performance			
Submit an Annual Return on the Charter to the SHR each year in accordance with the published guidance.		The ARC has been completed and returned to the SHR each year since this requirement was introduced in 2013/14.	

SHR requirements	Status	Evidence	Action
		The last ARC return was submitted on 31 May 2022. This will be published in due course by the SHR on their website along with the data for all social landlords in Scotland.	
Involve tenants, and, where relevant, other service users, in the preparation and scrutiny of performance information. The landlord must: • agree its 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 • report its performance in achieving or progressing towards the Charter outcomes and standards to its tenants and other service users (no later than October each year). It 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. When reporting its performance to tenants and other service users it must: • provide them with an assessment of performance in delivering each of the Charter		A programme of research with tenants in other service users is in place to ensure tenant/resident insight. This includes tenant surveys, focus groups, online events etc. HRA funding is provided to Edinburgh Tenants Federation (currently approved to 31 March 2024) and the Neighbourhood Alliance (NA) (currently approved to 31 March 2023) to support tenant participation and engagement. Grant funding up to £10,000 continues to be provided to support local Registered Tenant Organisations. The Council is working closely with ETF to implement a revised [Tenant Scrutiny Framework](#) as approved by Committee in January 2022. Implementation of this is a key objective of the current Service Level Agreement. A return to face to face meetings is being progressed as the pandemic has eased but hybrid arrangements will continue to	Ongoing discussions will continue with tenants and other service users to ensure their views continue to inform the priorities for HSIP and service development. Continue to ensure the performance reporting requirements are met and information is available on-line and in hard copy for tenants. (Accessible and alternative formats available) Performance reporting to be reviewed to revisit tenants' tenants' views on presentation of performance information. Information online and in hard copy will also be considered to ensure it meets accessibility guidelines.

SHR requirements	Status	Evidence	Action
outcomes and standards which are relevant to the landlord include relevant comparisons – these should include comparisons with previous years, with other landlords and with national performance set out how and when the landlord intends 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. • Make the SHR report on its performance easily available to its tenants, including online.		enable as many residents as possible to take part in discussions. Consultation is carried out in line with the Councils' Consultation framework to inform decisions on areas such as HSIP, annual rent setting, investment priorities, and local environmental projects etc. Annual performance information on the Charter performance the Assurance Statement and the SHR Engagement plant is provided to tenants online and in hard copy through the tenant newsletter (a copy is provided to all tenants)	
Tenant and service user redress			
Make information on reporting significant performance failures available to tenants, including SHR leaflet.		Provided via the hard copy newsletter issued to every tenant. Includes information on the SHR website and telephone contact, address details for tenants to report failures	Information to be included in revised new tenant information 'packs' being taken forward through the HSIP. Content available online is required to meet accessibility guidelines to ensure information is available to all users including those that may use assistive technology. These guidelines are also adhered to for hard copy documents, which are available in alternative formats where required.

SHR requirements	Status	Evidence	Action
Provide tenants/other service users with the information they need to complain and seek redress, and respond to tenants within service standard timescales, in accordance with guidance from the Scottish Public Services Ombudsman (SPSO).		Council Complaints Policy/procedure was updated in April 2021 to reflect the model complaint handling guidance from the SPSO. Guidance and e-learning is available for staff. Recording and closing responses to complaints timeously on the Capture IT system is an area for improvement. All new Council tenants receive information on how to raise a complaint including the option to raise complaints and make suggestion online.	Documentation on complaints to be reviewed as part of the HSIP work around new tenant information 'packs'. Content and format are reviewed, and improvements made on an ongoing basis to ensure this meets accessibility guidelines. Improvements to the recording and monitoring of data will be implemented for the new Complaints Resolution Team
Ensure effective arrangements in place to learn from complaints and from other tenant/service user feedback, in accordance with SPSO guidance.		Complaints' performance data and tenant feedback on services is used to inform service improvement A Complaints Resolution Team is being embedded in the Housing Service implement control process for the effective resolution and analysis of complaints.	Information on the revised approach to the management of complaints and performance data will be provided in biannual HSIP updates to Committee.
Whistleblowing			
Have effective arrangements and a policy for whistleblowing by staff and elected members, which it makes easily available and which we promote.		An updated Council [Whistleblowing policy](#) was approved on 23 May 2019. A copy of the policy is available online. The policy applies to all employees and workers including persons contracted to personally provide services to the	The Whistleblowing policy is included in induction and policy refresh for all Council staff.

SHR requirements	Status	Evidence	Action
		Council, persons undergoing training or work experience as part of a training course, elected members, and agency workers.	Actions approved following recommendations from the independent inquiry into the conduct of a member of Council staff and the Council's whistleblowing culture will be implemented as relevant.
Equalities and Human Rights			
Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.		The Council has an agreed Equality and Diversity Framework 2021-25. The framework that was approved by the Policy and Sustainability Committee in April 2021 includes equality outcomes and mainstreaming actions across key areas of Council work and services. The Council uses Integrated Impact Assessments (IIA) to take account of statutory and regulatory requirements in relation to equality, socio-economic disadvantage, climate change, sustainability, the environment, and human rights. The guidance was updated (June 2022). Documents, information, and written communications available in alternative formats and translation panels included. Interpreter services arranged for face-to-face contact where required.	Ensure IIAs carried out as required for all service improvement projects and use findings to inform plans and strategies. Ongoing awareness raising and training is provided to ensure staff understanding of the process and guidance.

SHR requirements	Status	Evidence	Action
		Accessibility requirements for Council website content and other sites operated by the Council including the Edindex site that has an accessibility tool ('Browsealoud')	
To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff. Local authorities must also collect data on protected characteristics for people who apply to them as homeless. Landlords who provide Gypsy/Traveller sites must collect data on protected characteristics for these service users.		Data is respect of the protected characteristics is not asked for and held for all areas of service. Updated SHR guidance is being reviewed and will be used by the Council to develop a consistent approach to data collection, retention, monitoring, and reporting that is reasonable and relevant.

There is a Data Privacy Statement in place for the Housing Service and reference to this are provided in information and online for areas of service where data is collected. Information sharing protocols are in place for sharing sensitive personal data (e.g. EdIndex, SAVALO). Personal mandates are used and required for sharing of personal data where information sharing protocols are not in place. GDPR/DPIA is assessed as part of all projects with authorisation for the collection, recording and use of new data is via the Information Asset Owner where required. | IT systems and practices will be updated to record any additional data on protected characteristics in line with any revised approach to ensure compliance with Data protection regulations.

Develop an approach to guidance and training for staff. |

SHR requirements	Status	Evidence	Action
		Approaches to briefing tenants and staff are being developed.	