

Housing, Homelessness and Fair Work Committee

10.00am, Tuesday, 8 August 2023

Annual Assurance Statement on Housing Services 2022/23

Executive/routine Wards Council Commitments	Executive All
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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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Annual Assurance Statement on Housing Services 2022/23

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 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. The ARC provides information across core housing service performance indicators and contains contextual information and data gathered from tenant surveys. Performance data is based on the 12-month period, up to the 31 March of the year of submission.
- 3.2 The SHR assesses returns and intervenes (as appropriate) to support service improvement. Individual Engagement Plans are published for each landlord on the SHR website and focus on areas for improvement. The SHR is engaging with the Council about services for people who are homeless, service quality and tenant and resident safety. The Engagement Plan can be found [here](#).

4 Main Report

- 4.1 The current regulatory framework for social landlords has been in force since April 2019 with Scottish social landlords required to submit an AAS confirming that they

comply with the relevant requirements of [Section 3 of the Regulatory Framework](#). Where a landlord does not fully comply, it should set out in the Statement how and when it will make the necessary improvements to ensure compliance. The Council's draft AAS is attached at Appendix 1 for approval.

- 4.2 The key focus over the past year has been to improve performance in relation to empty homes, repairs, complaints processes and management of dampness and mould in Council homes. The report to Committee on the Housing Service Improvement Plan (HSIP) on [9 March 2023](#) provided an update on progress against key workstreams and actions. The report contained an Action Tracker and performance information on Key Performance Indicators (KPIs). The KPIs align with those reported to the SHR in the ARC.
- 4.3 The operating context for the Housing Service remains challenging. Demand for social housing is high with an average of 197 households bidding for every social rented home that becomes available for let and an insufficient supply of suitable temporary accommodation. The cost of delivering services has risen in the past year due to inflationary pressures in the wider economy and shortages in materials and labour have impacted on timescales for repairing, improving and building homes.

Areas of SHR Engagement 2023/24

Homelessness Services

- 4.4 Homelessness continues to be an area of engagement, with a particular focus on the provision of temporary accommodation for people who are homeless. This follows the SHR's thematic review of homelessness, published in February 2023.
- 4.5 All Scottish Local Authorities were asked to produce Rapid Rehousing Transition Plans (RRTPS) setting out their homelessness strategy. The RRTP – Second Iteration was approved by Committee on [18 September 2020](#) and submitted to Scottish Government. Annual updates on progress are submitted to Committee each summer, with the latest update on the agenda for today's meeting. A Homelessness Services' Performance Dashboard is also submitted to Committee twice yearly with performance information. The last Dashboard was presented to Committee in [March 2023](#).
- 4.6 There is also a requirement to complete statutory returns covering a range of performance measures. These are submitted Scottish Government. The latest statutory return information was published by Scottish Government on 30 June 2023 and a report summarising this is on the agenda for today's meeting.
- 4.7 Demand for homelessness services and social housing in the city has remained high, with 3,303 households assessed as homeless, or threatened with homelessness in 2022/23, an increase of 30% on the previous year (2,540). Whilst this is higher than last year, it represents a return to pre-covid levels (3,365 in 2019/20) following a significant reduction during 2020/21 (1,958). As of 31 March 2023, there were 5,952 cases where the Council has a duty to secure settled

housing. This is a 12% increase from 2022 when there were 5,315 cases where the Council had a duty to secure settled housing. There were 197 bids for every home which becomes available on EdIndex and 24,500 households currently registered for EdIndex.

- 4.8 There were 4,784, households in temporary accommodation on 31 March 2023, a 34% rise compared to 2020 when there were 3,570 households in temporary accommodation. On 31 March 2023, 1,230 households were in temporary accommodation classed as unsuitable under the Unsuitable Accommodation Order. During 2022/23 there were 378 occasions when the Council failed to provide temporary accommodation where it had a statutory duty to do so.
- 4.9 The recent changes to Local Connection Legislation, the ongoing impact of the increase in the number of households in temporary accommodation and supporting refugees and other displaced people have been highlighted to the SHR in regular meetings as areas which will continue to exacerbate the ongoing challenges with demand for homelessness and housing services in the city.

Complaint handling and repairs

- 4.10 During 2022/23, 94% of Stage 1 complaints and 86% of complaints at Stage 2 were responded to. This compares to 91% for Stage 1 and 89% for Stage 2 in 2021/22. The average timescales for responses remained above Scottish Public Services Ombudsman (SPSO) response targets but are an improvement on the previous year. In 2022/23, the Council averaged 16 days for a Stage 1 response and 40 days for a Stage 2.
- 4.11 An improved approach to management of complaints has been established for Council house repairs 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. An improvement plan has also been put in place, with the primary objective of monitoring trends and establishing the root cause of complaints to allow action to be taken to reduce failures in service.
- 4.12 The average time to complete an emergency repair has reduced from 6.4 hours in 2021/22 to six hours in 2022/23 but is still identified as an area for further improvement as it is above our target time of four hours. The time to complete non-emergency repairs has increased from 14.4 days to 15.8 days. Work is being undertaken with inhouse colleagues and contractors to encourage prompt closure of jobs once work is completed as delays in updating the system impact on the average performance being reported.
- 4.13 The average time to complete adaptations has also increased from 64 days in 2021/22 to 84 days in 2022/23 but the number of households currently waiting for adaptations has reduced from 188 in 2021/22 to 169 in 2022/23. This is a demand led service with a wide range of solutions to meet the needs of tenants. Some work is relatively low financial value and can be completed quickly where other cases are much more complex requiring planning consent and building warrants and can take several months to complete.

Rent arrears and tenancy sustainment

- 4.14 There has been an improvement in rent collected as percentage of total rent due for the reporting year from 98.1% in 2021/22 to 98.6% in 2022/23, however, rent collection remains challenging in the context of a cost-of-living crisis and an acceleration in the number of tenants migrating to Universal Credit. The Department of Work and Pensions deadline for managed migration for working age claimants remains December 2024.
- 4.15 In the past year, a new workflow and analytics tool was introduced to assist housing officers with rent collection. The system assists officers to manage workload and engage with tenants at an early stage to prevent tenants getting into high levels of debt.
- 4.16 The Housing Service is almost entirely funded from tenants' rental income. Rent collection and rent arrears management will, therefore, remain a priority for the service with a focus on early intervention, signposting and supporting tenants to make regular rent payments alongside training and guidance for officers to collect rent. The Business Bulletin for this Committee contains an update on the Tenant Hardship Fund that was introduced in April 2023 and forms part of the wider approach to supporting tenants to pay rent and sustain tenancies.

Tenant Safety

- 4.17 The safety of tenants is the highest priority for the Housing Service and procedures are in place to ensure statutory inspections and servicing is carried out and monitored across all relevant safety requirements.
- 4.18 Most Council homes have an integrated smoke detection system and all homes have at least one hard wired smoke alarm. Work continues to secure access to the remaining Council homes where it has not yet been possible to install the system. Work is also underway to significantly improve compliance in relation to Electrical Installation Condition Reports (EICRs) with an improvement plan in place with the aim of achieving full compliance within the next 12 months.
- 4.19 On [9 May 2023](#), Committee received a report on Damp, Mould and Condensation in Council Housing. The Dampness Improvement Plan has been shared with the SHR and regular updates will be provided to Committee and the SHR on progress with addressing damp and mould in Council homes.
- 4.20 Committee is asked to agree the AAS for submission to Scottish Government.

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 The HISP reports to Committee on a six-monthly basis, with the next update scheduled for October 2023.

6. Financial Impact

- 6.1 There are no financial impacts arising directly from this report. Committee receives regular financial monitoring reports on the Housing Revenue Account (HRA) and General Fund Homelessness budget. The assumptions in the HRA Business Plan are updated annually and reported to Committee as part of the annual HRA Budget setting process.
- 6.2 The HSIP aims 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

- 7.2 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).
- 7.3 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. Most tenants (99%) surveyed in 2022 said they were satisfied with the opportunities given to them to participate in their landlord's decision making process with 82% of tenants satisfied with the quality of their home.

8. Background reading/external references

- 8.1 [SHR regulatory framework](#)

9. Appendices

- 9.1 Appendix 1 – Annual Assurance Statement.
- 9.2 Appendix 2 – Assurance Statement Summary of Compliance.

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

31 October 2023

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.

Tenant Safety

Tenant and resident safety is of utmost importance. We monitor compliance with legislation and best practice guidance and report to the Scottish Housing Regulator. We will continue to prioritise investment in measures that improve tenant safety and are driving forward improvements in how we deal with reports of damp and mould and focussing on increasing our compliance in electrical safety certification and fire detector installation.

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 2022/23

Requirements for all local authorities

SHR requirements	Status	Evidence	Action
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 2022 completed and made available to tenants online, as well as signposted through the Tenant Courier newsletter (Winter 2022 edition) which also let tenants know how to access or request a copy of the AAS.	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 2021/22 ASS.	Regular meetings take place 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.		<p>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.</p> <ul style="list-style-type: none"> The Council does not currently comply with its duty to offer suitable temporary or emergency accommodation for people experiencing homelessness. (Extension of the Unsuitable Accommodation Order (UAO) commenced in October 2021) Scottish Social Housing Charter (SSHC) data and operational performance monitoring information 	<p>The Rapid Rehousing Transition Plan sets out four strategic priorities for homelessness services. This includes ensuring temporary accommodation meets the needs of the household and transforming the mix of temporary accommodation stock to meet the requirements of the UAO. These actions continue to be progressed and the latest update can be found in the RRTP – Annual Update on Progress reported to Committee on 8 August 2023. Twice yearly Homelessness Services' Performance Dashboards also provide updates on progress the last of which was presented to Committee on 9 March 2023.</p>

SHR requirements	Status	Evidence	Action
		<p>is used to inform area for service improvement for the housing service.</p> <ul style="list-style-type: none"> • 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 has included the approach to addressing dampness and mould in Council homes, as reported to Committee in May 2023 Progress in repairing and letting Council homes is also discussed. • Strategy, policy, and audit reports are approved by the relevant Committee in accordance with the Council's Governance Framework. • Benchmarking via service and best practice forums e.g. Housemark, Housing Quality Network, Rent Income Excellence Network and the Scottish Rent Forum. • Partnership working with Mobyssoft to adopt new technology to improve the management of rent arrears and development of further improvements to mitigate the risks 	<p>Updates on the HSIP will continue to be provided to Committee on a 6 monthly basis. A performance dashboard has been developed to accompany the HSIP report in March 2023.</p> <p>An internal audit on 'Management of the Housing Revenue Account (HRA)' was carried out in 2022/23 to assess key controls for the capital and revenue elements of the HRA. Improvement actions in place to address recommendations include establishing documentation on Terms of Reference for the HRA Business Plan Board and improving process for monitoring and continuous improvements. Further Housing Audits in 2023/24 include:</p> <ul style="list-style-type: none"> • External Audit Scotland HRA System Controls Audit • Housing stock condition – tenant safety, damp and mould; • Management of mixed tenure work; • Repairs Right First Time; • Management of scaffolding for housing repairs; and • Housing void management. • New technology (Rentsense) introduced in Oct 22 –

SHR requirements	Status	Evidence	Action
		<p>of the Universal credit mass migration programme of the DWP.</p> <ul style="list-style-type: none"> • Fire Safety – 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). Technical officials meet with Scottish Fire & Rescue Service bi-monthly to discuss domestic fire safety. This supports the quarterly inspections undertaken by Fire and Rescue 	<p>transactional data is analysed, and cases are flagged to prioritise early contact with tenants in arrears showing signs of financial difficulty. This has seen our contact performance rates increase from 20% to 71%.</p> <ul style="list-style-type: none"> • Extension to this new technology is being investigated to introduce assisted automation which will open up communication channels with all tenants including those in debt. • An improvement plan also exists to manage the transition of the remaining 7,000 working age tenants move to Universal Credit. <p>A Fire Safety Management System is currently being developed to manage, plan and coordinate appropriate fire safety procedures to reduce the risk of fire for residents and assets.</p>

SHR requirements	Status	Evidence	Action
		<p>colleagues to Edinburgh's 44 multi storey buildings.</p> <ul style="list-style-type: none"> • Gas Safety – an in-house gas team supported by contractors carry out gas repairs, servicing and capital upgrades. A recent service improvement plan and external audits carried out by CORGI and Gas Safe Register (2022) identified that the team is compliant and meets all required standards. A Landlord Gas Safety Record (LGSR) inspection is carried out annually and the required certification is held on the IT system. • Asbestos – An in-house team are in place to support and provide information on all asbestos related issues. Current procedures ensure all requests for inspections, tests, samples and removals are passed to the in-house team who allocate works to a certified asbestos contractor. • Lifts – A servicing programme is in place with all lifts being serviced 	<p>A lift upgrade programme is in place with 44 new lifts being installed in the</p>

SHR requirements	Status	Evidence	Action
		<p>within a 2-to-6-month period depending on usage and the age of the equipment. Additional checks take place biannually with the Council's insurers.</p> <ul style="list-style-type: none"> • Water Safety – water testing and inspections are carried out by an in-house team within Facilities Management for the Housing service. • Electrical Safety – an electrical service improvement plan has been developed for 2023/24 which includes record keeping, training and the management of processes and procedures as well as increasing compliance on EICRs. 	<p>last five years and another 16 planned over the next two years.</p> <p>Recruitment is being carried out for a Water Quality Officer to join the Housing Service.</p> <p>A resourcing plan to increase capacity to improve compliance on EICRs is being prioritised.</p> <p>The plan also includes preparation to join the CORGI Quality Accreditation Scheme.</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>The Engagement Plan must be made easily available and accessible to</p>		<p>The 2023/24 Engagement Plan was made available to tenants online on the SHR website.</p>	<p>The Autumn / Winter 2023 edition of the tenants' newsletter will be used to notify tenants how to access the Engagement</p>

SHR requirements	Status	Evidence	Action
tenants and service users, including online.		A hard copy newsletter provided to tenants included information on how to access the Plan.	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 Annual Return on the Charter (ARC) has been completed and returned to the SHR each year since this requirement was introduced in 2013/14. The last ARC return was submitted on 30 May 2023. 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: <ul style="list-style-type: none"> • agree its approach with tenants • ensure that it is effective and meaningful – that the chosen 		A programme of research with tenants in other service users is in place to ensure tenant/resident insight. This includes tenant surveys, focus groups, and regular partnership working with tenant organisations.	Ongoing discussions will continue with tenants and other service users to ensure their views continue to inform the priorities for HSIP and service development.

SHR requirements	Status	Evidence	Action
<p>approach gives tenants a real and demonstrable say in the assessment of performance</p> <ul style="list-style-type: none"> 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. <p>When reporting its performance to tenants and other service users it must:</p> <ul style="list-style-type: none"> provide them with an assessment of performance in delivering each of the Charter outcomes and standards which are relevant to the landlord 		<p>HRA funding is provided to Edinburgh Tenants Federation (ETF) (currently approved to 31 March 2024) and the Neighbourhood Alliance (NA) (currently approved to 31 March 2024) to support tenant participation and engagement.</p> <p>Grant funding up to £10,000 continues to be provided to support local Registered Tenant Organisations.</p> <p>The Council is working closely with ETF to implement a revised Tenant Scrutiny Framework which was approved by Committee in January 2022. Implementation of this is a key objective of the current Service Level Agreement. A number of new scrutiny groups have been formed to focus on areas of importance to tenants, such as housing repairs.</p> <p>Regular progress meetings are held with ETF to measure delivery on the SLA and tenants' priorities. ETF are regular consulted to provide an additional avenue for tenants' voice to feed into service development and decision making.</p>	<p>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)</p> <p>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.</p> <p>Over the past 12 months, ETF have been consulted on new approaches to Estate Investment, considering the need for increased representation from tenants on local Estate Improvement Groups. Each group now has a nominated ETF representative to help meet local improvement priorities.</p> <p>In 2023, ETF will also review the success of the Council's Tenant Hardship Fund at six and 12 month intervals to ensure that the operation of the fund supports those most in need.</p>

SHR requirements	Status	Evidence	Action
<p>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</p> <ul style="list-style-type: none"> • 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. 		<p>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.</p> <p>Annual performance information on the Charter performance the Assurance Statement and the SHR Engagement plan is provided to tenants online and information on how to access these reports is included in the hard copy through the tenant newsletter.</p>	<p>Introduce an IT system to improve the way that tenants’ feedback is captured. (CX Feedback-Tenant Engagement Platform) to provide greater insight into tenants’ experience of the Housing Service and ability to analyse feedback more quickly to implement actions.</p>
Tenant and service user redress			
<p>Make information on reporting significant performance failures available to tenants, including SHR <u>leaflet</u>.</p>		<p>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</p>	<p>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.</p>
<p>Provide tenants/other service users with the information they need to complain and seek redress, and respond to tenants within service</p>		<p>Council Complaints Policy/procedure was updated in April 2021 to reflect the model complaint handling guidance from the Scottish Public Sector</p>	<p>Resolution Team moved to be located within Housing Operations and recruitment of a Project Manager completed December 2022 to take</p>

SHR requirements	Status	Evidence	Action
standard timescales, in accordance with guidance from the Scottish Public Services Ombudsman (SPSO).		<p>Ombudsman. Guidance and e-learning is available for staff.</p> <p>Recording and closing responses to complaints timeously on the Capture IT system is an area for improvement.</p> <p>All new Council tenants receive information on how to raise a complaint including the option to raise complaints and make suggestion online.</p> <p>Information on the complaints process is also available to all residents online.</p>	forward process review and improvements to the recording and monitoring of data during Summer 2023.
Ensure effective arrangements in place to learn from complaints and from other tenant/service user feedback, in accordance with SPSO guidance.		<p>Complaints' performance data and tenant feedback on services is used to inform service improvement.</p> <p>A Complaints Resolution Team is being embedded in the Housing Service implement control process for the effective resolution and analysis of complaints.</p>	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.		<p>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 Council, persons undergoing training or work experience as part of a training</p>	The Whistleblowing policy is included in induction and policy refresh for all Council staff.

SHR requirements	Status	Evidence	Action
		course, elected members, and agency workers.	
Equalities and Human Rights			
<p>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.</p>		<p>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.</p> <p>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).</p> <p>The Council is responding to the Scottish Government's Human Right's Bill for Scotland and will use any guidance or frameworks published to implement any changes identified.</p> <p>Documents, information, and written communications available in alternative formats and translation panels included. Interpreter services arranged for face-to-face contact where required.</p>	<p>Ensure IIAs carried out as required for all service improvement projects and use findings to inform plans and strategies.</p> <p>Ongoing awareness raising and training is provided to ensure staff understanding of the process and guidance.</p>

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')	
<p>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.</p>		<p>Work is ongoing to identify data currently collected and any gaps that exist and develop an action plan for implementing steps required to fulfil data collection requirements. The approach varies across services currently, e.g., EdIndex applicants are asked about age, ethnicity, and gender of involved parties only. In contrast more data is collected on those who are homeless, but not on tenants. Data on housing staff is collected corporately and meets requirements.</p> <p>The SHR model equality monitoring forms are being reviewed for Council needs for collecting data from tenants; the guidance recognises that this will not be a quick process and that it may also take longer to collect data in respect of certain data subjects with "reasonable adjustments" needed for people with disabilities.</p> <p>There is a Data Privacy Statement in place for the Housing Service and reference to this are provided in</p>	<p>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.</p> <p>Develop options for gathering data from tenants.</p> <p>Develop training programme for staff in respect of data collection.</p>

SHR requirements	Status	Evidence	Action
		<p>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, Sexual and Violent Offenders Liaison Officer (SAVOLO). Personal mandates are used and required for sharing of personal data where information sharing protocols are not in place.</p> <p>General Data Protection Regulation (GDPR) and Data Impact Assessment (DPA) 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. Approaches to briefing tenants and staff are being developed.</p>	