



ORKNEY
ISLANDS COUNCIL

Item: 7

Education, Leisure and Housing Committee: 10 September 2025.

Housing Service – Annual Assurance Statement.

Report by Director of Education, Communities and Housing.

1. Overview

- 1.1. The Council is required to submit an Annual Assurance Statement to the Scottish Housing Regulator by 31 October. The Annual Assurance Statement must provide assurance that the Council, in delivering its services in relation to social housing, is compliant with all aspects of legislation, including housing and also health and safety and meets appropriate performance and quality assurance standards.
- 1.2. The Scottish Housing Regulator enhanced its requirements in respect of assurance in relation to equalities, as well as tenant and resident safety, for Assurance Statements to be submitted after 31 October 2023. Further enhancements were made in relation to damp and mould for Assurance Statements to be submitted by 31 October 2025.

2. Recommendations

- 2.1. It is recommended that members of the Committee:
 - i. Approve the Annual Assurance Statement, together with supporting Annexes, attached as Appendix 1 to this report, for submission to the Scottish Housing Regulator.

3. Performance Structures

- 3.1. Members have previously been advised of the broad range of performance measures that are in place across Housing Services, with the following performance reports presented annually to the Education, Leisure and Housing Committee:
 - Homelessness update.
 - Energy Efficiency Standard for Social Housing.
 - Housing Performance.

- 3.2. A broad range of returns are submitted by Housing Services including:
- Quarterly submission of homelessness returns to Scottish Government (HL1, HL2, HL3 and Prevent 1).
 - Completion of quarterly and annual returns for Scotland's Housing Network.
 - Completion of annual return to Scottish Government "Housing Statistics Annual Return".
 - Membership of Scotland's Housing Network and benchmarking against peer authorities and also national benchmarking.
- 3.3. Housing Services undergo a range of inspections including:
- Care Inspectorate – Sheltered Housing.
 - Care Inspectorate – Homelessness and Housing Support Services.
 - National Standards for Information and Advice Providers (nationally recognised accreditation).
 - Until 2019, Housing Services, in common with other Council Services, undertook How Good is our Council Self-Assessment. This process will be replaced with a suitable corporate alternative following approval by the Council's Corporate Leadership Team.
- 3.4. The outcome of inspections, together with action plans where required, are reported to the relevant committee.
- 3.5. Additionally, the following are in place across Housing Services:
- Housing Services is subject to an annual assessment against eight specific criteria to determine the level of risk posed by relevant services and consequently any need for an internal audit.
 - An annual pre-submission audit of the Council's Annual Return against the Charter is undertaken by an independent organisation.
 - A quarterly meeting of key staff to consider, analyse and discuss improvements relating to the performance across Housing Services in relation to the indicators underpinning the Annual Return against the Charter.
- 3.6. The above are in addition to corporate processes such as the monitoring of indicators through the Council's corporate performance monitoring system, Pentana.

- 3.7. Some areas of Housing Services' performance are regulated and required by the Scottish Housing Regulator, including:
- Submission of Annual Return against the Charter.
 - Publication of Annual Report for Tenants.
 - Three Yearly Customer Satisfaction Survey with specific questions and requires a 40% return rate.
- 3.8. While required on a three yearly basis, the Council undertakes its Customer Satisfaction Survey every two years in order to ensure views collected are representative of the current tenant base. This was undertaken in April 2024 and reported to committee accordingly.
- 3.9. The Scottish Housing Regulator has published its Regulatory Framework and associated guidance relating to housing services' performance.
- 3.10. The Scottish Housing Regulator has produced an engagement plan for all social housing providers. Individual engagement plans highlight performance indicators which the Scottish Housing Regulator has identified as being areas where they may initiate some engagement with the organisation concerned. The engagement plan for Orkney Islands Council is available [here](#).

4. Annual Assurance Statement

- 4.1. The Annual Assurance Statement requires to be submitted annually between April and October and it is necessary for the Education, Leisure and Housing Committee to be assured that performance structures and assessments are appropriately robust.
- 4.2. The Scottish Housing Regulator has produced [guidance](#) which requires that the Annual Assurance Statement should be completed and agreed by the relevant local authority committee and should:

“Confirm that you have appropriate assurance that you comply with:

- All relevant regulatory requirements set out in Chapter 3 of the Regulatory Framework.
- All relevant standards and outcomes in the Scottish Social Housing Charter.
- All relevant legislative duties”.

- 4.3. Although the Scottish Housing Regulator has provided a prescriptive template to be submitted, the Regulator has not been prescriptive in respect of the structure of the information to accompany this. Attached as Appendix 1 to this report is the completed template.
- 4.4. Given that the appropriate Council committee is required to issue assurance on the performance of the Housing Service to the Scottish Housing Regulator, it is crucial that Elected Members are provided with information to be satisfied that performance processes are sufficient.
- 4.5. Annex 1 draws out the salient points in respect of performance areas, highlighting where performance has declined or would warrant additional explanation.
- 4.6. The onus is on the Council to highlight areas where it recognises its performance could be improved or where there are contextual factors which would limit its ability to compete at a national level. This information is also contained in Annex 1.
- 4.7. Scotland's Housing Network, the organisation which provides benchmarking services and good practice guidance to the housing sector has developed an action plan which organisations may choose to complete as part of their assurance process, ahead of submission. Attached as Annex 2 to this report is the action plan completed with local statistics and comments.
- 4.8. Annual Assurance Statements are required by the Scottish Housing Regulator for all social housing providers, namely both local authorities and registered social landlords. Consequently, some areas covered in Annex 2 are corporate responsibilities as opposed to being limited to those within Housing Services.

For Further Information please contact:

Frances Troup, Head of Community Learning, Leisure and Housing, extension 2450,
Email: frances.troup@orkney.gov.uk

Implications of Report

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

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

Background Papers

None.

Appendix

Appendix 1: Annual Assurance Statement.

Appendix 1 to Annual Assurance Statement Report

Orkney Islands Council's Housing Service

School Place

Kirkwall

Orkney

KW15 1NY

Annual Assurance Statement

We achieve all of the following standards and outcomes for tenants, people who are homeless and others who use our services:

- All relevant regulatory requirements set out in Chapter 3 of the Regulatory Framework.
- All relevant standards and outcomes in the Scottish Social Housing Charter.
- All relevant legislative duties.

Where additional explanatory information is required, this is included in annex 1 of the attached report and will be reproduced in the contextual information provided with the Annual Return against the Charter to the Scottish Housing Regulator.

I confirm that the Council's Education, Leisure and Housing Committee have seen and considered appropriate evidence to support the level of assurance we have at the meeting held on 10 September 2025.

Signed

Chair of Education, Leisure and Housing Committee.

Annex 1 – Key points relating to the Council’s performance

Explanatory information has been provided to explain either a change in performance or areas where Orkney’s context is particularly important.

Annual Return Against the Charter

The Annual Return against the Charter (ARC) for financial year 2024/25 has been completed for Orkney Islands Council and was submitted to the Scottish Housing Regulator by 31 May 2025. Areas of performance which required additional explanation are as follows (the indicators referred to are nationally required):

Satisfaction Survey

The Council undertook a wholesale tenant satisfaction survey in line with the Scottish Social Housing Charter in April 2024. The Council does this every 2 years, as opposed to every 3, to ensure closer alignment with the current tenant base. Results were timed to align with submission of the ARC and results were presented to the Council’s Education, Leisure and Housing Committee in September 2024, along with an action plan for improvement. The use of a warm up mailing and telephone survey option is the approach adopted by most social landlords and following the same approach allowed more appropriate benchmarking against others. Accordingly, in 2024 the company which undertook the survey ensured a higher level of telephone surveys despite the increased cost as the potential cost benefit was potentially helpful.

The tenant survey was undertaken by an independent body to ensure tenants felt able to openly express their views.

In addition to the wholesale survey, the Council undertakes a range of satisfaction surveys covering different parts of the service and these generally show good levels of satisfaction, though the response rate is low (with the exception of repairs customer satisfaction).

The Tenant Participation Officer is working with tenants with a view to increasing their involvement, improving the provision of information and considering alternative ways to collect information. This has included arranging events at the community fridge and parent and child groups in partnership with Orkney Housing Association Ltd. She is also developing an armchair panel and has created a leaflet promoting this accordingly. In addition, a social media page was set up to improve our provision of information in an accessible manner across the island group.

Information obtained from customer surveys and other means of obtaining information is used to inform the Housing Service’s relevant Service Delivery Plan accordingly.

Given that the repairs customer satisfaction survey is run as a rolling programme, that data was used for the Annual Return against the Charter rather than the wholesale tenant survey.

Indicators 3 and 4 (Complaints)

During the financial year 2024/25, a total of 24 first stage complaints were received, all of which were fully responded to. Additionally, 19 stage 2 complaints were received and 4 remained open at year end and will be carried forward into financial year 2025/26.

The average response time for first stage complaints was 3.38 days, showing a significant improvement from 6.9 days the year before. The average for stage 2 complaints also improved, decreasing from 23.78 days to 17.40 days.

One complaint at each stage exceeded the target (taking 7 and 41 days respectively), both delays were due to administrative oversight, which has since been reviewed. A manual audit of complaint handling has been completed, and targeted training is being rolled out for Housing Officers and Building Inspectors to improve complaint recording and resolution within the Concerto computer system.

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

Indicators 8 and 9 (Repairs)

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

A total of 346 emergency repairs were completed with a total of 3,498 hours, giving an average completion time of 10.11 hours and a median of 3.72 hours. This is a slight increase from last year's average of 8.97 hours. The majority of emergency repairs were completed within target timescales; however, 29 repairs exceeded the 24 hour limit, with 7 of those taking more than 30 hours. These delays were primarily due to contractor errors in raising follow-on orders, difficulties in sourcing specialist parts, access issues and third-party dependencies such as utility providers. Several isles jobs were also affected by weather related disruption and contractor availability.

Significant work has been undertaken during 2024/25 to close a backlog of historic open orders, bringing the number of live jobs to a more manageable level. Regular meetings are now held with Building Inspectors and contractors to review jobs at risk of exceeding target timescales, ensuring early intervention and seeking to prevent delayed completions.

The Council continues to work closely with its contractors to ensure the performance management culture remains central to service provision despite significant pressures on services and Orkney's remote and rural context.

As regards non-emergency repairs - a total of 1,526 repairs were undertaken with a total of 23,836 working days resulting in an average completion time of 15.62 days. This reflects an improvement from 2023/24, when the average reached 17.23 days. A total of 680 repairs were completed within 7 working days, and 971 were completed within 14 days, demonstrating that the majority of repairs continue to be delivered efficiently. A total of 347 repairs exceeded 20 working days, with the longest taking 197 days to complete.

These delays were mainly due to access constraints, contractor and subcontractor delays, and the bundling of similar repair types such as painter or fencing jobs, which were recorded as individual orders. While these cases represent a small proportion of overall repairs, they have had a disproportionate impact on the average. Work to improve the categorisation and recording practices will be undertaken in 2025/26 to ensure consistency and improve accuracy, particularly in processes between contractors and the Building Inspector interface.

As regards the indicator on “Right First Time” (RFT), during 2024/25, a total of 1,517 reactive repairs were completed, of which 1,105 were recorded as completed right first time, giving an overall rate of 72.84%. The accuracy of this measure is dependent on consistent reporting and appropriate use of follow-on orders where additional works are required. A mid-year audit by CD Consultancy highlighted concerns around how RFT data was being recorded and the need for clearer links between initial repairs and any subsequent visits. In response, a manual review of recorded RFT jobs has been carried out to identify discrepancies or misreporting, particularly where follow-up work may not have been properly linked. Targeted training is also being delivered to relevant staff.

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

Indicator 14 (Tenancy Offers Refused)

The percentage of tenancy offers refused in 2024/25 was 17.65%, up from 12.09% in 2023/24 but continuing a strong downward trend from previous years (29.92% in 2022/23 and 32.64% in 2021/22). The focus remains on reducing refusals through improved communication, pre-allocation contact, and matching processes.

It was previously advised that there is an intention to introduce a new lettings policy, based on the principles of choice, by April 2021, while delayed as a result of COVID-19, meantime given the local position around homelessness, lets to homeless households are being prioritised and the implementation of our lettings policy will progress during financial year 2025/26.

Indicators 15 (Anti-Social Behaviour)

The Council has neighbourhoods which are clean and attractive. The level of anti-social behaviour in Orkney remains very low. Along with Orkney Housing Association Ltd, joint work is undertaken closely with the Council’s corporate Anti-Social Behaviour Co-Ordinator and the Police in order to take a multi-agency approach to any issues which arise.

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

There were just 21 cases of anti-social behaviour, during financial year 2024/25 and all of these were resolved within the required timescale.

Indicators 16 (Tenancy Sustainment)

Overall tenancy sustainment (indicator 16) shows sustained performance.

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

A total of 69 tenancies were sustained for more than a year – 20 from the waiting list, 1 existing tenant and 48 homeless households. This was from a total of 79 tenancies, being 26 from the waiting list, 2 existing tenants and 51 homeless households. Of the tenancies which were not sustained for longer than a year, 2 were due to abandonments, 4 as a result of death and 4 renunciations. In percentage terms these were as follows:

- Existing tenants - 50%.
- Homeless households – 94.12%.
- Waiting list – 76.2%.
- Overall tenancy sustainment – 87.34%.

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

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

Void (empty property) loss increased from £62,408 in 2023/24 to £66,946, representing a slight increase in the amount of rent due to properties being empty but a percentage reduction from 1.49% to 1.47%. There were 71 relets in 2024/25, compared to 79 in the previous year. Despite ongoing issues with electric meters, for which assistance was sought from Orkney's MSP, a consistent relet performance was maintained.

Regarding the indicator on the average length of time taken to relet properties, a total of 71 properties were relet during the financial year 2024/25. The time taken to relet properties decreased. The total number of calendar days they were empty was 4,306, resulting in an average relet time of 60.65 days. This represents a decrease from the previous financial year 2023/24, where the average relet time was 71.43 days.

We again experienced a small number of voids with extended relet times due to low demand, particularly in specialist or isles stock. This included one supported accommodation unit, one sheltered, and one very sheltered property, which together took 539 days to relet. A further two island properties categorised as low demand took 413 days in total. Excluding these five properties, the adjusted average relet time would be 50.81 days, which compares favourably to 52.99 days the previous year. This demonstrates that, for the majority of stock, relet times are continuing to improve.

There continues to be a focus on minimising delays in relet processes, improving void turnaround times, and refining demand analysis for specialist properties to inform future lettings strategy.

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

Gross arrears continued to be challenging throughout the financial year 2024/25. The figures at year-end show a significant reduction to 9.43% from 12.58% in 2023/24. This shows the downward trend has continued from 12.65% in 2022/23 and 14.35% in 2021/22. This steady reduction reflects the sustained focus placed on income recovery and arrears management over the past four years.

We continue to maintain strong oversight of arrears performance. This approach includes early intervention by Housing Officers, close joint working with Orkney Citizen's Advice Bureau on income maximisation and debt advice, and escalation of complex cases to our dedicated Housing Officer (Income Collection). A second officer has remained in post throughout 2024/25 to support arrears recovery and supplement the wider Housing Management team. Performance is monitored closely and reported regularly to senior officers and elected members.

The percentage of rent collected as a percentage of rent due in the year was 98.84% compared to 102.47% for financial year 2023/24. While still within an acceptable range, this decrease reflects timing differences at year-end and ongoing administrative pressures. In year collection remained steady across all four quarters and the close monitoring of trends continues.

The number of households for which the Council received housing cost payments directly remained at 479, unchanged from 2023/24. However, the total value increased to £1,708,909, reflecting higher average entitlement. Manual inputting of Universal Credit and bank payments continues to place pressure on a small staffing resource and the Housing Revenue Account. Testing of the latest release of the Northgate computer system has now been completed and close joint working with the relevant software provider is

ongoing to schedule the automation of Universal Credit postings, which in turn will reduce administrative workload and improve data accuracy.

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

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

Write-offs for the financial year 2024/25 decreased to 0% from £42,007, or 18.26% of the former tenant arrears outstanding the year before, representing a significant change from the previous year. Discussions are still ongoing to potentially increase the level of write-offs for former tenant arrears. This reflects the fact that no write-offs were processed during 2024/25, as our focus remained on recovering historic debt where feasible. However, we are working with Finance colleagues to implement a wider and more structured write-off programme in 2025/26. This approach aligns more closely with common practice across the sector and will ensure a more consistent and sustainable focus on current arrears.

“Mandatory” Box

While introduced initially in 2022/23, the ARC for 2023/24 included a new requirement for a mandatory box to be completed with enhanced information. This related to areas of tenant and resident safety and required that as well as providing specific information on the number of properties which failed electrical safety checks and the provision of interlinked heat and smoke alarms, data must also be included to show the number of properties which fell out of compliance during the year.

The last full stock condition survey was undertaken in 2007 by Savills, an independent surveyor. The Housing Service intends to undertake a full stock condition survey in 2026/27.

There is an internal target to undertake at least 10% check of properties in a reporting year. During 2023/24, 12% of assessments were recorded on our computer system, Concerto. Work continues to improve the evidence base and operational processes in relation to Scottish Housing Quality Standard (SHQS) for the period prior to 2023/24 and we are working with the Scottish Housing Regulator in this respect.

The cost of undertaking a comprehensive stock condition survey was included in the Housing Revenue Account Business Plan which was approved by our Education, Leisure

and Housing Committee in February 2024. Additional committee approval will be required before a stock condition survey can be progressed and, assuming this approval is granted, a procurement process will then follow. It is likely therefore that the stock condition survey will be undertaken during financial year 2026/27 as outlined in our engagement plan.

We will continue to maintain ongoing evidenced assessment of at least 10% of total stock. A comprehensive stock condition survey will be undertaken as outlined above – the precise detail of which will be determined through our committee processes during financial year 2025/26.

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

As at 31 March 2025, the Council held 1,024 properties which were in scope for the Scottish Housing Quality Standard (SHQS).

One-criterion fails: A total of 38 properties fail on a single SHQS criterion. Of these, 34 relate to Energy Performance Certificates (EPC), 3 relate to LD2 smoke and heat alarm compliance, and 1 relates to secure common front door entry.

Two-or-more-criteria fails: A further 8 properties fail on two or more SHQS criteria. These include combinations such as EICR (electrical installation condition reports), LD2 alarms, bathroom standard, lead-free pipework, and common or public lighting.

In addition, 12 properties are recorded as being in abeyance, and 5 are recorded as exempt. The exemptions consist of four former schoolhouses for which formal Committee approval has been given for disposal once they become vacant, and one property where legal constraints prevent the necessary compliance works from being undertaken.

These figures represent our final reported position for year-end, following a comprehensive internal review and a 9-month data audit conducted by CD Consultancy in 2023/24. As part of this process, it was identified that a number of properties had previously been recorded as exempt without fully meeting the criteria outlined in the ARC Technical Guidance. These cases have since been reviewed and reclassified to ensure the return is fully compliant. The total number of properties reported excludes those considered out of scope.

Annual Report for Tenants

The annual report for tenants will be produced by 31 October 2025 as required by the Scottish Housing Regulator. This will include key information which is of interest to tenants.

The Council has a joint Residents' Panel with Orkney Housing Association Ltd which consists of tenants / residents of both organisations. They will be asked for their views on the Annual Report ahead of publication and their views will be taken into account in producing the final document. The Council includes a section in the Annual Report which encourages feedback from tenants more generally on how they feel about the report and the information in it.

The Residents' Panel will also be involved in discussions around the Annual Assurance Statement prior to submission.

Customer Satisfaction Survey

The Council is required to undertake a wholesale tenants' satisfaction survey every three years. This was undertaken most recently in April 2024 by an independent body in order to ensure impartiality.

A range of customer satisfaction surveys are in place across the Service in order to assess the quality of the service on an ongoing basis. These include:

- New tenants' survey regarding quality of home and service.
- Repairs Satisfaction survey.
- Improvements satisfaction survey.
- Exit questionnaires for tenants leaving the Council's accommodation.
- Homelessness service, new tenants' questionnaire.
- Homelessness service, exit questionnaire.
- Housing Advice service, exit questionnaire.

In addition, information is used from complaints and general feedback as encouraged by footnotes on all correspondence etc. The information is used to inform the Service Delivery Plan for the relevant part of the Service which underpins service improvements.

This links to standard 3.12 in the National Standards for Information and Advice Providers which is part of the Council's accreditation.

While the Council collects data from its wholesale tenant satisfaction survey, this can lead to some distortion in figures. For example, when questions are raised regarding repairs it should be the most recent repair. It is therefore more effective to collect this data immediately following completion of the repair.

The Council intends to use its ongoing customer satisfaction information so it can evidence that the information collected relates to the present day.

Scottish Housing Regulator's Engagement Plan

The Scottish Housing Regulator's engagement plan highlights key indicators, relating to services to people who are homeless, service quality, stock quality and tenant and resident safety where they have indicated they wish to engage with the Council.

During 2024/25 they reviewed and compared the data for all local authorities from the Scottish Government's national homelessness statistics. They also spoke to all local authorities to gather further information and assurance about their homelessness services. To assess the risks to people who are threatened with or experiencing homelessness they will engage with all local authorities during 2025/26 with a focus on the provision of appropriate temporary accommodation.

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

- Orkney's provision of temporary accommodation to people who are homeless.
- The Scottish Housing Regulator's Engagement Plan states that in January 2023, the Council advised the Scottish Housing Regulator that it had identified weaknesses in the quality of the evidence underpinning the data used to report on Scottish Housing Quality Standard (SHQS) compliance. In December 2023 the Council confirmed that the SHQS data remained unvalidated, and that there were inaccuracies in the data held. The Council advised it is progressing an improvement plan to address these weaknesses.
- The Council last carried out a stock condition survey in 2007. It will complete a stock condition survey in 2026/27 which will fully assess SHQS compliance in all of its homes. Until then, it will continue to perform SHQS checks to validate its data.
- The Engagement Plan further states that in January 2025, the Council told them that a number of planned legionella risk assessments had not been completed. The Council investigated this and found that it had only completed legionella risk assessments for a small number of its homes. The Council is planning to carry out legionella risk assessments in all of its homes.
- Further, the Scottish Housing Regulator's engagement plan states that in order to assess the risk to social landlords they have reviewed and compared the 2023/24 service quality performance of all social landlords to identify the "weakest performing" landlords. They will therefore engage with Orkney about tenant satisfaction, repairs and rent arrears.

Accordingly, the Council must:

- Send the Scottish Housing Regulator information required in relation to its homelessness service.
- Advise of any emerging issues preventing it from fulfilling its statutory duty to provide temporary accommodation when it should and comply with the Unsuitable Accommodation Order.
- Provide monthly updates on progress to validate and improve the quality of its data used to report compliance with the SHQS and on its progress with completing legionella risk assessments and any required actions in its homes.

- Provide updates on progress with completing a full stock condition survey in 2026/27.
- Send information about the actions being taken to improve performance on tenant satisfaction, repairs and rent arrears.

Data on homelessness is not included within the Annual Return against the Charter generally. Instead, this information is provided through returns outlined at section 4.2 of the committee report and is reported to the Council's Education, Leisure and Housing Committee, specifically a report is presented to the June cycle of meetings.

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

Annex 2: Assurance Action Plan

Assurance and Notification

Requirement.	Who.	When.	RAG.	Comments.
Prepare an Annual Assurance Statement in accordance with guidance.	Head of Community Learning, Leisure and Housing and Data Analysts.	October 2025.	Green.	Committee report and appendices to be presented to Education, Leisure and Housing Committee on 10 September 2025.
Submit Annual Assurance Statement to Scottish Housing Regulator between April and October each year.	Data Analysts.	October 2025.	Green.	On target to be submitted by October 2025.
Make Annual Assurance Statement available to tenants and other service users.	Data Analysts and Tenant Participation Officer.	October 2025.	Green.	To be included in Housing Services' area of website.
Notify Scottish Housing Regulator during the year of any material changes to the assurance in the Annual Assurance Statement.	Head of Community Learning, Leisure and Housing and Data Analysts.	As required.	Green.	
Have assurance and evidence that we are meeting all our legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety.	Head of Community Learning, Leisure and Housing and Team Manager (Maintenance and Heritage).	Ongoing.	Amber*.	In general compliance with our legislative duties links to Standard 1.5 of National Standards for Information and Advice Providers. We were re-accredited by the Scottish Legal Aid Board during 2022 and are scheduled for re-accreditation during 2025/26.

Requirement.	Who.	When.	RAG.	Comments.
				<p>Evidence includes a broad range of Council corporate policies including the Health and Safety Policy; Policy on Unacceptable Actions and Challenging Behaviour by Service Users and Complainants; The Role of Customer Service Advisers and All Staff Using the Customer Services Facility; Housing Services' Staff Training and Development Policy; Library Procedure for Housing Services; staff training logs and internal portal which includes a broad range of information on corporate policy areas.</p> <p>Staff management processes are in place across Housing Services including induction, regular one to ones in line with the Line Management Policy and all staff are required to complete the Personal Development Award for Advisors with Shelter at the next intake after taking up post. In addition, structures such as qualified housing officer are in place to encourage housing staff to complete a housing qualification.</p> <p>During 2021 we undertook a review of our equalities policy and the processes</p>

Requirement.	Who.	When.	RAG.	Comments.
				<p>relating to equalities data collection and human rights. Our revised Equalities Policy and Action Plan was approved by our Education, Leisure and Housing Committee in June 2021. We sought equalities information from all existing tenants and housing applicants, in relation to 9 protected characteristics in line with the Scottish Housing Regulator's Regulatory Framework and Scottish Federation of Housing Association Limited's Guidance. Equalities data requested has been expanded across all housing and homelessness service areas accordingly and data will be used as required to ensure continued improvement of service provision.</p> <p>As regards tenant safety, specifically in relation to the points outlined in the Scottish Housing Regulator's guidance of summer 2023 and updated in March 2025:</p> <ul style="list-style-type: none"> • Gas safety is not applicable as Orkney has no mains gas; • As regards electrical safety, we have in place a 5 yearly rolling programme to carry out EICRs and address any

Requirement.	Who.	When.	RAG.	Comments.
				<p>remedial works identified from them. An issue arose which affected this in December 2022 and by 31 March 2025 just 9 properties require to have an EICR completed. All are properties where there are other issues affecting the ability to complete an EICR including legal issues, undergoing major works or hoarding issues experienced by the tenant.</p> <ul style="list-style-type: none"> • Fire safety - We are also working through a programme of implementing the residual aspects of our contract on interlinked smoke alarms. At 31 March 2025, just 9 properties require LD2s to be fitted. Again, all are properties where there are other issues impacting on the ability to complete the works. These include an abandonment in a remote location, legal issues and hoarding issues affecting the tenant. We also have a total of 588 properties where a contract is in place to ensure the evidence that LD2 has been fitted has been obtained – note this is

Requirement.	Who.	When.	RAG.	Comments.
				<p>specifically different to the fitting of LD2.</p> <ul style="list-style-type: none"> • Water safety – we have entered into a contract with a contractor who will undertake legionella risk assessments across all of our housing stock. A plan has been developed and implementation has begun during 2025/26. • Asbestos – The amount of asbestos in our properties is low and is largely confined to artex ceilings, external fabric such as soffits, roof sheeting etc, that have been surveyed in accordance with the Control of Asbestos Regulations 2012. • Our asbestos records are held on an external online platform. This is fully accessible to our contractors and allows us to track users access. Details are held on when the property was last surveyed, updates carried out as well as if any asbestos containing materials were identified or removed. The data is

Requirement.	Who.	When.	RAG.	Comments.
				<p>updated as asbestos is managed / removed, and historical data maintained. In 2023/24, 4 asbestos surveys required to be completed and 3 were completed accordingly. Access issues affected the fourth and attempts to gain access continue. The property concerned was previously within our stock, so historic records exist. Some additional properties purchased during 2024/25 require asbestos surveys and accordingly a total of 8 require to be completed in 2025/26.</p> <ul style="list-style-type: none"> • We are currently completing a procurement process to recruit a contractor to undertake our asbestos surveys over the next three years and will look to re-survey our stock. The duty to manage asbestos does not apply to domestic properties, (but common areas are covered) however we are responsible for maintaining the buildings' structure and are

Requirement.	Who.	When.	RAG.	Comments.
				<p>considered duty holders under the Control of Asbestos Regulations (CAR).</p> <ul style="list-style-type: none"> • Radon – we previously carried out radon gas testing to 56% of our properties which generated remedial works to 18 properties that have been subsequently completed. The survey data and remedial actions are captured and maintained in a property tracker held by the Council. • The contractor which undertook the work 10 years ago is no longer in business. We are currently working with our Procurement Service to look at availability of specialist contractors via the Scotland Excel framework. Should this process fail, we will advertise via Public Contracts Scotland and undertake a full procurement exercise. It is hoped that this will be concluded in September 2025 and that a contractor will be in place. The data will be picked up from 10 years ago with any properties situated in

Requirement.	Who.	When.	RAG.	Comments.
				<p>areas of high readings revisited along with a sample of other areas.</p> <ul style="list-style-type: none"> • Damp and mould – a policy on damp and mould was approved by our Education, Leisure and Housing Committee in September 2023 and staff were trained accordingly. Our recording and monitoring processes were enhanced (and continue to improve and develop) to allow focused measures to be implemented to address cases of damp and mould in our social housing. Where damp and mould has been identified we have put in place joint visits, between Building Inspectors and Housing Officers, to provide our tenants with technical and practical assistance and guidance to address the issue. Where fabric issues have been identified as the cause, remedial works have been carried out. • Indicators have been included in the Annual Return against the Charter for 2025/26. Data so far, shows that 12 cases were completed between 1 April and 31 July 2025. Most cases were

Requirement.	Who.	When.	RAG.	Comments.
				<p>condensation related but a small number were caused by plumbing leaks. We will now strengthen our process to ensure the cause is recorded for every case. The average time for completion of cases was 29 days including delays relating to arranging access with tenants. All cases involved a joint Housing Officer / Building Inspector visit, and follow up inspections are planned around 6 months after completion. As at 30 July 2025, there were two open cases, both still well within target timescales.</p> <ul style="list-style-type: none"> • Service improvements around damp and mould include clearer tenant advice at tenancy sign up stage and when damp / mould is reported; all cases are prioritised within the 20 day target but with urgent escalation where health risks are identified; proactive inspections of similar property types or neighbouring homes where a case is found and the use of case data to inform targeted investment in extractor fans, insulation upgrades and cold-spot treatment etc.

Requirement.	Who.	When.	RAG.	Comments.
				<p>This approach ensures we are responding quickly, improving the consistency of monitoring processes and using data to reduce the risk of repeat issues for tenants.</p> <ul style="list-style-type: none"> • Lift safety – this is not applicable in an Orkney situation as the Council has no social housing which is fitted with lifts. <p>Going forward revised structures will be implemented around monitoring of preventative, protective maintenance.</p>
Notify Scottish Housing Regulator of safety matters which have been reported to or investigated by the Health and Safety Executive (HSE) or reports from other regulatory or statutory authorities or insurance providers, relating to safety concerns.	Head of Community Learning, Leisure and Housing / Head of Property, Asset Management and Facilities and Team Manager (Maintenance and Heritage).	In place.	Green.	<p>The Council's Health and Safety Advisor provides guidance on all aspects of health and safety as required. If a report were received from the Health and Safety Executive, immediate steps would be taken to address the issue, and the Scottish Housing Regulator would be advised accordingly.</p> <p>We have policies covering issues such as Asbestos and procedures in place regarding Radon / Legionella etc. Our Infrastructure and Organisational Development Service undertakes property inspections and ensures</p>

Requirement.	Who.	When.	RAG.	Comments.
				properties are fitted with interlinked smoke alarms etc. Housing Services has quality assured the data on checks to evidence compliance with the Scottish Housing Quality Standard.
Make Engagement Plan easily available and accessible to tenants and service users, including online.	Head of Community Learning, Leisure and Housing and Data Analysts.	May 2025.	Green.	To be included by link to the Scottish Housing Regulator's website from Housing Services' area of the Council's website.
Register all requirements for providing data to Scottish Housing Regulator and Information Commissioners Office.	Head of Community Learning, Leisure and Housing and Head of Legal Services.	In place.	Green.	Housing Services will hold a register of any matters reported to the Scottish Housing Regulator and Legal Services will record all matters reported to the Information Commissioners Office.

Scottish Social Housing Charter Performance

Requirement.	Who.	When.	RAG.	Comments.
Submit Annual Return against the Charter to Scottish Housing Regulator in accordance with published guidance.	Head of Community Learning, Leisure and Housing and Data Analysts.	May 2025.	Green.	Submitted by 31 May 2025.
Involve tenants, and where relevant service users, in the preparation and scrutiny of performance information.	Tenant Participation Officer.	In place.	Green.	<ul style="list-style-type: none"> Residents' Panel involved in development of annual report as standard.

Requirement.	Who.	When.	RAG.	Comments.
<ul style="list-style-type: none"> • Agree an effective and meaningful approach with tenants. • Publicise approach to tenants. • Verify approach and evidence involving tenants has happened. • Involve other service users in an appropriate way. 				<ul style="list-style-type: none"> • Section in the annual report to encourage feedback. • Residents' Panel are invited to an annual presentation on performance from Scotland's Housing; Network (from 2019) and discussion at Residents' Panel meeting thereafter.
<p>Report performance to tenants and other service users no later than October each year:</p> <ul style="list-style-type: none"> • Agree format of performance reporting with tenants and ensure accessible with plain and jargon free language. • Provide assessment of performance in delivering Charter outcomes. • Include relevant comparison including previous years, other landlords and with national performance. • Set out how we intend to address areas for improvement. 	Head of Community Learning, Leisure and Housing and Data Analysts and Tenant Participation Officer.		Green.	The Council has a joint Residents' Panel with Orkney Housing Association which consists of tenants / residents of both organisations. They are asked for their views on the Annual Report ahead of publication and their views will continue to be taken into account in producing the final document. The Council includes a section in the Annual Report which encourages feedback from tenants more generally on how they feel about the report and the information on it.

Requirement.	Who.	When.	RAG.	Comments.
<ul style="list-style-type: none"> Give tenants and service users a way to feedback views on style and form of reporting. 				
Make Scottish Housing Regulator report on our performance easily available to tenants including online.	Head of Community Learning, Leisure and Housing and Data Analysts.	When produced by SHR.	Green.	To be included as a link to the Scottish Housing Regulator's website from Housing Services' area of the Council's website.

Whistleblowing

Requirement.	Who.	When.	RAG.	Comments.
Ensure effective arrangements and a policy for whistleblowing for staff and elected Members.	Head of HR and Performance.	In place from October 2015.	Green.	Policy on Whistleblowing is available on internal portal or in either electronic or hard copy from HR on request. Trade Unions are also aware of this. There is a monthly meeting with Trade Unions which is corporate and each individual service holds regular meetings with the Trade Unions as well.
Make Whistleblowing policy easily available and promote its existence.	As above.	In place. As above.	Green.	As above.

Tenants and Service Users Redress

Requirement.	Who.	When.	RAG.	Comments.
Make information on reporting any significant performance failures, including the Scottish Housing Regulator's leaflet, available to our tenants.	Head of Community Learning, Leisure and Housing and Tenant Participation Officer.	In place from June 2019.	Green.	A link will be provided to the Scottish Housing Regulator's leaflet from the Council's website.
Provide tenants and service users with the information they need to exercise right to complain and seek redress.	Team Manager (Housing Strategy, Development and Data).	In place.	Green.	The Council's corporate complaints process is used and corporate policy in line with the guidance from the Scottish Public Services Ombudsman. Information is available through our website and in hard copy on request.
Respond to tenant complaints within our service standards timescales and in accordance with the Scottish Public Services Ombudsman guidance.	Team Manager (Housing Strategy, Development and Data).	In place.	Green.	Reporting against timescales is included in the Annual Return against the Charter.
Ensure we have effective arrangements to learn from complaints and other tenant and service user feedback, in accordance with SPSO guidance.	Head of Community Learning, Leisure and Housing and Head of Legal Services.	In place.	Green.	This links with standard 3.12 of the National Standards for Information and Advice Providers which covers using feedback to inform service provision. Information collected through complaints, comments and customer satisfaction surveys is used to inform the

Requirement.	Who.	When.	RAG.	Comments.
				update of the Service Delivery Plan for the relevant service area.

Equality and Human Rights

Requirement.	Who.	When.	RAG.	Comments.
Have assurance and evidence we consider equality and human rights issues properly when making decisions, in the design and review of internal and external policies, and in our day to day service delivery.	Senior Management Team of the Council.	In place.	Green.	<ul style="list-style-type: none"> All policies within Housing Services contain a section on equalities. The Housing Service has a specific Equalities Policy and one on Accessibility and reviewed its Equalities Policy during 2021. Equalities monitoring across 9 protected characteristics has been taken forward in line with the national guidance. We sought equalities information from all existing tenants and housing applicants, in relation to 9 protected characteristics in line with the Scottish Housing Regulator's Regulatory Framework and Guidance from the Scottish Federation of Housing Associations. Equalities data requested has been expanded across all housing and homelessness service areas accordingly and data will be used as required to ensure continued improvement of service provision.

Requirement.	Who.	When.	RAG.	Comments.
				<ul style="list-style-type: none"> • Committee reports on policy matters all contain a section on equality so this is mainstreamed. • Completion of equality impact assessments is standard. • Island communities impact assessments are undertaken as required. • The Council monitors its website and ensures it meets website accessibility requirements. • The Council employs a specialist equalities officer to ensure compliance. • Housing staff and staff within our Infrastructure and Organisational Development Service received refresher training on equalities in the autumn of 2023.
Collect data relating to protected characteristics for existing tenants, new tenants, people on waiting lists and elected Members and staff.	Head of Community Learning, Leisure and Housing	In place.	Green.	<ul style="list-style-type: none"> • Equalities criteria do not currently apply to Elected Members given that they are democratically elected. • Equalities monitoring information across 9 protected characteristics is now collected for new tenants and applicants and information has also

Requirement.	Who.	When.	RAG.	Comments.
				<p>been sought in relation to existing tenants also. This is sought along with information relating to requirements for information in a range of formats.</p> <ul style="list-style-type: none"> As regards staff, our HR Service collect information relating to 9 protected characteristics for staff when they apply for any post whether when they initially come into the organisation or where an internal application is submitted. Updates are requested through the MyView portal and annual communications are issued to remind staff to update details. The staff survey also requests information relating to the 9 protected characteristics and an annual report is produced on staff diversity which in turn is used to inform any relevant changes to policy required.
Collect data on protected characteristics of people who apply as homeless.	Head of Community Learning, Leisure and Housing.	In place.	Green.	<ul style="list-style-type: none"> Equalities monitoring information is collected for people who apply as homeless. Our homelessness interview form has been updated to include all 9 protected characteristics.

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

* Those requirements marked as “amber” will all revert to green during 2024/25 when the issue has been addressed through ensuring the Council complies with the requirements in the Scottish Housing Regulator’s engagement plan. Delivery of repairs services is undertaken by the Council’s Infrastructure and Organisational Development Service for the Housing Service including the physical aspects of ensuring tenant and resident safety (gas, electrical, fire, water, asbestos, radon, damp and mould and lift safety).