



Moray Council Housing and Property Service Assurance Statement

We comply with the regulatory requirements set out in Chapter 3 of the Scottish Housing Regulator's Regulatory Framework with the exception of the areas set out below.

We achieve all but the following outcomes and standards in the Scottish Social Housing Charter:

Outcome 4 – Quality of Housing

- At 31 March 2021, we reported that 257 of our 6,251 properties did not meet the Scottish Housing Quality Standard.

We have based this on the findings of our Stock Condition Survey completed in Feb 2021. This Survey had been delayed due to COVID 19. The Survey provides a significant improvement in the quality of the data held by the Council, particularly on our cloned properties, and has facilitated a more accurate assessment to be made of the extent of our progress in achieving SHQS and EESSH compliance.

Our delivery programmes were significantly delayed due to COVID-19 but have since resumed within Scottish Government guidelines.

- At 31 March 2021, we reported that 1,369 of our 6,251 properties do not meet the Energy Efficiency Standard for Social Housing, reduced by 505 properties from March 2020

The reported improvement has been achieved in part by the improved intelligence provided by the Stock Condition Survey but also due to the continuation of significantly increased resources allocated to the EESSH delivery programme.

£5.2m was set aside in 2020/21 for heating upgrades, an increase of £1m from the previous year. Although this programme has been delayed due to COVID-19 the budget allocation remains in place to deliver an ambitious programme of over 900 upgrades over a 3 year period.

The Council secured funding of £0.9m from the Warm Homes Fund to replace electric heating with new energy efficient gas boilers, or with air source heat pumps in off-gas areas in 190 homes. Progress on the works programme during 2020/21 has been delayed by restrictions on working in homes caused by COVID-19.

The Council has been successful in a bid from the Scottish Government's Low Carbon Infrastructure Transition Fund (LCITP) for 50% grant of £1.2m to implement a programme of improvements to 245 properties located off the mains gas grid. These works will contribute to delivery of EESSH2.

We comply with all relevant legislative duties, including our legal obligations relating to housing and homelessness, equality and human rights, and tenant and resident safety with the exception of:

Gas safety

- In 2020/21, we did not meet our statutory duty to complete a gas safety check within the required timescale for 198 properties. A comprehensive analysis of the reasons for these failures has been completed with the following findings:

No of failures	Findings
123	COVID-19 - tenants reporting symptoms refusing access due to CV19, shielding etc.
65	forced entry suspended - Tenants not responding to access requests during lockdown period (when forced entry was suspended)
6	void management - Normal practice is to cap during the void period and prior to the gas safety check expiry date but we failed to do this. No tenants were put at risk through this failure as the properties were unoccupied.
2	commercial boiler - 2 commercial boilers in 2 communal living settings (1 sheltered housing scheme/1 temporary accommodation hostel), serviced by a sub-contractor. This failure occurred as a result of the servicing contractor furloughing engineers during lockdown, resulting in a backlog of servicing and maintenance.
2	Administration failures due to system error and missing paperwork

All of these properties have since been serviced or the supply has been capped and made safe. We are currently trialing an automated system called Gas Tag which, once implemented, will reduce the potential for human/system errors to compromise our performance.

In addition, we are aware of changes in our performance which are directly attributable to the COVID19 pandemic and associated cessation of activities:

Rents

- As part of our budget setting process for 2020/21, during December 2020/January 2021 we consulted tenants on the affordability of our rents and sought tenants' views on rent increase options. 68% of respondents reported no change in their ability to pay their rent during the pandemic and 58% were in favour of a 3% rent increase.

At the same time we also commissioned consultancy to assess affordability of our rents which found that a 3% rent increase would mean that our rents would be 1% lower on average than comparable local authorities and 22% less than locally operating RSLs. We implemented a 3% rent increase for 2021/22 with the additional income directed towards ESSH/ESSH2 compliance.

We have commissioned further consultancy to complete a HRA Business Plan Review which will consider rent levels, rent affordability, and investment requirements over the medium term. This Review is expected to be complete by December 2021.

Voids

- The number of properties becoming void during 2020/21 reduced by 22% from 2019/20. The number of days void and the rent lost through properties being empty increased by 27% and 23% respectively. These trends are directly attributable to the pandemic i.e. to the cessation of house moves for a time, the hesitancy of some tenants to consider moving home, the cessation of indoor works for a time, periods of staff sickness and self-isolation, supply chain shortages and delays.

We have been implementing a recovery plan since April 2021 and are confident that void performance will be restored to pre-pandemic levels through 2021/22.

We are preparing for increased scrutiny on our compliance with **Charter Outcome 1: Equalities**.

- Moray Council has initiated work on development of improved equalities and human rights outcomes as part of the Local Outcome Improvement Plan and Corporate Plan. This will improve mainstreaming of response to equalities and human rights issues throughout the Council.

We routinely gather information from new tenants on each of the protected characteristics and routinely complete Equalities Impact Assessments on all of our strategies, policies and plans. These Assessments form an integral part of our decision making process.

We confirm that we have seen and considered appropriate evidence to give us this assurance.

We approved our Assurance Statement on behalf of the Housing & Community Safety Committee on 22 October 2021 and sign this statement on behalf of the Committee.

Councillor Louise Nicol
Chair of Housing & Community Safety

Councillor Paula Coy
Depute Chair Housing & Community Safety