



Moray Council Housing and Property Service Assurance Statement

We comply with the regulatory requirements set out in Section 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:

QUALITY OF HOUSING

Moray Council generally performs well as a landlord across the range of benchmarked performance indicators, there is an identified need for improvement in relation to Scottish Housing Quality Standard (SHQS) and Energy Efficiency Standard for Social Housing (ESSH).

At the Housing and Community Safety Committee on 7 May 2024, an ambitious improvement action plan was approved. It illustrated the route to increasing investment delivery to ensure improved compliance. The Improvement Plan includes a target of 90% SHQS compliance by the end of the reporting year. This is inclusive of an approved £19m Planned Maintenance and Investment Programs budget.

SHQS Compliance

Of the 6,380 Moray Council residential properties, 1,444 fully complied (22.6%) with the SHQS. The main areas of non-compliance were:

- Electrical Safety
- Energy Efficiency

Following the 2021/22 ARC submission, the SHR invited landlords in late July 2022 to reassess their SHQS compliance regarding electrical inspections. After reviewing the Council's position, we informed the SHR that most of our properties fell below the required electrical testing standard. This significantly impacted our SHQS compliance, resulting in only 6.3% of properties meeting the SHQS as of 31 March 2022. We took immediate action to address this by allocating additional investment.

As of 31 March 2024, 1,444 out of 6,380 properties (22.6%) meet the Scottish Housing Quality Standard (SHQS), with the primary issue being electrical safety, as 2,994 properties (47%) failed electrical testing alone; additional failures were mainly coupled to energy efficiency.

EESH

The second key component of SHQS which requires improvement is energy efficiency. As at 31 March 2024, 4,150 properties (65%) of our stock met EESH. An improvement plan has been developed to accelerate delivery of energy efficiency programs, which will significantly improve this position.

Damp and Mould

The Moray Council Housing and Community Safety Committee addressed the rise in dampness and mould in council houses. Measures include external and internal wall insulation, ventilation systems, and monitoring devices. A 2023 working group has revised procedures to prioritise inspections and remedial actions, focusing on vulnerable tenants. Over 250 properties received remedial works in

2023, and future measures will target at-risk properties. Continuous improvements aim to meet the SHQS and enhance living conditions for tenants.

Tenant and Resident Safety

Electrical Safety

By 31 March 2024, we had conducted 2,277 Electrical Installation Condition Reports (EICR) and brought 35.7% of properties up to a satisfactory standard. Additionally, 601 properties have undergone an EICR and scheduled for remedial works. All identified C1 faults (most critical) were rectified immediately, with none remaining unresolved.

As of 1 February 2024, two additional contractors were appointed to support Moray Council's electrical safety testing program. This followed a lengthy procurement process that required retendering because the local market lacked sufficient capacity to undertake the task. A monthly update is provided to the Regulator to advise on the progress on this matter.

Landlord Gas Safety

Two gas service failures regrettably occurred in 2023/24 out of 5,996 annual gas safety checks carried out. Both were the result of human errors in recording, with lessons learned on both occasions and procedures/training updated.

Furthermore, assessment is underway for an alternative servicing management and record keeping software solution with more rigorous control measures to further reduce the possibility of future errors.

Fire and Carbon Monoxide Detection

At 31 March 2024, 99.4% of our properties are compliant with the updated Fire Safety Regulations. Of the 35 properties that are not compliant, 7 are long term voids. Where there are issues gaining access, we will use our legal right to force entry to the property as a last resort under our No Access Policy to carry out works associated with our statutory safety requirements.

All our properties (where required) are adequately equipped with CO detection devices and comply with the Housing (Scotland) Act 1987 (Tolerable Standard) (Extension of Criteria) Amendment Order 2021.

Lift Safety

We only have one sheltered housing complex with a lift which is included on a cyclical maintenance contract to ensure that it complies with relevant legislation.

Asbestos

We continue to maintain an asbestos register and carry out a risk assessment before work commences in properties. Progression has been made to phase out cloned asbestos surveys so that we have full surveys available for all of our properties. We are reviewing our asbestos procedure and are implementing an Asbestos module that will provide staff with electronic access to information on Asbestos Containing Materials (ACM) within properties.

Reinforced Autoclave Aerated Concrete (RAAC)

After conducting a thorough desktop review and a limited physical inspection of our housing stock on those properties identified as fitting the profile, we have determined that there is no presence of RAAC within any of our residential properties. This conclusion is based on the available data and the results of the inspections carried out, ensuring that our housing stock does not include this material, which is known for its structural weaknesses.

Legionella Risk Assessment

We routinely conduct legionella risk assessments on our vacant properties, actively working to reduce risks by removing dead legs in the plumbing systems. The exception to this practice is with newly installed mandatory wet sprinkler systems, where the risk of legionella has been assessed as low and the benefits of these systems outweigh the potential risk.

Health and Safety Executive Reportable Events

Unfortunately, there were four notifiable events reported to the Health and Safety Executive (HSE) under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR). Three involved tradesperson-related injuries with no danger posed to tenants, while the fourth concerned a gas boiler installation issue that was promptly remedied before any harm occurred.

Housing and Homelessness

The total number of homeless households to whom the local authority has a statutory duty to secure permanent accommodation remained at the same level as last year with 415 households. Local RSL's remained taking a low percentage of the burden at only 15.18% (15.66% - 2022/23). New nomination agreements have almost all been agreed and local RSLs are submitting quarterly returns to Moray Council to monitor their direct homeless lets and applications.

Unsuitable Accommodation Order

During 2023/24 there were 25 households breaching the Unsuitable Accommodations Order. This was a direct result of a further increase in homeless presentations from 562 in 2022/23 to 584 in 2023/24. This was further exacerbated by the lack of new supply of council housing.

Temporary Accommodation Standards Framework

We are working towards compliance with the new guidance/framework. Most of our properties satisfy each of the criteria apart from digital inclusion. However, tenants have access to Moray Council information hubs and our main reception which all provide free internet access.

Equality and Human Rights

We continue to work towards compliance on the guidance on equalities published by the SFHA in 2023. We have been unable to fully implement system changes due to conflicting definitions on some of the protected characteristics which would affect the Scottish Government's homeless data collections. The Government has indicated that they will not review this until at least 2025.

Integrated Impact Assessments are conducted during the development of all new policies and strategies. By systematically analysing these impacts and monitoring these protected characteristics, we ensure that our policies and strategies promote positive outcomes, mitigate any negative consequences, and align with our Local Outcome Improvement Plan and Corporate Plan, and their Equality Outcomes.

Gypsy/Travellers

Moray Council does not currently operate any official gypsy/traveller sites. However, we have established a local protocol for managing unauthorised encampments, which ensures that the needs of both the encampment residents and the broader community are met. This protocol is supported by our dedicated unauthorised encampments officer, who oversees the process and provides necessary assistance and support.

We approved our Assurance Statement on 17 October 2024 and sign this statement on behalf of the Housing and Community Safety Committee.

Councillor Amber Dunbar

Chair of Housing and Community Safety

Councillor Donald Gatt

Depute Chair of Housing and Community Safety