

COMMITTEE:	Audit and Governance Committee
MEETING DATE:	16 September 2025
BY:	Executive Director for Place
REPORT TITLE:	Housing Annual Assurance Statement
REPORT STATUS:	Public

PURPOSE

- 1.1 To advise the Audit and Governance Committee of the Scottish Housing Regulator's regulatory framework and in particular, the requirement for East Lothian Council to produce an Annual Assurance Statement, which requires to be signed off by the Senior Internal Auditor on behalf of the Council.
- 1.2 To obtain approval for East Lothian Council's Annual Assurance Statement as laid out in Appendix 1.

RECOMMENDATIONS

- 2.1 That Audit and Governance Committee notes the regulatory framework and the requirement for the Senior Internal Auditor to sign-off the Annual Assurance Statement (AAS) on behalf of the Council.
- 2.2 That Audit and Governance Committee note that the regulatory framework requires the submission of the AAS no later than the 31st October 2025.
- 2.3 That Audit and Governance approves the Annual Assurance Statement as detailed in Appendix 1 noting that East Lothian Council was partially compliant with the regulatory requirements for the financial year 2024/25 and partially compliant for the first quarter of 2025/26. Areas of partial compliance are in relation to lead water pipe programme (due to non-access) and meeting the requirements of the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2020.

BACKGROUND

- 3.1 The Scottish Housing Regulator (SHR) published a new regulatory framework that came into effect on April 1, 2024. This update followed extensive consultation with social landlords, tenants and stakeholders. A summary of the framework is attached at Appendix 3. In Summary, the framework is designed to ensure that social landlords operate effectively and in the best interests of their tenants, with a strong emphasis on accountability, safety and stakeholder engagement.
- 3.2 There is a requirement on all social landlords to normally submit an Annual Assurance Statement to the SHR by the end of October each year. This statement must either confirm the relevant committee is assured that the landlord is complying with all regulatory requirements and standards or alternatively highlight any areas of material non-compliance and how the landlord will address these.
- 3.3 In many respects the process for gathering evidence to ensure the committee has the necessary level of assurance it needs to sign the statement is more important than the statement itself. Appendix 4 highlights key evidence of where the Council demonstrates compliance with the new regulatory framework.
- 3.4 East Lothian Council has existing scrutiny and performance structures in place to ensure the ongoing review of performance and service delivery. These processes are subject to continuous review and improvement. The Annual Assurance Statement is reviewed by Internal Audit and the findings from Internal Audit's assurance work are detailed in Appendix 2.
- 3.5 It is important to note that the Council also has various arrangements in place to support its governance, finance and controls environment, which are the subject of other regular reports to Audit and Governance.
- 3.6 It is also important to note that the Council's housing services are delivered across various teams in the Council (Service Development, Community Housing, Property Maintenance, Revenues and Asset Services being the main ones). In this regard a Service Review has recently been completed with a newly established Strategy, Policy and Performance Service, who will take the lead in this area. For this year the Service Development Manager has developed quarterly and annual assurance checklists, which all areas of housing service delivery have been asked to sign-off on at service manager level. These checklists once signed have been passed to the Service Development Manager and Head of Housing to check for completeness.
- 3.7 In addition, the Scottish Social Charter and Performance Group will consider evidence gathered from these service areas. In the event of material partial or non-compliance, this group will consider action plans and monitor progress to ensure full compliance. This group comprises

staff across the range of these service areas as well as members of East Lothian Tenants and Residents Panel.

- 3.8 The Service Manager – Housing Strategy, Policy and Performance will prepare the Annual Assurance Statement with a summary report for Audit and Governance Committee each year for approval before the deadline of 31st October.
- 3.9 Relevant managers across the Housing teams are expected to be aware of the regulatory requirements and impacts of non-compliance and will immediately advise the Service Manager – Housing Strategy, Policy and Performance of any such instances. The SHR has not provided a prescriptive list of material non-compliance examples, but it is felt these would be in the areas of Health and Safety breaches reported to the Health and Safety Executive, Data Protection breaches reported to the Information Commissioner's Office, Care Inspectorate or Scottish Social Services Commission interventions or regulatory failures.
- 3.10 The Council has determined that it has partially complied with the regulatory framework for the 2024/25 year and for the first quarter of 2025/26. The following paragraphs highlight the areas of partial compliance.
- 3.11 The Council's Lead Pipe Water Programme involves testing the water supply in Council houses for lead content, and enacting replacement of supply pipes where required. This programme was established some years ago; however, we established more recently that open market acquisition properties had been missed. A mop-up programme was mobilised to address these, and there remains 50 (11 less than last year) properties where we have been unable to gain access. For each of these properties, tenants have been sent at least two access letters (followed up by actual visits), and housing officers have also sought to engage with their tenants, but without success. Following advice from our Legal colleagues, we continued to re-engage with tenants over the course of 2024/25 and 2025/26 to date, ahead of issuing formal 24-hour notice letters advising we intend to force entry to complete the sampling/tests. This risk is also included and monitored through the housing services risk register.
- 3.12 The Council continues to be in breach of the Homeless Persons (Unsuitable Accommodation Order), which it regularly reports to the Scottish Government monthly. The Council continues to work hard to mitigate these breaches through new supply; high numbers of allocations to homeless households; revisions to the Council's Allocations Policy; and conversion of temporary accommodation to permanent housing etc. However, demand from predominately single homeless households (circa 95% of live breaches are from single homeless households) continues to outstrip supply and this pressure necessitates the need to source additional accommodation, which will often breach the Order. East Lothian Council currently has 66 rolling

breaches of the Unsuitable Accommodation Order, with ongoing efforts and a strategic plan in place, to further reduce this figure going forward.

- 3.13 The SHR expectation is that the Annual Assurance Statement is brief confirming compliance or otherwise. In the event of material non-compliance, a statement of how this will be addressed must be included.
- 3.14 The statement when signed should be made available to tenants and service users.
- 3.15 In April each year the SHR publishes an engagement plan for each landlord. This is informed by the Annual Return on the Charter (ARC), Scottish Government homeless statistics, previous engagement with the landlord and the new Annual Assurance Statement going forward. East Lothian Council's current engagement plan can be found at: [Engagement plan from 1 April 2025 to 31 March 2026 | Scottish Housing Regulator](#)

4. POLICY IMPLICATIONS

- 4.1 The new regulatory framework, and in particular the requirement to produce an Annual Assurance Statement will give tenants, service users and stakeholders greater confidence in the delivery of the Council's Housing Services.

5 RESOURCE AND OTHER IMPLICATIONS

- 5.1 Finance: None
- 5.2 Human Resources: None
- 5.3 Other (e.g. Legal/IT): None
- 5.4 Risk: as set out in sections 3.11 and 3.12

6 INTEGRATED IMPACT ASSESSMENT

- 6.1 ***Select the statement that is appropriate to your report by placing an 'X' in the relevant box.***

An Integrated Impact Assessment screening process has been undertaken and the subject of this report does not affect the wellbeing of the community or have a significant impact on: equality and human rights; tackling socio-economic disadvantages and poverty; climate change, the environment and sustainability; the Council's role as a corporate parent; or the storage/collection of personal data.

X

or

The subject of this report has been through the Integrated Impact Assessment process and impacts have been identified as follows:

☐

Subject	Impacts identified (Yes, No or N/A)
Equality and human rights	
Socio-economic disadvantage/poverty	
Climate change, the environment and sustainability	
Corporate parenting and care-experienced young people	
Storage/collection of personal data	
Other	

[Enter information on impacts that have been identified]

The Integrated Impact Assessment relating to this report has been published and can be accessed via the Council's website:

https://www.eastlothian.gov.uk/info/210602/equality_and_diversity/12014/integrated_impact_assessments

7 APPENDICES

- 7.1 Appendix 1 – Annual Assurance Statement
- 7.2 Appendix 2 – Internal Audit Annual Assurance Report
- 7.3 Appendix 3 – Summary requirements for Local Authorities and RSLs
- 7.4 Appendix 4 – Evidence List

8 BACKGROUND PAPERS

- 8.1 Cabinet Report – Homelessness Action Plan – September 2024
- 8.2 Link to SHR web-pages on the Regulatory Framework: [Regulatory Framework | Scottish Housing Regulator](#)

9 AUTHOR AND APPROVAL DETAILS

Report Author(s)

Name	Wendy McGuire
Designation	Head of Service
Tel/Email	wmcguire@eastlothian.gov.uk
Date	5 September 2025

Head of Service Approval

Name	Lesley Brown
Designation	Executive Director
Confirmation that IIA and other relevant checks (e.g. finance/legal) have been completed	Yes
Approval Date	09.09.2025

Scottish Housing Regulator
5th Floor
220 High Street
Glasgow
G4 0QW

Appendix 1

Date: 16 September 2025

Dear Sir/Madam,

East Lothian Council – Annual Assurance Statement

Subject to the highlighted areas detailed below, we can confirm that the Council complies with the regulatory requirements set out in Chapter 3 of the Regulatory Framework. This includes that we:

- ❖ Achieve all of the standards and outcomes in the Scottish Social Housing Charter for tenants, people who are homeless and others who use our services.
- ❖ Comply with our legal obligations relating to housing and homelessness, equality and human rights, and tenant and resident safety.

The following areas are highlighted as exceptions:

Lead Pipe Water Programme

The Council's Lead Pipe Water Programme involves testing the water supply in Council houses for lead content, and enacting replacement of supply pipes where required. This programme was established some years ago; however, we established more recently that open market acquisition properties had been missed. A mop-up programme was mobilised to address these, and there remains 50 properties where we have been unable to gain access. For each of these properties, tenants have been sent at least two access letters (followed up by actual visits), and Housing Officers have also sought to engage with their tenants but without success. Following advice from Legal colleagues, we continued to re-engage with tenants over the course of 2024/25 and 2025/26 to date, ahead of issuing formal 24-hour notice letters advising we intend to force entry to complete the sampling/tests.

The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2020

The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2020 came into effect on 01 October 2021. From this date onwards, the Council has been unable to meet its statutory obligations in respect of suitable temporary accommodation provision and remains in breach of the Order. In addition, the Homeless Persons (Suspension of Referrals between Local Authorities) (Scotland) Order 2022 changed the rules on local connection in November 2022 meaning local authorities no longer had the power to refer an applicant to another local authority on the basis of their local connection status. It is in regard to both of these legislative changes that East Lothian Council continues to face challenges regarding the provision of suitable temporary accommodation. The SHR's Engagement Plan in place for East Lothian Council focuses on the provision of temporary accommodation to homeless households and compliance with the Unsuitable Accommodation Order. The Council continues to work hard to mitigate these breaches through new supply; high numbers of allocations to homeless households; revisions to the Council's Allocations Policy; and conversion of temporary accommodation to permanent housing etc. However, demand from predominately single homeless households (circa 95% of live breaches are from single homeless households) continues to outstrip supply and this pressure necessitates the need to source additional accommodation, which will often breach the Order. East Lothian Council currently has 66 rolling breaches of the Unsuitable

Accommodation Order, with ongoing efforts and a strategic plan in place, to further reduce this figure going forward.

General

We confirm that we have seen and considered appropriate evidence to support the level of assurance.

We approved our Annual Assurance Statement at our Audit and Governance Committee meeting on 16 September 2025.

I sign this statement on behalf of East Lothian Council's Audit and Governance Committee.

Yours sincerely,

Duncan Stainbank
Service Manager – Internal Audit



Appendix 2

East Lothian Council Internal Audit Assurance Report

From:	Duncan Stainbank, Service Manager – Internal Audit Stuart Allan, Senior Auditor
To:	Lesley Brown, Executive Director for Education & Children’s Services Wendy McGuire, Head of Housing Nicky Sandford, Service Manager – Community Housing and Homelessness
Date:	05 September 2025

SHR Annual Assurance Statement

1. Background

The Council is required to provide the Scottish Housing Regulator (SHR) with an Annual Assurance Statement (AAS) to confirm its compliance with the regulatory requirements set out in Chapter 3 of the SHR’s Regulatory Framework. This includes that the Council:

- achieves all of the standards and outcomes in the Scottish Social Housing Charter for tenants, people who are homeless and others who use our services; and
- complies with all legal obligations relating to housing and homelessness, equality and human rights, and tenant and resident safety.

The deadline for submission of this year’s Annual Assurance Statement to the Scottish Housing Regulator (SHR) is 31 October 2025.

The scope of the audit is to obtain, review and consider the adequacy of the evidence available to support the Council’s compliance with the regulatory requirements set out in Chapter 3 of the SHR’s Regulatory Framework. The audit covers compliance with the following five areas of regulatory compliance as set out in Chapter 3:

- Assurance and Notification – the Council is required to prepare an Annual Assurance Statement, submit it to the SHR and make it available to tenants and other service users; have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights and tenant and resident safety; notify the SHR of any tenant and resident safety matters; and make its Engagement Plan easily available and accessible to its tenants and service users;
- Scottish Social Housing Charter Performance – the Council is required to report its performance in achieving or progressing towards the Charter outcomes and standards;
- Tenants and Service Users Redress – the Council provides tenants and other service users with the information they need to exercise their right to complain and seek redress;
- Whistleblowing – the Council has effective arrangements and a policy for whistleblowing by staff and elected members, which it makes easily available and which it promotes;

- Equality and Human Rights – there is assurance and evidence that the Council 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.

2. Findings

2.1 Assurance and Notification

Key findings are:

- The Council prepares an Annual Assurance Statement, which it submits to the SHR and makes available to tenants and service users.
- The service area has introduced a quarterly Assurance and Notification Self-Assessment Checklist, which requires to be signed off by appropriate managers/officers and is included as part of the evidence gathering regarding regulatory compliance. The following areas are highlighted:
 - Annual Gas Safety Inspections – at the year end, all properties were fully compliant with Gas Safety Regulations.
 - Interlinked Fire Alarms and Electrical Safety Inspections – new legislation required all homes in Scotland to have interlinked fire/heat alarms by February 2022 and full electrical safety checks by March 2022. The Council has continued to dedicate increased resource and spend to the respective fire and electrical safety programmes. At the end of 2022/23, the council had 84 non-compliant properties in respect of fire safety (SHQS elements 11A & 11B) and 155 non-compliant properties for electrical installation inspections known as EICRs (SHQS element 45). These non-compliant properties represented the council's most challenging stock both in terms of tenancy management and/or technical issues i.e. illegally bypassed meters, no incoming earth, no power in quantum, hoarders etc. Over the past two years, the wider housing division worked alongside social workers, Police Scotland and SPEN to complete the necessary works. At 2024/25 year-end, all properties were fully compliant in respect of EICRs. The Council's access procedure for EICRs now aligns to that of the well-established gas safety programme, which will ensure no new properties fall out of time. At 2024/25 year-end, the Council still had one property without adequate fire detection provision (SHQS elements 11A & 11B), which represented a complex tenancy management case. This case has since been resolved and as of 23 May 2025, the Council became fully compliant in respect of interlinked fire alarms.
 - The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2020 came into effect on 01 October 2021. From this date onwards, the Council has been unable to meet its statutory obligations in respect of suitable temporary accommodation provision and remains in breach of the Order. In addition, the Homeless Persons (Suspension of Referrals between Local Authorities) (Scotland) Order 2022 changed the rules on local connection in November 2022 meaning local authorities no longer had the power to refer an applicant to another local authority on the basis of their local connection status. It is in regard to both of these legislative changes that East Lothian Council continues to face challenges regarding the provision of suitable temporary accommodation. The SHR's Engagement Plan in place for East Lothian Council focuses on the provision of temporary accommodation to homeless households and compliance with the Unsuitable Accommodation Order. The Council continues to work hard to mitigate these breaches through new supply; high numbers of allocations to homeless households; revisions to the Council's Allocations Policy; and conversion of temporary accommodation to permanent housing etc. However, demand from predominately single homeless households (circa 95% of live breaches are from single homeless households) continues to outstrip supply and this pressure necessitates the need to source additional accommodation, which will often breach the Order. East Lothian Council

currently has 66 rolling breaches of the Unsuitable Accommodation Order, with ongoing efforts and a strategic plan in place, to further reduce this figure going forward.

- Revised guidance issued by the Scottish Housing Regulator in February 2024 requires the Council to confirm that it meets all duties in relation to tenant resident and safety, including in respect of damp and mould, water safety, lift safety and asbestos. In this regard, the following points are noted:
 - Damp and Mould – as part of our cyclical stock condition survey programme, the Council conducts mould and damp checks according to SHQS (element 2) guidance. In addition, a cross service working group was established to implement the conclusions set out in the joint SHR, ALACHO, SFHA and CIH ‘Putting Safety First’ briefing note. The group oversaw staff training, a revised process for dealing with mould cases (which included a rapid response to mould removal) and the development of a new booklet “Don’t let condensation and mould ruin your home” a guide for tenants on minimising condensation, which has been found to be the cause of mould growth in the majority of cases. The Council also acknowledges the new social housing charter mould and damp indicators which commenced on 1 April 2025 and will apply to the 2026 Annual Return of the Charter (ARC). To this end, the cross service working group was reconvened to ensure that systems and processes were revised to ensure the accurate capture and reporting of data to meet the requirements of the new indicator.
 - Water Safety – in terms of Legionella, the Council has management arrangements in place, which define responsible persons who are trained accordingly. Housing Services continue to develop operating arrangements for the control of Legionella in Council housing, but we anticipate further guidance from the Regulator around the specific measures that should be taken in this area. In addition, the Council’s Lead Pipe Water Programme involves testing the water supply in Council houses for lead content, and enacting replacement of supply pipes where required. This programme was established some years ago; however, we established more recently that open market acquisition properties had been missed. A mop-up programme was mobilised to address these, and there remains 50 properties where we have been unable to gain access. For each of these properties, tenants have been sent at least two access letters (followed up by actual visits), and Housing Officers have also sought to engage with their tenants, but without success. Following advice from our Legal colleagues, we continued to re-engage with tenants over the course of 2024/25 and 2025/26 to date, ahead of issuing formal 24-hour notice letters advising we intend to force entry to complete the sampling/tests. This risk is also included and monitored through the Housing Services risk register.
 - Lift Safety – the Council has an adequate safety compliance regime in place for lifts in Council housing stock, including communal areas of sheltered complexes.
 - Asbestos – the Council has robust asbestos management arrangements with associated operating procedures, and Housing Services have a comprehensive asbestos register specifically covering all of our housing stock.
- In respect of RAAC (Reinforced Autoclave Aerated Concrete) the Council implemented a clear plan to manage all risks, which has now concluded with no findings on those properties that fell within the criteria. Ongoing surveys continue as part of our asset plans.
- Confirmation was sought from the Council’s Health & Safety Adviser and Insurance Manager, and we were advised that they do not have a record of any HSE investigations relating to tenant or resident safety, nor have the Council had any notification from our insurers of any concerns.
- The SHR’s Engagement Plan for East Lothian Council from 01 April 2025 to 31 March 2026 can be accessed via the Council’s website.

2.2 Scottish Social Housing Charter Performance

Key findings are:

- The Council submitted the 2024/25 Annual Return on the Charter (ARC) to the SHR on 28 May 2025. As part of our audit work, we selected a sample of five ARC indicators for review, which highlighted two errors in the figures that had been submitted. In one case, the SHR contacted the Council in June 2025 to query one of the reported indicators. Further investigation highlighted that an incorrect figure had been submitted, which had impacted on three of the reported indicators. Corrected figures were subsequently submitted to the SHR, and it is these corrected indicators which form part of the SHR published data. In the second case, an error was identified in the reported number of mutual exchanges and a correction is being made to the SHR. In view of the errors identified, the service area have confirmed that there will be greater management review of future returns prior to submission.
- The Council has involved tenants, and where relevant other service users, in the preparation and scrutiny of performance information through the East Lothian Tenants and Residents Panel (ELTRP), the umbrella organisation for tenants and residents in East Lothian. The deadline for landlords to report to their tenants and service users on their performance against the Scottish Social Housing Charter is 31 October 2025. A draft of the Landlord Report to Tenants 2024/25 is in place, providing information on the performance of the Council as a housing provider. The draft report will be updated to reflect Scottish average figures published by the SHR and homeless data, and the final report will be published prior to the 31 October 2025 deadline.
- A 2024-27 Tenant Participation Strategy is in place and was approved by Cabinet on 14 May 2024.

2.3 Tenants and Service Users Redress

Key findings are:

- The Council provides tenants and other service users with the information they need to exercise their right to complain and seek redress and responds to tenants within the timescales outlined in its service standards, in accordance with guidance from the Scottish Public Services Ombudsman (SPSO).
- Full details of the Council's Complaints Procedure are provided on the Council's website including the online Complaints, Compliments and Comments form; a link to the pages providing full details of the Council's Complaints Handling Procedure; advice on what to do if the person making the complaint remains dissatisfied with how the Council has handled their complaint; links to the SPSO and SHR; and details of the Council's complaints performance.

2.4 Whistleblowing

Key findings are:

- The Council has a Whistleblowing Policy in place, which is available to employees in the Human Resources section of the Council's intranet. The Policy was last updated in 2022, and the updated version was approved by Cabinet on 27 September 2022.
- A dedicated whistleblowing hotline and whistleblowing email address are both in place.

2.5 Equality and Human Rights

Key findings are:

- The Council has a detailed “East Lothian Equality Plan 2021-2025” in place, dated November 2021.
- All Council, Cabinet and Committee reports require an Integrated Impact Assessment to be carried out if the subject of the report affects the wellbeing of the community or has a significant impact on equality and human rights, the environment or economy.
- The SHR states that to comply with its duties in respect of equality and human rights “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.” The nine protected characteristics, as per the Equality Act 2010, are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We note that the Council previously collected and held data for some, but not all, of the protected characteristics detailed in the legislation. Final guidance on “Collecting equality information: National guidance for Scottish social landlords” was produced in March 2022. A Project for Protected Characteristics was instigated, and significant progress has been made in this regard. The new Housing Application Form, which is available on the Council’s website, now collects data on all nine protected characteristics (with additional sections being added for the six protected characteristics for which data was not previously collected); the nine protected characteristics have been set up on Orchard; and training has been provided to Housing staff on how to complete the new characteristics with the updated applications. In addition, for existing tenants and applicants who were on the waiting list prior to the new Housing Application Form being introduced, Housing Officers are updating records with protected characteristics as they become aware of them. All homeless households are required to complete a housing application covering the nine protected characteristics, and in addition, some of these characteristics are recorded on the Council’s homelessness system.

3. Conclusions

3.1 Subject to the exceptions detailed in paragraph 3.2 below, we can confirm that the Council complies with the regulatory requirements set out in Chapter 3 of the Regulatory Framework. This includes that the Council:

- achieves all of the standards and outcomes in the Scottish Social Housing Charter for tenants, people who are homeless and others who use our services; and
- complies with all legal obligations relating to housing and homelessness, equality and human rights, and tenant and resident safety.

3.2 The areas of non-compliance that require to be highlighted in the Annual Assurance Statement are:

- The Council’s Lead Pipe Water Programme involves testing the water supply in Council houses for lead content, and enacting replacement of supply pipes where required. This programme was established some years ago; however, we established more recently that open market acquisition properties had been missed. A mop-up programme was mobilised to address these, and there remains 50 properties where we have been unable to gain access. For each of these properties, tenants have been sent at least two access letters (followed up by actual visits), and Housing Officers have also sought to engage with their tenants but without success. Following advice from Legal colleagues, we continued to re-engage with tenants over the course of 2024/25 and 2025/26 to date, ahead of issuing formal 24-hour notice letters advising we intend to force entry to complete the sampling/tests.
- The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2020 came into effect on 01 October 2021. From this date onwards, the Council has been unable to meet its

statutory obligations in respect of suitable temporary accommodation provision and remains in breach of the Order. In addition, the Homeless Persons (Suspension of Referrals between Local Authorities) (Scotland) Order 2022 changed the rules on local connection in November 2022 meaning local authorities no longer had the power to refer an applicant to another local authority on the basis of their local connection status. It is in regard to both of these legislative changes that East Lothian Council continues to face challenges regarding the provision of suitable temporary accommodation. The SHR's Engagement Plan in place for East Lothian Council focuses on the provision of temporary accommodation to homeless households and compliance with the Unsuitable Accommodation Order. The Council continues to work hard to mitigate these breaches through new supply; high numbers of allocations to homeless households; revisions to the Council's Allocations Policy; and conversion of temporary accommodation to permanent housing etc. However, demand from predominately single homeless households (circa 95% of live breaches are from single homeless households) continues to outstrip supply and this pressure necessitates the need to source additional accommodation, which will often breach the Order. East Lothian Council currently has 66 rolling breaches of the Unsuitable Accommodation Order, with ongoing efforts and a strategic plan in place, to further reduce this figure going forward.

APPENDIX 4 – Evidence List

Annual Assurance Statement 2025– Sources of evidence examples for 2025

Subject/Issue	File path Name	Document	Contact
Annual Return of the Charter (ARC) and EESSH	ARC Return 2024_25 Copy in folder: Y:\CHPM\Community Housing\PMF\Annual Returns\ARC ARC Return 2024_25	PDF	Performance Officer
Annual Landlord Report	Landlords Report to Tenants – 2024 Report Copy in folder: Y:\CHPM Shared\Scottish Social Housing Charter\Social Housing Charter\Landlords Report\2024 Report LLR Report 2024 (draft report 2024/25 currently being worked on, final version will be saved in folder once approved by Working Group)	PDF	Service Development Officer, (Tenant Participation)
Housing Statistics Annual Return to Scottish Government	Scottish Government Annual Return 2024/2025 Copy in folder: Y:\Community Housing\PMF\Annual Returns\Scottish Government Returns\202425 Scot Gov Return SG Annual Return 202425	Excel	Performance Officer
Scotland's Housing Network Returns	Scotland's Housing Network (SHN) Annual Return 2024/2025 Copy in folder: Y:\CHPM\Community Housing\PMF\Annual Returns\SHN Scotland's Housing Network Performance Officer advised that this is in the process of being prepared for submission to SHN 202425 SHN Annual Return		Performance Officer
Regular internal performance monitoring and reporting of KPIs to PPRC	Policy & Performance Review Committee https://www.eastlothian.gov.uk/meetings/committee/99/policy_and_performance_review_committee	Link to Performance Meeting documents	Performance Officer
Three yearly comprehensive tenant satisfaction survey	Tenants Satisfaction Survey (3 yearly) (next survey due to be carried out in Summer 2025, just at Contract Award stage and survey which will be a face-to-face survey of just over 1,730 tenants will commence in August 2025) Copy In Folder: Y:\CHPM Shared\Scottish Social Housing Charter\Comprehensive Satisfaction Survey 2022 Y:\CHPM Shared\Scottish Social Housing Charter\Comprehensive Satisfaction Survey 2022 Comprehensive Satisfaction Survey 2025	PDF	Service Development Officer
Transactional Customer Surveys	Transactional New Tenant Satisfaction Survey Results 2024-25 Copy in folder: \\squirrel\chpm\Community Housing\PMF\New Tenant Satisfaction Survey Results Y:\Community Housing\PMF\New Tenant Satisfaction Survey Results	Excel	Performance Officer
	The Day-to-Day Repairs Satisfaction Survey Results 2024-25 Copy in folder: \\squirrel\chpm\CHPM Shared\Scottish Social Housing Charter\Social Housing Charter\satisfaction survey reviews\day to day survey results Day to day survey results 2024-25 Capital Programme Satisfaction Survey Results 2024-25 Copy in folder: \\squirrel\chpm\CHPM Shared\Scottish Social Housing Charter\Social Housing Charter\satisfaction survey reviews\Capital programme survey results 2015 onward\2024-25 Capital Programme Survey Results 2024-25	PDF	Service Development Officer, (Property Maintenance)
	Scotland's Housing Network (SHN) Annual Return 2024/2025 Copy in folder: Y:\CHPM\Community Housing\PMF\Annual Returns\SHN Scotland's Housing Network	PDF & Excel	Performance Officer

	Performance Officer advised that this is in the process of being prepared for submission to SHN 202425 SHN Annual Return		
Complaints Monitoring and handling	Complaint Handling 2024/25 Copy In Folder: Y:\Community Housing\PMF\Performance Officer work\Complaint Handling Y:\Community Housing\PMF\Performance Officer work\Complaint Handling	Excel	Performance Officer
Regular reviews of housing policies and procedures in tandem with ELTRP, including integrated impact assessments	Housing Review Groups – Minutes and agenda Copy In Folder: Y:\Community Housing\Shared Admin\Minutes\HRA Project Group\HRA Consultation Group\Minutes\2025 HRA Consultation Group Minutes 2025 Y:\Community Housing\Shared Admin\Minutes\Social Housing Charter (SHC)\Minutes 2025 Social Housing Charter Minutes 2025	Minutes and Agenda from meetings	Service Development Officer
Social Housing Charter & Performance Group	Social Housing Charter Working Group Copy In Folder: C:\Users\pined\OneDrive - East Lothian Council\TenantParticipation\Social Housing Charter\Papers for meetings\2025 Social Housing Charter Papers for meetings 2025	Minute and agenda from meetings	Service Development Officer / Performance Officer
Financial monitoring and reporting	Great Plains and Management Reporter		Service Manager / Finance Business Partner
HRA Programme Board	HRA Programme Board Copy in Folder: \\squirrel\chpm\CHPM Shared\Scottish Social Housing Charter\Annual Assurance Statement\ASS Evidence 2025 Submission\Evidence for submission\HRA Programme Board HRA Programme Board		Wendy McGuire, (Chairperson of Board)
Adherence to Council Standing Orders	https://intranet.eastlothian.gov.uk/info/20288/committees_and_meetings	Committee information and papers	Intranet
Care inspectorate reviews and reports	Inspection Reports Copy In Folder: Y:\CHPM Shared\Scottish Social Housing Charter\Annual Assurance Statement\AAS Evidence 2025 Submission\Evidence for Submission\Care Inspection reports Care Inspectorate Reports Sheltered housing inspection reports from 2016 – No inspection took place in 2020/21/22/23/24 No further Care Inspectorate reports to date. We are looking to de-register the CI registration in relation to homelessness and work is fairly well advanced in this regard, but we remain registered for the moment.	PDF Copies in Evidence 2023	Performance Officer
Internal and external audit reviews and reports	Publications Audit Scotland (audit-scotland.gov.uk)	Link to ELC Annual Audit Plan 2024/25	Accounts Commission
	https://www.eastlothian.gov.uk/meetings/committee/98/audit_and_governance_committee Audit and Governance committee papers for meetings	Link to Committee papers on ELC website	D Stainbank / S Allan
Management of public protection matters through MAPPA process	Housing’s involvement and attendance at these meetings is noted. It is not appropriate to share the paperwork associated with these meetings given sensitive nature.		Nicky Sandford, Service Manager
Detailed mapping and procedures within all parts of the service	What is Nimbus? Nimbus East Lothian Intranet	Link to Nimbus on ELC Intranet	Service Development Officers

Formalised committee reporting cycles and submission of relevant reports	https://www.eastlothian.gov.uk/downloads/download/12754/general_committee_information	Link to ELC website	
Production of our Strategic Housing Investment Plan (SHIP)	SHIP / Members Library Report Copy In Folder: Y:\CHPM Shared\Scottish Social Housing Charter\Annual Assurance Statement\AAS Evidence 2025 Submission\Evidence for Submission\SHIP SHIP	Word Documents	Wendy McGuire, Head of Housing
Regular contractor review meetings	Project Monitoring Group meetings monitor current Development Support Contract Copy in Folder: Y:\CHPM Shared\Scottish Social Housing Charter\Annual Assurance Statement\AAS Evidence 2024 Submission\Evidence for Submission\Contract Monitoring Project Monitoring Group 2025 Other Copy in Folder: Contract Monitoring\Extensions Contractor Monitoring of Extensions - Master New.xlsx	Minutes and agendas Excel spreadsheet	Steph Irvine, Service Development Team Manager
Compliance with procurement legislation and policies	https://intranet.eastlothian.gov.uk/info/20680/buying_goods	Intranet	Steph Irvine, Service Development Team Manager
Business Continuity Plans	https://intranet.eastlothian.gov.uk/info/20720/business_resilience/141/business_continuity not currently invoked.	Intranet	Service Manager
Corporate Development/Housing Risk Register	Copy In Folder: Development Risk Register v28.docx The Corporate Risk Register also contains several risks owned by Housing Agendas, reports and minutes East Lothian Council The Housing Risk Register 2023/24, approved at A&G Committee 17 th September 2024 Housing Risk Register	PDF Minutes and agendas	Scott Kennedy, Service Manager
Service Plans	Copy In Folder: Y:\CHPM Shared\Scottish Social Housing Charter\Annual Assurance Statement\AAS Evidence 2023 Submission\Evidence for Submission Draft Service Plan 24-25.docx	Word Document	Service Manager
Data Protection / GDPR Reporting	Information and Governance Group, response to each FOI within timescales		
Tenant Participation Strategy	Tenant Participation Strategies Copy In Folder: \\squirrel\chpm\Community Housing\Community Housing Information\Tenant Participation Strategies Tenant Participation Strategy 2024_2027	PDF	Service Development Officer, (Tenant Participation)
Quarterly & Annual Assurance checklists	Quarterly Returns and AAS Documents Copy In Folder: Y:\CHPM Shared\Scottish Social Housing Charter\Annual Assurance Statement\AAS Evidence 2024 Submission ASS Evidence 2025 Submission	Word, PDF	Service Manager
Rapid Rehousing Transition Plan 2019/24	Rapid Rehousing Transition Plan with 2025 Update Plan saved in shared area along with draft RRTP Update Jan 2025 although budget figures have still to be inserted into the document	PDF	Nicky Sandford, Service Manager

Spheracloud Health & Safety	SI confirmed that all risk assessment are up-to-date and are reviewed annually. DP 30 th June 2025		Stephanie Irvine, SDT Team Manager
SHR Engagement Plan publicly available	https://www.eastlothian.gov.uk/info/210629/improving_our_housing/12116/housing_performance	ELC website link	Performance Officer
Information on reporting Significant Performance Failures	Significant Performance Failures Housing Performance East Lothian Council	ELC website link	Performance Officer
Data collection of protected characteristics	Equalities and Protected Characteristics Project ongoing – Evidence and Project plan in: Copy in folder: Y:\CHPM Shared\Scottish Social Housing Charter\Annual Assurance Statement\AAS Evidence 2024 Submission\Evidence for Submission ASS Evidence 2025 Submission	Word Docs in folder	Stephanie Irvine, SDT Team Manager

Deborah Piner / V.1 / 30th June 2025

APPENDIX 3

AAS 2025 - EVIDENCE LIST

- Submission of the Annual Return of the Charter (ARC) and Energy Efficiency Standards for Social Housing (ESSH) reports each year to the Scottish Housing Regulator (SHR)
- Production of an Annual Landlord Report based on the ARC return in conjunction with the East Lothian Tenants and Residents Panel (ELTRP)
- Statutory returns to the Scottish Government
- Non-statutory benchmarking exercises with Scottish Housing Network
- Regular internal performance monitoring and reporting of key indicators to PPRC
- Regular transactional customer surveys and three yearly comprehensive tenant satisfaction survey
- Complaints monitoring and handling
- Regular reviews of housing policies and procedures in tandem with ELTRP, including integrated impact assessments where appropriate
- Social Housing Charter project group
- Financial monitoring and reporting
- HRA project board
- Adherence to Council Standing Orders
- Care Inspectorate reviews and reports
- Internal and external audit reviews and reports
- Management of public protection matters through the MAPPA process
- Detailed process mapping and procedures within all parts of the Service
- Formalised committee reporting cycles and submission of relevant reports
- Production of our Strategic Housing Investment Plan (SHIP)
- Regular contractor review meetings
- Compliance with procurement legislation and policies
- Business Continuity Plans
- Corporate Development Risk Register – that also contains several risks owned by Housing
- Housing Risk Register will go to September Audit & Governance Committee
- Service Plans
- Data Protection/GDPR reporting and monitoring framework in place
- Tenant Participation Strategy, including Tenant scrutiny framework
- Quarterly and Annual Assurance checklists
- Rapid Rehousing Transition Plan 2019-24
- Spheracloud Health and Safety incident reporting and risk assessments
- SHR Engagement Plan publicly available
- Information on reporting Significant Performance Failures to SHR publicly available
- Data collection of protected characteristics (partial)