

BOARD AGENDA – 19 MAY 2021

ITEM	AGENDA ITEM	ACTION	PRESENTED BY	PAGE NO	TIME
1	Attendance and Apologies	Noting	Chair	2	2:30pm
2	Declaration of Interest	Noting	Chair	-	
3	Action Sheet	Noting	Company Secretary	4	
4	Date of Next Meeting 23 June 2021	Approval	Chair	-	2:45pm
5	Health & Safety	Noting	Director of Operations	-	

ITEM	AGENDA ITEM	ACTION	PRESENTED BY	PAGE NO	TIME
6	Items For Decision				
6.1	Annual Return on the Charter 2020/21	Approval	Chief Executive	6	2:45pm
6.2	Allocation of Housing to Priority Homeless	Approval	Director of Operations	66	3:30pm

ITEM	AGENDA ITEM	ACTION	PRESENTED BY	PAGE NO	TIME
7	Policies for Approval				
7.1	Workforce Strategy	Approval	Chief Executive	71	3:30pm
7.2	Privacy Policy	Approval	Governance Officer	90	-
7.3	Equalities Action Plan	Approval	Chief Executive	108	3:45pm

ITEM	AGENDA ITEM	ACTION	PRESENTED BY	PAGE NO	TIME
8	Monitoring & Update Reports				
8.1	Business Plan Progress Report	Noting	Chief Executive	111	3:45pm
8.2	Development Programme	Noting	Development Manager	116	
8.3	Quarterly Treasury Report	Noting	Director of F&CS	128	
8.4	Asset Management Action Plan Update	Noting	Assets & Contracts Manager	134	4:00pm
8.5	SHR Engagement Plan	Noting	Chief Executive	147	
8.6	Review of Corporate Registers	Noting	Governance Officer	152	

MEETING GOES INTO PRIVATE SESSION

Board Meetings 2020/21

Board Members	Notes	27-Aug-20	17-Nov-20	27-Jan-21	17-Mar-21	29-Apr-21			
Iain Macmillan	1								
Calum Mackay	1								
Alasdair Mackenzie	2 & 4								
Alexander Gardner	2								
Fiona Macleod	1								
Gordon Macleod									
Norman A Macdonald									
Paul Finnegan	3								
Roddy Mackay									
Roddy Nicolson	1								
John N Macleod	5								
Peter Graham	6								

1 - Appointed as a Community Member on 27 August 2020

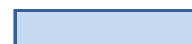
2 - Appointed as a Tenant Member on 27 August 2020

3 - Resigned as Board Member on 14 December 2020

4 - Resigned as Board Member on 9 February 2021

5 - Appointed as Council Member on 3 February 2021

6 - Appointed as Tenant Member on 17 March 2021



Member present at meeting



Member not present at meeting



Cancellation of travel due to weather



Unable to attend remote meeting due to technical difficulties



Member not required to be present at meeting

Special Leave

Board Training and Conferences 2020/21

Board Members	Notes	SFHA Finance Virtual Conference	Board Member Roles & Responsibilities Refresher Training	Finance: Questions You Should Be Asking Training	Equalities & Diversity Training	Landlord Facilities Health & Safety Training
		11-Nov-20	17-Dec-20	27-Jan-21	24-Feb-21	11-Mar-21
Iain Macmillan	1					
Calum Mackay	1					
Alasdair Mackenzie	2 & 4					
Alexander Gardner	2					
Fiona Macleod	1					
Gordon Macleod						
Norman A Macdonald						
Paul Finnegan	3					
Roddy Mackay						
Roddy Nicolson	1					

1 - Appointed as a Community Member on 27 August 2020

2 - Appointed as a Tenant Member on 27 August 2020

3 - Resigned as Board Member on 14 December 2020

4 - Resigned as Board Member on 9 February 2021



Member present at training



Member not present at training



Cancellation of travel due to weather



Unable to attend remote training due to technical difficulties



Member not required to be present

Special Leave

Board Action Sheet

ACTION POINT	MINUTE NUMBER	ACTION TO BE TAKEN	DEADLINE/TIMESCALE	ACTION BY	PROGRESS
1	17 Mar 2021 (Add Item & 3.2)	Governance Forms to be completed by appointed Tenant and Council Appointed Members.		Governance Officer	Forms sent to Members for signing and return
2	17 Mar 2021 (1)	Company Secretary details to be updated on Regulator Portal	1 April 2021	Governance Officer	Done
3	17 Mar 2021 (5)	Update to Board Members on H&S incident when available		Director of Operations	Riddor report submitted by contractor. Operative returned to work. Notifiable event closed by SHR.
4	17 Mar 2021 (6.2)	Dates for Business Planning Workshops to be arranged	31 March 2021	Governance Officer	First 3 workshops arranged for 8 April 2021, 13 May 2021 and 10 June 2021.
5	17 Mar 2021 (6.4)	Development at Crowlista to progress to tender		Development Manager	
6	17 Mar 2021 (6.5)	Procurement of external Tenant Participation Service to be progressed		Director of Operations	One tender return received and being evaluated.
7	17 Mar 2021 (6.6)	Meeting to be arranged with CNES' Housing Manager, Homeless Service Manager and representatives from IJB.		Chief Executive	Meeting held on 22 April 2021
8	17 Mar 2021 (7.1, 7.4 & 7.5)	Policies to be issued for consultation with staff and Unison & Tenants	16 April 2021	Governance Officer	Consultations issued on 19 March 2021 to run until 16 April 2021.
9	17 Mar 2021 (7.5)	Action Plan to be prepared for Equality & Diversity Policy	May 2021	Chief Executive	Report on the agenda

ACTION POINT	MINUTE NUMBER	ACTION TO BE TAKEN	DEADLINE/ TIMESCALE	ACTION BY	PROGRESS
10	27 Jan 2021 (8.1)	Business Planning review deferred to September/October 2021 following the AGM.	Sept 2021	Chief Executive	Business Planning Timeline on March 2021 Agenda
11	27 Jan 2021 (8.3)	Re-wiring tender to be procured out with the Investment Framework. Report to Board on refusals and non-access issues		Director of Operations	Tender issued March 2021 Completed
12	17 Nov 2020 (6.8)	Barvas development to be brought forward to 2020/21		Director of Operations	Land acquisition not finalised before 31 March 2021. Contractor working at risk.
13	17 Nov 2020 (6.10)	Grant to be awarded and legal agreement to be drawn up prior to construction of path		Director of Operations	Signed agreement received from community group and work being planned.
14	26 Aug 2020 (6.1)	Housing Needs Analysis to be completed prior to finalisation of new borrowing.	October 2021	Director of Operation	Tender returns due 4 May 2021
15	20 May 2020 (8.3)	Arrange for a Board Member to attend staff meeting.	Once Office activities return to normal	Company Secretary	

ANNUAL RETURN ON THE CHARTER 2020/21

Board 18 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 The purpose of this report is to bring our Annual Return on the Charter (ARC) 2020/21 before the Board for consideration and approval.

Summary

- 2.1 The completed ARC which includes our EESSH return, is at Appendix 1.
- 2.2 Of the 40 indicators, 13 are contextual, 8 remain static and 1 was not applicable this year. Of the remaining 18 performance indicators, 10 are showing an improvement since the previous year. A summary of some of the key variances is shown in the table at 9.3.
- 2.3 There was a change to the standard for the Scottish Housing Quality Standard (SHQS) introduced in 2020/21 and further information can be found at Appendix 2.
- 2.4 On 5 March 2021, the Scottish Housing Regulator advised that it was reverting to pre-COVID-19 timescale of 31 May for submission of ARC data.
- 2.5 The Regulator, following consultation with key stakeholders, further advised the importance of collecting the full dataset for the ARC to provide a comprehensive picture of the impact of the pandemic and the scale of recovery work that is needed, whilst recognising that the resulting datasets may look very different to those in previous years.

Competence

- 3.1 The financial, legal and other implications are detailed in paragraph 5.1 – 8.1 of this report.

Recommendations

- 4.1 **It is recommended that the Board review and approve the Draft Annual Return on the Charter 2020/21 at Appendix 1, subject to the reconciliation of any queries raised.**

APPENDIX 1: Draft Annual Return on the Charter 2020/21

APPENDIX 2: SHQS 2020/21

Background Papers: Scottish Social Housing Charter

Writer of Report: Iona France

Tel: 0300 123 0773

Competence

Financial

- 5.1 There are no financial constraints to the recommendation in this report being implemented.

Legal

- 6.1 There is a legal and regulatory requirement to ensure that the ARC is prepared and submitted by 31 May 2021.

Regulatory Guidance

- 7.1 The Regulatory Standards checklist has been completed and there is nothing in the report which would result in a breach of the standards.
- 7.2 This report provides ongoing assurance of evidence points CH1 in relation to our Annual Assurance Statement.

Risk

- 8.1 The risks of not submitting the ARC will lead to the Partnership being in breach of regulatory requirements and have a knock-on effect on its risk rating and regulatory engagement.

Report Details

- 9.1 On 1 April 2020, RSLs commenced reporting against the seventh full year of the Annual Return on the Charter (ARC). This return covers the period 1 April 2020 – 31 March 2021.
- 9.2 This year has seen no significant amendments compared with the 2019/20 Return. The ARC 2020/21 is attached at Appendix 1 for consideration.
- 9.3 Some of the pertinent statistics from key indicators are summarised below. Previous years' data has been included for comparison.

DETAIL	Variance	ARC 2020/21	ARC 2019/20	ARC 2018/19
REPAIRS				
Emergency repairs completed	47.79%	1206	816	809
Average length of time to complete emergency repairs	-8.74%	2.61 hours	2.86 hours	3.43 hours
Non-emergency repairs completed	-10.23%	4141	4613	4675
Average length of time to complete non-emergency repairs	90.66%	4.90 days	2.57 days	2.69 days
Reactive repairs completed right first time	1.20%	90.56%	89.49%	89.48%
ARREARS				
Total arrears	1.87%	£307,832	£302,173	£295,611
Former tenant arrears	27.55%	£120,221	£94,252	£128,050
VOIDS				
Average time to re-let properties in the last year	103.53%	50.19 days	24.66 days	27.73 days
Calendar days properties were empty	80.21%	8131	4512	6350
Rent loss through voids	69.22%	£96,726	£57,159	£56,229
LETTINGS				
General needs lets	-15.60%	184	218	231
Supported Housing lets	-83.33%	2	12	2
NEIGHBOURHOOD & COMMUNITY				
Anti-social behaviour cases	-25%	12	16	40
Abandoned properties	0%	4	4	13
HOUSING QUALITY & ENERGY EFFICIENCY STANDARDS				
Total self-contained stock	1%	2223	2201	2172
Stock meeting SHQS	-3.72%	80.07%	82.78%	81.08%
Stock meeting EESSH	3.73%	86.10%	83.00%	80.30%
GENERAL				
Rent increase	n/a	1.3%	2.2%	3.2%
Staff turnover	22.12%	5.08%	4.16%	13.87%

- 9.4 A number of areas of performance have decreased due to the impact of COVID-19 restrictions and subsequent periods of lockdown. The most significant impact was evident in the following areas:
- Number of emergency repairs – 47.79% increase;
 - Average length of time to complete non- emergency repairs – 90.66% increase;
 - Average time to re-let properties in the last year – 103.53% increase;
 - Number of calendar days properties were empty - 80.21% increase; and
 - Rent loss through voids – 69.22% increase.
- 9.5 Repairs recorded as 'delayed due to COVID-19' had an average completion time of 33 days.
- 9.6 Several factors affected the increase in the number of emergency repairs such as more people being at home every day causing more things to go wrong. It may also be that during the initial lockdown tenants were reluctant to have anyone in their home and did not report repairs immediately, resulting in repairs which otherwise would have been routine, being categorised as emergencies. This was in periods when operating emergency repairs only.
- 9.7 Some of the increases in the re-let performance were due to low demand properties but in the main this was due to delays resulting from COVID-19.
- 9.8 Although the figure for Rent Arrears has risen slightly, the overall percentage has decreased from 3.33% to 3.22%.
- 9.9 Following the publication of ARC results by the Regulator in the autumn our Tenant Report will be prepared and issued to all Tenants.



Landlord name: Hebridean Housing Partnership Ltd

RSL Reg. No.: 359

Report generated date: 07/05/2021 09:44:11

Approval

A1.1	Date approved	
A1.2	Approver	
A1.3	Approver job title	
A1.4	Comments	



Social landlord contextual information

Staff

Staff information, staff turnover and sickness rates (Indicator C1)

C1.1	the name of Chief Executive	Ms. Dena Macleod
C1.2.1	C1.2 Staff employed by the RSL: the number of senior staff	4.00
C1.2.2	the number of office based staff	37.75
C1.2.3	the number of care / support staff	2.50
C1.2.4	the number of concierge staff	0.00
C1.2.5	the number of direct labour staff	0.00
C1.2.6	the total number of staff	44.25
C1.3.1	Staff turnover and sickness absence: the percentage of senior staff turnover in the year to the end of the reporting year	0.00%
C1.3.2	the percentage of total staff turnover in the year to the end of the reporting year	5.08%
C1.3.3	the percentage of days lost through staff sickness absence in the reporting year	2.82%

**Social landlord contextual information****Lets**

Number of lets during the reporting year, split between 'general needs' and 'supported housing' (Indicator C3)
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C3.1	The number of 'general needs' lets during the reporting year	184
C3.2	The number of 'supported housing' lets during the reporting year	2

Indicator C3		186
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The number of lets during the reporting year by source of let (Indicator C2)

C2.1	The number of lets to existing tenants	29
C2.2	The number of lets to housing list applicants	85
C2.3	The number of mutual exchanges	13
C2.4	The number of lets from other sources	3
C2.5.1	C2.5 The number of applicants who have been assessed as statutorily homeless by the local authority as: section 5 referrals	0
C2.5.2	nominations from the local authority	69
C2.5.3	other	0
C2.6	the number of other nominations from local authorities	0
C2.7	Total number of lets excluding exchanges	186

Annual Return on the Charter (ARC) 2020-2021

Comments (Social landlord contextual information)

**Overall satisfaction****All outcomes**

Percentage of tenants satisfied with the overall service provided by their landlord (Indicator 1)

1.1.1	1.1 In relation to the overall tenant satisfaction survey carried out, please state: the number of tenants who were surveyed	824
1.1.2	the fieldwork dates of the survey	07/2018
1.1.3	The method(s) of administering the survey: Post	☐
1.1.4	Telephone	☒
1.1.5	Face-to-face	☒
1.1.6	Online	☐
1.2.1	1.2 In relation to the tenant satisfaction question on overall services, please state the number of tenants who responded: very satisfied	365
1.2.2	fairly satisfied	360
1.2.3	neither satisfied nor dissatisfied	38
1.2.4	fairly dissatisfied	38
1.2.5	very dissatisfied	23
1.2.6	no opinion	0
1.2.7	Total	824

Indicator 1	87.99%
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Annual Return on the Charter (ARC) 2020-2021

Comments (Overall satisfaction)



The customer / landlord relationship

Communication

Percentage of tenants who feel their landlord is good at keeping them informed about their services and decisions (Indicator 2)

2.1	How many tenants answered the question "How good or poor do you feel your landlord is at keeping you informed about their services and decisions?"	824
2.2.1	2.2 Of the tenants who answered, how many said that their landlord was: very good at keeping them informed	458
2.2.2	fairly good at keeping them informed	301
2.2.3	neither good nor poor at keeping them informed	25
2.2.4	fairly poor at keeping them informed	30
2.2.5	very poor at keeping them informed	10
2.2.6	Total	824

Indicator 2	92.11%
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Participation

Percentage of tenants satisfied with the opportunities given to them to participate in their landlord's decision making processes (Indicator 5)

5.1	How many tenants answered the question "How satisfied or dissatisfied are you with opportunities given to you to participate in your landlord's decision making processes?"	823
5.2.1	5.2 Of the tenants who answered, how many said that they were: very satisfied	409
5.2.2	fairly satisfied	286
5.2.3	neither satisfied nor dissatisfied	90
5.2.4	fairly dissatisfied	30
5.2.5	very dissatisfied	8
5.2.6	Total	823

Indicator 5	84.45%
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Annual Return on the Charter (ARC) 2020-2021

Comments (The customer / landlord relationship)



Housing quality and maintenance

Quality of housing

Scottish Housing Quality Standard (SHQS) – Stock condition survey information (Indicator C8)

C8.1	The date your organisation's stock was last surveyed or assessed for compliance with the SHQS	01/2018
C8.2	What percentage of stock did your organisation fully assess for compliance in the last five years?	20.00
C8.3	The date of your next scheduled stock condition survey or assessment	10/2021
C8.4	What percentage of your organisation's stock will be fully assessed in the next survey for SHQS compliance	20.00
C8.5	Comments on method of assessing SHQS compliance.	

Assets of age, construction, type and in differing areas were developed into cells for a 20% sample .
A contingency list within the cells was also prepared in readiness for cloning across the remainder of the stock
The results of the sample and cloning will then be cross referenced to known improvements carried out in recent years in order to provide an accurate model of works required across SHQS criteria.



Scottish Housing Quality Standard (SHQS) – Stock summary (Indicator C9)

		End of the reporting year	End of the next reporting year
C9.1	Total self-contained stock	2,223	2,320
C9.2	Self-contained stock exempt from SHQS	247	246
C9.3	Self-contained stock in abeyance from SHQS	196	123
C9.4.1	Self-contained stock failing SHQS for one criterion	0	0
C9.4.2	Self-contained stock failing SHQS for two or more criteria	0	0
C9.4.3	Total self-contained stock failing SHQS	0	0
C9.5	Stock meeting the SHQS	1,780	1,951



C9.6	Total self-contained stock meeting the SHQS by local authority
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	End of the reporting year	End of the next reporting year
Aberdeen City	0	0
Aberdeenshire	0	0
Angus	0	0
Argyll & Bute	0	0
City of Edinburgh	0	0
Clackmannanshire	0	0
Dumfries & Galloway	0	0
Dundee City	0	0
East Ayrshire	0	0
East Dunbartonshire	0	0
East Lothian	0	0
East Renfrewshire	0	0
Eilean Siar	1,780	1,951
Falkirk	0	0
Fife	0	0
Glasgow City	0	0
Highland	0	0
Inverclyde	0	0
Midlothian	0	0
Moray	0	0
North Ayrshire	0	0



North Lanarkshire	0	0
Orkney Islands	0	0
Perth & Kinross	0	0
Renfrewshire	0	0
Scottish Borders	0	0
Shetland Islands	0	0
South Ayrshire	0	0
South Lanarkshire	0	0
Stirling	0	0
West Dunbartonshire	0	0
West Lothian	0	0
Totals	1,780	1,951

Percentage of stock meeting the Scottish Housing Quality Standard (SHQS) (Indicator 6)
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6.1.1	The total number of properties within scope of the SHQS: at the end of the reporting year	2,223
6.1.2	projected to the end of the next reporting year	2,320
6.2.1	The number of properties meeting the SHQS: at the end of the reporting year	1,780
6.2.2	projected to the end of the next reporting year	1,951

Indicator 6 - Percentage of stock meeting the SHQS at the end of the reporting year	80.07%
Indicator 6 - Percentage of stock meeting the SHQS projected to the end of the next reporting year	84.09%



Percentage of tenants satisfied with the quality of their home (Indicator 7)

7.1	How many tenants answered the question "Overall, how satisfied or dissatisfied are you with the quality of your home?"	824
7.2.1	7.2 Of the tenants who answered, how many said that they were: very satisfied	405
7.2.2	fairly satisfied	344
7.2.3	neither satisfied nor dissatisfied	22
7.2.4	fairly dissatisfied	43
7.2.5	very dissatisfied	10
7.3	Total	824

Indicator 7	90.90%
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Repairs, maintenance & improvements

Average length of time taken to complete emergency repairs (Indicator 8)
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8.1	The number of emergency repairs completed in the reporting year	1,206
8.2	The total number of hours taken to complete emergency repairs	3,147

Indicator 8		2.61
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Average length of time taken to complete non-emergency repairs (Indicator 9)
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9.1	The total number of non-emergency repairs completed in the reporting year	4,141
9.2	The total number of working days taken to complete non-emergency repairs	20,290

Indicator 9	4.90
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Percentage of reactive repairs carried out in the last year completed right first time (Indicator 10)

10.1	The number of reactive repairs completed right first time during the reporting year	3,750
10.2	The total number of reactive repairs completed during the reporting year	4,141

Indicator 10		90.56%
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How many times in the reporting year did not meet your statutory duty to complete a gas safety check (Indicator 11).

11.1	The number of times you did not meet your statutory duty to complete a gas safety check.	1
11.2	if you did not meet your statutory duty to complete a gas safety check add a note in the comments field	
Unable to attend 1 property due to tenant claims re COVID-19. Legal letters were sent to attempt access but none was given. Works carried out when repair was required and tenant allowed access.		

Indicator 11		1
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Percentage of tenants who have had repairs or maintenance carried out in last 12 months satisfied with the repairs and maintenance service (Indicator 12)

12.1	Of the tenants who had repairs carried out in the last year, how many answered the question "Thinking about the LAST time you had repairs carried out, how satisfied or dissatisfied were you with the repairs service provided by your landlord?"	154
12.2	Of the tenants who answered, how many said that they were:	124
12.2.1	very satisfied	
12.2.2	fairly satisfied	29
12.2.3	neither satisfied nor dissatisfied	0
12.2.4	fairly dissatisfied	0
12.2.5	very dissatisfied	1
12.2.6	Total	154

Indicator 12	99.35%
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EESH

Percentage of properties meeting the EESH (Indicator C10)

C10.1	Number of self contained properties			
	Gas	Electric	Other fuels	Total
Flats	177	151	0	328
Four-in-a-block	48	0	0	48
Houses (other than detached)	199	1,507	68	1,774
Detached houses	2	70	1	73
Total	426	1,728	69	2,223

C10.2	Number of self contained properties not in scope of the EESH			
	Gas	Electric	Other fuels	Total
Flats	0	0	0	0
Four-in-a-block	0	0	0	0
Houses (other than detached)	0	0	0	0
Detached houses	0	0	0	0
Total	0	0	0	0

C10.3	Number of self contained properties in scope of the EESH			
	Gas	Electric	Other fuels	Total
Flats	177	151	0	328
Four-in-a-block	48	0	0	48
Houses (other than detached)	199	1,507	68	1,774
Detached houses	2	70	1	73
Total	426	1,728	69	2,223

C10.4	Number of properties in scope of the EESH where compliance is unknown			
	Gas	Electric	Other fuels	Total
Flats	0	0	0	0
Four-in-a-block	0	0	0	0
Houses (other than detached)	0	0	0	0
Detached houses	0	0	0	0
Total	0	0	0	0



C10.4.21	Where EESSH compliance is unknown for any properties, please explain why
	N/A

C10.5	Number of properties in scope of the EESSH that do not meet the standard			
	Gas	Electric	Other fuels	Total
Flats	0	0	0	0
Four-in-a-block	0	0	0	0
Houses (other than detached)	0	0	0	0
Detached houses	0	0	0	0
Total	0	0	0	0

C10.6	Number of properties in scope of the EESSH that are exempt the standard			
	Gas	Electric	Other fuels	Total
Flats	2	19	0	21
Four-in-a-block	6	0	0	6
Houses (other than detached)	7	222	16	245
Detached houses	0	36	0	36
Total	15	277	16	308

C10.7	Number of properties in scope of the EESSH that meet the standard			
	Gas	Electric	Other fuels	Total
Flats	175	132	0	307
Four-in-a-block	42	0	0	42
Houses (other than detached)	192	1,285	52	1,529
Detached houses	2	34	1	37
Total	411	1,451	53	1,915

	C10	86.1%
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Energy Performance Certificates (EPCs) (Indicator C12)

C12.1	EPC rating	
	The number of properties with a valid EPC	The number of EPCs lodged in the reporting year
A	4	0
B	88	1
C	789	46
D	247	45
E	3	0
F	0	0
G	0	0
Total	1,131	92

C12.2	Of the properties with a valid EPC, please state which version of the SAP was used for generating the EPCs	
	Number of Properties	
SAP 2001	0	
SAP 2005	0	
SAP 2009	1,093	
SAP 2012	38	
Other procedure / unknown	0	
Total	1,131	

C12.3	If other procedure or unknown, please explain	
		N/A

Indicator C12

50.9%



Investment in the EESSH (Indicator C13)

C13.1	The total number of properties brought up to the EESSH during the reporting year	49
C13.2	Of the total amount invested in bringing properties up to the EESSH, please state how much came from	
C13.2.1	Subsidy	£0
C13.2.2	The landlord's own financial resource	£435,388
C13.2.3	Another source	£0
C13.2.4	Total amount invested in bringing properties up to the EESSH	£435,388

C13.3	Please give reasons for any investment which came from another source	
		N/A

Annual Return on the Charter (ARC) 2020-2021

Comments (Housing quality and maintenance)

Indicator C9: Previous exemptions due to disproportionate costs have changed to abeyances due to works being delayed under Covid or refused by tenants. This shows in reduced exemptions and increased abeyances. Abeyances will clear as Covid works are done during 2021/22



Neighbourhood & community

Estate management, anti-social behaviour, neighbour nuisance and tenancy disputes

Percentage of all complaints responded to in full at Stage 1 and percentage of all complaints responded to in full at Stage 2. (Indicators 3 & 4)

	1st stage	2nd stage
Complaints received in the reporting year	73	34
Complaints carried forward from previous reporting year	1	2
All complaints received and carried forward	74	36
Number of complaints responded to in full by the landlord in the reporting year	74	36
Time taken in working days to provide a full response	318	680

Indicators 3 & 4 - The percentage of all complaints responded to in full at Stage 1	100.00%
Indicators 3 & 4 - The percentage of all complaints responded to in full at Stage 2	100.00%
Indicators 3 & 4 - The average time in working days for a full response at Stage 1	4.30
Indicators 3 & 4 - The average time in working days for a full response at Stage 2	18.89



Percentage of tenants satisfied with the landlord's contribution to the management of the neighbourhood they live in (Indicator 13)

13.1	How many tenants answered the question "Overall, how satisfied or dissatisfied are you with your landlord's contribution to the management of the neighbourhood you live in?"	822
13.2.1	13.2 Of the tenants who answered, how many said that they were: very satisfied	390
13.2.2	fairly satisfied	364
13.2.3	neither satisfied nor dissatisfied	20
13.2.4	fairly dissatisfied	43
13.2.5	very dissatisfied	5
13.2.6	Total	822

Indicator 13	91.73%
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Percentage of tenancy offers refused during the year (Indicator 14)

14.1	The number of tenancy offers made during the reporting year	257
14.2	The number of tenancy offers that were refused	64

Indicator 14		24.90%
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Percentage of anti-social behaviour cases reported in the last year which were resolved (Indicator 15)
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15.1	The number of cases of anti-social behaviour reported in the last year	12
15.2	Of those at 15.1, the number of cases resolved in the last year	12

Indicator 15	100.00%
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Abandoned homes (Indicator C4)

C4.1	The number of properties abandoned during the reporting year	4
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Percentage of the court actions initiated which resulted in eviction and the reasons for eviction (Indicator 22)

22.1	The total number of court actions initiated during the reporting year	0
22.2.1	22.2 The number of properties recovered: because rent had not been paid	0
22.2.2	because of anti-social behaviour	0
22.2.3	for other reasons	0

Indicator 22 - Percentage of the court actions initiated which resulted in eviction because rent had not been paid	N/A
Indicator 22 - Percentage of the court actions initiated which resulted in eviction because of anti-social behaviour	N/A
Indicator 22 - Percentage of the court actions initiated which resulted in eviction for other reasons	N/A
Indicator 22 - Percentage of the court actions initiated which resulted in eviction	N/A

Annual Return on the Charter (ARC) 2020-2021

Comments (Neighbourhood & community)

**Access to housing and support****Housing options and access to social housing**

Percentage of lettable houses that became vacant in the last year (Indicator 17)
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17.1	The total number of lettable self-contained stock	2,223
17.2	The number of empty dwellings that arose during the reporting year in self-contained lettable stock	158

Indicator 17	7.11%
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Number of households currently waiting for adaptations to their home (Indicator 19)

19.1	The total number of approved applications on the list for adaptations as at the start of the reporting year, plus any new approved applications during the reporting year.	142
19.2	The number of approved applications completed between the start and end of the reporting year	129
19.3	The total number of households waiting for applications to be completed at the end of the reporting year.	13
19.4	if 19(iii) does not equal 19(i) minus 19(ii) add a note in the comments field.	
		N/A

Indicator 19	13
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Total cost of adaptations completed in the year by source of funding (£) (Indicator 20)

20.1	The cost (£) that was landlord funded;	£0
20.2	The cost (£) that was grant funded	£280,594
20.3	The cost (£) that was funded by other sources.	£0

Indicator 20	£280,594
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The average time to complete adaptations (Indicator 21)

21.1	The total number of working days taken to complete all adaptations.	7,516
21.2	The total number of adaptations completed during the reporting year.	299

Indicator 21	25.14
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Homelessness – the percentage of referrals under Section 5, and other referrals for homeless households made by the local authority, that result in an offer, and the percentage of those offers that result in a let (Indicator 23)

23.1	The total number of individual homeless households referrals received under section 5.	0
23.2	The total number of individual homeless households referrals received under other referral routes.	105
23.3	The total number of individual homeless households referrals received under section 5 and other referral routes.	105
23.4	The total number of individual homeless households referrals received under section 5 that result in an offer of a permanent home.	0
23.5	The total number of individual homeless households referrals received under other referral routes that result in an offer of a permanent home.	89
23.6	The total number of individual homeless households referrals received under section 5 and other referral routes that result in an offer of a permanent home.	89
23.7	The total number of accepted offers.	69

Indicator 23 - The percentage of referrals under section 5, and other referrals for homeless households made by a local authority, that result in an offer	84.76%
Indicator 23 - The percentage of those offers that result in a let	77.53%



Average length of time to re-let properties in the last year (Indicator 30)

30.1	The total number of properties re-let in the reporting year	162
30.2	The total number of calendar days properties were empty	8,131

Indicator 30		50.19
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Tenancy sustainment

Percentage of new tenancies sustained for more than a year, by source of let (Indicator 16)

16.1.1	The number of tenancies which began in the previous reporting year by: existing tenants	23
16.1.2	applicants who were assessed as statutory homeless by the local authority	81
16.1.3	applicants from your organisation's housing list	109
16.1.4	nominations from local authority	0
16.1.5	other	0
16.2.1	The number of tenants at 16.1 who remained in their tenancy for more than a year by: existing tenants	21
16.2.2	applicants who were assessed as statutory homeless by the local authority	78
16.2.3	applicants from your organisation's housing list	94
16.2.4	nominations from local authority	0
16.2.5	other	0

Indicator 16 - Percentage of new tenancies to existing tenants sustained for more than a year	91.30%
Indicator 16 - Percentage of new tenancies to applicants who were assessed as statutory homeless by the local authority sustained for more than a year	96.30%
Indicator 16 - Percentage of new tenancies to applicants from the landlord's housing list sustained for more than a year	86.24%
Indicator 16 - Percentage of new tenancies through nominations from local authority sustained for more than a year	N/A
Indicator 16 - Percentage of new tenancies to others sustained for more than a year	N/A

Annual Return on the Charter (ARC) 2020-2021

Comments (Access to housing and support)

**Getting good value from rents and service charges****Rents and service charges**

Rent collected as percentage of total rent due in the reporting year (Indicator 26)

26.1	The total amount of rent collected in the reporting year	£9,465,464
26.2	The total amount of rent due to be collected in the reporting year (annual rent debit)	£9,469,604

Indicator 26	99.96%
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Gross rent arrears (all tenants) as at 31 March each year as a percentage of rent due for the reporting year (Indicator 27)

27.1	The total value (£) of gross rent arrears as at the end of the reporting year	£307,832
27.2	The total rent due for the reporting year	£9,566,330

Indicator 27		3.22%
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Average annual management fee per factored property (Indicator 28)

28.1	The number of residential properties factored	133
28.2	The total value of management fees invoiced to factored owners in the reporting year	£1,107

Indicator 28		£8.32
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Percentage of rent due lost through properties being empty during the last year (Indicator 18)

18.1	The total amount of rent due for the reporting year	9,566,330
18.2	The total amount of rent lost through properties being empty during the reporting year	96,726

Indicator 18		1.01%
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Rent increase (Indicator C5)

C5.1	The percentage average weekly rent increase to be applied in the next reporting year	1.30%
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The number of households for which landlords are paid housing costs directly and the total value of payments received in the reporting year (Indicator C6)

C6.1	The number of households the landlord received housing costs directly for during the reporting year	1,114
C6.2	The value of direct housing cost payments received during the reporting year	£3,899,037



Amount and percentage of former tenant rent arrears written off at the year end (Indicator C7)
--

C7.1	The total value of former tenant arrears at year end	£92,825
C7.2	The total value of former tenant arrears written off at year end	£16,193

Indicator C7	17.44%
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**Value for money**

Percentage of tenants who feel that the rent for their property represents good value for money (Indicator 25)
--

25.1	How many tenants answered the question "Taking into account the accommodation and the services your landlord provides, do you think the rent for your property represents good or poor value for money?"	812
25.2.1	25.2 Of the tenants who answered, how many said that their rent represented: very good value for money	278
25.2.2	fairly good value for money	361
25.2.3	neither good nor poor value for money	54
25.2.4	fairly poor value for money	96
25.2.5	very poor value for money	23
25.3	Total	812

Indicator 25	78.69%
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Percentage of factored owners satisfied with the factoring service they receive (Indicator 29)

29.1	How many factored owners answered the question "Taking everything into account, how satisfied or dissatisfied are you with the factoring services provided by your landlord?"	3
29.2.1	29.2 Of the factored owners who answered, how many said that they were: very satisfied	1
29.2.2	fairly satisfied	0
29.2.3	neither satisfied nor dissatisfied	0
29.2.4	fairly dissatisfied	0
29.2.5	very dissatisfied	2
29.3	Total	3

Indicator 29	33.33%
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Annual Return on the Charter (ARC) 2020-2021

Comments (Getting good value from rents and service charges)

**Other customers****Gypsies / Travellers**

For those who provide Gypsies/Travellers sites - Average weekly rent per pitch (Indicator 31)

31.1	The total number of pitches	
31.2	The total amount of rent set for all pitches during the reporting year	

	Indicator 31	
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For those who provide sites – percentage of Gypsy/Travellers satisfied with the landlord's management of the site (Indicator 32)

32.1	How many Gypsies/Travellers answered the question "How satisfied or dissatisfied are you with your landlord's management of your site?"	
32.2.1	32.2 Of the Gypsies/Travellers who answered, how many said that they were: very satisfied	
32.2.2	fairly satisfied	
32.2.3	neither satisfied nor dissatisfied	
32.2.4	fairly dissatisfied	
32.2.5	very dissatisfied	
32.2.6	Total	

	Indicator 32	
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Annual Return on the Charter (ARC) 2020-2021

Comments (Other customers)

SHQS 2021

Smoke detectors

- 1.1 There is a new SHQS standard for smoke detection (SHQS 11A) to meet the new standard. As some properties refused access due to COVID-19, they have been classed as 'in abeyance'. This means that they are delayed temporarily and will be completed once we have access.

Address	SHQS 11	SHQS 11A	SHQS 11B
9 Columbia Place	Pass	Abeyance	Pass
22 Macmillan Brae	Pass	Abeyance	Pass
61 Matheson Road	Pass	Abeyance	Pass
15 Plantation Road	Pass	Abeyance	Pass

As these are now in abeyance, 35 houses are removed from the total of our stock fully meeting SHQS i.e. our total decreases by 35 and our abeyances increase by 35.

Heating systems

- 1.2 Prior to 2021, SHQS had 6 energy efficiency standards. These have now been rolled into the one standard, which is the EESSH, which takes account of all energy efficiency in a property and relates it to the one SAP score.
- 1.3 Prior to 2021, the required SAP score (SHQS 35) for a property, regardless of type, was 48. All of our gas properties met this score and, if they met the other 5 standards, were then deemed to have met SHQS as can be seen below.

Address	SAP	SHQS 31	SHQS 32	SHQS 33	SHQS 34a	SHQS 34b	SHQS 35
6 Torquil Terrace	65	Pass	Pass	Pass	Pass	Pass	Pass
7 Torquil Terrace	75	Pass	Pass	Pass	Pass	Pass	Pass
9 Torquil Terrace	64	Pass	Pass	Pass	Pass	Pass	Pass
11 Torquil Terrace	64	Pass	Pass	Pass	Pass	Pass	Pass

- 1.4 This year our gas properties must meet a score based on house type. For Torquil Terrace flats, this is 69. As you can see above and below, this has not been achieved yet, due to the delay of works during the pandemic. As shown below, these are now treated as being in abeyance, as explained previously.

Address	Comments	New Fuel	2020-21 SAP	SHQS 35
6 Torquil Terrace	COVID Delay	Gas	65	Abeyance
7 Torquil Terrace		Gas	75	Pass
9 Torquil Terrace	COVID Delay	Gas	64	Abeyance
11 Torquil Terrace	COVID Delay	Gas	64	Abeyance

- 1.5 Again, this takes properties from our total stock fully meeting SHQS and places them in abeyance. There are a number of other similar properties with this issue and together with smoke alarms their effect is that in 2021, we have less stock fully meeting SHQS than in 2020. All this will change in 2021 as the works are completed.

ALLOCATION OF HOUSING TO PRIORITY HOMELESS

Board 19 May 2021

Report by Director of Operations

Purpose of Report

- 1.1 This report is to advise the Board of a request from the Comhairle's Housing Team to increase the proportion of vacancies being made to Statutory Homeless applicants in the Stornoway area.

Summary

- 2.1 In March 2021 the Board considered a request from the Comhairle for the proportion of allocations of 2 apt properties in Stornoway be increased to 100% of all allocations with the exception of Amenity Housing (Murray Place), medical priority, new build and Foyer. This increase would be for six months initially.
- 2.2 It was agreed that further discussion was required with representatives of the Comhairle and the Integrated Joint Board before determining this issue. A meeting subsequently took place on 22 April 2021 and a note of that meeting is at Appendix 1.
- 2.3 It is proposed that the number of properties we make available be increased for a 12 month period and that the impact be reviewed at that time. It is anticipated that a prevention strategy and support assessment framework will have been established by the Comhairle by then then and a strategic review of housing development carried out. This will in turn inform our longer term decision making with regard to homelessness.

Competence

- 3.1 The financial, legal and other constraints arising directly from the recommendations in this report are detailed at paragraph 5.1 – 8.1.

Recommendations

- 4.1 **It is recommended that the Board agree to allocate up to 25 2 apt vacancies per annum to Statutory Homeless Applicants in the Stornoway area.**

APPENDIX 1: Note of Meeting 22 April 2021

Background Papers: Allocations Policy
Allocations Homeless Report

Writer of Report: Mina Maclean

Tel: 0300 123 0773

Competence

Financial

- 5.1 There are no financial implications arising from implementing the recommendations in this report.

Legal

- 6.1 There are no specific legal implications arising from implementing the recommendations in this report.
- 6.2 We are required to provide reasonable preference when allocating properties to applicants who are homeless as well as those who are living in unsatisfactory housing conditions e.g. overcrowded and those who are under occupying homes.
- 6.3 Ministerial guidance issued in response to the pandemic has stressed the importance of continuing to prioritise and house homeless applicants

Regulatory Guidance

- 7.1 The Regulatory Standards checklist has been completed and there is nothing in the report which would result in a breach of the standards.
- 7.2 This report provides assurance of evidence AN3 in relation to our Annual Assurance Statement.

Risk

- 8.1 Demand for housing is an important issue for HHP. The demand for housing in Stornoway area is relatively high and if more allocations are made to Priority Homeless applicants this has a bearing on applicants on the housing list.

Report Details

Background

- 9.1 In broad terms the overall supply of housing vacancies across the housing stock is sufficient to address the number of homeless applicants referred to us by the Comhairle. However, the challenge presented is that the supply of accommodation in Stornoway to meet the needs of single person homeless households is insufficient to meet the demand and consequently applicants can wait for significant periods of time in temporary accommodation before an offer of housing is made.

Demand

- 9.2 At present 44 Priority Homeless applicants are awaiting a 2apt property where Stornoway is their first area of choice. We also receive an average of between 25 and 30 new referrals each year for 2 apt accommodation in Stornoway.
- 9.3 In addition, there are over 100 applicants on our 2 apt waiting list for Stornoway.

Supply

- 9.4 On average we will receive between 35 and 40 2 apt vacancies each year in Stornoway. A number of these will be required for other needs e.g. where they are particularly suitable for medical needs or support for Foyer service users and care leavers. If this is estimated at 5 per annum then the available supply is in the region of 30 to 35 properties.
- 9.5 As we are currently seeking to allocate 50% of 2 apt vacancies (15-18 properties) to homeless applicants the number of people in temporary accommodation will increase as will waiting times as demand exceeds supply. However, a significant proportion homeless households (est 25%) resolve their homelessness by other means and do not ultimately require housing from us which slows the rate at which unmet demand grows.

Housing Need and Support

- 9.6 A further factor to be noted is that a number of applicants in temporary accommodation have not been housed to date because of their particular needs. These are summarised below. We have, over recent years, stressed to the Comhairle the need for such applicants to be adequately supported before housing was made available. Without such support we would be setting up applicants to fail and would also in some cases be likely to cause significant issues for the communities in which they were housed.
- 9.7 Where support has been provided (e.g. via Foyer or ARK) we have housed such applicants and this has generally been successful. However, the availability of support is very limited and consequently several applicants have been waiting for long periods of time. We would argue that in such cases it is not housing that is the challenge but one of support.
- 9.8 At present 22 out of the 44 homeless applicants for 2 apt accommodation have particular needs including drug and alcohol dependency, mental health issues, learning disabilities and other support requirements.
- 9.9 The ethos behind the Government's Rapid Rehousing Policy is that applicants identified as homeless should be housed with the minimum possible time being spent in temporary accommodation to avoid institutionalisation. The key to Rapid Rehousing is support and this continues to be a challenge locally. It requires a co-ordinated approach between support agencies and a shared view and assessment on applicants need for support.

Key Issues

- 10.1 A number of issues have been identified through the discussions held at Board and with the Comhairle. These include:
- The strategic position as established in the LHS and SHIP requires to be clarified on whether new housing to meet the needs identified is a priority for investment;
 - The approach to the provision of support for applicants with challenging behaviors and other needs to enable them to successfully sustain a tenancy requires to be strengthened. At present there is no systematic and shared approach to assessment to determine need and support requirements; and
 - The approach to homeless prevention needs to be improved. The Scottish Government have commissioned a new report which sets out guidance on this although it has been best practice for many years. It sets out recommendations for all agencies. We are largely compliant with the requirements for RSLs. However, good inter-agency working is key and while there are some areas of strength locally there are significant areas for improvement.

Summary

- 11.1 The current situation where demand from homeless applicants exceeds supply can be addressed in 4 ways:
- increase the overall supply of 2 apt housing in Stornoway;
 - increase the number of 2 apt properties being made available to homeless applicants;
 - house applicants in areas where there is available housing; and
 - reduce the number of households presenting as homeless through more effective prevention and partnership working across agencies.
- 11.2 While these are not either/or options, only the second and third of these can deliver the change the Comhairle are seeking immediately although effective prevention should be able to be put in place in a reasonably short period. The Comhairle do not wish to pursue the third option as they believe that the majority of applicants require to be housed in the Stornoway area for social, medical or support reasons.

Recommendations

- 12.1 It is proposed that assistance be offered to the Comhairle as requested by increasing the number of properties allocated to statutory homeless applicants. If the target number of properties allocated over a 12 month period was set at 25 this would broadly align with the expected number of referrals in a 12 month basis. This coupled with the fact that up to 25% of applicants resolve their homeless situation should mean that the overall numbers waiting should reduce. It would also be an increase in our provision of over 25%.
- 12.2 The impact of this proposal would be reviewed at the end of 12 months. This would also provide a period to enable the Comhairle to establish a prevention and housing support strategy and framework and for the strategic direction in terms of housing development reviewed.
- 12.3 While this approach will have a detrimental impact on waiting list applicants it will still allow some applicants to be housed and for people to progress in terms of waiting list position.



HEBRIDEAN HOUSING PARTNERSHIP

NOTE OF BUSINESS PLANNING WORKSHOP - HOMELESSNESS

Note of Meeting held on Thursday 22 April 2021 @ 3.30pm via Microsoft Teams

ITEM / DISCUSSION		
<u>Attendance & Apologies</u>		
<u>Board Members</u> Calum Mackay Iain Macmillan Fiona Macleod Norman Macdonald	<u>Staff</u> Dena Macleod Donald Macleod John Maciver Katie Walker Donalda Mackinnon Mina Maclean Iona France Jonathan Fairgrieve	<u>Consultants</u> Lorraine Graham (CNES) Iain Watson (CNES) Emma Macsween (IJB)
<u>Discussion</u> Lorraine Graham, Homeless Manager, CNES, gave a presentation on the homelessness application and allocation trends. Despite homeless allocations increasing over previous years, the number of homeless applications had not reduced with the majority of applications being within the Stornoway area. The Comhairle were seeking approval for 100% of allocations for 2 apt properties within the Stornoway area be allocated to Homeless Applicants for a short period of time in order to reduce the homeless waiting lists. Members agreed this decision could not be taken without further information being presented. Iain Macmillan stated it was important that action on homelessness was in alignment with our development plans and Comhairle's SHIP. Iain Macmillan suggested a short term solution was required currently whilst Homelessness was considered as part of our Development Plans, the Comhairle's SHIP and Homeless Strategy were aligned. John Maciver advised that some caution was required as prioritising homeless applicants could result in non-homeless applicants being at a disadvantage and potentially lead to more homeless applicants as it could be perceived to be the only way to be housed. It was agreed that more data was required on how this situation had arisen and to ensure that a long term solution was in place to prevent having to take similar action in the future. A further report will be brought to the Board on 19 May 2021 for consideration.		

WORKFORCE STRATEGY

Board 19 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 To provide an update to our Workforce Strategy for consideration and consultation with staff and the Union.

Summary

- 2.1 This update outlines our approach to ensuring we have a highly skilled and effective workforce for the next five years.
- 2.2 The Strategy which is at Appendix 1 highlights:
- we have an older workforce with an average age of 48. All our teams have an average age over 40+;
 - our working population within the islands is reducing drastically and forecasts show this is only going to worsen;
 - the introduction of trainee posts and the expansion of modern apprentices as a means of developing skills;
 - implementation of our Flexible Working Policy;
 - an emphasis on training and development of staff; and
 - commitment to look at introducing healthy working options.

Competence

- 3.1 The financial, legal or other constraints arising from the recommendation in this report are detailed at paragraph 5.1 - 8.1.

Recommendations

- 4.1 **It is recommended that the Board consider and approve the revised Workforce Strategy for consultation with staff and the Union.**

APPENDIX 1: Workforce Strategy

Background Papers: None

Writer of Report: Dena Macleod

Tel: 0300 123 0773

Competence

Financial

- 5.1 There is provision within the 30 year financial projections for the Workforce Strategy.

Legal

- 6.1 The approval and amendment of policies and strategies is a matter reserved to the Board.
- 6.2 The Board has referred the following function to the Audit & Risk Committee:

"Monitoring and reviewing policies and procedures relating to the Board's system of internal control, risk evaluation and corporate governance"

Regulatory Guidance

- 7.1 This report provides ongoing assurance of evidence RS1 – RS5 in relation to our Annual Assurance Statement. Approving the recommendations will ensure compliance with the Regulatory standards.

Risk

- 8.1 The loss of key staff is highlighted in the Risk Register and this Strategy will go some of the way to mitigating this risk.



hebridean housing
partnership



► Workforce Strategy 2021 to 2025

Effective Date: ►

Review Date: ►

Approved by HHP Board:

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Foreword

A photograph of a person's hands working at a desk. The hands are wearing a white long-sleeved shirt. The desk is cluttered with various office supplies: a tablet, a laptop, a calculator, a pen, a clipboard with a checklist, a newspaper, and some papers. The image is overlaid with a large, light-colored 'X' shape.

Our world is facing unprecedented challenges with an ever growing aging population and climate change. We need to ensure our services are designed in a way that minimises our impact on the environment, provides a high quality service to all our customers, encourages young people into the housing sector whilst keeping our employees skilled and motivated.

This strategy details our plans for investing in our employees over the next four to five years.

The difference between a good and excellent service is the staff responsible for delivering the service. I believe staff who are skilled, motivated, and passionate and who care about customers are the best chance of transforming service delivery.

Dena Macleod
CHIEF EXECUTIVE

Workforce Strategy 2021 to 2025

INTRODUCTION

- 1.1 Our Business Plan 2019/20 to 2023/24 has four strategic goals which will be delivered by the employees of the Partnership. This Workforce Strategy identifies what the workforce needs to look like to ensure the four strategic goals are delivered. Our goals are:

1. *Placing tenants at the centre of everything we do*
2. *Investing in an environmentally sustainable way in tenants' homes*
3. *Being a good employer that attracts and retains high quality staff*
4. *Working with partners to contribute to the wellbeing of communities throughout the Outer Hebrides*

- 1.2 The Strategy makes sure we have the right mix of people with the necessary skills in the right location. If we are to deliver our strategic goals within our resources then we need a workforce that is not only skilled but committed to our strategic goals and organisational culture.
- 1.3 In the last financial year we spent £20.8 million repairing properties, building new homes, investing in older properties, general management costs and staff (people) costs. Our direct people costs average 11% of our annual expenditure so it is vital we get it right. In 2020/21 it was reduced to 9.4% because of the substantial increase in our development programme.
- 1.3 This is our second documented Workforce Strategy.

AIMS

- 2.1 The aim is to have a Strategy that:
- a) Reduces risk and cost by eliminating over reliance on one person for any of our key processes;
 - b) Ensures delivery of our strategic goals;
 - c) Improves the quality of customer service;
 - d) Improves the quality of staff engagement and retention rates; and
 - e) Stimulates creativity and innovation within the workforce.

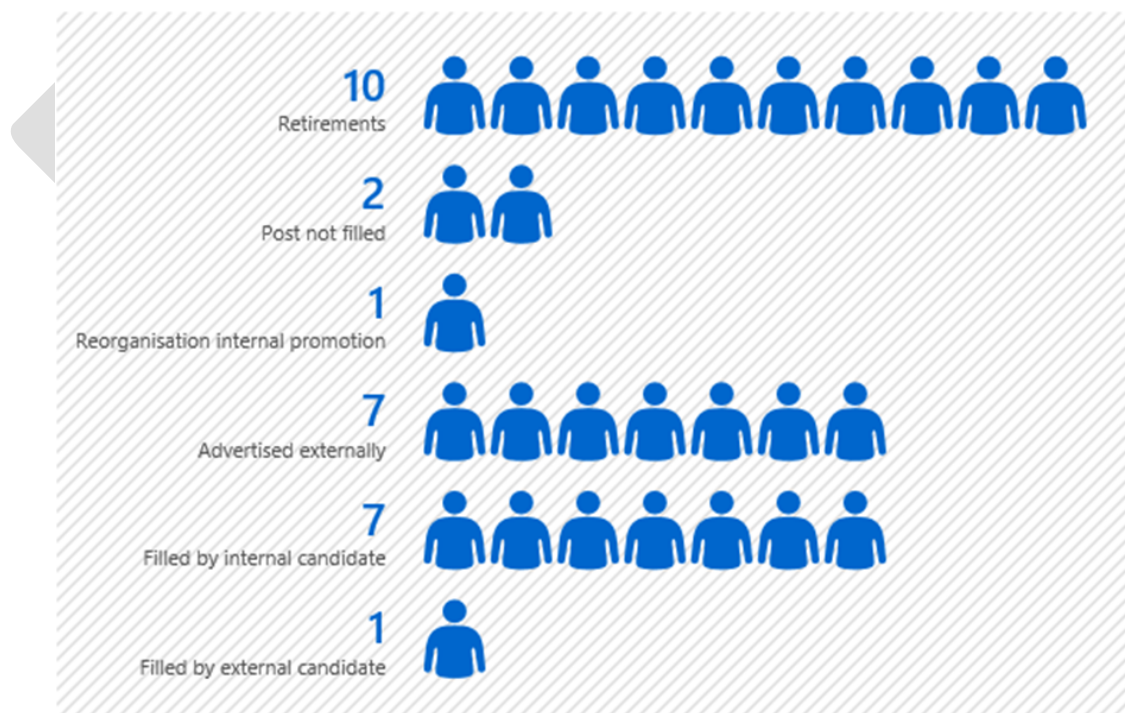
BACKGROUND

- 3.1 The first Strategy was developed following a number of discussions with Managers and took into account the results from the 2020 staff satisfaction survey. We looked at how we currently delivered services and during 2021/22 we will examine how these posts could change over the next five years.
- 3.2 The 2021 review updates the data and amends the Action Plan to bring forward the appointment of the Housing Modern Apprentice.
- 3.3 Feedback from a number of other surveys has been taken into account, e.g. tenant satisfaction survey, repairs surveys and stock condition survey.
- 3.4 Local plans by the Community Planning Partnership were reviewed.

LOCAL CONTEXT

- 4.1 We are considered a large employer in the Outer Hebrides currently employing 50 people. We are a Living Wage employer and have provision for two Modern Apprentices and two Graduate Trainee posts.
- 4.2 In 2006 when we were formed, we employed 42 people who managed 1787 homes. Over the years our workforce has grown and changed in response to service delivery requirements, customers' expectations, additional homes, increased government and regulatory standards, and changes in tools available for delivering a housing service.
- 4.3 Since 12 September 2006 (14.5 years) the position is

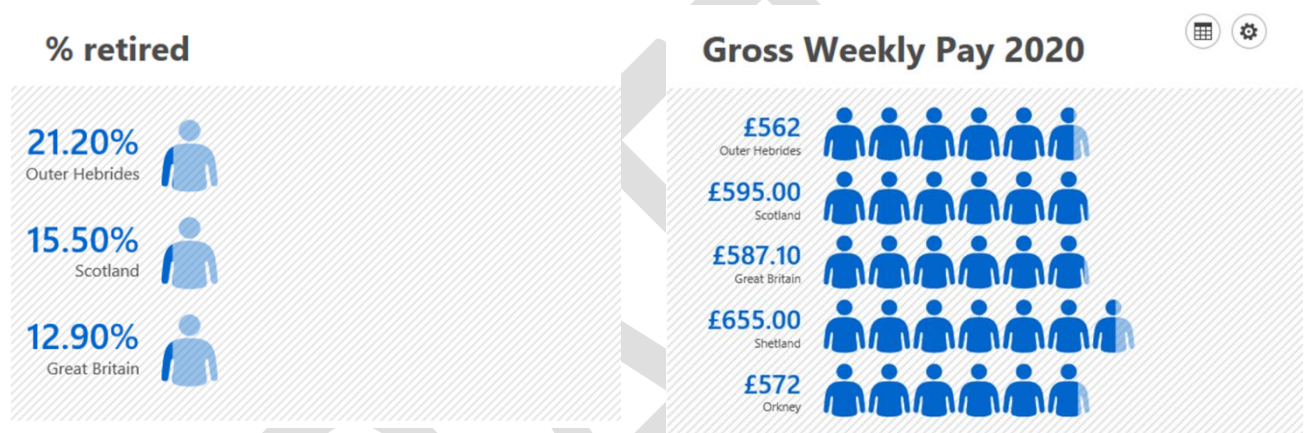
Retirements since 2006



- 4.4 The percentage of retirement posts filled by internal candidates was 77% which is quite high and relatively reassuring. It reveals staff are gaining the experience

and qualifications needed to progress to promoted posts. For comparison purposes, internal candidates filled 50% of the posts which became vacant in 2020.

- 4.5 The average retirement age was 60. All the retirements were “early” and one was due to ill health. The changes introduced by the Government with the Rule of 85 mean the average retirement age will increase over the next 10 to 15 years.
- 4.6 The population of the islands is aging and falling, putting pressure on nearly all employers to find the necessary skills to deliver their businesses and services.
- 4.7 The Office for National Statistics Service in June 2020 showed that the employment rates in the Outer Hebrides remains stable. The report showed that in the year to June 2020 employment rate was 81.6% which is higher than the Scottish Average of 74.5%.



Source: NOMIS

- 4.8 The two graphs above show clearly the challenges employers in the Outer Hebrides must grapple with when maintaining and developing their workforce.

ANALYSIS OF CURRENT WORKFORCE

- 5.1 In this section we analyse the age profile of our current work force and look at the skills base which will enable us to clearly identify risks and actions required to mitigate the risks.

Age Profile

- 5.2 The average age of our current workforce is 48 years and 52% (25) are over 50. If we assume staff will retire at the current state age for retirement

- 20% (10) will retire by 2030

- 58% (28) will retire by 2040

Table 1 below shows the age profile of our workforce at March 2021.

Table 1

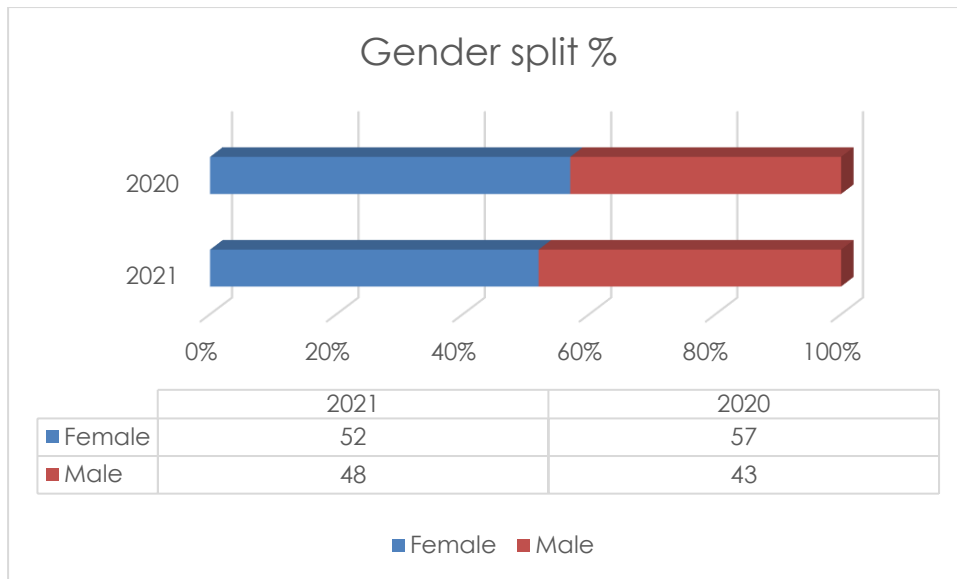
	2020	2021	2022	2023	2024	2025	2026
Under 20	0%	0%	0%	0%	0%	2%	2%
20 to 29	4%	4%	4%	2%	2%	2%	2%
30 to 39	21%	19%	17%	15%	15%	15%	13%
40 to 49	27%	25%	21%	25%	23%	19%	19%
50 to 55	20%	24%	26%	22%	18%	16%	18%
56 to 60	24%	20%	22%	18%	20%	20%	20%
over 60	2%	6%	8%	16%	20%	24%	24%

- 5.3 Our Housing Team has the highest average age at 52.5 followed by Property Services Team and Executive Team at 49. Our youngest team is the Executive Office with an average age of 40. The Property Service Team are one of our longest serving teams so there is a risk of a substantial amount of knowledge being lost if it is not captured in our systems before the team members retire. More than 50% of the current team are due to retire by 2033.

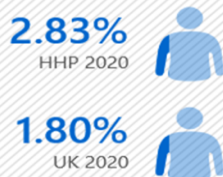
Table 2

	Ave Age	Ave Service
Housing Services	52.5	11
Property Services	52	16
Executive Team	49	16.7
Corporate Resoures	44	8.6
Customer Services	44	5.8
Finance	42	3.6
Executive Office	40	4.75

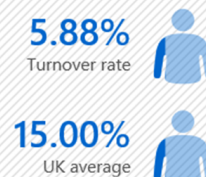
- 5.4 The following graphs show the statistics for gender split, days lost through sickness and turnover rate.



Sickness Absence Rate



Average Turnover



- 5.5 Our sickness absence rate is still higher than the UK average but it has reduced from 4.4% in 2019. Our higher rate absence could be reflective of our age profile and the level of long term sickness. Nationally sickness absence levels are higher in older employees. There is a direct impact on our ability to deliver on our strategic goals when there are long term absences and we need to build more resilience into our ways of working and also take this into account when setting targets for our strategic goals.

Skills Base

- 5.6 There are specific risks associated with a team which is predominately older e.g. there could be a lack of innovation and a slowness to move to new technologies or new methods of working, preferring to do things the way they have always been done.
- 5.7 Experience and knowledge of tenants is valuable but it is equally important for staff to have the skills to deal with the increasingly varied needs of our tenants. There is a growing need/demand for support to vulnerable tenants. Moving tenants onto self-service will free up time for our Customer Services Officers. This time can be invested in the provision of a low level of support to our vulnerable tenants to prevent problems.

- 5.8 Two of our teams have particular vulnerabilities:
- a) **Corporate Resources Team** - Two members have been in post since the inception of HHP which has resulted in an over reliance on their ITC knowledge. Key to minimising this risk is to have clearly documented system procedures. As businesses become more reliant on robust ITC services the need to have sufficient skills to support this service increases. To strengthen our skill set in this area and recognising the growth in our dependence on ITC systems we have included an IT Graduate Trainee post in our structure.
 - b) **Executive Office** - this is a newly established team where two members of the team have recently left after less than two years service.
- 5.9 Our current turnover rate is low which provides a level of stability but it also means we need to be more vigilant against stagnation. If the work and the attitude are right then this doesn't need to be the case.
- 5.10 It is very unlikely that the jobs we currently do will be done in the same way as we do them now. We are going to need more skills in the backroom to manage our systems as more tenants move towards self-service. We need multimedia skills to develop and improve how we present ourselves and improve the level of our social media engagement. We will need to assess whether it is better to buy these services in or to provide them in house.
- 5.11 An ageing workforce generally results in a higher sickness absence rate as more illness is experienced. There is also a greater risk for long term absences so we are exploring options to encourage and support healthy living. We are reviewing the office layout to ensure it is not contributing to the spread of illness.
- 5.12 The culture in the organisation needs to keep changing from 'fear of making a mistake' to 'trust' and continuing to explore better ways of working.

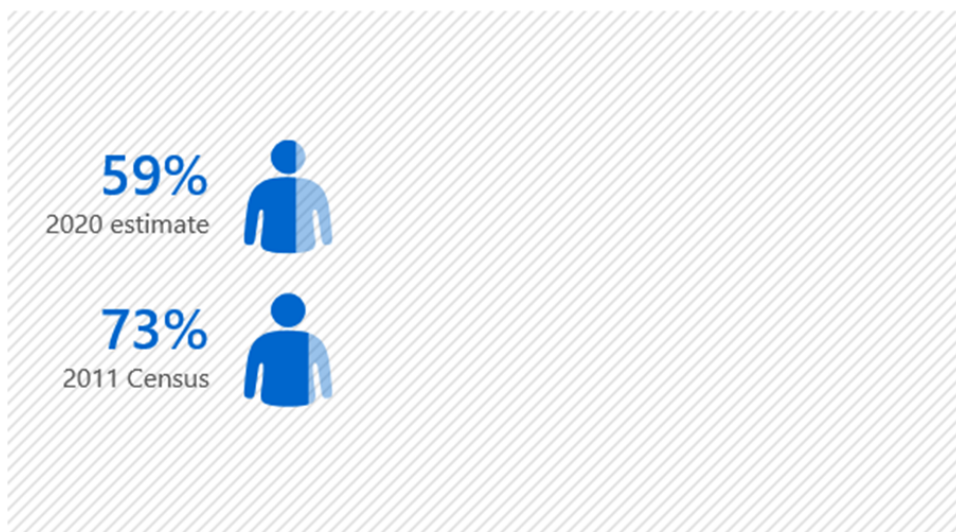
Ways of working

- 5.13 In 2020 all of our staff moved to home working and during the next few months we are reviewing options for our working patterns in the future including a blended model of home and office working. Whatever arrangements we put in place we will always ensure that we can continue to put our customers' needs first.

Workforce Supply

- 5.14 An aging and falling population is placing strain on the workforce supply for most employers in the islands. The source for the statistics below is the Outer Hebrides Fact file on the Comhairle's web site.
- 5.15 In 2020 it was estimated that 59% of the population in the Outer Hebrides was of working age in comparison to 64% for the Scotland. There has been a drop of over 15% in the workforce supply between 2011 and 2016. This trend is reflected in the reduction in applications received for vacant posts. Five years ago a vacancy would have resulted in three or four times the applications now being received for vacancies.

Outer Hebrides Working Population



- 5.16 10% of the population in the Outer Hebrides is self-employed compared with 7% for Scotland.

WHAT KIND OF WORKFORCE DO WE NEED

- 6.1 The Board have approved an ambitious Business Plan for the next four years which looks to deliver the standards required by Government in our properties and continually improve on our service delivery standards. The Board want all of our tenants to feel that the house they rent from us is a place they can call their home. To achieve the vision of “making our house your home” the workforce need to be:
- Customer focussed by placing tenants at the centre of everything they do, customers should be the first thing we think about when we are looking at our service delivery
 - Innovative so we can invest in an environmentally sustainable way in tenants' homes
 - Outcome focussed and high performing-using time and resources in a way that avoids waste and delivers the best results for our tenants
 - Supported to maintain good physical and mental health
 - Motivated by seeing what they do as more than just a job and the impact they can have on the lives of those who live in our communities
 - Leadership - our Managers need to be supportive of their team, demonstrate fairness by recognising excellent performance and dealing fairly and effectively with poor performance
 - Aware, agile and adaptable - with constantly changing work environments due to technology, climate change and reducing resources. It is imperative that everyone is on board with looking at how we can change how we deliver our service and be prepared to amend how jobs are carried out

HOW WE WILL DEVELOP THE WORKFORCE WE NEED?

- 7.1 The foundations have been laid by the Board in 2019 to develop the workforce by implementing a Competency Framework as part of a new Pay and Grading Scheme. The Competency Framework outlines the behaviours required for each post in the organisation making it clear that doing a good job is more than completing a task, it is also about how that task is completed. Managers are taking the lead role with the teams to ensure the Competency Framework is fully embedded in how we all work.

Training

- 7.2 Our Training Plan ensures identified skills gaps are met from a combination of the current workforce and trainee positions. We will use trainee and apprenticeship posts to equip young people for filling the vacancies which arise from retirements.

Leadership

- 7.3 Managers are being given greater flexibility in how they manage their teams and they will be supported to become the leaders our customers need them to be. Our Managers will be leaders whose first response will be to find a solution rather than presenting a problem and they will encourage their teams to

develop the same approach. Our Managers have been enrolled in a 12 month Leadership program specifically developed for housing.

Service Delivery

- 7.4 We are carrying out a review of our key processes, making sure they are documented and that we have triple cover in place. We will also use the opportunity to see how the processes can be improved.
- 7.5 Executive Team will support Managers to enable them to ensure that all their team members buy into the Board's vision and that they are committed to delivering on our strategic goals.
- 7.6 Staff will be supported in developing ideas which could improve service delivery and we all need to be more willing to try things and learn from the things that fail.

Plans

- 7.7 Our detailed plans are at Appendix 1 to this strategy and will be monitored and managed by the Executive Team. Our actions include:
 - a) Assessing how we are using our Flexible Working Policy to give Managers greater options for the working patterns required for their team and to assist with a healthy work/life balance.
 - b) Review of Recruitment Policy to see how we can accommodate "career advancement" to ensure we have skilled staff to fill vacancies that will arise from retirements
 - c) Assessing the changes required to implement our Digital Transformation Strategy
 - d) Projections for stock numbers by island
 - e) Retirements due
 - f) Review of our risks
 - g) Wider working environment (how will we fit in with the Comhairle's vision for Hubs)
- 7.8 The cycle for reviewing retirements is below. The opportunity will always be taken when a post becomes vacant to assess whether the best option is a "like for like" replacement or something different.

November	Review retirements due in the coming 5 years
	Review objectives for the same time frame
	Decide if vacancy needs to be filled and if so how
December	Include any agreed changes in staffing to long and short term budget proposals
February	Draft budgets to Board for approval to include an update on any changes required to staffing

- 7.9 A summary of the key actions is in Table 3 below and a full Action Plan is at Appendix 1 to the Strategy.

	2021/22	2022/23	2023/24
Assess how to use Flexible working policy when the restrictions on working from the office are lifted			
Review Retirements due in next 5 years			
Skills audit completed and gaps identified			
Trainees in post	Business Admin Modern Apprentice Multi-media Graduate Apprentice in post	Two Year Housing Modern Apprentice IT Graduate Trainee post (two year)	Technical Graduate Trainee post (two year)
Key processes documented and triple cover in place			
Full procedure manual completed and tested	Completed	Tested	
Training Plan delivered			
Healthy working options			
Review of Office space	Completed	Implemented	

STRATEGY CHANGE HISTORY

Version	Change Applied	Date	By
1.0	First Strategy	27 February 2020	Dena Macleod
2.0	2021 update	20 April 2021	Dena Macleod

INTERPRETATIONS & ABBREVIATIONS

The following interpretation and abbreviations are used in this policy:

Word	Interpretation
<i>HHP or Partnership</i>	Hebridean Housing Partnership
<i>Board</i>	Means the Board of the Hebridean Housing Partnership
<i>Board Members</i>	All Members of the Board including co-opted Members
<i>SHR</i>	Scottish Housing Regulator
<i>SFHA</i>	Scottish Federation of Housing Associations
<i>EVH</i>	Employers in Voluntary Housing
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	



HHP is a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number: 2644R(S), Registered Office: Creed Court, Gleann Seileach Business Park, Willowglen Road, STORNOWAY, Isle of Lewis HS1 2QP. It is a charity registered in Scotland, Charity Number: SC035767, registered as Registered Social Landlord with the Scottish Housing Regulator, Registration Number: 359 and registered as a Property Factor, Registration Number PF000183

Email: info@hebrideanhousing.co.uk

Web: www.hebrideanhousing.co.uk

Phone: 0300 123 0773

APPENDIX 1-WORKFORCE STRATEGY ACTION PLAN 2021 TO 2025

STAFF ENGAGEMENT

	Action	Responsible	Completion Date	Measured By
1	Complete skills audit for staff and ensure any gaps are captured in training plans	Managers	30 September 2021	Audits completed
2	Develop Wellbeing events for staff	Head of Executive Office	31 March 2022	Plan prepared for consideration
3	Encourage ideas for improved service delivery	Managers	Immediately	Number of ideas received and implemented
4	Conduct staff engagement surveys on a regular basis and implement action plans	Head of Executive Office	31 March 2022	Survey results

DEVELOPING OUR PEOPLE

	Action	Responsible	Completion Date	Measured By
5	Identify talent in the organisation and developing leaders of the future	Managers	Annually by 30 September	Number of potential leaders identified and developed
6	Review potential retirements due in next five years	Directors	Annually by 30 September	Completion of review
7	Fill Business Admin Modern Apprentice post	Head of Executive Office	30 September 2021	Post filled and training completed
8	Fill Multi-media Graduate Trainee post	Head of Executive Office	30 September 2021	Post filled and training completed
9	Fill Housing Modern Apprentice post	Area Manager	31 March 2022	Post filled and training completed within 2 years
10	Fill IT Graduate Trainee post	Director of Finance & Corporate Services	31 March 2023	Post filled and training completed within 2 years

	Action	Responsible	Completion Date	Measured By
10	Fill Technical Graduate Trainee post	Director of Operations	31 March 2024	Post filled and training completed
11	Build and develop networking opportunities for staff at all levels	Chief Executive and all managers	31 March 2022	Number of opportunities provided and considered effective by those who attend
12	Develop and implement Housing Education pack for delivering in schools	Head of Executive Office	31 March 2022 (dependent on COVID-19 impact)	Feedback from the schools on the effectiveness and usefulness of the pack

DEVELOPING OUR PROCESSES

	Action	Responsible	Completion Date	Measured By
13	Review of office space in Stornoway and Balivanich and examine options for participating in Community Hubs	Director of Finance & Corporate Services	31 March 2022	Staff satisfaction with any changes in working environment and tenant satisfaction with customer service spaces
14	Implement our Digital Transformation Strategy	Digital Transformation Manager	31 March 2023	
15	Full procedure manual completed and tested	Head of Executive Office	31 March 2022	Complete procedure manual
16	Encourage everyone to ask the question "Can I do this in a better way that uses less time?"	Managers	Now	Staff satisfaction

PRIVACY POLICY

Board 19 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 To present an updated Privacy Policy to the Board.

Summary

- 2.1 The Privacy Policy was approved in May 2018 following the introduction of the General Data Protection Regulation (GDPR).
- 2.2 Statutory instruments have been used to incorporate EU regulations into UK and Scottish Acts following Brexit.
- 2.3 This policy has therefore only had some minor updates, primarily in relation to the renaming and implementation of the UK GDPR and formatting changes.
- 2.4 All related documentation will be updated as required.

Competence

- 3.1 The financial, legal and other constraints arising from the consideration of the recommendations are detailed at paragraph 5.1 – 8.1.

Recommendations

- 4.1 **It is recommended that the Board approve the revised Privacy Policy at Appendix 1.**

APPENDIX 1: Privacy Policy

Background Papers: None

Writer of Report: Iona France

Tel: 0300 123 0773

Competence

- 5.1 There are no financial costs arising directly from consideration of this report.

Legal

- 6.1 There is a legal requirement to comply with the UK General Data Protection Regulation (UK GDPR) in addition to a regulatory requirement to have appropriate policies and procedures in place.

Regulatory Guidance

- 7.1 The Regulatory Standards checklist has been completed and there is nothing in the report which would result in a breach of the standards.
- 7.2 This report provides ongoing assurance of evidence RS2.2, RS4.6 and RS5 in relation to our Annual Assurance Statement.

Risk

- 8.1 A breach of the policies within an organisation carries a number of risks that can impact in all areas of its internal and external operations. It is important that we have the correct Policies, Procedures and Staff Guidance in place to prevent problems and to provide the appropriate support and information.



hebridean housing
partnership



► Privacy Policy

Effective Date: ►

Review Date: ►

Approved by HHP Board:

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PRIVACY POLICY

INTRODUCTION

- 1.1 Hebridean Housing Partnership is committed to ensuring the secure and safe management of data held by us in relation to customers, staff and other individuals. Our Board Members and staff have a responsibility to ensure compliance with the terms of this policy, and to manage individuals' data in accordance with the procedures outlined in this policy and documentation referred to herein.
- 1.2 We need to gather and use certain information about individuals. These can include customers (tenants, factored owners etc.), employees and other individuals that we have a relationship with. We manage a significant amount of data, from a variety of sources. This data contains Personal Data and Sensitive Personal Data (known as Special Categories of Personal Data under the UK GDPR).
- 1.3 This Policy sets out our duties in processing that data, and the purpose of this Policy is to set out the procedures for the management of such data.

LEGISLATION

- 2.1 It is a legal requirement that we process data correctly; we must collect, handle and store personal information in accordance with the relevant legislation.
- 2.2 The relevant legislation in relation to the processing of data is:
 - (a) the General Data Protection Regulation (EU) 2016/679 ("the GDPR");
 - (b) the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications); and
 - (c) the UK's DPA 2018 (Data Protection Act 2018) enacted the EU GDPR's requirements into UK law, however, with effect from 1 January 2021, the DPPEC (Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit)) Regulations 2019 amended the DPA 2018 and merged it with the requirements of the EU GDPR to form a new, UK specific data protection regime. This is known as "the UK GDPR".

DATA

- 3.1 We hold a variety of Data relating to individuals, including customers and employees (also referred to as data subjects) which is known as Personal Data. The Personal Data held and processed by us is detailed within the Fair Processing Notice at Appendix 1 hereto and the Data Protection Addendum of the Terms of and Conditions of Employment which will be provided to all employees.
 - 3.1.1 "Personal Data" is that from which a living individual can be identified either by that data alone, or in conjunction with other data held by us.

- 3.1.2 We also hold Personal data that is sensitive in nature (i.e. relates to or reveals a data subject's racial or ethnic origin, religious beliefs, political opinions, relates to health or sexual orientation). This is "Special Category Personal Data" or "Sensitive Personal Data".

PROCESSING OF PERSONAL DATA

- 4.1 We are permitted to process Personal Data on behalf of data subjects provided it is doing so on one of the following grounds:
- Processing with the consent of the data subject (see clause 4.6 hereof);
 - Processing is necessary for the performance of a contract between us and the data subject or for entering into a contract with the data subject;
 - Processing is necessary for our compliance with a legal obligation;
 - Processing is necessary to protect the vital interests of the data subject or another person;
 - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of our official authority; or
 - Processing is necessary for the purposes of legitimate interests.

Fair Processing Notice

- 4.2 We have produced a Fair Processing Notice (FPN) which we are required to provide to all customers whose Personal data is held by us. That FPN must be made available to the customer from the outset of processing their Personal Data and they should be advised of the terms of the FPN when it is provided to them.
- 4.3 The Fair Processing Notice at Appendix 1 sets out the Personal Data processed by us and the basis for that Processing. This document is made available to all of the Partnership's customers at the outset of processing their data.

Employees

- 4.4 Employee Personal data and, where applicable, Special Category Personal Data or Sensitive Personal Data, is held and processed by us. Details of the data held and processing of that data is contained within the Employee Fair Processing Notice which is provided to Employees at the same time as their Contract of Employment.
- 4.5 A copy of any employee's Personal Data held by us is available upon written request by that employee from the HR Officer.

Consent

- 4.6 Consent as a ground of processing will require to be used from time to time when processing Personal Data. It should be used where no other alternative ground for processing is available. In the event that we require to obtain consent to process a data subject's Personal Data, it shall obtain that consent as appropriate. The consent provided by the data subject must be freely given

and the data subject will be required to opt in to providing that consent. Any consent to be obtained by us must be for a specific and defined purpose (i.e. general consent cannot be sought).

Processing of Special Category Personal Data or Sensitive Personal Data

- 4.7 In the event that we process Special Category Personal Data or Sensitive Personal Data, the Partnership must do so in accordance with one of the following grounds of processing:
- The data subject has given explicit consent to the processing of this data for a specified purpose;
 - Processing is necessary for carrying out obligations or exercising rights related to employment or social security;
 - Processing is necessary to protect the vital interest of the data subject or, if the data subject is incapable of giving consent, the vital interests of another person;
 - Processing is necessary for the establishment, exercise or defence of legal claims, or whenever the courts are acting in their judicial capacity; and
 - Processing is necessary for reasons of substantial public interest.

DATA SHARING

- 5.1 We share our data with various third parties for numerous reasons in order that its day to day activities are carried out in accordance with our relevant policies and procedures. In order that we can monitor compliance by these third parties with Data Protection laws, we will require the third party organisations to enter in to an Agreement with us governing the processing of data, security measures to be implemented and responsibility for breaches.

Data Sharing

- 5.2 Personal data is from time to time shared with third parties who require to process personal data that we process as well. Both we and the third party will be processing that data in their individual capacities as data controllers.
- 5.3 Where we share in the processing of personal data with a third party organisation, we shall require the third party organisation to enter in to a Data Sharing Agreement with us in accordance with the terms of a Data Sharing Agreement.

Data Processors

- 5.4 A data processor is a third party entity that processes personal data on behalf of us, and are frequently engaged if certain of our work is outsourced (e.g. payroll, maintenance and repair works).
- 5.4.1 A data processor must comply with Data Protection laws. Our data processors must ensure they have appropriate technical security measures in place, maintain records of processing activities and notify us if a data breach is suffered.

- 5.4.2 If a data processor wishes to sub-contract their processing, prior our written consent must be obtained. Upon a sub-contracting of processing, the data processor will be liable in full for the data protection breaches of their sub-contractors.
- 5.4.3 Where we contract with a third party to process personal data held by us, it shall require the third party to comply with a Data Protection Addendum.

DATA STORAGE AND SECURITY

- 6.1 All Personal Data held by us must be stored securely, whether electronically or in paper format.

Paper Storage

- 6.2 If Personal Data is stored on paper, we will ensure that it is kept in a secure place where unauthorised personnel cannot access it. When the Personal Data is no longer required it must be disposed of by the employee so as to ensure its destruction. If the Personal Data requires to be retained on a physical file then the employee should ensure that it is affixed to the file which is then stored in accordance with our storage provisions.

Electronic Storage

- 6.3 Personal Data stored electronically must also be protected from unauthorised use and access. Personal Data should be password protected when being sent externally to our data processors or those with whom we have entered into a Data Sharing Agreement. If Personal Data is stored on removable media (CD, DVD, USB memory stick) then that removable media must be stored securely at all times when not being used.

BREACHES

- 7.1 A data breach can occur at any point when handling Personal Data and we have reporting duties in the event of a data breach or potential breach occurring. Breaches which pose a risk to the rights and freedoms of the data subjects who are subject of the breach require to be reported externally in accordance with Clause 7.3 hereof.

Internal Reporting

- 7.2 We take the security of data very seriously and in the unlikely event of a breach will take the following steps:
- As soon as the breach or potential breach has occurred, and in any event no later than six (6) hours after it has occurred, the DPO must be notified in writing of (i) the breach; (ii) how it occurred; and (iii) what the likely impact of that breach is on any data subject(s);
 - We will seek to contain the breach by whatever means available;
 - The DPO must consider whether the breach is one which requires to be reported to the ICO and data subjects affected and do so in accordance with this clause 7; and
 - Notify third parties in accordance with the terms of any applicable Data Sharing Agreements.

Reporting to the ICO

- 7.3 The DPO will require to report any breaches which pose a risk to the rights and freedoms of the data subjects who are subject of the breach to the Information Commissioner's Office ("ICO") within 72 hours of the breach occurring. The DPO must also consider whether it is appropriate to notify those data subjects affected by the breach.

DATA PROTECTION OFFICER "DPO"

- 8.1 A Data Protection Officer is an individual who has an over-arching responsibility and oversight of compliance by the Partnership with Data Protection laws. We have elected to appoint a Data Protection Officer whose details are noted on our website and contained within the Fair Processing Notice at Appendix 1 hereto.
- 8.2 The DPO will be responsible for:
- 8.2.1 monitoring our compliance with Data Protection laws and this Policy;
 - 8.2.2 co-operating with and serving as the our contact for discussions with the ICO; and
 - 8.2.3 reporting breaches or suspected breaches to the ICO and data subjects in accordance with Part 7 hereof.

DATA SUBJECT RIGHTS

- 9.1 Certain rights are provided to data subjects under the GDPR. Data Subjects are entitled to view the personal data held about them by us, whether in written or electronic form.
- 9.2 Data subjects have a right to request a restriction of processing their data, a right to be forgotten and a right to object to our processing of their data. These rights are notified to our tenants and other customers in our Fair Processing Notice.

Subject Access Requests

- 9.3 Data Subjects are permitted to view their data held by us upon making a request to do so (a Subject Access Request). Upon receipt of a request by a data subject, we must respond to the Subject Access Request within one month of the date of receipt of the request. We
- 9.3.1 must provide the data subject with an electronic or hard copy of the personal data requested, unless any exemption to the provision of that data applies in law;
 - 9.3.2 where the personal data comprises data relating to other data subjects, we must take reasonable steps to obtain consent from those data subjects to the disclosure of that personal data to the data subject who has made the Subject Access Request; or
 - 9.3.3 where we do not hold the personal data sought by the data subject, we must confirm that we do not hold any personal data sought to the data subject as soon as practicably possible, and in any event, not later than one month from the date on which the request was made.

The Right to be Forgotten

- 9.4 A data subject can exercise their right to be forgotten by submitting a request in writing to us seeking that we erase the data subject's Personal Data in its entirety.
- 9.5 Each request received by us will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests from time to time. The DPO will have responsibility for accepting or refusing the data subject's request in accordance with clause 9.4 and will respond in writing to the request.

The Right to Restrict or Object to Processing

- 9.6 A data subject may request that we restrict its processing of the data subject's Personal Data, or object to the processing of that data.
- 9.6.1 In the event that any direct marketing is undertaken from time to time by us, a data subject has an absolute right to object to processing of this nature by us, and if we receive a written request to cease processing for this purpose, then we must do so immediately.
- 9.7 Each request received by us will require to be considered on its own merits and legal advice will require to be obtained in relation to such requests from time to time. The DPO will have responsibility for accepting or refusing the data subject's request in accordance with clause 9.6 and will respond in writing to the request.

PRIVACY IMPACT ASSESSMENTS (PIA)

- 10.1 These are a means of assisting us in identifying and reducing the risks that our operations have on personal privacy of data subjects.
- 10.2 We shall:
 - 10.2.1 Carry out a PIA before undertaking a project or processing activity which poses a "high risk" to an individual's privacy. High risk can include, but is not limited to, activities using information relating to health or race, or the implementation of a new IT system for storing and accessing Personal Data; and
 - 10.2.2 In carrying out a PIA, include a description of the processing activity, its purpose, an assessment of the need for the processing, a summary of the risks identified and the measures that it will take to reduce those risks, and details of any security measures that require to be taken to protect the personal data.
- 10.3 We will require to consult the ICO in the event that a PIA identifies a high level of risk which cannot be reduced. The Data Protection Officer ("DPO") will be responsible for such reporting, and where a high level of risk is identified by those carrying out the PIA they require to notify the DPO within five (5) working days.

ARCHIVING, RETENTION & DESTRUCTION OF DATA

- 11.1 We cannot store and retain Personal Data indefinitely. We will ensure that Personal data is only retained for the period necessary. We shall ensure that all Personal data is archived and destroyed in accordance with the periods specified within our Data Retention Schedule which will be appended to our Privacy Policy on our website.

RELATED POLICIES

- 12.1 The following policies and procedures are referenced as part of this Policy:
- Openness & Confidentiality Policy; and
 - Data Retention Schedule.

LIST OF APPENDICES

1. Fair Processing Notice

PRIVACY NOTICE CHANGE HISTORY

Version	Change Applied	Date	By
2.0	Change in legislation post Brexit & Formatting Changes	14 April 2021	Iona France

INTERPRETATIONS & ABBREVIATIONS

The following interpretation and abbreviations are used in this policy:

Word	Interpretation
<i>HHP or Partnership</i>	Hebridean Housing Partnership
<i>Board</i>	the Board of the Hebridean Housing Partnership
<i>Board Members</i>	all Members of the Board including co-opted Members
<i>Data Controller</i>	a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed
<i>Data Processor</i>	in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller
<i>Data Sharing Agreement</i>	an Agreement between the Partnership and a third party individuals/organisation with which we share personal data
<i>Data Subjects</i>	an individual who is the subject of personal data
<i>DPO</i>	Data Protection Officer
<i>EFPN</i>	Employee Fair Processing Notice
<i>FPN</i>	Fair Processing Notice
<i>GDPR</i>	General Data Protection Regulation
<i>ICO</i>	Information Commissioner's Office
<i>Personal Data</i>	data which relate to a living individual who can be identified
<i>PIA</i>	Privacy Impact Assessment
<i>Sensitive Personal Data</i>	special categories of data which require to be treated with greater care than personal data
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	



HHP is a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number: 2644R(S). Registered Office: Creed Court, Gleann Seileach Business Park, Willowglen Road, STORNOWAY, Isle of Lewis HS1 2QP. It is a charity registered in Scotland, Charity Number: SCO35767, registered as Registered Social Landlord with the Scottish Housing Regulator, Registration Number: 359 and registered as a Property Factor, Registration Number PF000183

Email: info@hebrideanhousing.co.uk

Web: www.hebrideanhousing.co.uk

Phone: 0300 123 0773

HEBRIDEAN HOUSING PARTNERSHIP

GDPR Fair Processing Notice

How We Use Your Personal Information

- 1.1 This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

WHO WE ARE

- 2.1 Hebridean Housing Partnership Ltd, a Scottish Charity (Scottish Charity Number SCO35767) a registered society under the Co-operative and Community Benefit Societies Act 2014 with Registered Number 2644R(S) and having their Registered Office at Creed Court, Gleann Seileach Business Park, Willowglen Road, Stornoway, Isle of Lewis, HS1 2QP, we take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act of 1998 and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.
- 2.3 The UK's DPA 2018 (Data Protection Act 2018) enacted the EU GDPR's requirements into UK law, however, with effect from 1 January 2021, the DPPEC (Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit)) Regulations 2019 amended the DPA 2018 and merged it with the requirements of the EU GDPR to form a new, UK specific data protection regime. This is known as 'the UK GDPR'.
- 2.4 We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z9313196 and we are the data controller of any personal data that you provide to us.
- 2.5 Our Data Protection Officer is Iona France
- Any questions relating to this notice and our privacy practices should be sent to Hebridean Housing Partnership Ltd., Creed Court, Gleann Seileach Business Park, Stornoway, HS1 2QP

HOW WE COLLECT INFORMATION FROM YOU & WHAT INFORMATION WE COLLECT

- 3.1 We collect information about you:
- when you apply for housing with us, become a tenant, request services/repairs, enter in to a factoring agreement with ourselves, or otherwise provide us with your personal details;
 - when you apply to become a member of the Partnership;
 - from your use of our online services, whether to report any tenancy/factor related issues, make a complaint or otherwise;

- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information);
- when you provide a service to the Partnership i.e. sub-contractor works records.

3.2 The personal information that we collect about you may include, but is not limited to:

- name;
- date of birth;
- ethnic origin;
- address;
- previous addresses;
- telephone numbers;
- e-mail address;
- National Insurance Number;
- Bank details;
- debts owed to the Partnership;
- bankruptcy details;
- household composition;
- connected persons;
- next of kin/emergency contact;
- employment history;
- Equalities information in line with the Equality Act, 2010;
- health/disability;
- vulnerabilities;
- warning notices, for example, whether two persons are required to visit you;
- complaints made about you;
- IP Addresses; and
- CCTV images.

3.3 We receive the following information from third parties:

- Benefits information, including awards of Housing Benefit/ Universal Credit;
- Payments made by you to us;
- Complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland;
- Reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- Reports/supporting letters from Social Work/Occupational Therapy/Health Care Professionals;
- Tenancy references;
- Priority Homeless Determinations and correspondence relating to housing applicants from the CNES Homeless Service; and
- Medical letters from GP in support of housing or transfer applications.

WHY WE NEED THIS INFORMATION FROM YOU & HOW IT WILL BE USED

4.1 We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to enable us to prioritise your application against housing needs;
- to help us to recognise and address your needs if you have mobility or medical requirements;
- to enable us to respond to your repair request, housing application and complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our business or suppliers which may affect you;
- to contact you for your views on our products and services;
- to assist in the completion of benefit/Universal Credit applications;
- to assist with statutory returns made to regulatory bodies;
- so that we may work in co-operation with the CNES Homeless Service to respond to the accommodation and service needs of Homeless applicants;
- so that we may monitor Equalities information in order to ensure that we consider all individuals when carrying out our day-to-day work – in shaping our policies, in delivering services to our tenants and in relation to HHP's employees, in order to eliminate unlawful discrimination and to promote equality of opportunity and good relations between persons of different protected groups;
- to comply with legal insurance requirements; and
- for all other purposes consistent with the proper performance of our operations and business.

SHARING OF YOUR INFORMATION

5.1 The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK/EEA. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- If we instruct repair or maintenance works, your information may be disclosed to any contractor;
- If we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;

- If we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authority);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authority and the Department of Work & Pensions;
- If we are conducting a survey of our products and/ or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- If we are asked to provide information in connection with the prevention of fraud;
- If we are required by law to disclose information in respect of any legal matter;

5.2 Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

TRANSFERS OUTSIDE THE UK AND EUROPE

6.1 Your information will only be stored within the UK.

SECURITY

7.1 When you give us information we take steps to make sure that your personal information is kept secure and safe in line with our ICT Security Policy and the requirements of the GDPR. Access to personal information is controlled to ensure that it is only granted to users based on role, operational requirements, and the duration for which access is required.

7.2 Any personal information about you which is in hard copy is stored in locked cabinets with restricted access.

7.3 Any personal information about you which is held in electronic format is protected and appropriate security measures installed to only allow permitted usage. These measures include the use of passwords, firewalls, secure networks and encryption.

7.4 Our ICT Security Policy is available on our website for reference.

HOW LONG WILL WE KEEP YOUR INFORMATION

8.1 We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We will generally keep your information for as long as we have a legal base to process it, or you have given your consent for us to process it if no legal base is applicable, after which it will be destroyed if it is no longer required for the reasons it was obtained.

- 8.2 Our Personal Data Retention Schedule is available in hard copy in both of HHP's offices, or on our website.

YOUR RIGHTS

- 9.1 You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold, subject to paragraph 8.1; and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at dataprotection@hebrideanhousing.co.uk.

- 9.2 You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
Email: Scotland@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.



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EQUALITIES ACTION PLAN 2021/22

Board 19 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 To present a draft Equalities Action Plan for 2021/22 to accompany our Equalities & Diversity Policy.

Summary

- 2.1 A draft Equalities Action Plan was prepared for discussion with staff in their various teams. It was felt that we wanted an action plan that we could deliver over the year so we have focused this year on three key areas.
- 2.2 The action plan and the policy is underpinned by the commitment to "Promote a culture that respects and values difference across our customer and employee bases"- it is very much about valuing and treating with respect and dignity everyone we come in contact with as we deliver our services throughout the islands and beyond.

Competence

- 3.1 There are no financial or legal issues affecting the recommendation in this report.

Recommendations

- 4.1 **It is recommended that the Board approve the Equalities Action Plan at Appendix 1.**

APPENDIX 1: Equalities Action Plan 2021/22

Background Papers: None

Writer of Report: Dena Macleod

Tel: 0300 123 0773

Making our house your home

EQUALITIES ACTION PLAN 2021/22

	Communication Review our communications - website - letters - newsletters to make sure they are accessible and easy to understand for our customers
Sandy Matheson speaking at our AGM about Deafness: A Personal Perspective 	Informing & engaging Invite a key disability speaker to at least one event per year Review the location of where public events are held and ensure that they are fully accessible to disabled people.

Data

Identify gaps in data available and put measures in place to gather data for the future

Promote a culture that respects and promotes equality, diversity and inclusion within the workplace

BUSINESS PLAN 2019/20 TO 2023/24 PROGRESS REPORT

Board 17 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 To present a progress report to 31 March 2021 on the Delivery Plan for the Business Plan 2019/20 to 2023/24.

Summary

- 2.1 The progress report to 31 March 2021 is at Appendix 1.
- 2.2 This is the first quarter where progress is less than target on the Delivery Plan mainly due to the impact of lockdown measures. The two areas which did not meet target are:

	Target	Target Value	Actual	Actual	Shortfall
Arrears % of Gross Debit	2%	£197,253	2.30%	£224,041	£26,878
Voids % of Gross Debit	<1%	£98,626	1.04%	£102,571	£3,944

- 2.3 The monthly performance report provides a breakdown by geographical area and shows the area with the greatest void loss % (2.96%) and value (£48,201) is Uist. Further work is being undertaken to determine all the contributory factors e.g. access to services, location, population, demand, and condition of property.

Competence

- 3.1 The legal, financial and other constraints to the recommendations of this report are at paragraph 5.1 - 8.1.

Recommendations

- 4.1 **It is recommended that the Board:**
- a) review the Delivery Plan Progress report to 31 March 2021 at Appendix 1; and
 - b) note the action being taken to address areas where targets are not being met.

APPENDIX 1: Delivery Plan Progress report to 31 March 2021

Background Papers: None

Writer of Report: Dena Macleod

Tel: 0300 123 0773

Competence

Financial

- 5.1 The 5 year Business Plan is supported by 30 year financial projections, 5 year projections and the detailed annual budget for 2020/21.
- 5.2 The detailed annual budget for 2021/22 was approved in March 2021.

Legal

- 6.1 There are no specific legal issues relating to the Delivery Plan progress report.
- 6.2 Our current funding agreement requires annual review and business plan approval and will remain in place until the negotiations are concluded on the revised facility and a new funding agreement is put in place.

Regulatory Guidance

- 7.1 The Regulatory Standards checklist has been completed and there is nothing in the report which would result in a breach of the standards.

Risk

- 8.1 Reviewing progress on the Delivery Plan on a quarterly basis will reduce the risk of the Strategic Goals not being delivered.

Detail

Measures of Success & Action Plan

- 9.1 Good progress is being made on the majority the measures of success and the action plan, the exceptions, which we are working to address for the current financial year, are:
 - a) **Arrears** – have steadied at 2.30% (largely due to impact of COVID-19 and more tenants moving onto Universal Credit). If adjusted for Universal Credit technical arrears they are under 2% at 1.87%. Whilst this is over our target it is a very good performance in light of the restrictions placed on us during lockdown.
 - b) **Void**- the outturn of 1.04% is better than we were forecasting in December 2020. We are introducing new performance measures for voids for 2021/22 which will provide more refined information and assist in bringing our performance back within target. We will break the performance down to show voids due to lockdown, lack of demand and condition of property and the information will be available at the Board meeting.
 - c) **Complaints**- at 87% this is the second year of being below target. There is no doubt that lockdown measures contributed to this along with long term absence of a couple of members of staff.
- 9.2 There are some measures where we are dependent on partnership working in order to achieve them e.g. 4.20 and 4.21 on population.
- 9.3 The Board were previously advised that the Investment Programme would not be delivered by the end of February 2021 largely due to the time lost during lockdown and the additional time required to complete jobs whilst complying with Government safety requirements.

Business Plan 2019/20 to 2023/24

Progress Report to: 31 March 21 **Quarter 4**

MEASURES OF SUCCESS		Due by 31 Mar 21	On Target	Below Target	Exceeding Target
SG 1	Placing Tenants at the centre of everything we do	7	3	4	
SG 2	Investing in an environmentally sustainable way in tenants' homes	4	4		
SG 3	Being a good employer that attracts and retains high quality staff	5	3		3
SG 4	Working with partners to contribute to the wellbeing of communities throughout the Outer Hebrides	6	4	2	

ACTION PLAN		Due by 31 Mar 21	On Target	Below Target	Exceeding Target
SG 1	Placing Tenants at the centre of everything we do	12	10	2	
SG 2	Investing in an environmentally sustainable way in tenants' homes	1	1		
SG 3	Being a good employer that attracts and retains high quality staff	5			
SG 4	Working with partners to contribute to the wellbeing of communities throughout the Outer Hebrides	5	5		



45	30	8	3
	67%	18%	7%

On Target
More than 75% of actions on target and less than 20% below

Below Target
Less than 75% of actions on target or more than 20% below

Exceeding Target
100% of actions on target and none below target

Measures of Success	Target date	Baseline	Progress to March 2021		Trend	Lead Officer
2020-1 Placing tenants at the centre of everything we do						
2020 - 1.1 - % of satisfaction with our overall services > 90%	31/03/2021	88%	✓	88%		Sevice Development Manager
2020 - 1.2 - Maintain all our homes to meet or exceed SHQS (exl abeyances & exemptions)	31/03/2021	100%	✓	100%		Investment Manager
2020 - 1.3 - Respond to complaints within SPSO targets	31/03/2021	94.23	✓	87%		Director of Operations
2020 - 1.4 - Level of current arrears at 2% of Gross Debit	31/03/2021	1.70%	✗	2.30%		Director of Operations
2020 - 1.5 - Voids at < 1% of Gross Rent Debit	31/03/2021	0.66%	✗	1.04%		Director of Operations
2020 - 1.6 - Provide options for a rent guarantee period	31/03/2021	Current Rent Structure	✗	25% complete		Director of Finance
2020 - 1.7 - 88% of tenants satisfied with opportunities to participate in decision making	31/03/2021	84%	✗	84%		Service Development Manager
2020-2 Investing in Properties						
2020 - 2.8 - Deliver 214 new builds	31/03/2021		✓	103		Development Manager
2021 - 2.9 - Deliver 50 extra care units in Stornoway by Sept 2022	31/03/2021	None	✓	Contracts awarded. Enabling works on site.		Director of Operations
2020 - 2.10 - Reduce % of tenants in fuel poverty to under 25% by 2023 (subject to fuel prices)	31/03/2023	41%		No change. Formula needed to work out %		Investment Manager
2019 - 2.11 - 100% properties achieving EESSH by 2020	31/03/2020	87%	✓	97% (including exemptions)		Investment Manager
2020 - 2.12 - 100% of stock assessed in terms of long term viability	31/03/2021	0%	✓	75%		Asset & Contract Manager
2020-3 Being a good employer						
2019 - 3.13 - Flexible working policy in place by 2020	31/03/2020	N/A	✓	Completed in June 2020		Chief Executive
2020 - 3.14 - Staff survey in 2020 showing positive feedback. Action Plan by 31 March 21	31/03/2021	2015 Survey	✓	Survey completed and reported in March 20		Chief Executive
2020 - 3.15 - 10% of staff pursuing and obtaining qualifications	31/03/2021	4%	✓	10.00%		Training & Development Officer
2019 - 3.16 - 100% of vacancies filled on first attempt	31/03/2021	100% in 2018/19	✓	100%		Chief Executive
2020 - 3.17 - Sustain a minimum level of 65% of HHP staff with a service length greater than 3 years	31/03/2021	68%	✓	82%		Chief Executive
2020 - 3.18 - % of staff turnover at less than 10%	31/03/2021	4% for 2018/19	✓	8%		Chief Executive
2019-4 Working with partners						
2019 - 4.19 - New arrangement in place for the delivery of accommodation for the Foyer by 1 April 2019	01/04/2019	N/A	✓	In place 25 April 2019		Director of Operations
2020 - 4.20 - Population forecasts decline + demographics	31/03/2021	Population at 2011-27,684	✗	2016-26,950 2020-26,720		Chief Executive
2020 - 4.21 - Increased demand for housing in rural areas	31/03/2021	243 at 31 March 2019	✓	Total 532 Rural 235		Director of Operations
2020 - 4.22 - Community benefit measures delivered across our communities and on all contracts	31/03/2021	100% of contractors	✓	100%		Director of Operations
2020 - 4.23 - 95% of tenants satisfied with management of the area they live in	31/03/2021	92%	✗	92%		Service Development Manager
2020 - 4.24 - Complete Housing Demands Study	31/03/2021	N/A				Director of Operations
2020-Competencies Achieved	31/08/2021	N/A new measure	✓	95% achieved with areas for improvement identified		Chief Executive

Action Plan	Target date	Baseline		Progress to March 2021	Lead Officer
2020-1 Placing tenants at the centre of everything we do					
2020 - 1.1 - Carry out affordability checks	31/03/2021	2018	✓	Annual Review due as part of Rent Setting 25% Currently being drafted for review at May Exec Team Rent models have been reviewed and likely we will need to move to a model where rents are aligned at COT. Issues with New Build Benchmark Rents to be corrected.	Director of Operations
2020 - 1.2 - Value for money Strategy	31/03/2021	2012	X		Director of Finance
	31/03/2021				
2020 - 1.3 - New Rent Structure		Current Rent Structure	X		Director of Finance
2020 - 1.4 - Profile our Customers Needs	31/03/2021	20% complete	✓	25%	Service Development Manager
2020 - 1.5 - Support Western Isles Housing Association Communities Forum	31/03/2021	Grant + Staff time	✓	Assistance with Tenant days + attendance at tenant & resident groups	Service Development Manager
2020 - 1.6 - Develop tenant scrutiny	31/03/2021	2 groups in place	✓	2 groups in place	Area Managers
2020 - 1.7 -Provide dedicated tenant participation support	31/03/2021	Half time post in place	✓	New contract to be awarded in May 21	Director of Operations
2020 - 1.8 - Ensure tenants maximise their opportunities to access digital services	31/03/2021	Information from survey	✓	Digital Transformation Manager appointed	Area Managers
2020 - 1.9 -Develop a digital transformation strategy	31/03/2021	IT Strategy	✓	Approved by Board in November 2020	Business Support Officer
2019 - 1.10 - Develop an Anti-Poverty Strategy	31/03/2020	None in place	✓	CPP Strategy launched 9 October 19	Director of Operations
2020 - 1.11 -Benchmark our services with other Housing Associations	31/03/2021	High Level desk top	✓	SHN review shows improvement in performance Initial KCIs measured with Quarterly performance report	Head of Executive Office
2020 - 1.25 -Key Risk Indicators and Key Control Indicators developed during 2019	31/12/2020	None in place	✓		Head of Executive Office
2020-2 Investing in Properties					
2020 - 2.12 - Develop an Environmental Strategy	31/03/2021	None in place		Strategy being developed. Response to Government "Heat in Building Strategy" completed	Investment Manager
2019 - 2.13 - Update Asset Management Strategy	31/03/2020	Current Strategy	✓	Completed	Assets & Contract Manager
2020 - 2.14 - Annual Investment Programmes completed by February each year	29/02/2021	90% delivered by March	✓	88% (works delayed due to COVID)	Investment Manager
2020-3 Being a good employer					
2020 - 3.15 - Offer shadowing and coaching opportunities to all staff	31/03/2021	Informal arrangements	✓	Informal arrangements to be reviewed following appraisals	Training & Development Officer
2020 - 3.16 - Team building events	31/03/2021	2 held	✓	Event held in June 19-survey showing increased satisfaction	Chief Executive
2020 - 3.17 - Round table discussions with managers	31/03/2021	None in place	✓	Meetings held every month since January 2020	Chief Executive
2019 - 3.18 - Develop use of on line system in particular appraisals	31/03/2020	New system in Jan 2019	✓	1-2-1 being recorded on system	Head of Executive Office
2020 - 3.19 - Deliver Annual Training Plan for 2020/21	31/03/2021		✓	Delivered within lockdown restrictions	Training & Development Officer
2020-4 Working with partners					
2020 - 4.20 - Working with community groups to improve common areas	31/03/2021	None in place	✓	Community Garden in Casmir Place	Area Managers
				Not many opportunities have presented themselves for generating income. Looking for ways to make savings or start collaborations with other organisations (Knowledge Transfer Partnership with UHI), Heritage funding for Scotland Street.	
2020 - 4.21 - Identify opportunities to generate income	31/03/2021		X		Finance Manager
2020 - 4.22 - Support OHCPP to deliver its aims	31/03/2021	Attendance at OHCPP	✓	Meetings attended Agreement signed	Chief Executive
2020 - 4.23 - Work closely with voluntary sector	31/03/2021	None in place	✓	3 grants awarded to community groups	Chief Executive
2020 - 4.24 - Work with CNES to deliver LHS	31/03/2021	IDB	✓	New build on Target; Homeless targets presenting challenges	Chief Executive

DEVELOPMENT UPDATE

Board 19 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 To provide an update to the Board on how we have performed to 31 March 2021 against our 5 year Development Plan and the Comhairle's Strategic Housing Investment Plan (SHIP).

Summary

- 2.1 Overall performance on the delivery of our 5 year Development Plan was ahead of schedule at 31 March 2021; 26 homes built, as at Appendix 1, and a further 170 in progress (51% of the plan). Appendix 2 provides further details on our performance.
- 2.2 During the next four years we have plans and funding in place to deliver the remaining 197 homes within the plan.
- 2.3 The Comhairle's SHIP for 31 March 2021 planned for a grant draw down of £9.709m. We drew down £11m which is the highest level of grant funding we have drawn down in one financial year. This is a significant achievement considering the challenging operating environment.
- 2.4 Scottish Government has issued a Resource Planning Assumption (RPA) of £9.7m to the Comhairle for 2021/22. This is £1.7m higher than assumed in the Comhairle's SHIP, as at Table 5.1 Appendix 2. Discussions are underway with the Comhairle about the additional RPA and any proposals will be discussed with the Finance Working Group and the Asset Management Working Group prior to being presented to the Board in June 2021.
- 2.5 The Housing Needs Assessment tender was returned on 4 May 2021 and is currently being assessed.

Competence

- 3.1 The financial, legal and other constraints arising from the recommendations in this report are detailed at paragraph 5.1 - 8.3.

Recommendations

4.1 It is recommended that the Board note the:

- a) progress on the Development Plan for 2020/21 and our plans for 2021/22; and
- b) increased Scottish Government RPA of £9.7m for 2021/22 and the proposed actions.

APPENDIX 1: Completions 2020-21

APPENDIX 2: New Build Updates

Background Papers: None

Writer of Report: Sawan Morrison

Tel: 0300 123 0773

Competence

Financial

- 5.1 £11.07m of Scottish Government Grant was drawn grant across 8 sites at various stages of build in 2020/21.
- 5.2 At the point of approving our budgets for 2021/22 the grant required for the year was £8.4m of which £4.24m was committed and included the carry forward of developments on site at 31 March 2021. The remaining £4.28m is for the potential developments not yet on site as per Table 2.1 in Appendix 2
- 5.3 In April 2021 the Scottish Government confirmed the 2021/22 RPA for CNES as £9.7m. This is £1.7m above our previous RPA assumption for 2021/22. Our budgetary assumption for 2021/22, taking into consideration slippage in our 2020/21 development programme, was to draw down grant of £8.38m. The increased RPA of £1.7M will therefore be partially utilised with prior year development carry-over.
- 5.4 The Development Plan will be reviewed in detail as part of the business planning cycle, capturing the key outputs from the housing needs assessment survey and changes in the RPA for future years. The current Business Plan and the Five Year Development Plan do not provide for new builds beyond 2024/25 so any changes to the Plan will need to be assessed against the impact of delivering our key strategic goals.
- 5.5 It is worth noting that RPA is a resource planning assumption for anticipated grant provision to the Comhairle on an annual basis to deliver its SHIP. A fully funded development project not only requires grant but also requires significant private finance contributions.

Legal

- 6.1 The Asset Management Working Group has delegated authority until 31 March 2022, to approve private finance up to 40% of the cost, subject to approval from the Director of Finance & Corporate Services and funding being available through savings.

Regulatory Guidance

- 7.1 The Regulatory Standards checklist has been completed and there is nothing in the report which would result in a breach of the standards.
- 7.2 This report provides ongoing /assurance of evidence RS2.2, RS4.3 and RS7.7 in relation to our Annual Assurance Statement.

Risk

- 8.1 Development is inherently risky. Feasibility work to ascertain the suitability and capacity of potential sites for development helps to reduce risk. These are jointly funded in partnership with the Comhairle and are primarily undertaken by (TIG). Additional resource has been put in place through desktop feasibilities being carried out by the Comhairle's Asset Management Team.
- 8.2 Risk related to particular developments is assessed as part of the feasibility study, including the demand within the area. At present, our Housing List does not demonstrate a significant demand in rural areas. Developing in rural areas introduces the risk of low demand for future relets. A housing needs assessment will help to inform this level of risk. A tender has been issued for the Housing Needs Assessment.
- 8.3 The Risk Register details relevant risks including COVID-19, risk of contractor failure and BREXIT, which can impact on delivery of the development programme.

Report Details

2020/21 Summary

- 9.1 A total of 26 units were handed over across the Outer Hebrides in 2020/21 with a further 170 units on site. Further details and photos of the sites that have completed can be found at Appendix 1.
- 9.2 Even with the pressures of COVID-19, a full lockdown and other disruptions due to changing tiers and local COVID-19 clusters, together with our stakeholders we were able to apply for £11.3m of Scottish Government funding of which £11.07m was approved in 2020/21 financial year giving us a £300k start to 2021/22. This level of support was split across 8 different sites at various stages of build.
- 9.3 Overall, we are on track to deliver what was agreed in both the Development Plan and SHIP with 50% of units identified in the plan being either completed or on site. Table 1.1 of Appendix 2 shows our performance against the 5 Year Development Plan (approved July 2020) and Table 1.2 Appendix 2 summarises performance against Strategic Housing Investment Plan (SHIP) which was updated in December 2020.

Development 2021/22

- 10.1 The current 5 Year Development Plan (July 2020) which formed the basis of our budgets assumed a grant drawdown of £8.5m, as at Table 2.1 Appendix 2. CNES have now received confirmation from Scottish Government of an RPA of £9.7M which represents an increase of £1.7m in the RPA compared with the previous RPA assumption in the Comhairle's SHIP. We currently do not have the capacity within our plans to support this increase of spend and CNES are considering options for utilising the increased RPA.
- 10.2 Table 2.1 in Appendix 2 shows a summary of all developments identified for this financial year in the 5 year Development Plan. Sites to be noted are the delayed handovers from 2020/21 namely Shawbost (completed April 2021) and Scotland Street. The land transactions for the sites at Barvas, Lochmaddy, Blackwater and Barra land are ongoing with Lochmaddy and Barra awaiting planning permission before conclusion.
- 10.3 Table 3.1 in Appendix 2 summarises the types of units and the relevant demand levels.

Future Plans

- 11.1 Scottish Government RPA beyond 2021/22 is expected to be confirmed in early summer and will be considered as a part of our Business Planning process.
- 11.2 The Comhairle has engaged the Grazing Committees across the Outer Hebrides to identify potential land for future developments. The initial engagement has resulted in some land offers which are currently being reviewed by CNES for an initial desktop feasibility study.
- 11.3 Table 4.1 in Appendix 2 summarises work being done on projects for future years including current levels of demand. The outcome of the Housing Needs Analysis will provide more clarity on our development work for future years.

New Supply Shared Equity (NSSE)

- 12.1 All houses at Pairc Niseaboist, Horgabost have now been sold.
- 12.2 One final house at Mackenzie Avenue, Sandwick was sold on the 26 April 2021.
- 12.3 Two properties have settled at Sgeir Ghlais, Breasclete. The remaining two properties continue to be marketed by TIG with an added marketing boost from our own social media.
- 12.4 Marketing of the Shared Equity properties at Goathill (Sinclair Avenue) will begin on the conclusion of negotiations with contractor on handover date for the first phase of properties.
- 12.5 Currently, we have received 75 people expressions of interest for the Shared Equity properties at Goathill.

Changes to Building Regulation

- 13.1 From 1 March 2021, all social housing must include fire suppression systems. We are currently reviewing the fire suppression system options for incorporation into our standard specifications. It is a requirement that sprinkler systems be designed and installed by certified providers.
- 13.2 An initial quote has been received for fire suppression systems for 3 bed 5 person houses and has been quoted to be £7,800 (plus VAT) per house with the potential for cost savings with larger developments.

Scheme	Area	Type	Units
Mackenzie Avenue	Stornoway	Rent	2
Sgeir Ghlais, Breasclete	Rural Lewis	Rent	6
Sgeir Ghlais, Breasclete	Rural Lewis	NSSE	4
Cnoc A Runaire, North Tolsta	Rural Lewis	Rent	4
An Glib, Garrabost	Rural Lewis	Rent	2
Trosaraidh, Garrynamonie	Uist	Rent	5
Cnoc Na Monadh, Torlum	Uist	Rent	2
Winfield Close, Balivanich	Uist	Rent	1
Total Handover 2020/21 Financial Year			26



Table 1.1 Development Performance – 5 Year Development Plan (July 2020)

	RENT	NSSE	HWEC	TOTAL	% of Plan	Stornoway	Rural
Units Completed 20/21	22	4	0	26	7%	8%	92%
Units Completed 21/22	4	0	0	4	1%	0%	100%
Units On Site	100	16	50	166	42%	78%	22%
Units Planned for 2021-25	171	0	26	197	50%	25%	75%
Total Units in 5 Year Development (July 2020)				393*		46%	54%

Table 1.2 Development Performance – SHIP (December 2020)

	RENT	NSSE	HWEC	TOTAL	% of SHIP	Stornoway	Rural
Units Completed 20/21	22	4	0	26	7%	8%	92%
Units Completed 21/22	4	0	0	4	1%	0%	100%
Units On Site	100	16	50	166	43%	78%	22%
Units Planned for 2021-25	182	0	10	192	49%	44%	56%
Total Units as per SHIP (December 2020)				388*		56%	44%

*Differences in totals can be attributed to feasibility studies ruling out some sites identified in the 5 year development plan.

New Build Updates

APPENDIX 2

Table 2.1 Current Development Projects

YEAR*	Scheme	Area	Units	Stage	Expected Handover	Comments by exception	SG Spend 21/22
2020/21	Shawbost	Rural Lewis	4	Completed	Apr-21	Slippage from 2020/21 due to COVID related subcontractor delays.	-
2020/21	Scotland Street	Stornoway	6	On Site	Jun-21	Delays due COVID related subcontractor delays	-
2021/22	Goathill HWEC	Stornoway	50	On Site	TBC	-	719,472
2021/22	Goathill	Stornoway	58	On Site	Jun-21	Handover of Phase 1 slipped to 2021/22. Handover of final stage of 28 units slipped to 22/23	1,272,506
2021/22	Goathill NSSE	Stornoway	16	On Site	Jun-21	As per above.	-
2021/22	South Dell	Rural Lewis	6	On Site	Jun-21	Work is currently 5 weeks behind.	-
2021/22	Barvas	Rural Lewis	8	On Site	Jan-22	Awaiting land transaction. Contractor working at risk.	840,000
2021/22	Tarbert Police Station	Harris	8	On Site	Jun-21	-	11,502
2021/22	Low Flyer, Balivanich	Uist	10	On Site	Feb-22	-	1,074,977
2021/22	Howmore	Uist	4	On Site	Sep-22	-	322,424
2021/22	Barra – Cleit Road	Barra	6	Planning	Mar-22	Awaiting planning permission to progress land transaction.	1,025,472
2021/22	Crowlista, Uig	Rural Lewis	4	Negotiations	TBC	Letter of intent issued to contractor following Uig Demand study.	942,978
2021/22	Keose Glebe	Rural Lewis	2	Tender	TBC	Tender for this project to progress	532,736
2021/22	Blackwater	Stornoway	14	Land Transaction/ Tender	TBC	Planning achieved for 72 units. Possibility of Shared equity units.	220,000
2022/23	Lochmaddy	Uist	8	Planning	Jul-22	Awaiting planning permission.	1,562,003

New Build Updates

APPENDIX 2

YEAR*	Scheme	Area	Units	Stage	Expected Handover	Comments by exception	SG Spend 21/22
2022/23	Scott Rd/Coastguard	Harris	10	Land Negotiations	TBC	-	-
2023/24	Arnol (Developer Led)	Rural Lewis	6	N/A	N/A	Developer Led - moved to 2023/24 on SHIP	-
2024/25	Benbecula - Dunganichy	Uist	6	N/A	N/A	Moved to 2024/25 on SHIP and requirement to review demand.	-
	Total		226				8,524,070

*As per approved 5 year development plan

Table 3.1 Summary of Current Projects and Demand

Development Name	Units in Development		Demand Before Allocation	Demand After Allocation
	No of Beds	Units		
South Dell	1	2	5 (1 bed)	Not yet allocated
	2	2	6 (2 bed)	
	3	2	2 (3 bed) 1 (4 bed)	
Johnstone Court, Balivanich	1	4	18 (1bed)	Not yet allocated
	2	2	5 (2 bed)	
	3	4	6 (3 bed)	
Sinclair Avenue, Stornoway	1	30	299 (1- 4 beds)	Not yet allocated
	2	19		
	3+	9		
Scotland Street	1	4	299 (1 – 4 bed)	Not yet allocated
	2	2		
Tarbert Police Station	2	8	14 (1 bed) 15 (2 bed) 6 (3 bed)	Not yet allocated
Shawbost, Isle of Lewis	4	2	7 (1 bed) 3 (2 bed) 2 (3 bed)	7 (1 bed) 1 (3 bed)
Goathill HWEC	1	50	N/A	Not yet allocated
Howmore	2	2	1 (1 bed)	Not yet allocated
	2	3	2 (2 bed) 1(3 bed)	
Barvas	1	2	8 (1 bed)	Not yet allocated
	2	4	3 (2 bed)	
	3	2	1 (3 bed)	

Table 4.1 Future Plans

YEAR*	Scheme	Area	Units	Demand Transfer/Waiting	Comments by exception
2022/23	Stornoway Periphery	Stornoway	20	85/211	Blackwater substituted in SHIP. 30 units of 72 Unit site
2022/23	Barra ECH	Barra HWEC	10	TBC	Negotiations started on SG contribution to site. Moved to 23/24 in SHIP
2022/23	Claddach Illeray, North Uist	Uist	4	9/36	Feasibility has ruled out this site.
2022/23	Uist 22/23	Uist	6	14/54	Site to be identified.
2022/23	Bernera	Rural Lewis	4	1/11	Site will not be progressing.
2023/24	Barra 23/24 (Cuithir Glebe)	Barra	6	4/19	Potential for additional units at existing
2023/24	Rural Lewis	Rural Lewis	8	26/82	Site to be identified. Possibly Arnol if there demand.
2023/24	South Harris - Leverburgh	Harris	4	6/38	Feasibility ongoing
2023/24	Scott Rd/Coastguard	Harris	18	6/38	Land transaction negotiations
2023/24	Rural Lewis	Rural Lewis	8	26/82	Site to be identified
2023/24	Balivanich 23/24	Uist	6	8/25	Site to be identified. Current Balivanich Site has capacity for 4 more units
2024/25	Rural Lewis HWEC 24/25	Rural Lewis HWEC	16	TBC	Site to be identified
2024/25	Benbecula (Liniclete)	Uist	4	8/25	Site to be identified
2024/25	Uist 24/25	Uist	6	14/54	Site to be identified
2024/25	Stornoway Periphery	Stornoway	15	85/211	Site to be identified
2024/25	North Uist	Uist	4	9/36	Site to be identified

*As per approved 5 Year Development Plan

Table 5.1 Comhairle's approved SHIP 2021-2026

Year 1	RPA	£8,000,000	Year 2	RPA	£6,300,000	Year 3	RPA	£7,500,000	Year 4	RPA	£5,000,000	Year 5	RPA	£5,000,000
2021/22	Units	Cost	2022/23	Units	Cost	2023/24	Units	Cost	2024/25	Units	Cost	2025/26	Units	Cost
Blackwater Ph1	14	£1,540,000	Blackwater Ph2	30	£3,300,000	Barra HWEC	10	£1,920,000	Benbecula	4	£440,000	Sty Regeneration	14	£1,540,000
Crowlista, Uig	4	£532,736	Scott Rd Ph1	14	£1,820,000	Rural Lewis	8	£880,000	South Uist	6	£660,000	Rural Lewis	8	£880,000
North Lochs (Keose)	2	£220,000	North Uist	6	£660,000	Blackwater Ph3	30	£3,300,000	North Uist	6	£660,000	North Uist	6	£660,000
Barvas (Developer led)	8	£840,000	South Uist	6	£660,000	Scott Rd Ph2	14	£1,300,000	Stornoway Regeneration	12	£1,320,000	Barra	6	£660,000
									South Harris	6	£660,000	Balivanich	4	£440,000
									Point	8	£880,000			
c/f from 20/21														
Goathill RENT		£910,283												
Goathill HWEC		£584,926												
Balivanich		£570,053												
Lochmaddy Hospital		£725,472												
Howmore		£342,736												
Barra/Vatersay		£640,000												
Tarbert Police Station		£106,418												
	28	£7,012,624		56	£6,440,000		62	£7,400,000		42	£4,620,000		38	£4,180,000



QUARTERLY TREASURY REPORT TO 31 MARCH 2021

Board 19 May 2021

Report by Director of Finance & Corporate Services

Purpose of Report

- 1.1 To inform the Board of the Treasury Management activities for the fourth quarter of 2020/21.

Summary

- 2.1 The quarterly Analysis of Investment and Borrowing report required by the Treasury Management Policy is at Appendix 1.
- 2.2 Financial covenants were met for 2020/21.

Competence

- 3.1 Financial, legal and other constraints arising from the recommendation to this report being implemented are detailed at paragraph 5.1 – 8.2.

Recommendations

- 4.1 **It is recommended that the Board note the:**
- a) **quarterly report on the Analysis of Investment and Borrowing at Appendix 1;**
 - b) **outstanding loans at 31 March 2021 of £4.91 Million; and**
 - c) **cash balance at 31 March 2021 of £4.927 Million.**

APPENDIX 1	Analysis of Investment and Borrowings
APPENDIX 2	Quarterly Income and Expenditure Profile
Background Papers	None
Writer of Report	Donald Macleod

Tel: 0300 123 0773

Competence

Financial

- 5.1 This report deals entirely with the cash resources utilised over the fourth quarter of 2020/21.

Legal

- 6.1 Rule 19.1 to 20.1 details the Partnership's borrowing powers.
- 6.2 The effecting of borrowing and lending money is in accordance with the Partnership's borrowing and lending policies and CIPFA's "Treasury Management in Housing Partnerships: A Code of Practice" and has been delegated to the Director of Finance & Corporate Services.
- 6.3. The Treasury Management Policy requires that as a minimum a quarterly report is provided to the Board in the form "Analysis of Investment and Borrowing".
- 6.4 The Treasury Management Policy requires that if the cash balances exceed £4 Million the funds should be spread over no fewer than four interest bearing accounts. The cash balances are in a special interest account with Royal Bank of Scotland (RBOS). The remainder is held in the current accounts with the RBOS.

Regulatory Guidance

- 7.1 The Regulatory Standards checklist has been completed and there is nothing in the report which would result in a breach of the standards.
- 7.2 This report provides ongoing assurance of evidence RS3 in relation to our Annual Assurance Statement.

Risk

- 8.1 There are a number of risks highlighted in the Risk Register in relation to Treasury Management. The risk scored as "high" is the impact of increases in the interest rate and inflation rate and this has been addressed in Appendix 1.
- 8.2 The COVID-19 pandemic has resulted in turmoil in the financial markets. The reduction in the bank interest rates are not posing a risk at present as we have hedged appropriately between our fixed and variable loan facility. It does however mean that there will be a reduction in interest received on deposit accounts.

Report Details

- 9.1 There were no borrowings during the fourth quarter.
- 9.2 The fourth quarter of the year saw £7.790M expenditure of which £5.928M related to new build.
- 9.3 The income for the fourth quarter was £6.989M and comprised Rental Income (34%), Sale of Shared Equity Units (4%), Government Grants including new build (61%) and Other Income (1%).
- 9.4 Appendix 2 summarises the income and expenditure profiles for the fourth quarter.
- 9.5 The cash balances at 31 March 2021 decreased quarter on quarter by £0.998M to £4.927M. This was driven by the increase in development spend planned in the fourth quarter.
- 9.6 All covenants were complied with for 2020/21.

31MAR21

ANALYSIS OF INVESTMENTS AND BORROWINGS

INVESTMENTS

	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21	Average
DEPOSIT ACCOUNTS	£000's	£000's	£000's	£000's	£000's	£000's
Royal Bank	749	749	749	749	749	749
CWS	0	0	0	0	0	0
BOS	782	782	782	787	787	784
Santander	1,578	1,581	1,581	1,582	1,583	1,581
Total Deposit	3,109	3,112	3,112	3,119	3,119	3,114

CURRENT ACCOUNTS

General Account	1,195	859	1,795	664	726	1,048
Standing Order	345	495	750	750	750	618
Direct Debit	257	750	533	750	150	488
Office/Cash	208	750	750	613	151	494
Property Factoring	36	39	28	30	31	33
Total current	2,042	2,892	3,856	2,807	1,808	2,681
Total	5,151	6,004	6,968	5,925	4,927	5,795

Balances shown are taken from the Bank Statements and not the ledger.

The cash held at the Royal Bank is split between 5 operational accounts totalling £1.808m. 5 deposit accounts held with the 4 banks shown above total £3.119m.

BORROWINGS

Core Funding Facility	£m
Estimated debt outstanding (per Business Plan)	4.91
Actual amount outstanding	4.91
Difference	0.00

Compliance with Cash Flow Forecasts

The onset of the COVID-19 pandemic resulted in a halt to our development and investment programmes. The drawdown of the remaining loan facility is now not expected to take place until 2021/22.

Interest Rates

The Interest Rate that applies to the Partnership is LIBOR plus an agreed margin. LIBOR (London Inter Bank Offer Rate) is the interest rate banks borrow funds from each other in the London Interbank Market.

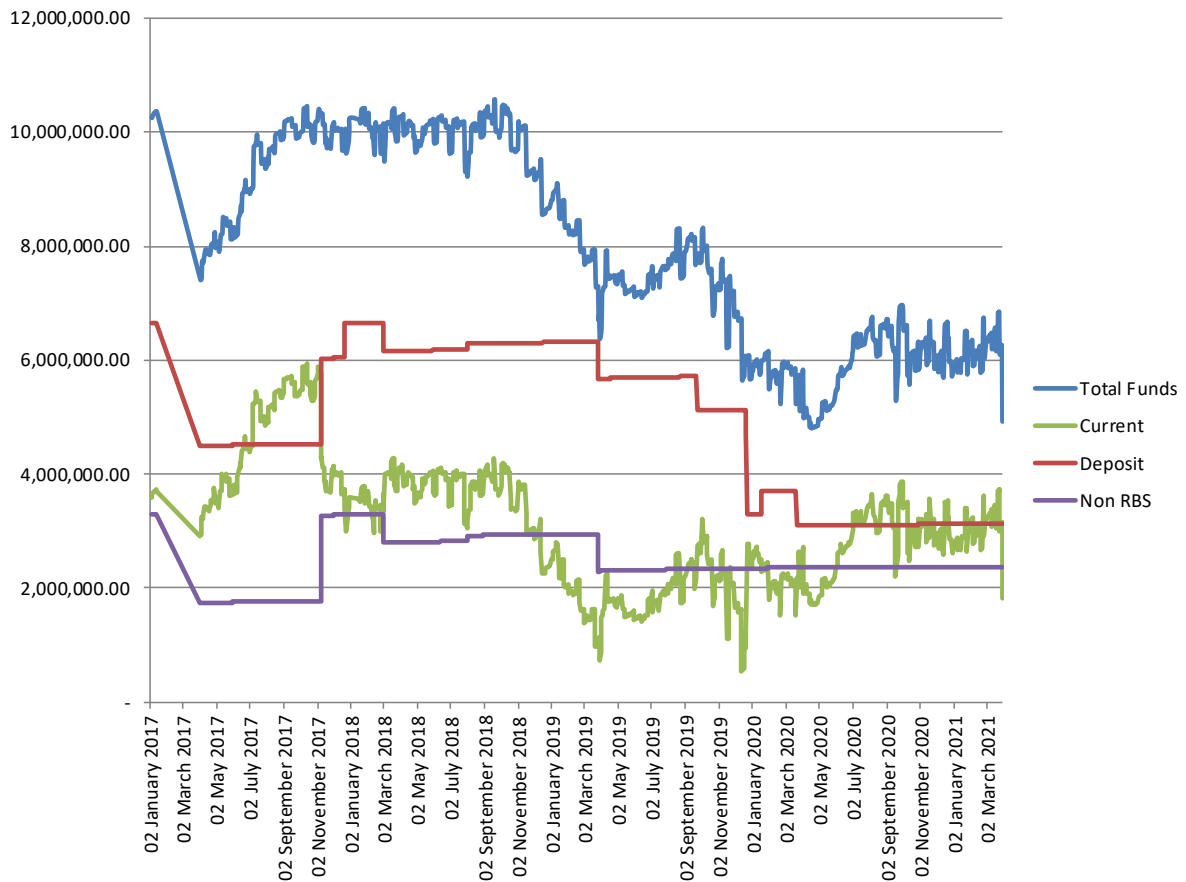
The Base Rate has remained at 0.1% since the COVID-19 lockdown was initiated. 3 month LIBOR increased to 0.09% as at 31 March 2021.

Borrowings	Mar-20 £000's	Jun-20 £000's	Sep-20 £000's	Dec-20 £000's	Mar-21 £000's	Average £000's
Facilities arranged	15,000	15,000	15,000	15,000	15,000	15,000
Loans outstanding	4,909	4,909	4,909	4,909	4,909	4,909
Variable/Fixed analysis-amounts						
Variable amount	1,409	1,409	1,409	1,409	1,409	1,409
Fixed amount	3,500	3,500	3,500	3,500	3,500	3,500
Other Hedging	-	-	-	-	-	-
	4,909	4,909	4,909	4,909	4,909	4,909
Variable/Fixed analysis-Percentages						
Variable	28.70%	28.70%	28.70%	28.70%	28.70%	28.70%
Fixed	71.30%	71.30%	71.30%	71.30%	71.30%	71.30%
Other Hedging Products						
	100%	100%	100%	100%	100%	100%
Lenders amounts						
Core Facility (RBS)	4,909	4,909	4,909	4,909	4,909	4,909
Other Borrowings	-	-	-	-	-	-
	4,909	4,909	4,909	4,909	4,909	4,909

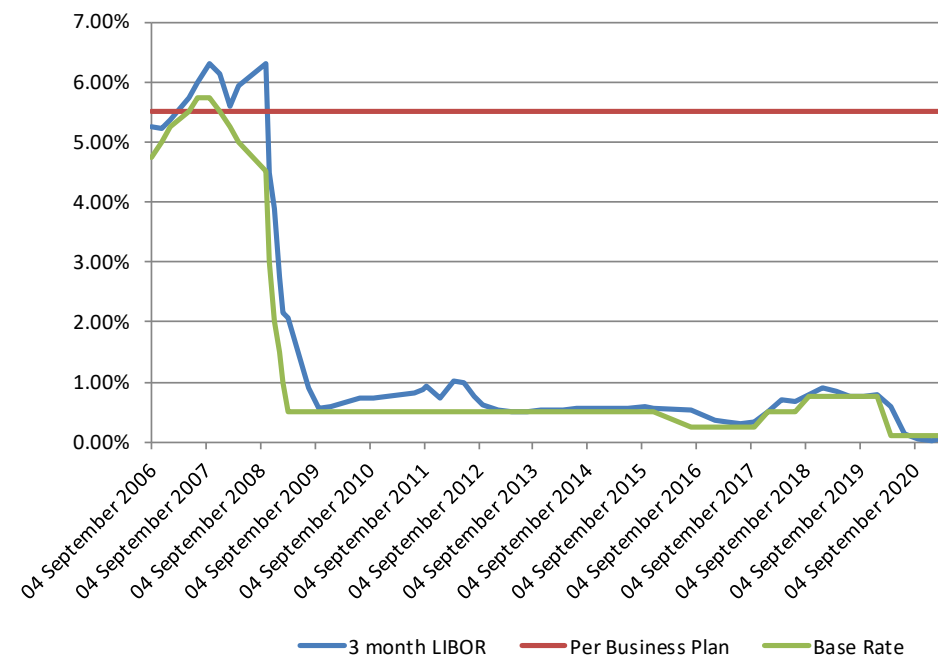
Average cost of borrowing				
Amount £000's	Interest	Type	Annual Cost	
3,500.00	5.55%	Fixed	194,300	
1,408.67	3.65%	Variable	51,424	
4,908.67			245,724	
Average cost of funds			5.01%	

Anticipated level of borrowing over next 5 years			
Year	2020/21 Est £m	AFS Forecast £m	Variance £m
2020/21	4.909	14.805	(9.896)
2021/22	18.500	14.805	3.695
2022/23	21.000	14.805	6.195
2023/24	23.000	14.805	8.195
2024/25	25.000	14.805	10.195

Cash Balances



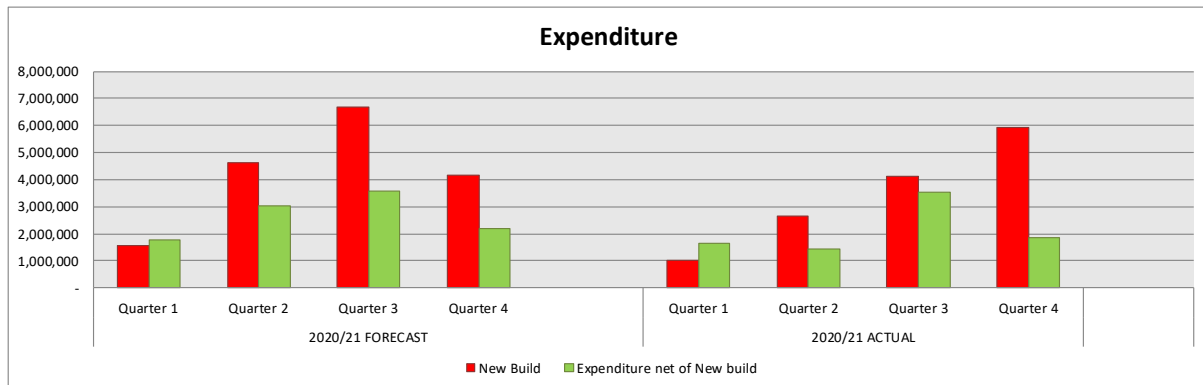
Interest Rates



31MAR21

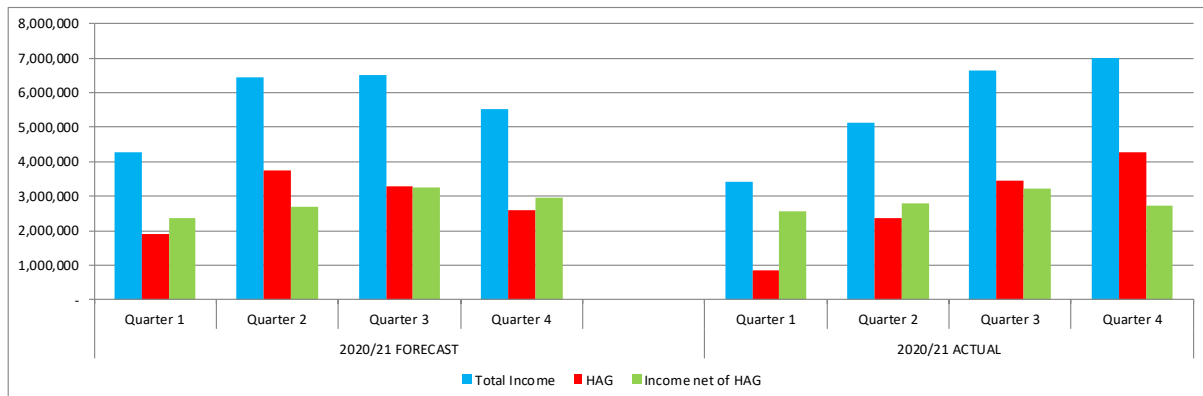
ANALYSIS OF INCOME AND EXPENDITURE PROFILES

EXPENDITURE



Overall the expenditure for the fourth quarter (Q4) of 2020/21 is significantly up compared to forecast. Expenditure net of new build is below forecast due to the Tier 4 measures in place for most of the fourth quarter. Development works have continued to ramp up in the fourth quarter following the delays driven by lockdown and getting onto some sites. Total development spend is below the initial budget for the full year.

INCOME



Total Income for the fourth quarter of 2021/22 is up £1.450M compared to the initial budget. This is driven by an increase in the HAG received in Q4 as our development programme progresses.

ASSET MANAGEMENT ACTION PLAN UPDATE

Board 19 May 2021

Report by Director of Operations

Purpose of Report

- 1.1 To provide an update on the Asset Management Action Plan.

Summary

- 2.1 The Board approved the Asset Management Strategy in March 2020. The strategy included an Action Plan to be used as a monitoring framework. It was agreed that progress would be reported on an annual basis.
- 2.2 The Strategy Action Plan has been updated and is at Appendix 1. Progress is on target.
- 2.3 The Strategy is based very closely on guidance from the Scottish Housing Regulator and is an integral part of our Business Plan. It is intended to bring forward our Stock Condition Survey from 2022 to 2021 to inform the Strategy and forward planning and a tender for this is being prepared.

Competence

- 3.1 The legal, financial or other constraints to the recommendations in this report are contained in paragraph 5.1 – 8.1.

Recommendations

- 4.1 **It is recommended that the Board note progress on the Asset Management Strategy Action Plan at Appendix 1**

APPENDIX1: Action Plan Progress

Background Papers: Risk Register/ Asset Management Strategy

Writer of Report: Angus MacNeil

Tel: 0300 123 0773

Competence

Financial

- 5.1 There are no financial implications arising from this report. The Strategy is based on a financial framework as set out in the Business Plan.

Legal

- 6.1 The Scottish Government has set up a legal requirement for Social Housing Landlords to bring their stock up to meet the second milestone of the Energy Efficiency Standard for Social Housing (EESH2) by 2032.

Regulatory Guidance

- 7.1 The regulatory standards checklist has been completed and there is nothing in the report that would be in breach of the standards.
- 7.2 This report provides ongoing assurance of evidence RS4 and RS7 in relation to our Annual Assurance Statement.

Risk

- 8.1 There are several risks highlighted in the Risk Register which are relevant to the Asset Management Strategy including:
- Delivery of the Investment Programme;
 - Rent Affordability;
 - Climate Change;
 - Increased costs to tenants, particularly Fuel Poverty;
 - Effectiveness of key IT systems;
 - Demographic change; and
 - Legislative changes.

ASSET MANAGEMENT STRATEGY – ACTION PLAN

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
	STRATEGIC			
1	Influence Local Housing Strategy on: - Demand - Population change - Population movement - Development requirements	Chief Executive	October 2022	Ongoing meetings with CNES on annual SHIP programme and through the Investment Delivery Board.
2	Continue to review current and emerging risks and mitigation measures (including Climate Change agenda)	Chief Executive Investment Manager	Each Board Cycle May 2021 March 2022	Risk Register reviewed on a regular basis by Managers and Audit & Risk Committee. Signed up to Climate Change Working Group. Heat in Building Strategy - The Scottish Government Strategy updates both the Energy Efficient Scotland Route Map and the Heat Policy Statement. We are responding to draft strategy. An Environmental strategy is being developed to capture our response to the climate agenda and actions to meet EESSH 2 standard being developed
3	Monitor low demand and report on financial impact	Area Manager	Allocation report to Board in June each year	Ongoing analysis of long term voids and hard to let assets. Further analysis

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
				on reasons for relets and demand in differing areas across island chain. Management accounts and performance reports provide monthly updates on position
4	Continue to work with partners to lobby on fuel pricing	Director of Operations	Ongoing November 2021 Ongoing	Continued lobbying of OFGEM, energy suppliers and agencies with other Highlands & Islands landlords. Preferred supplier arrangement in place with UTILITA for all voids. Signpost tenants to Tigheann Innse Gall for independent Energy Advice where required Switching service provider to be reviewed. Lobbying with partners reflected in Scottish Government acceptance of the need for rural income issues to be reflected in definition of fuel poverty.
TENANT ENGAGEMENT AND FEEDBACK				
5	Carry out tenants survey	Director of Operations	September 2021	Recruitment of students to carry our survey in progress.
6	Continue to develop ongoing satisfaction measurements		Monthly	Tenant Satisfaction Survey and point of service data collected on voids, repairs and investment work and used to inform services.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
	- Assess satisfaction with homes and environment - Collect, analyse and use data on ongoing basis on repairs, investment, new lets and environment	Service Development Manager	Monthly (daily monitoring)	Daily analysis of repairs being issued in terms of nature of works, value, priority. Patterns of repairs analysed in conjunction with other patterns for recall visits, multiple visits to same properties. Recommendations from contractor reviewed daily and actioned.
	Develop 2 way communication channels	Digital Transformation Manager	Annual April 2022	Reasons for voids and relets analysed and compared with socio economic demographics published by CNES. Annual allocation report to Board in June Digital transformation strategy being implemented
7	Develop digital self-service for repairs and maintenance work	Service Development Manager	March 2022	Project being progressed through Digital Transformation Strategy.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
	INFORMATION MANAGEMENT			
8	Carry out Stock Condition Survey	Director of Operations	October 2021	Exploring commencing survey at October or earlier. Brief being developed. Early investigation into consultant capacity carried out.
9	Review and document all processes for data input with Q A system integrated	Service Development Manager	Ongoing monthly June 2022	Data reviewed monthly to QA check all data provided by Contractor and ensure data is robust. Electronic invoicing being explored as next step of system development to be assessed as part of Housing system procurement.
10	Continued development of Active H Planned Maintenance module:- - Life cycle cost (LCC) plans - Investment programme management - Cash flow management - Interfaces with financial systems	Service Development Manager	Ongoing Annual update March 2021 December 2021	LCC plans being developed with ongoing uploads of investment and new build attribute data. Stock Condition Survey information uploaded. Data updated as investment works completed. Investment Programme Management process is completed. It is now being reviewed and refined. Regular meetings to improve reporting systems and QA of data input against programmes. System development forming part of of Housing system procurement.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
11	Develop interfaces between asset information and customer interface software particularly on repairs diagnosis	Service Development Manager	Complete	System development between modules ongoing internally and with system provider – interfaces now in place.
PROTECT CORE STOCK				
12	Pursue measures to control reactive repairs demand	Service Development Manager/Asset & Contract Manager/Investment Manager	Ongoing Daily and Monthly process in place. Annually	Daily reports and analysis carried out and circulated to members of staff. Regular reporting to Board on patterns of repairs and estimated out turns. Annual review to be carried out on completion of each year
13	Pursue increased focus on planned and cyclical maintenance	Asset & Contract Manager	Ongoing Every 5 years Annually Annually Annually	Annual and 5 year cycles in place. Electrical Condition Survey established Fire Safety Inspections Legionella - On voids/ Investment works/ ASHP have legionella cycles Asbestos - Sampling on Investment Works - Inspecting communal lofts meetings with Contractor to review programme and budget.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
14	Address SHQS abeyances and exemptions • Replace all solid fuel heating systems • Continue engagement with owners	Investment Manager	March 2021 Ongoing	Abeyances being addressed as opportunities arise. Solid fuel systems complete excluding refusals Opportunities offered when possible
15	Review and agree Investment Programme	Asset & Contract Manager	November Annually	4 year programme approved up until 2023
	PROCUREMENT			
16	Review options for delivery of Repairs & Maintenance work Decision on whether to invoke contract 2 year extension to be taken	Director of Operations Director of Operations	March 2024 March 2024	Contract now entered year 2 out of initial 5 year contract.
17	Review outcomes of current investment framework contract	Asset & Contract Manager	March 2022	Framework expires 31 March 2023
18	Determine procurement route for investment programme post 2023	Asset & Contract Manager	June 2022	Procurement options evaluated and new framework or alternative approach in place for 2023.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
	ENERGY EFFICIENCY AND FUEL POVERTY			
19	Investigate and pursue replacement of all THTC systems within housing stock by end of strategy period	Director of Operations	March 2024 March 2022	Carbon Infrastructure Transition Programme application expected to be approved. Formal notification awaited. Circa 400 THTC properties heating systems remain.
20	Assess and report on progress against EEESH Standard	Investment Manager	May Annually	Assets assessed against new guidance. Utilise membership of SFHA Innovation Hub and Scottish Housing Network Asset Management Forum for information share on EEESH improvements to assets
21	Evaluate options to address EEESH failures	Investment Manager	May Annually	Areas of failures and SAP calculations evaluated against possible areas for improvements.
22	Assess implications of EEESH 2 standard	Investment Manager	November 2021 November 2021	Engagement through RIHAF to influence standard and definitions. Awaiting outcome of Scottish Government Heating in Building Strategy consultation Energy Efficiency Investment policy to be developed in conjunction with Environmental Strategy
23	Monitor new and emerging solutions to improve energy efficiency	Investment Manager	Ongoing	Ongoing information sharing with members of other organisations. Attendance at relevant events to discuss energy efficiency ratings for Infra red systems as SAP does not currently provide specific rating.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
	ENVIRONMENT			
24	Carry out annual environmental estate management inspections and link to planned maintenance and investment programmes	Area Managers	February (annually) Annually Annually	Annual estate surveys carried out. Grounds maintenance programmes/sites reviewed annually. New sites also added for developments. Garden Assistance programme reviewed annually. Contract for 2021 and 2022 awarded. Commenced April Review approach to grass cutting with specification and frequency.
	LAND AND UNADOPTED INFRASTRUCTURE			
25	Review land assets on regular basis and consider potential uses including disposal	Asset & Contract Manager	Yearly Review Of Each Site	Housing developed on 7 HHP sites in last three years across islands.
26	Survey unadopted roads and footpaths and assess maintenance needs, cost implications and shared ownership responsibilities	Asset & Contract Manager	March 2022	Unadopted Infrastructure surveys being prepared. Surveys will cover • Roads • Footpaths • Kerbing • Drains/ covers • Parking • Lighting

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
27	Evaluate use of drones for survey work	Asset & Contract Manager	March 2022	Pilot survey undertaken on PPM works. Additional exploration of IT requirements compatible with drone software
28	Review effectiveness and specification of grounds maintenance arrangements with CNES	Asset & Contract Manager	March 2022	CnES retendered works and contract awarded. Contract expires 2026
29	Update contracts with new sites as developments complete	Asset & Contract Manager	Ongoing	Development of handover process with Development Officer to include • Asset and attribute data • Health and Safety/ Building manuals • Life Cycle data • Infrastructure adoption
30	Pursue adoption of septic tanks and ensure adequate maintenance regime is in place	Asset & Contract Manager	November 2021	Adoption being pursued through TIG on three sites. Maintenance being carried out as required. Ongoing discussions with Scottish Water and SEPA
31	Compile survey of existing septic tanks and implement recommendations		April 2021 July 2021	Surveys completed by Engineer. Report under review for replacement options. Draft report received. With Officers for review and to agree proposed actions and timescales.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
	ENGAGEMENT WITH OWNERS AND FACTORING			
32	Explore opportunities to assist owners to participate in maintenance works particularly in relation to SHQS works	Asset & Contract Manager	Ongoing	HHP undertakes surveys and obtains costs and can inform owners of works and costs. Take up is very limited but is encouraged.
33	Explore enforcement options for shared responsibilities with owners if appropriate	Asset & Contract Manager	August 2021	Participation from private owners continues to be problematic across all programmes. Enforcement options require development to ensure HHP stock and estates do not fall into disrepair. Enforcement will be implemented in serious situations
34	Improve factoring service delivery and owner satisfaction Review processes and implement improvements identified	Area Managers/Service Development Manager	December 2021	Data collected checked for detail to ensure clear information is provided to owners. Improvements being made to logs for annual servicing. Works programmed annually.
35	Annual planned and cyclical maintenance programmes - Ensure good communication with owners	Asset & Contract Manager	Annually	Works surveyed. Tenants lettered in advance including COVID protocols
	'CAUSE FOR CONCERN' STOCK			
36	Monitor stock and investigate issues as they are identified and assess options to address these	Asset and Contracts Manager	Ongoing	Investigate issues identified via Investment, Planned and Cyclical Maintenance and daily repairs.

REF	ACTION	RESPONSIBLE	TIMESCALE	PROGRESS
				Regular review of data on hard to let and long term voids or patterns of frequent relets to the same property. Several assets have been disposed and one is in the process of disposal. Investment works to assets potentially considered for disposal reviewed.
37	Develop a model to enable an assessment to be made of the value of properties to the business Review stock and classify as: • Core Stock • Under Review • Non-core Stock	Director of Operations/Asset & Contract Manager	June 2022	Modelling tool under continued development as resources permit. Model seeks to use core data on physical condition, demand issues and financial performance to produce categorisation of stock by house types/ areas.
	PROGRESS MONITORING			
38	Report to the Board on progress against this Action Plan	Director of Operations	May/June – Annually	
	SKY DISHES			
39	Review whether provision of communal Sky services should be provided due to broadband services providing access to separate online streaming services	Asset and Contracts Manager/ Housing Managers	August 2021	Undertake surveys for existing stock with communal dishes. Liaise with Development Officer and best options for future developments.

SHR ENGAGEMENT PLAN 2021/22

Board 19 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 The purpose of this report is to inform the Board of our Engagement Plan for 2021/22 which has been prepared by the Scottish Housing Regulator (SHR).

Summary

- 2.1 The Engagement Plan is at Appendix 1 and shows that we continue to be classified as an RSL of systemic importance and the level of engagement with the Regulator has been set as Medium.
- 2.2 All Engagement Plans are available on the SHR website and are public documents.
- 2.3 The key issue highlighted is ensuring the impact of the pandemic on our development plans is reflected in our Business Plan and that we keep the Regulator informed of any material changes which might affect our financial position or our reputation as per the notifiable events guidance.
- 2.4 Previously we had been requested to provide updates on 6 of the ARC indicators and for completion an update on our performance is at Appendix 2.

Competence

- 3.1 There are no financial or legal issues affecting the recommendation in this report.

Recommendations

- 4.1 **It is recommended that the Board note the:**
- a) SHR Engagement Plan for 2021/22 at Appendix 1; and**
 - b) Performance Indicators at Appendix 2.**

APPENDIX 1:	Engagement Plan 2021/22
APPENDIX 2:	Performance Indicators
Background Papers:	None
Writer of Report:	Dena Macleod

Hebridean Housing Partnership Ltd

Regulatory Status: Compliant

Hebridean Housing Partnership Ltd (HHP) meets regulatory requirements, including the Standards of Governance & Financial Management.

Why we are engaging with HHP

We are engaging with HHP because it is a **systemically important** landlord.

COVID-19 has significantly impacted the services provided by social landlords in 2020 and will continue to influence how services are provided in 2021. We will continue to monitor, assess and report upon how each landlord is responding and we will keep our regulatory engagement under review so that we can continue to respond to the challenges of COVID-19.

We refer to a small number of RSLs as systemically important because of their stock size, turnover or level of debt or because of their significance within their area of operation. We need to maintain a comprehensive understanding of how their business models operate, and how they manage the risks they face and the impact these may have. So we seek some additional assurance each year through our engagement plans. Given HHP's significance in its area of operation we consider it to be systemically important.

HHP is one of the larger developers of new affordable housing in Scotland and receives significant public subsidy to help achieve this. HHP plans to develop new homes for social rent.

What HHP must do

HHP must:

- provide copies of its Board and audit committee minutes as they become available; and
- ensure that the impact of the pandemic on its development plans is reflected in its business plan and tell us if there are any material adverse changes to its development plans which might affect its financial position or reputation, in line with our notifiable events guidance.

What we will do

We will:

- review the minutes of the Board and audit committee meetings and liaise as necessary;
- meet with HHP's senior staff to discuss the impact of the pandemic on its existing business model and business plan and any risks to the organisation particularly in relation to its services to tenants; and

- update our published engagement plan in light of any material change to our planned engagement with HHP.

Regulatory returns

HHP must provide us with the following annual regulatory returns and alert us to notifiable events as appropriate:

- Annual Assurance Statement;
- audited financial statements and external auditor's management letter;
- loan portfolio return;
- five year financial projections; and
- Annual Return on the Charter.

It should also notify us of any material changes to its Annual Assurance Statement, and any tenant and resident safety matter which has been reported to or is being investigated by the Health and Safety Executive or reports from regulatory or statutory authorities or insurance providers, relating to safety concerns.



[Read more about HHP>](#)

Our lead officer for Hebridean Housing Partnership Ltd is:

Name: Kelda McMichael, Regulation Manager
Address: Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF
Telephone: 0141 242 5887
Email: Kelda.mcmichael@shr.gov.scot

Performance Indicators

ARC 2 (previously ARC 3) - Tenants who feel the landlord is good at keeping them informed about services and decisions

	ARC
2020/21	92.11%
2019/20	92.11%
2018/19	92.11%
2017/18	80.62%
2016/17	80.62%
2015/16	80.62%
2014/15	75.20%
2013/14	75.15%

ARC 25 (previously ARC 29) - Tenants who feel rent for their property represents good value for money

	ARC
2020/21	78.69%
2019/20	78.69%
2018/19	78.69%
2017/18	66.24%
2016/17	66.24%
2015/16	66.24%
2014/15	74.44%
2013/14	70.66%

This data is taken from the tenant survey carried out in 2018.

ARC 8 (previously ARC 11) - Average hours to complete emergency repairs

	ARC
2020/21	2.61
2019/20	2.86
2018/19	3.43
2017/18	8.96
2016/17	10.09
2015/16	9.43
2014/15	10.98
2013/14	7.9

A change in policy implemented in January 2018 has seen our average hours drop. Emergency priorities changed from 4 hours and 24 hours to 4 hours only. 2018/19 is the first full reporting year with the new priorities.

ARC 15 (previously ARC 19) - Anti-social behavior cases reported in the last year which were resolved

	ARC
2020/21	100.00%
2019/20	100.00%
2018/19	82.50%
2017/18	69.44%
2016/17	70.97%
2015/16	81.25%
2014/15	78.13%
2013/14	50.00%

In 2018/19 this indicator changed, omitting the phrase 'local agreed timescales'.

ARC 16 (previously ARC 20) - Tenancies began in previous year remained more than a year-all

	ARC
2020/21	90.06%
2019/20	87.22%
2018/19	86.11%
2017/18	82.00%
2016/17	83.73%
2015/16	81.25%
2014/15	88.02%
2013/14	89.57%

Tenancy sustainment has been consistent since 2015/16. Socio-economic factors driving depopulation in the Outer Hebrides have continued to affect our housing demand and sustainment. Approx. 25% of all terminations since 2013 have been due to tenants relocating to mainland UK.

ARC 28 (previously ARC 33) - Factored owners satisfaction with the factoring service

	ARC
2020/21	33.33%
2019/20	33.33%
2018/19	33.33%
2017/18	33.33%
2016/17	33.33%
2015/16	33.33%
2014/15	14.29%
2013/14	16.67%

This data is taken from the factoring survey carried out in 2015/16.

Point of Service	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16
Letting Process	95%	95%	96%	96%	98%	90%
Overall Standard	89%	88%	90%	85%	88%	82%
Condition of Home	86%	82%	83%	82%	91%	88%
Decoration	58%	76%	72%	70%	64%	58%

REVIEW OF CORPORATE REGISTERS

Board 19 May 2021

Report by Chief Executive

Purpose of Report

- 1.1 The purpose of this report is to assure the Board that the Corporate Registers are functioning in accordance with our constitutional documents, regulatory and legal requirements, and that they are fully up to date.

Summary

- 2.1 In order to ensure good governance, probity and transparency, we must keep a number of registers recording business transactions and working practices across a number of areas.
- 2.2 Registers are updated regularly and reviewed annually to ensure compliance, in accordance with Rule 64.
- 2.3 This report is concerned with the following registers and seeks to give assurance to the Board that they are functioning appropriately:
- Membership Register; and
 - Entitlements, Payments & Benefits Register.

Competence

- 3.1 The financial, legal and other implications are detailed in paragraph 5.1 – 8.1 of this report.

Recommendations

- 4.1 **It is recommended that the Board note this review.**

Background Papers: HHP Rules & Standing Orders
Guidance Note 5: Regulatory Standards of Governance and Financial Management (February 2019)

Writer of Report: Iona France

Tel: 0300 123 0773

Competence

Financial

- 5.1 There is no financial constraint arising from the recommendation to this report being implemented.

Legal

- 6.1 There is a legal and regulatory requirement to ensure that registers are kept by the Partnership.

Regulatory Guidance

- 7.1 The Regulatory Standards checklist has been completed and there is nothing in the report which would result in a breach of the standards.
- 7.2 This report provides assurance of evidence GF1 in relation to our Annual Assurance Statement.

Risk

- 8.1 The risks of not keeping and reviewing registers could lead to the Partnership being in breach of statute and regulation. It could also lead to a perceived lack of transparency and probity from tenants and other stakeholders.

Report Details

Membership Register

- 9.1 The Membership Register is fully up to date in accordance with Rule 64. Members' names and addresses are detailed in addition to the names and addresses of the Office Bearers of the Partnership, their positions, and the dates they took and left office.

Entitlements, Payments & Benefits Registers

- 9.2 The Scottish Housing Regulator's Guidance Note 5: Regulatory Standards of Governance and Financial Management does not prohibit payments and benefits to staff and connected persons, but requires that RSLs manage them within a clear policy framework to ensure transparency, honesty and propriety.
- 9.3 Payments and Benefits to employees and connected persons are controlled by the Entitlements, Payments & Benefits Policy and recorded in three registers, as follows:
- The Entitlements, Payments & Benefits Register (general) records instances of applications for housing or NSSE properties being made;
 - The Entitlements, Payments & Benefits Register (special exceptions) records instances of benefits being granted, such as houses being allocated and 'de minimis' payments being made; and
 - The Entitlements, Payments & Benefits Register (transactions) records any transactions between connected persons and, for example, contractors that may be on HHP's Framework. Permissions are sought from the Chief Executive in instances like these and full disclosures made and retained on staff personal files.
- 9.4 The Entitlements, Payments & Benefits Registers are fully up to date.
- 9.5 Gifts to the Partnership are raffled and the proceeds are donated to local charities throughout the year.