

March 2020

Sanctuary Scotland Housing Association Limited

Mapping Exercise for Assurance Statement - Assurance and Notification

The purpose of this document is to provide the Board of Management of Sanctuary Scotland Housing Association Limited with assurance that the organisation complies with the requirements of Chapter Three of the Regulation of Social Housing in Scotland in relation to Assurance and Notification. The compliance requirements are defined, the evidence and practice to support compliance is described and additional information or further action defined.

SHR Regulatory Requirement and Evidence	Compliant?	Action Required/Commentary
<p>Requirement Prepare an Annual Assurance Statement in accordance with SHR published guidance, submit it to us (SHR) between April and the end of October each year, and make it available to tenants and other service users.</p> <p>Evidence 2019 Annual Assurance Statement approved, signed and submitted as per regulatory requirements. 2019 Annual Assurance Statement published on Sanctuary Scotland website. A working group has been formed to take the 2020 mapping forward and a timetable approved by the Board of Management at the meeting of 11 February 2020. This shows who will lead on each area and the topics that the National Residents review panel and the Area committees will be involved in.</p>	<p>YES</p>	<p>The approach for 2020 submission: Use the aspects of the SFHA toolkit that differ from the approach taken for 2019 – e.g. form a working group (the toolkit was only available from August so our mapping processes were underway by then) Working group to review all areas again for 2020 (first meeting 11.3.20 complete) Involve our National Residents Review Panel and area committees in more detail Action items for improvement to be monitored to completion</p>

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<p>Requirement Notify us (SHR) during the year of any material changes to the assurance in its Annual Assurance Statement.</p> <p><u>Evidence</u> Cannot provide evidence of this but the formation of the working group and keeping areas under review will ensure that any material changes will be notified</p>	<p>YES</p>	<p>The working group and mapping processes are in place to monitor, identified actions required and that we understand any material changes.</p> <p>Ensure that any significant changes to our business or the way we operate is considered.</p> <p>To be added – Thistle Housing Association acquisition.</p> <p>Business continuity plans for Coronavirus risk management.</p>
<p>Requirement Each landlord must have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety.</p> <p><u>Evidence</u></p> <p>In general terms We have a clear understanding of the legal requirements associated with our duties as an RSL and ensure we understand our external environment and the factors affecting our business. Specific examples of this: Membership of the SFHA and CIH to ensure access to good practice briefings, papers, guidance Training and awareness session with staff and board members e.g. Housing Scotland Act 2014, GDPR, Freedom of Information Scotland Specialist legal advice taken from trusted partners to ensure clarity of requirement and that we act within the law</p>	<p>YES</p>	

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<p>Our policies, procedures and process maps/info refer to and reflect relevant legislation and good practice requirements</p> <p>Our Residents review panel participate in review of key policies e.g. Lettings policy in relation to changes following HAS 2014 – this gives assurance that we take account of customers views</p> <p>New and reviewed policies approved by Board of Management to ensure active understanding and involvement in key requirements and changes</p> <p>We have a Policy and Equalities Manager with specific responsibility for policy development and review</p> <p>Our policy development and review process and use of Group policies where relevant gives assurance that our policies and procedures are compliant with the law</p> <p>The internal audit function gives us assurance of independent scrutiny</p> <p>Allocations</p> <p>Lettings Policy and procedures</p> <p>Local lettings Strategies for every area that is considered by the Area Committees and approved by the Board of Management – this analysis gives reassurance that the terms of the lettings policy is being correctly implemented and that we are meeting our legal obligations to people who are homeless</p> <p>Monitoring and Performance reports considered by Area Committees and Board of Management – this gives assurance that our stock is being used to meet housing need effectively and that housing stock being managed effectively</p> <p>Common Housing Register participation and agreements</p> <p>Internal auditors carried out a review of our allocations practices and gave highest level of satisfactory in terms of compliance</p> <p>MMR process and practice will be subject to internal audit</p> <p>Internal quality assurance processes audit randomly selected cases</p>		<p>Includes Housing Management of Estates policy 2019 (NRRP)</p> <p>Add- External training, Landlord Association and Scottish Association of Landlords for MMR CPD. New and reviewed policies are also reviewed by Senior Staff, internal subject matter experts and Area Committees.</p> <p>Quality Assurance provides us with internal checks on consistency and good practice. External (PWC) quality audits also provides assessment and recommendations for service improvement and compliance. Aberdeenshire Council and Care Inspectorate completes unannounced/announced visits to Sheltered Services to meet standards and requirements.</p> <p>Liaising with partner organisations on Rapid Rehousing. Actively attending meetings with Local Authorities on Housing First approach?</p> <p>Choice Based Lettings – agreements with HomeHunt to reduce underoccupation/overcrowding.</p> <p>Local lettings Strategies for every area – reviewed annually.</p> <p>When policy is next due for review we will consult applicants on their experiences and ensure this informs any improvements.</p>

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<p>Anti-Social Behaviour ASB Policy and Associated procedures are compliant with legislation and good practice requirements Use of React system to ensure consistent recording, approach and timescale management of ASB cases Specialist legal advice taken if cases enrolled for court Monitoring of ASB cases part of performance reporting to Area Committees</p> <p>Evictions Income Management policy and procedures details approach to evictions and are compliant with legal and good practice requirements System Case management and escalation processes are designed to ensure compliance with legal requirements e.g. pre action requirements Specialist legal advice taken if cases enrolled for court Monitoring of arrears is part of performance reporting to Area Committees Eviction approval process ensures scrutiny of cases before utilisation of decree Annual eviction report to Board of Management summarises evictions, give assurance of good practice and compliance and analyses any overall trends</p> <p>Abandonment The policy and procedure meet the legal requirements Staff are provided with appropriate training Information on abandonments included in Area Committee performance reporting</p>		<p>Majority of cases are closed within 28 days and responding within timescales. Customers have the opportunity to report ASB cases through different means – telephone (24/7), email/letter, face to face. At case closure – we will start a new process: call the customer to ask for any feedback as satisfaction surveys have not given a successful return rate. Any feedback recorded in ReACT. LR to explore if AM could get support from CSC to do this.</p> <p>Evictions – representation in court by solicitors. To be created: Checklist for post-court and pre-enforcing decree stage or when a case has been sisted/continued to ensure interventions have been made for welfare rights/ manager visit. Signposting to potential charity grants/crisis funds, check if they are employed, WRO help.</p> <p>Legal advice sought to ensure that we effectively implement the law in complex cases. Additional advice has been created in the last 12 months on the correct process for the storage and/or disposal of abandoned goods.</p>

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<p>Tenancy Agreements Our Scottish Secure Tenancy and Short Scottish Secure Tenancy Agreements are based on the models and therefore contain all required statutory clauses The changes required to these to meet the requirements of the Housing Scotland Act 2014, were made, consulted on and implemented by November 2019 as required. The policy updates required were approved by Board of Management by required date: Lettings Policy Tenancy Changes Policy</p> <p>Homelessness Our annual local letting strategies review our obligations, quantify how these were met and propose strategy for forthcoming year Housing Options interviews support homeless applicants to consider their options Performance monitoring and reporting to the Area committees</p> <p>Equality and Human Rights See separate mapping/self assessment process on this subject to give assurance that we are compliant with legal and good practice requirements In general terms: All board reports reference equality considerations All policy, procedure and processes are compliant with equality and human rights legislation e.g. Allocations policy, all staffing and recruitment practices Training and equality and diversity is mandatory for all staff and board members</p> <p>Tenant and Resident Safety Our group compliance function monitors compliance with key requirements e.g. gas safety servicing, fire risk assessment, site</p>		<p>Verbal or written updates given to those who have participated in consultations to explain any recommendations taken forward (or not) and a final copy of the document/literature shared with participants.</p> <p>Glasgow City Council; Renfrewshire Council, Aberdeen City and Aberdeenshire – quarterly returns on section 5 referrals (refused/ rejected / accepted offers – GCC) or just those allocated. Six properties provided to GCC to make temporary furnished flats for their homelessness strategy. Other local authorities are given dedicated properties to house homeless people.</p> <p>We also do ice and snow risk assessments. Estate Inspections/Block inspections to ensure</p>

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<p>actions arising for fire risk assessments, engineering, water hygiene and asbestos</p> <p>The Head of Compliance and Director – Sanctuary Scotland have a formal quarterly catch up</p> <p>The Group has a dedicated Health and Safety function to ensure compliance with legal and good practice requirements</p> <p>RADAR system is used group wide to record and report accidents and incidents</p> <p>The Board of Management receives a Health, Safety and compliance report at every meeting to provide assurance on compliance with legal obligations</p> <p>2018 Fire Regulations – the requirement to upgrade smoke detectors etc has been included in the re-investment programme to ensure compliance by required deadline. Discussed with Board of Management as part of approval of re-investment programme at meeting in August 2019.</p> <p>Use of our internal maintenance service ensures control over safety processes and practices</p> <p>Our Contractor Framework approach ensures third party contractors can demonstrate compliance with legal requirements in relation to health and safety</p>		<p>no hazardous or dangerous goods are in public spaces. We will also assess any dangerous/hazardous goods when ensuring communal areas are being cleared.</p> <p>Abandoned cars process.</p> <p>Bed bugs and infestations process.</p> <p>Sanctuary Way – reporting issues with health and safety/assets in properties and buildings.</p> <p>Compliance team get fire safety certificates.</p> <p>PCRAs completed with tenants where they may need assistance in an evacuation.</p> <p>New Wellbeing Service to support vulnerable tenants to life safely and independently in their own homes (e.g. with telecare support).</p> <p>Fire Safety visits co-ordinated by local operations with fire services.</p>

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<p><u>Requirement</u> Notify us (SHR) of any tenant and resident safety matters which have been reported to, or are being investigated by the Health and Safety Executive, or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.</p> <p><u>Evidence</u> Use of stock conditions surveys ensure we understand our stock and any resident safety matters that require to be addressed Our compliance levels with SHQS and EESSH requirements are reported to Board of Management and SHR via the Annual Return on the Charter Our re-investment programme reflects legislative, health and safety requirements The SHR notifiable event guidance is understood and followed The use of the RADAR system ensures a clear understanding of the nature of incidents, how they require to be followed up and notification required to a third party such as the Health and Safety executive</p>	YES	
<p><u>Requirement</u> Each landlord must make its Engagement Plan easily available and accessible to its tenants and service users, including online.</p> <p><u>Evidence</u> Sanctuary Scotland engagement plan is available on our website</p>	YES	We should advertise this in the next Voice newsletter (provide a link to website).