



Fife Council Annual Assurance Statement 2022

The People & Communities Scrutiny Committee at a meeting on the 27th October 2022 sought appropriate assurance that Fife Council Housing Service comply with all relevant requirements of the Scottish Housing Regulatory Framework; all relevant standards and outcomes in the Scottish Social Housing Charter; and all relevant legislative duties. Evidence has been considered through a regular cycle of performance reporting and liaison with tenant organisations to support the required level of assurance.

On review of the evidence provided principally through the Annual Return on the Charter 2021-22, it can be confirmed the Council recognises material non-compliance in the following standards and outcomes of the Scottish Social Housing Charter for tenants, people who are homeless and other service users. These areas are a focus for performance improvement throughout 2022-23:

Areas of Non-Compliance: General Reasons

Homelessness

The Scottish Housing Regulator has maintained regular contact and a positive working relationship with the Service for some time. This relationship has highlighted concerns around access to homelessness services, the assessment of homelessness applications, offers of temporary / emergency accommodation and the outcomes for people who are homeless.

The direct and indirect effects of the Covid-19 pandemic have increased pressure on a housing access and homelessness system that was already experiencing significant challenges creating unprecedented demand for crisis response services and temporary accommodation specifically. These issues are not unique to Fife and the Service has taken a positive decision to work with the Chartered Institute of Housing and other stakeholders to commission research examining local authority progress in implementing Rapid Rehousing Transition Plans across Scotland which is expected to report later in the year.

In 2022-23 there will be a further focus on accommodation that is deemed as unsuitable, which includes most of the Council's hostel type accommodation and the use of B&B / hotel type accommodation. The Regulator is also likely to be interested in the Council's approach to reducing the number of families with children in temporary accommodation with a particular focus on the Kirkcaldy Sheriff Court Judgement relating to Temporary Accommodation Occupancy Agreements received in March 2022.

Temporary accommodation continues to operate under significant pressure, and this led to formal escalation processes within the Council and to the Scottish Housing Regulator in August 2022 due to the risk of breaching the Council's statutory duties towards homeless households. The Service has continued to make all homeless households an offer of temporary accommodation where this is required.

The improvement actions identified for delivery in 2022-23 are to:

- Continue enhanced monitoring, reporting and escalation arrangements for temporary accommodation allocations to ensure 100% compliance.
- Continue to implement the Temporary to Permanent Accommodation Plan to re-provision temporary accommodation converted to mainstream tenancies and focus allocations towards statutory homeless households.
- Implement an Unsuitable Accommodation Mitigation Plan to drive faster transitions through emergency accommodation, decommissioning buildings which are no longer fit for purpose and developing different models of accommodation with support.
- Continue to develop, enhance and mature a revised frontline housing options service focussed on homelessness prevention and move forward organisational change within temporary and supported accommodation services.
- Learn from and mainstream the '4 Disciplines of Execution (4DX)' approach to the prevention of homelessness to embed culture change throughout the organisation.
- Proactively redevelop the housing advice framework to focus on housing options and homelessness prevention to promote informed housing choices and pathways.
- Modernise our TurnKey approach to managing the change of tenancy process for mainstream and temporary tenancies.
- Deliver 2022-23 Rapid Rehousing Transition Plan commitments to:
 - Modernise temporary accommodation and enhance the range of accommodation with support options.
 - Scale Up the number of Housing First tenancies in partnership with the Rock Trust and develop further Housing First pathways with the Health and Social Care Partnership and specialist providers to support those with complex needs.
 - Continue to 'flip' 100 temporary tenancies to permanent homes per year to reduce transitions and improve outcomes for those experiencing homelessness in addition to the 12-month programme to convert tenancies affected by the legal judgement.
 - Review and recommission homelessness and housing support services as part of a revised and collaborative approach to service commissioning.
 - Increase allocations to statutory homeless households across the Fife Housing Register Partnership.
 - Re-design temporary and supported accommodation staff structures linked to a modernised temporary accommodation service.
 - Enhance private and private rented sector interventions to raise standards and prevent homelessness.

Energy Efficiency Standard for Scottish Social Housing (ESSH)

Performance for 2021-22 highlights that 89.06% of the Council's housing stock currently meets ESSH standards, highlighting the Council's inability to deliver ESSH by the original deadline of December 2020.

The improvement actions identified for delivery in 2022-23 are to:

- Frequently monitor and update the MRI Asset system (formerly Promaster)

- Conduct additional property surveys and additional Energy Performance Certificates (EPCs).
- Continue to ensure that staff are dedicated to work to address non-access issues supported by area staff with localised knowledge.
- Increase the volume of heating upgrades to improve the EESSH compliance rate.
- Target the capital investment programme to maximise EESSH compliance rates.
- Progress investigation into options for achieving higher EESSH2 standards.
- Undertake costed options appraisal with support from the Energy Savings Trust modelling software to ensure most cost-effective improvements to achieve the required standards. Report will produce draft investment programme and prioritise measures which will be reported to the Council's Cabinet Committee in April 2023.
- Agree a technical solution with costed delivery model for remaining non-traditional properties requiring improvement.

Gas Safety

The Scottish Housing Regulator has previously highlighted concerns to Fife Council around its failure to carry out annual gas safety checks in 100% of homes. The Council recognises there was non-compliance in 32 cases where gas safety checks were not carried out within timescale, thus breaching a statutory duty.

In terms of preventing future failures, the improvement actions identified for delivery in 2022-23 are to:

- Maintain weekly meetings of the Gas Safety Governance Group with representation from area teams, including weekly monitoring and reporting of gas safety cases below 12 weeks.
- Continue the role of Area Teams to communicate to, and support tenants, in arranging gas safety inspections, to maintain integrated working.
- Continue working with Business Support to eliminate any system issues which prevent properties from being included in scheduled appointments.

Due to these improvement actions, there have been no non-compliance cases reported in relation to gas safety checks for the past 34 weeks.

Areas of Non-Compliance: Exacerbated by the Covid-19 pandemic

Adaptations

Performance for 2021-22 demonstrates 564 households were waiting for adaptations which has been impacted by the increase in average time to complete adaptations. During 2021-22 the average completion time was 35.98 days (an increase from 18.76 days in 2019-20). Covid-19 restrictions had an immediate and widespread impact on the ability to deliver adaptations across Fife. Health & Safety Executive and Scottish Government guidance set parameters for safe working and identified categories of work which could still go ahead. Restrictions on close working along with protecting vulnerable households had an impact on the ability to carry out necessary works. This slowed down the delivery of adaptations, creating an increase in the waiting list although the number of adaptations completed during 2021-22 returned to pre-Covid levels. Improvement actions are identified for 2022-23 to

speed up delivery, reduce the waiting list and enhance independent living. These actions are to:

- Review and increase the adaptations budget to allow the waiting list to be cleared.
- Work with Kingdom Housing Association to increase the capacity of contractors to undertake more jobs. This will improve Private Sector adaptations delivered via Kingdom Care & Repair Service and their contractors.
- Work with Building Services to increase their capacity to undertake more jobs to improve adaptation delivery in Fife Council owned properties.

Voids Turnover

Following a period of significant and sustained improvement, the direct and indirect impacts of the pandemic and wider environmental factors have had a negative impact on voids. During 2021-22 the average time taken to relet properties was 46.78 days. Prior to the pandemic, Fife was achieving top quartile performance (28.61 days in 2019-20), and this was a focus during the lockdown phases with the a cross-service partnership being awarded Housing Team of the Year at the Chartered Institute of Housing Scotland Awards.

The teams worked collaboratively to ensure all properties remained available for allocation or were directed to meet other priority needs, including an ongoing programme to re-provision temporary accommodation. A combination of factors which include revised arrangements for working in homes, labour and supplies issues and a range of housing management pressures have combined to extend the time properties are empty and negatively impact void rent loss. Performance over the last year has also been affected by a range of contextual factors:

- the need to re-provision temporary accommodation and divert a significant number of properties to meet statutory homelessness duties.
- Decommissioning the legacy Housing Management Information System and replacing this with a new CX system during 2022.
- the implementation of a revised Housing Options Frontline Structure replacing Housing Access Officer and Homelessness Officer roles.

Return to top quartile performance is an organisational priority to maximise use of the housing stock and support the HRA Business Plan. This is particularly important in a post pandemic environment where turnover is significantly reduced. Current forecasts are suggesting that around 2,000 housing opportunities have been lost between March 2020 and March 2023 due to the changing operation of the housing market and systems.

The improvement actions identified for delivery in 2022-23 are to:

- Specialise the Voids Management Team within Housing Services with a direct line of accountability to the Head of Service.
- Refocus housing allocations to reduce pressures on allocating officers and improve outcomes for priority groups.
- Harmonise the change of tenancy process for mainstream and temporary tenancies linked to the Rapid Rehousing Transition Plan.

- Further develop the new CX Housing Management Information System to improve workflows, performance reporting and accountability within the change of tenancy process.
- Review the Letting Standard with a revised focus on customer engagement and programmed post-let works.

Future Risks

The Committee also considered future risk areas for 2022-23 and the improvement actions put in place to mitigate these.

Cost-of-living crisis

The cost-of-living crisis including the energy price cap pose a risk to homelessness levels, rent collection and gross rent arrears in Fife. With inflation currently sitting at 10.1% and a UK recession forecasted for later this year, actions have been identified to mitigate the impact of the cost-of-living crisis:

The improvement actions identified for delivery in 2022-23 are to:

- Provide £1.5million support to tenants struggling to manage their Universal Credit claims and tenants significantly impacted by the cost-of-living crisis.
- Provide £500,000 to support tenants in fuel poverty
- Increase the number of people receiving income maximisation advice and continue to offer a range of financial assistance as poverty interventions.

Housing Revenue Account & Future Financial Viability

In line with the current Cost of Living Crisis and hardship felt by many of our council tenants, the Council will be sensitive to the level of rent increases rents over the next year. At a time of high CPI inflation and other inflationary pressures on housing workstreams, the financial viability of the HRA, expressed through the 30-year HRA Business Plan will be put under increased risk.

The Scottish Government announced in the Programme for Government that they would bring forward emergency legislation, effective from 6th September to freeze rents in the social rented sector. The rent freeze, or a rent cap could be considered by Scottish Ministers for 2023/24. This would further increase risk to the HRA Business Plan potentially restricting the Council's borrowing to fund the new build programme and stock improvement to meet SHQS and EESSH. Mitigating actions would need to be considered by the Council to ensure that the viability of the HRA was secured for future years.

Staff recruitment and vacancy levels

The current difficulty of recruiting and retaining staff by Fife Council and partner services pose a risk to the delivery of all services and performance across Housing.

The improvement actions identified for delivery in 2022-23 are to:

- Ensure essential services are delivered by regularly reviewing staff and vacancies, and redeploying staff on a short-term basis to assist with pressures where necessary.

- Closely monitoring staff absence and offer support where possible to reduce absence levels across the service.
- Work closely with partner services to understand workforce capacity and implement integrated working where possible.

Equalities / Human Rights

Fife Council recognises that it has responsibilities under the Equality Act 2010 and the Human Rights Act 1998. It is committed to promoting equality, addressing discrimination and providing housing as a human right. Examples of how we achieve this are through:

- Promoting customer and tenant participation in decision making working collaboratively with our Tenant and Resident Associations and Tenant Forum, achieving Gold Accreditation by the Tenant Participation Advisory Service (TPAS) for excellence in tenant participation.
- Collecting equalities data on our staff, tenants, service users and being clear on how we use that data.
- Completing equality impact assessments for all new strategies, policies and programmes prior to approval through Committee.
- Providing accessible information on performance through our website, dedicated publications, and the tenant magazine, Down Your Street.
- Understanding the needs of tenants and service users through housing need and demand assessments, customer surveys, workshops, etc.
- Safeguarding people with protected characteristics – through the provision of gypsy travellers' sites, temporary accommodation, older persons housing and refuge provision.
- Providing housing as a human right through our work in the resettlement schemes.
- Eliminating discrimination and promoting diversity through an extensive staff training programme, including equality and diversity, equality in recruitment, mental health, gender equality, etc.

Addendum

It is noted that the Housing Service is currently reporting a small number of breaches of statutory duty on a weekly basis to provide temporary accommodation. This has occurred during the period of late Summer 2022 to present. This has been escalated to the Scottish Housing Regulator and engagement is ongoing. A weekly Incident Management Meeting has been implemented 6 weeks ago, and Council governance arrangements are being followed. Actions are in progress to mitigate the breaches with the last reporting week confirming that the council was no longer in breach of the duty. This will continue to be closely monitored by the Head of Housing in association with the Executive Director (Communities).

People & Communities Scrutiny Committee Date: 27th October 2022

Councillor Judy Hamilton
Spokesperson Housing and Building Services

Councillor Eugene Clarke
Convenor People & Communities Scrutiny Committee

Date: 28 October 2022

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