



## Moray Council Housing and Property Service Assurance Statement

We comply with the regulatory requirements set out in Section 3 of the Scottish Housing Regulator's Regulatory Framework, apart from the areas set out below.

We achieve all but the following outcomes and standards in the Scottish Social Housing Charter:

### QUALITY OF HOUSING

The Moray Council's annual performance presents an account of our housing service delivery, reflecting both steady performance in key areas and challenges that are being proactively addressed, such as Scottish Housing Quality Standard (SHQS) and Energy Efficiency Standard for Social Housing (EESH).

We embarked on an ambitious improvement plan in 2024, and whilst we have not currently achieved our target of 90% compliance, we are set to achieve this within the next reporting period. Substantial investment in improving compliance was made as part of our Improvement Plan and real strides have been made.

### SHQS Compliance

Of the 6,410 Moray Council residential properties, 2,799 fully complied (43.67%) with the SHQS, almost doubling our compliance compared to last year (22.6%). The main areas of noncompliance were:

- Electrical Safety
- Energy Efficiency

The primary area of non-compliance relates to electrical safety, with 4,249 properties (66.29%) currently meeting the required standard. Energy efficiency also remains a notable challenge, with 4,468 out of 6,410 properties (69.70%) achieving compliance with the EESH2 standard. It is important to note that dual non-compliance, where properties fail to meet both electrical safety and energy efficiency standards, is relatively uncommon.

### Energy Efficiency

The 2025/26 Housing Investment Plan includes £16.7M to support SHQS and EESH improvements. As of 31 March 2025, the Accelerated Capital Programme has delivered 245 heating upgrades (including 57 air source heat pumps), 82 solar panel installations, 203 kitchen replacements, 204 bathrooms replacements, and over 600 insulation measures.

### Damp and Mould

The Moray Council Housing and Community Safety Committee has acknowledged the increase in dampness and mould within council housing and is actively implementing a range of mitigation measures. These include the installation of external and internal wall insulation, enhanced ventilation systems, and environmental monitoring devices. Remedial works are ongoing, with future interventions prioritised for properties identified as being at higher risk.

Continuous improvements delivered through the Accelerated Capital Improvement Programme

aim to ensure compliance with SHQS, ultimately enhancing living conditions for tenants and mitigate causes of damp and mould.

## **Tenant and Resident Safety**

### **Electrical Safety**

By 31 March 2025, a total of 5,623 Electrical Installation Condition Report (EICR) inspections had been completed. Of these, 4,223 properties were found to be in (or brought to) compliance. The remaining 1,400 inspections that identified C2 faults, have been scheduled for remedial work. All C1 faults (classified as the most critical) were addressed immediately, and no identified unresolved C1 issues remain.

### **Landlord Gas Safety**

A property acquired to support homelessness prevention was found to lack a valid gas safety certificate at the time of purchase. A full inspection confirmed the property's compliance shortly after, but due to incomplete documentation, we have recorded it as a failure. We've since strengthened our procedures to ensure this does not happen again.

### **Fire and Carbon Monoxide Detection**

As of 31 March 2025, all our properties meet the updated Fire Safety Regulations. Over the past year, we completed the final phase of fire detection system upgrades. This was achieved through strong teamwork between housing, asset and DLO staff, which helped us reach residents who were harder to contact. In a few cases, formal forced entry procedures were followed to ensure the work could be carried out safely and in line with regulations.

All homes that required them are fitted with carbon monoxide (CO) detectors and comply with the Housing (Scotland) Act 1987 (Tolerable Standard) (Extension of Criteria) Amendment Order 2021.

### **Lift Safety**

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

### **Asbestos**

We maintain a comprehensive and up-to-date asbestos register and ensure that a full risk assessment is conducted prior to the commencement of any work within our properties. Significant progress has been made in phasing out the use of cloned asbestos surveys, with full, property-specific surveys now available across our housing stock.

As part of our ongoing commitment to health and safety compliance, we have begun the implementation of a dedicated asbestos module within the NEC Housing System. This system once fully implemented will provide staff with secure electronic access to detailed information on Asbestos Containing Materials (ACMs) within each property, supporting informed decisionmaking and safe working practices.

### **Water Safety**

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

## **Health and Safety Executive Reportable Events**

Unfortunately, there was a single notifiable event reported to the Health and Safety Executive (HSE) under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR). A member of staff sustained an injury.

## **Housing and Homelessness**

The total number of homeless households to whom the local authority has a statutory duty to secure permanent accommodation decreased from last year, with a reduction of 12.2%.

## **Unsuitable Accommodation Order**

During 2024/25 there were 34 households breaching the Unsuitable Accommodations Order. This was a direct result of two periods where supply was insufficient to meet demand and resulted in extended stays in Bed and Breakfast accommodation. This was further exacerbated by the lack of new supply of council housing.

## **Temporary Accommodation Standards Framework**

The service is broadly compliant with the new guidance and framework, with the exception of digital inclusion. Currently, our temporary accommodation units are not equipped with free internet access. Nevertheless, tenants are supported through free access to internet services provided at Moray Council information hubs, libraries, and the main reception, helping to reduce barriers to digital connectivity.

## **Equality and Human Rights**

We are continuing to work towards aligning with the equalities guidance published by the Scottish Federation of Housing Associations (SFHA) in 2023. While some system changes have not yet been fully implemented due to differing definitions of certain protected characteristics—which may impact the Scottish Government’s homelessness data collection—we remain committed to progress. The Government has advised that a review of these definitions is not expected before 2025.

Integrated Impact Assessments are carried out as part of the development process for all new policies and strategies. This structured approach helps us to assess potential impacts, monitor relevant protected characteristics, and ensure our work supports positive outcomes. It also helps us to minimise any unintended effects and maintain alignment with our Local Outcome Improvement Plan, Corporate Plan, and associated Equality Outcomes.

## **Gypsy/Travellers**

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

We approved our Assurance Statement on 9 September 2025 and sign this statement on behalf of the Housing and Community Safety Committee.

**Councillor Amber Dunbar**

Chair of Housing and Community Safety

**Councillor Paul McBain**

Depute Chair of Housing and Community Safety