
Report to: Clackmannanshire Council

Date of Meeting: 1 October 2026

Subject: The Scottish Housing Regulator Annual Assurance Statement

Report by: Director, Place & Economy

1.0 Purpose

- 1.1. This report references the 2019 changes to the regulatory framework for social housing in Scotland and asks members to approve the submission of Clackmannanshire Council's Annual Assurance Statement (AAS) to the Scottish Housing Regulator (SHR) due to be submitted by 31st October 2026.

2.0 Recommendations

- 2.1. It is recommended that Council:
- 2.2. Approve the 2026 submission of the AAS (attached as Appendix 1) to the Scottish Housing Regulator (SHR).
- 2.3. Note that Westhaugh has been removed from the AAS as the service no longer considered this an area of material non-compliance.
- 2.4. Note the service are reviewing emergency repairs arrangements (outlined in section 3.29).
- 2.5. Note that one area of service delivery is highlighted as being materially non-compliant with regulatory requirements (outlined in section 4.1).
- 2.6. Note the improvement actions outlined to redress the area of material non compliance (outlined within the AAS attached as Appendix 1).
- 2.7. Note one area of service delivery highlighted as being non-materially non-compliant with regulatory requirements (outlined in section 4.8).

- 2.8. Note the improvement actions outlined to redress this issue of non-material non compliance (outlined in sections 4.9).

3.0 Background

- 3.1. As required by section 31 of the Housing (Scotland) Act 2010, the Scottish Ministers set the standards and outcomes that all social landlords should aim to achieve when performing their housing activities.
- 3.2. The Charter was approved by resolution of the Scottish Parliament in 2012, taking effect from 1 April 2012. Reporting on performance against the Charter is undertaken via the Annual Return of Charter (ARC), which all social landlords are required to return annually by 31st May.
- 3.3. Following consultation a revised Regulatory Framework was introduced in February 2019 detailing revised regulatory requirements for social landlords in Scotland:
- New requirements for collection and publishing of data,
 - New requirement for social landlords to submit annually an AAS to the SHR to provide assurance that social landlords are meeting the standards and outcomes set out within the Scottish Social Housing Charter,
 - How forward engagement by the SHR with landlords will take place.
- 3.4. Further to this, and following an extensive consultation with stakeholders, the SHR implemented a revised regulatory framework from 1st April 2024. The SHR's statutory objective remains to safeguard and promote the interests of current and future tenants, people who are homeless, factored owners and Gypsy/Travellers.
- 3.5. Although the Regulator has retained much of the previous framework some notable changes include for:
- An increased focus on ensuring landlords are compliant with their obligations in relation to tenant and resident safety.
 - A strengthened emphasis on social landlords listening to tenants and service users.
 - A new provision to allow landlords to provide explicit assurance in the AAS on a specific issue or issues.
- 3.6. The Annual Assurance Statement
- 3.7. The AAS requires that all social landlords in Scotland provide assurance to the regulator that they comply with the relevant regulatory standards and legal

requirements, and are able to provide evidence in support of this. Areas of non-compliance are required to be stated, these termed as “material non-compliances”.

- 3.8. The Assurance Statement provides only a short overview of compliance levels with the greater detail contained within supplementary evidence held elsewhere by each landlord.
- 3.9. The supplementary evidence provides assurance that the Council has in place robust mechanisms to ensure that appropriate levels of governance and monitoring of relevant service provision takes place against the statutory and regulatory standards.
- 3.10. Supplementary evidence has been gathered through interrogation of both local and corporate arrangements currently in place to ensure effective service delivery. It is a key requirement by the SHR that assurance be reviewed by each landlord throughout the year, for Clackmannanshire Council the Housing Business Management Team holds regular monthly and quarterly meetings to assess performance and review levels of assurance.
- 3.11. In addition, the Service continue to deliver a scheduled programme of monthly Housing Performance Meetings, these sessions are aimed at facilitating discussion over key housing issues across a variety of areas of service delivery and provide opportunity for those in attendance to directly engage with officers delivering frontline housing services.
- 3.12. Invitation to attend is open to all elected members and the Clackmannanshire Tenants and Residents Federation (CTRF) and the service are actively considering the potential to broaden the scope of the audience invited, with potential for other tenant and resident groups to attend.
- 3.13. The next scheduled Housing Performance Meeting is on 15th September with Scotland's Housing Network (SHN) due to present a review of our 2025/26 housing service performance benchmarked against other local authorities and registered social landlords. The forward plan for upcoming Housing Performance Meetings is attached as Appendix 2.
- 3.14. Clackmannanshire Council's AAS for 2026 is attached as Appendix 1.
- 3.15. SHR guidance states that the AAS should be submitted to full Council for approval or alternatively to another committee who has the delegated authority as stated in standing orders to approve the statement. As members will be

aware no other committee currently has the delegated authority from Council as stated in the standing orders, to approve the statement.

- 3.16. The Housing Spokesperson (Place & Economy) is required to sign off on the AAS as being a true and accurate reflection of assurance within the housing service.

Westhaugh Travelling Persons Site

- 3.17. As noted within the AAS 2025, Clackmannanshire Council were non-compliant in relation to its responsibility to provide and manage an effective Gypsy/Traveller Site. This related to the significant delays experienced in the redevelopment of the site.
- 3.18. The redevelopment project has now been completed and all residents who were decanted to facilitate the construction works have successfully returned to the site. This includes those residents who were allocated a pitch in accordance with the approved Westhaugh Allocations Policy.
- 3.19. In light of the completion of the redevelopment project and reoccupation of the site, this matter has now been removed from the AAS and is no longer considered an area of material non-compliance.

Tenant Survey

- 3.20. The Housing Service undertakes a tenant satisfaction survey every three years to understand tenants' views on the services provided and to help inform future service improvements. The most recent survey was carried out by independent research company Research Resource between 14th April and 13th May 2026. A total of 900 interviews were completed
- 3.21. The survey results demonstrate continued high levels of tenant satisfaction with the Housing Service. Overall satisfaction remains very strong at 93%, unchanged from the previous survey in 2023.
- 3.22. Tenants also reported high levels of satisfaction with the quality of their homes and the repairs service. Satisfaction with the overall quality of homes remains at 92%, while satisfaction with the repairs service has increased from 92% in 2023 to 94% in 2026. These results suggest that investment in housing stock and ongoing improvements to repairs delivery continue to be recognised by tenants.
- 3.23. Views on value for money remain positive, although there has been some reduction since the previous survey. Overall, 88% of tenants considered their

rent to represent good value for money, compared with 95% in 2023. Affordability remains strong, with 84% of tenants describing their rent as either very affordable or fairly affordable, and a further 15% stating it was just about affordable. This suggests that while affordability pressures are being felt more widely, most tenants continue to regard council housing rents as affordable.

- 3.24. The survey also identified tenants' priorities for future service delivery and investment. The most frequently identified priorities were repairs and maintenance (62%), improvements to existing housing stock (44%) and keeping tenants informed (36%). When asked what would most improve their experience as tenants, respondents highlighted improvements and upgrades to their homes, reducing rent levels, improvements to communal and external areas, enhancements to the repairs service and greater energy efficiency. These findings will help shape future service planning and investment decisions.

New Housing IT System Update

- 3.25. As a reminder to Council, the new NEC housing system is being delivered in two stages. The first stage focuses on implementing the core NEC Housing Management System. This will establish a modern, cloud-hosted housing management solution supporting key operational functions including estates management, rents, allocations, housing advice, service charges and customer services, together with the migration of housing data and integration with key corporate systems. The second stage will build on this foundation by introducing enhanced digital services and business intelligence capabilities, including a tenant self-service portal, online customer transactions, performance dashboards and advanced reporting and analytics functionality.
- 3.26. Following a review of programme progress, a decision has been taken to revise the planned go-live date for the first stage of the programme to November 2026. Good progress continues to be made across the project, the Housing Service is currently undertaking a comprehensive review of the housing waiting list to ensure that data migrated into the new system is accurate, up to date and aligned with future operational processes. The revised timescale will ensure that critical testing, assurance activities and data validation can be completed prior to implementation, reducing risk and supporting a successful transition to the new system.
- 3.27. The Council's priority remains the implementation of a robust, reliable and fully tested system that delivers the intended business benefits without causing disruption to tenants, housing applicants or service delivery. The additional time will provide greater confidence in the integrity of migrated data, the

effectiveness of new processes and the readiness of staff and systems for go-live in November 2026.

- 3.28. Progress on the property system project has been limited with the implementation work currently paused while contractual arrangements are being reviewed. Activity is focused on concluding the existing contract and assessing available options for future provision.

Emergency Repairs

- 3.29. In response to ongoing financial and service delivery pressures, the Housing Service is going to undertake a review of its emergency repairs arrangements, including consideration of whether certain repair categories should continue to be attended outwith normal working hours where there is no immediate risk to health, safety, property security or asset integrity. Consideration will be given to seasonal repairs, such as loss of heating or hot water during warmer months, while ensuring appropriate protections remain in place for vulnerable households. Tenant consultation will be undertaken as part of the review, and any proposed changes to service standards will be brought back to Members for consideration before implementation.

RAAC

- 3.30. In relation to the ongoing monitoring of the seven occupied RAAC blocks, two blocks were identified in February 2025 as requiring further investigative and repair works. The recommended works, as outlined by the structural engineer, were subsequently completed. Follow-up surveys undertaken in June 2025 confirmed that no new cracking had occurred. The remaining five occupied blocks are scheduled to be surveyed within the coming weeks as part of the ongoing monitoring programme.
- 3.31. The Council is currently progressing with the purchase for the remaining High Street property. It is anticipated that McConnells will be on site mid September to begin remedial works to this block. Discussions continue with the other remaining owners in relation to the potential purchase of their properties.

4.0 Considerations

- 4.1. This year's Assurance Statement notes that Clackmannanshire Council achieves all but the following standards and outcomes in the Scottish Social Housing Charter for tenants:

Type of Material Non-Compliance	Area of Material Non – Compliance	Reason for Material Non-Compliance
Legislative	Homelessness	Breach of the Homeless Persons (Unsuitable Accommodation) Order (Scotland) due to use of temporary accommodation out with the local authority area (for more than 7 days).

- 4.2. The above noted areas of service delivery are contained within the AAS (Appendix 1) and will be reported to the Scottish Housing Regulator as items of material non-compliance.
- 4.3. The major incident in Coalsnaughton has placed additional pressure on the Housing Service, requiring the use of both temporary accommodation and mainstream housing stock to support displaced households and meet immediate housing needs. This has impacted the Service's ability to respond to wider housing pressures. The Council continues to work closely with partner agencies to mitigate these impacts while ensuring affected residents receive appropriate support and accommodation throughout the recovery period.
- 4.4. Areas of non-compliance must be reported. Where assurance is provided to the SHR that effective plans and the capacity and willingness to improve or resolve the issue are in place then the SHR will ask to be kept up to date on progress within the improvement area.
- 4.5. In these circumstances the SHR will not engage with the landlord unless the issue presents such a significant risk to the interests of tenants and service users that they need to monitor it closely, or take action, to ensure it is resolved successfully.
- 4.6. A forward plan of improvement actions has been developed and is being implemented to address the under performance within the areas noted in the above table. These actions are outlined within the Assurance Statement.
- 4.7. The Housing Service has commenced the development of the Clackmannanshire Local Housing Strategy, which will provide the strategic

direction for housing provision across the area over the coming years. The Strategy will identify current and emerging housing needs, establish key priorities for local communities, and set out clear and deliverable actions to improve housing outcomes, which also includes establishing strategic priorities for the prevention and alleviation of homelessness.

- 4.8. Areas of non-material non-compliance are not required to be highlighted within the Assurance Statement but are noted here and relate to a number of domestic Energy Performance Certificates (EPCs) having expired and requiring renewal. Following a programme of EPC renewals, the Council's reported compliance with the Scottish Housing Quality Standard (SHQS) has increased from 84.65% in 2024/25 to 86.96% in 2025/26.
- 4.9. During the current financial year, 284 Energy Performance Certificates (EPCs) have been completed. Of these, 76 have resulted in a positive outcome, either by identifying properties that had previously failed to meet the required standard or where an EPC had not been completed. There are currently 304 EPCs outstanding, work is ongoing to address these, with a programme of assessments continuing throughout the year to ensure that all properties hold a valid EPC and that opportunities to improve the energy efficiency of the housing stock are identified and progressed.
- 4.10. As part of the annual submission of the Annual Return on the Charter to the Scottish Housing Regulator, Clackmannanshire Council reported higher-than-average timescales for the resolution of damp and mould repairs compared with other social landlords across Scotland. To address these concerns and strengthen the management of damp and mould cases across Housing and Property Services, a dedicated Damp and Mould Working Group has been established.
- 4.11. The group meets monthly to review ongoing cases, monitor end-to-end resolution timescales, and identify areas of concern and operational challenges. It also provides a forum for discussing reporting requirements, sharing learning, and considering legislative changes and statutory guidance, supporting a coordinated approach to improving outcomes for tenants affected by damp and mould.
- 4.12. The service will keep the SHR updated on progress in recovery of our SHQS position and on progress in addressing the areas of non-compliance highlighted.
- 4.13. Updates to the SHR will be provided on both an ad-hoc and planned basis, planned meetings are taking place as part of the SHR's formal Engagement Plan for Clackmannanshire Council (attached as Appendix 3. Meetings have

been held this year in June and September, with further engagement sessions scheduled for December and March.

- 4.14. The Engagement Plan highlights the SHRs intention to analyse the council's delivery of services related to people who are homeless, our services to Gypsy/Travellers and our stock quality, this includes for engagement on our asset management plans relating to properties where Reinforced Autoclaved Aerated Concrete (RAAC) was identified.
- 4.15. Although no formal feedback has been received from the meetings held to date, the service believes the sessions to have been open, transparent and positive.
- 4.16. We will continue to work with the SHR to engage and provide the required information on our homeless service, services to Gypsy/Travellers and stock quality/RAAC.

5.0 Sustainability Implications

- 5.1. The information contained within the Assurance Statement and its supporting evidence demonstrates that housing priorities contribute positively to sustainability.

6.0 Resource Implications

6.1. *Financial Details*

- 6.2. Finance have been consulted – there are no financial implications arising directly from this report.

6.3. *Staffing*

There are no direct impacts to staff arising from this report.

7.0 Exempt Reports

Is this report exempt?

Yes ☐ (please detail the reasons for exemption below) No ☒

8.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

- (1) **Our Priorities** (Please click on the check box ☒)

Clackmannanshire will be attractive to businesses and people and ensure fair opportunities for all

☒ Our families, children and young people will have the best possible start in life

☒ Women and girls will be confident and aspirational, and achieve their full potential

☒ Our communities will be resilient and empowered so that they can thrive and flourish ☒

(2) Council Policies

Complies with relevant Council Policies Yes ☒

9.0 Equalities Impact

9.1. Have you undertaken the required equalities impact assessment to ensure that no groups are adversely affected by the recommendations?

Yes ☒

No ☐

10.0 Legality

It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes ☒

11.0 Appendices

Appendix 1 Annual Assurance Statement to the Scottish Housing Regulator 2026.

Appendix 2 – Housing Performance Meeting Schedule 2027

Appendix 3 – SHR Engagement Plan 2026/27 for Clackmannanshire Council

[Engagement plan from 1 April 2026 to 31 March 2027 | Scottish Housing Regulator](#)

12.0 Background Papers

12.1. Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered).

Yes ☐

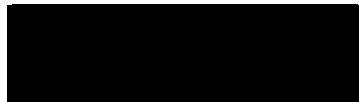
No ☒

(please list the documents below)

Author(s)

NAME	DESIGNATION	TEL NO / EXTENSION
Katie Roddie	Team Leader – Business Improvement	2688

Approved by

NAME	DESIGNATION	SIGNATURE
Kevin Wells	Director – Place & Economy	

Clackmannanshire Council Annual Assurance Statement 2026 to the Scottish Housing Regulator

Clackmannanshire Council complies with all relevant regulatory requirements set out in Chapter 3 of the Regulatory Framework.

We meet all but the below noted relevant standards and outcomes in the Scottish Social Housing Charter for tenants, people who are homeless and others who use our services:

Legislative Duties - Homelessness

Legislative duties associated with housing and homelessness services, equality and human rights, and tenant and resident safety.

Have assurance and evidence that the Council is meeting all its legal obligations associated with housing and homelessness services.

We do not materially comply with meeting our legal obligations in Homelessness due to our non compliance with the Scottish Governments Homeless Persons (Unsuitable Accommodation) (Scotland) Order. This is due to our current need for use of temporary accommodation located out with our Local Authority area (for greater than seven days).

The below noted actions are planned to be undertaken in order to help us move toward achieving adequate levels of accommodation provision within the Local Authority area and the meeting of the Homeless Persons (Unsuitable Accommodation) (Scotland) Order:

1. The Service continues to actively purchase properties from the open market. The service will continue to monitor the local housing market for properties which may boost our own stock of suitable accommodation.
2. The Service will continue to utilise temporary accommodation properties owned by our RSL partners to increase suitable accommodation within Clackmannanshire.
3. Complete detailed feasibility assessments of identified Council-owned properties to determine their suitability for conversion to temporary accommodation, with recommendations presented to elected members for consideration.
4. The Service continue to review new housing supply activity against the programme outlined within our Strategic Housing Investment Plan, this to ensure best delivery of the plan with aim of increasing the amount of homes available for social rent within Clackmannanshire. To ensure progress and project delivery recruitment of a Development Officer is to be progressed.

5. Advance the development of a specialist supported homeless accommodation project (approved to move to next stage from Council in June 2026), delivering an additional 12 units to increase local housing options and reduce reliance on out-of-area placements.

Tenant and Resident Safety Requirements

Clackmannanshire Council have identified Reinforced Autoclaved Aerated Concrete (RAAC) to be present within our housing stock. The Service have taken action to manage the situation and ensure the safety of tenants and residents whose homes are affected. We will continue to provide regular update to the Scottish Housing Regulator as required throughout the ongoing management of this issue.

Following the major incident caused by ground movement in Coalsnaughton, Clackmannanshire Council worked closely with partner agencies to support affected tenants and residents to ensure public safety. The Council has taken appropriate action in response to the evacuation of affected properties and continues to work with the Mining Remediation Authority and other partners to support tenants and residents. We will continue to provide regular updates to the Scottish Housing Regulator, as required, throughout the recovery process.

The service have considered our compliance with relevant obligations toward tenant and resident safety requirements and confirm sufficient process to be in place to ensure compliance to requirements within the below noted areas -

- Gas safety
- Electrical safety
- Water safety
- Fire safety
- Asbestos
- Damp and Mould

The Scottish Housing Regulator Engagement Plan - 2026/27

The Scottish Housing Regulator Engagement Plan for Clackmannanshire Council (2026/27) highlights an intention to analyse the council's delivery of services related to people who are homeless, our Gypsy/Travellers site and stock quality, this includes for engagement on our asset management plans relating to properties where Reinforced Autoclaved Aerated Concrete (RAAC) was identified.

There are four planned engagement meetings scheduled during 2026/27.

We will continue to work with the SHR to engage and provide the required information on our homeless service, the Gypsy/Travellers site and stock quality/RAAC.

In determining our level of assurance we have considered appropriate evidence against each of the requirements as set out by the Scottish Housing Regulator and we will continue to review assurance throughout the course of the year.

The Annual Assurance Statement 2026 to the Scottish Housing Regulator was presented and approved at Council on Thursday 1st October 2026.

Signed

Housing Spokesperson (Place & Economy):

Date:

Signed

Head of Service:

Date:

Signed

Strategic Director (Place & Economy):

Date:

Appendix 2 Housing Performance Meeting Schedule

Date	Topic
January 2027	Capital Programme & Stock Condition Survey Update
February 2027	Q3 Performance Update
March 2027	Repairs, Voids & Damp/Mould Update
April 2027	SHIP/LHS
May 2027	Tenancy Participation
September 2027	SHN PAV
October 2027	Q2 Performance Update
November 2027	Homelessness

Please note that a brief update on SHIP progress will be provided at each meeting.

**Scottish Housing Regulator (SHR) Engagement Plan for Clackmannanshire Council
(1 April 2026 - 31 March 2027)**

The Scottish Housing Regulator (SHR) is engaging with Clackmannanshire Council to seek assurance and monitor performance in three key areas:

- Homelessness services
- Gypsy/Traveller site provision
- Stock quality, specifically homes affected by Reinforced Autoclaved Aerated Concrete (RAAC)

Clackmannanshire Council is required to:

- Provide the information requested by the SHR in relation to homelessness services.
- Continue to use best efforts to meet its statutory duty to provide temporary accommodation and comply with the Unsuitable Accommodation Order.
- Keep the SHR updated on its capacity to meet temporary accommodation duties and compliance with the Unsuitable Accommodation Order.
- Notify the SHR of any further delays in the completion of the new Gypsy/Traveller site.
- Continue to engage with residents regarding progress on the new Gypsy/Traveller site.
- Provide the SHR with its long-term strategy for managing RAAC in affected homes and engage further as required.
- Submit annual regulatory returns, including:
 - Annual Assurance Statement; and
 - Annual Return on the Charter.
- Notify the SHR of any material changes to the Annual Assurance Statement and any tenant or resident safety matters reported to, or investigated by, the Health and Safety Executive or other regulatory bodies.

The SHR will:

- Review information provided by the Council regarding homelessness services and engage as necessary.
- Meet quarterly with the Council to discuss homelessness services, particularly the provision of suitable temporary accommodation.
- Monitor the Council's progress in delivering the new Gypsy/Traveller site and consider further regulatory engagement if additional delays occur.
- Review information on the Council's long-term strategy for managing RAAC-affected homes and engage as required.
- Update the published engagement plan should any material changes arise in relation to its planned engagement with the Council.



Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title: Annual Assurance Statement 2026 to the Scottish Housing Regulator

Name of your decision, activity, policy, strategy or proposal. Referred to throughout as 'proposal' in this document.

Key findings from this assessment (or reason why an EFSIA is not required):

The assessment identified that the Annual Assurance Statement (AAS) is evidential and assurance-based in nature and does not introduce new policies, proposals, service changes, or operational decisions. Its purpose is to provide assurance to the Scottish Housing Regulator that Clackmannanshire Council's Housing Service complies with the SHR Regulatory Framework and to enable scrutiny and approval by the Audit and Scrutiny Committee.

As the proposal does not directly affect individuals or groups, including those with protected characteristics, no evidence of differential impact, inequality, or socio-economic disadvantage has been identified. A full Equality and Fairer Scotland Impact Assessment is therefore not required.

Summary of actions taken because of this assessment:

No specific actions have been required as a result of this assessment, as no direct equality or socio-economic impacts have been identified. The assessment has confirmed that the proposal is limited to reporting, assurance, governance, and scrutiny activities and does not introduce changes to policy or service delivery.

Ongoing actions beyond implementation of the proposal include:

The EFSIA will be reviewed annually alongside the preparation and submission of the AAS and the associated report to the Audit and Scrutiny Committee.

Any future policy developments, service changes, improvement programmes, or operational activities arising from actions identified within the are subject to separate equality impact assessment processes, where appropriate, to ensure any potential impacts on equality groups or those experiencing socio-economic disadvantage are identified and addressed

Lead person(s) for this assessment: Monika Bicev

Senior officer approval of assessment: Katie Roddie

DATE:11/08/2026

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: ['NAME']. Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

The purpose of this proposal is to present Clackmannanshire Council Housing Service's Annual Assurance Statement (AAS) to the Audit and Scrutiny Committee for review, scrutiny and approval.

The AAS is submitted annually to the Scottish Housing Regulator (SHR) and provides assurance that the Council's Housing Service, in its role as a social landlord, is compliant with the SHR's Regulatory Framework. The statement considers all housing and homelessness functions delivered by the Housing Service and assesses the extent to which these services and associated activities comply with the relevant regulatory requirements and standards.

The report and accompanying AAS enable the Audit and Scrutiny Committee to review the Housing Service's self-assessment of compliance, consider areas of material compliance or non-compliance, scrutinise identified risks and improvement actions, and determine whether the AAS should be approved for submission to the SHR.

This supports effective governance, transparency and accountability by providing elected members with the opportunity to review performance and the delivery of the landlord services to tenants and service users, as well as challenge areas of concern.

2. Why is the proposal required?

The proposal is required to fulfil the Council's governance and reporting obligations in relation to its role as a social landlord.

The Scottish Housing Regulator is responsible for overseeing and monitoring the performance of social landlords across Scotland. As part of this regulatory framework, the Housing Service is required to submit an Annual Assurance Statement each year. The statement confirms the extent to which the Housing Service complies with the requirements of the Regulatory Framework, relevant statutory duties, and the outcomes and standards of the Scottish Social Housing Charter.

Where areas of non-compliance, risks or weaknesses have been identified, the AAS also outlines the actions being taken to address these matters and improve compliance.

Reporting the AAS to the Audit and Scrutiny Committee provides an opportunity for elected members to review the Housing Service's assessment of compliance, scrutinise areas of risk and improvement activity, and ensure appropriate oversight of housing and homelessness service delivery.

3. Who is affected by the proposal?

No specific individual or group is directly affected by this proposal.

The AAS is evidential in nature and provides information on the Housing Service's performance, regulatory compliance, identified risks, and planned improvement actions. It is intended to demonstrate assurance to the SHR and support governance and scrutiny arrangements within the Council.

While the statement relates to services delivered to tenants, homeless households and other service users within the remit of housing and homelessness services, it does not in itself introduce new policies, alter service provision, or implement operational changes. As such, no direct impacts on individuals or groups have been identified.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

There are no Council policies or activities directly related to this proposal.

The AAS is an evidential and reporting document which provides assurance regarding the Housing Service's compliance with the SHR's Regulatory Framework and the standards set out in the Scottish Social Housing Charter.

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

The proposal does not constitute a strategic decision. The AAS does not set strategic priorities, determine future service delivery models, allocate resources, or establish new policies. Rather, it is an evidential and assurance document that presents the Housing Service's assessment of compliance with the SHR Regulatory Framework and outlines any associated risks and improvement actions.

Its primary purpose is to provide assurance, support transparency, and enable effective governance and scrutiny by both the Council and the SHR. As the proposal does not introduce or implement strategic change, it does not have direct implications for socio-economic disadvantage and does not require further assessment under the Fairer Scotland Duty.

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- help you to understand the importance of your proposal for those from equality groups,
- inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and
- provide justification for the outcome, including where it is agreed an EFSIA is not required.

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such, no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.
Disability	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such, no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.
Race	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such, no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.
Sex	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such, no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Gender Reassignment	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such, no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.
Sexual orientation	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such, no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.
Religion or Belief	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such, no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.
Pregnancy or maternity	N/A	Not applicable to this proposal. The Annual Assurance Statement is evidential in nature and provides assurance to the Scottish Housing Regulator on the Housing Service's compliance with the Regulatory Framework, including any identified areas of material non-compliance and associated improvement actions. The proposal does not introduce new policies, service changes, or operational decisions that would directly affect individuals or groups with protected characteristics. As such,

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		no specific evidence of inequality, differential impact, or disadvantage arising from this proposal has been identified.
Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)		Not applicable, not an employment matter.
Socio economic disadvantage (if required)		Not applicable, not a strategic decision

**7. Based on the evidence above, is there relevance to some or all of the equality groups? No
If yes or unclear, proceed to further steps and complete full EFSIA**

If no, explain why below and then proceed to Step E:

The Annual Assurance Statement is not considered relevant to any of the protected equality groups.

The AAS is evidential in nature and is intended to provide the Audit and Scrutiny Committee with assurance on the Housing Service's compliance with the Scottish Housing Regulator's Regulatory Framework. It enables members to review and scrutinise the Housing Service's assessment of compliance, consider areas of material non-compliance, identify associated risks, and review planned improvement actions prior to

The AAS does not introduce new policies, service changes, operational activities, or decisions that would directly affect individuals or groups, including those with protected characteristics. Rather, it reports on existing service delivery activities and the actions being taken to address identified areas of non-compliance and support continuous improvement.

Whilst it is recognised that improvement actions referenced within the AAS may relate to services that affect equality groups, any future policy changes, service developments, or operational proposals arising from these actions would be subject to separate consideration through the appropriate impact assessment processes. This proposal, however, does not in itself give rise to any direct equality impacts.

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

- 8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:**
- 9. Please detail the outcome of any further engagement, consultation and/or research carried out:**

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination				
potential for developing good relations				
potential to advance equality of opportunity				

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)				

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?				

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

Please select (X)	Implications for the proposal
	No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.
	Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.
	Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.
	Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

The findings of this assessment were considered and discussed during the development of the AAS and the associated report to the Council's Audit and Scrutiny Committee. This included consideration of the evidence used to support the Housing Service's assessment of compliance with the SHR's Regulatory Framework, together with any identified areas of non-compliance, risk, and improvement activity.

These discussions confirmed that the proposal is evidential and assurance-based in nature and does not introduce new policies, service changes, or operational decisions. It was therefore

concluded that the proposal does not give rise to direct impacts on individuals or groups, including those with protected characteristics, and that no further assessment is required at this stage.

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. Record any post-implementation actions required.

This EFSIA will be reviewed on an annual basis, in line with the preparation and submission of the Annual Assurance Statement to the Scottish Housing Regulator and the associated reporting to the Audit and Scrutiny Committee.

15. Note here how you intend to monitor the impact of this proposal on equality groups.

The impact of the proposal will be monitored as part of the annual submission of the AAS and the associated reporting to the Committee.

16. Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:

The AAS submission is subject to an annual review. The EFSIA will be reviewed alongside each annual submission of the AAS and the associated report the Committee.

Step G – Assessment sign off and approval

Lead person(s) for this assessment: Monika Bicev

Signed: MBicev

Date: 11/8/2026

Senior officer approval of assessment: Katie Roddie

Signed:

Date: 11/8/2026

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.