

A meeting of the Management Committee will take place on **Saturday 30 November 2019 at 9.30am at Carberry Tower, Musselburgh.**

Please advise staff if you are unable to attend.

**Joyce Bolan**  
**Secretary**

## **B U S I N E S S**

### **1.0 GENERAL**

- 1.1 Apologies
- 1.2 Declaration of Interest by Management Committee Members
- 1.3 Minutes of 26 September 2019 – **for approval**
- 1.4 Action List – for information
- 1.5 Matters Arising

### **2.0 GOVERNANCE**

- 2.1 Secretary's Report – for information
- 2.2 Management Committee Calendar 2020/21 – **for approval**
- 2.3 Key Performance Indicators 2019/20 – for information

### **3.0 PRIORITY ITEMS**

- 3.1 Review of ELHA Performance – for information

### **4.0 POLICIES**

- 4.1 Freedom of Information Policy – **for homologation**
- 4.2 Staff Appraisal Policy Review – **for approval**
- 4.3 Tenancy Management Policy Review – **for approval**
- 4.4 Tenant Participation Strategy Review – **for approval**
- 4.5 IT Systems Policy Review – **for approval**

### **5.0 BUSINESS MANAGEMENT**

No reports

### **6.0 ANY OTHER BUSINESS**

### **DATE OF NEXT MANAGEMENT COMMITTEE MEETING**

**Thursday 27 February 2020** at ELHA Head Office, Haddington, at 7.00pm

## Action List

### Report by Martin Pollhammer, Chief Executive – for information

The table below sets out the required actions agreed at the last meeting of the Management Committee on 26 September 2019, and confirms the actions taken as a result.

Minute Ref	Action Required	Action By	Action Taken
1.3	Publish the minutes on elha.com	MP	Complete
2.1	Confirm the Meeting Calendar	MP	See <b>Agenda Item 2.2</b>
2.1	Add a Tenant Scrutiny section to the outline Audit & Assurance Committee agenda	MP	Complete
2.3	The Chair to confirm additional appointments to the Audit & Assurance Committee	PE	Iain Atkinson, Peter Hayman and David Rose were appointed at the meeting. Joyce Bolan, Peter Ewart, Brian Logan and David Rose have subsequently joined the Audit & Assurance Committee:  Any final appointments should be confirmed at the Management Committee on 30 November 2019
2.3	A third member of the Remuneration Working Group to be sought	PE / AF	None identified as yet
2.4	Ensure all Code of Conduct, Eligibility for Membership and Declaration of Interest forms are returned by all Management Committee members	JT	Complete
5.1	Implement office closure on Friday 3 January 2020	MP	Complete

## Secretary's Report – for homologation

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### 1.0 Membership:

Membership cancellation [REDACTED] – member deceased.

### 2.0 Use of Seal for Homologation:

Contract for Services – Level-Up-Consulting Limited & East Lothian Housing Association

Software Support, Maintenance & Consultancy Agreement – Level-up Consulting Limited & East Lothian Housing Association

### Recommendation

The Management Committee is asked to Homologate the use of the Seal.

## Management Committee Calendar 2020/21

### Report by Martin Pollhammer, Chief Executive – for information

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Management Committee dates for 2020/21 are as follows (dates in 2020 are confirmed, dates in 2021 are provisional):

Date	Meeting Time	Venue
27 February 2020	7.00pm to 9.00pm	ELHA Conference Room
26 March 2020	7.00pm to 9.00pm	ELHA Conference Room
28 May 2020	7.00pm to 9.00pm	ELHA Conference Room
20 August 2020	7.00pm to 9.00pm	ELHA Conference Room
24 September 2020 (AGM)	2.00pm to 3.30pm	Maitlandfield Hotel, Haddington
24 September 2020	4.00pm to 6.00pm	ELHA Conference Room
28 November 2020	9.30am to 11.00am	Carberry Towers, Musselburgh
25 February 2021	7.00pm to 9.00pm	ELHA Conference Room
25 March 2021	7.00pm to 9.00pm	ELHA Conference Room
27 May 2021	7.00pm to 9.00pm	ELHA Conference Room
19 August 2021	7.00pm to 9.00pm	ELHA Conference Room
23 September 2021 (AGM)	2.00pm to 3.30pm	Maitlandfield Hotel, Haddington
23 September 2021	4.00pm to 6.00pm	ELHA Conference Room
27 November 2021	9.30am to 11.00am	Carberry Towers, Musselburgh

## Key Performance Indicators 2019/20

### Report by Martin Pollhammer, Chief Executive – for Information

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#### 1.0 Introduction

The Association's Key Performance Indicators (KPI's) for the second quarter of 2019/20 are attached as **Appendix 1** to this report.

#### 2.0 ELHA Performance

The Association has missed the following targets:

##### 2.1 Properties Allocated after 3 or more Refusals

One property was refused four times because applicants thought that Stenton was either too remote or they did not want to live in the area. Demand for the property was very high therefore giving no concern in terms of Asset Management.

##### 2.2 Gold and Platinum Key Tenants

Figures have increased slightly on the last quarter but remain under target. The initial promotion to increase the percentage of tenants upgrading to Gold or Platinum Key Tenant status has only had limited success, with revised promotions being developed for Quarters 3 and 4.

##### 2.3 Management Committee Attendance

Lower levels of attendance in Quarter 2 have impacted on the good Quarter 1 figures.

##### 2.4 Percentage of Tenants Paper free

There has been further improvement, but the figure remains below target. A promotion planned for December 2019 / January 2020 will hopefully improve this figure.

Key Performance Indicators 2019/20

Appendix 1

Performance Indicator	Quarterly Target	Q1	Q2	Q3	Q4	2019/20 Target	2018/19 Actual	Year to Date	Status
<b>Rental Income</b>									
Non-technical arrears as % of rental income	3.4%	3.01%	2.98%			3.4%	3.28%	3.01%	😊
Bad debts written off as % rental income	1.75%	0.92%	0.92%			1.75%	-0.26%	0.92%	😊
Voids as % of rental income	0.75%	0.36%	0.29%			0.75%	0.41%	0.32%	😊
<b>Finance</b>									
Interest cover (loan covenants)	110%	264%	297%			110%	251%	280%	😊
Gearing (loan covenants FRS102 definition)	<37%	25%	25%			<37%	26%	25%	😊
Current assets as a % of current liabilities	100%	128%	130%			100%	124%	130%	😊
Unit management costs	£1,663	£1,526	£1,492			£1,663	£1,545	£1,509	😊
Unit reactive maintenance costs	£667	£559	£769			£667	£793	£664	😊
<b>Asset Management</b>									
Stock condition inspections completed	cumulative	20%	0%			20%	20%	20%	😊
Gas services completed within timescale	cumulative	100%	100%			100%	100%	100%	😊
Planned maintenance contracts with >5% overspend	0	0	0			0	0	0	😊
Average length of time taken to complete emergency repairs	< 2 hours	0.63	0.65			< 2 hours	1.01	0.64	😊
Average length of time taken to complete non-emergency repairs	< 6 days	2.97	6.1			< 6 days	6.42	4.62	😊
Repairs completed right first time	85%	100%	99%			85%	95%	100%	😊
Repair appointments kept	93%	96%	99%			93%	95%	98%	😊
<b>Housing Management</b>									
Properties allocated after 3 or more refusals	0	0	1			0	0	1	😞
Number of evictions carried out	no target	0	1			no target	5	0	😞
Number of ASBO's in force against tenants	no target	1	2			no target	1	1	😞
Gold Key Tenants	35.0%	10.6%	10.6%			35%	10.5%	10.6%	😞
Platinum Key Tenants	25.0%	13.3%	14.0%			25%	11.3%	13.3%	😞
<b>Corporate</b>									
Number of accidents reportable to HSE	0	0	0			0	1	0	😊
% working days lost through long term sick leave	5%	0.4%	1.15%			5%	2.29%	0.79%	😊
% working days lost through short term sick leave	2%	1.05%	0.92%			2%	1.60%	0.98%	😊
Management Committee Attendance	75%	91%	62%			75%	71%	77%	😞
Audit & Assurance Committee Attendance	75%	92%	54%			75%	81%	68%	😞
% of Tenants using their My Home Account	75%	66%	69%			75%	65%	69%	😊
% of Tenants Paper Free	60%	47%	49%			60%	45%	49%	😞

😊 Performance Excellent    😞 Performance Satisfactory    😞 Performance Poor

## Review of ELHA Performance

### Report by Linda Ewart – for Information

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#### 1.0 Introduction

The data contained in this report is presented in the same format as in previous years. It includes year on year comparisons (mainly since 2014) based on elha's most recent tenant satisfaction results and ARC returns up until March 2019. elha's performance is compared over the period and then compared with the 'neighbours' and the 'peers' as before. Using this format means that there is a picture of elha's performance and then comparisons against the various averages. As a reminder, the neighbours are Melville, Manor Estates, Castle Rock Edinvar and East Lothian Council. The peer group is Albyn, Eildon and Fyne Homes. These groups have been used throughout the benchmarking period and so the comparisons are consistent. The following table shows the total number of units managed by each landlord<sup>1</sup>:

<b>Neighbours</b>	<b>Total Owned and Managed</b>
elha	1371
Castle Rock Edinvar (CRE)	6067
Manor Estates (MEHA)	1016
Melville	1974
<b>Peer Group</b>	
Albyn	3136
Eildon	2421
Fyne Homes	1578

#### 2.0 Tenant Satisfaction

Previous reports have noted that elha's reported performance may be affected by the timing and conduct of tenant satisfaction surveys (TSS) by the comparator landlords. To support the 2019 comparison, ARC data has been reviewed to establish the timing of all the comparator landlords' tenant satisfaction surveys. This shows that five landlords have carried out TSS since 2018, enabling the results to be considered in the context of the timing of the survey. The results from CRE, Melville, Albyn and Eildon are drawn from data collected within a similar time period to elha's; ELC and MEHA will be undertaking surveys this year and Fyne Homes in 2020. For the purposes of this exercise, there are sufficient landlords whose results are based on data gathered at a broadly similar time to ensure that the comparisons are valid.

<b>Landlord</b>	<b>Most Recent TSS</b>
elha	October 2018
Castle Rock Edinvar	January 2018
Manor Estates	November 2016

<sup>1</sup> SHR Audited Financial Statement Data at 30 November 2018; ELC data not available  
3.1 Review of ELHA Performance 2018/19

Melville	January 2019
East Lothian Council	August 2016
Albyn	February 2019
Eildon	February 2019
Fyne Homes	March 2017

elha’s performance has improved by just over 3% since the ARC was introduced but, as Table 1 shows, it remains below the Scottish average by almost 4% and has fallen slightly against previous performance in 2018 (-2%). elha remains slightly behind the national average for information provision (-2.3%) and more significantly behind for opportunities to participate in decision-making (-9.5%). This is an improvement on previous performance; in 2018, elha was some 12% behind against this indicator.

Table 1	Quality of service overall	Good at keeping informed about service & outcomes	Satisfied with opportunities to participate in decision making
elha 2019	86.2%	89.3%	77%
elha 2018	88.3%	89.1%	73.7%
elha 2017	88.3%	89.1%	73.7%
elha 2016	88.3%	89.1%	73.7%
elha 2015	83%	87%	66.1%
elha 2014	83%	87%	66.1%
Scottish Av. 2019	90.1%	91.6%	86.5%
Scottish Av. 2018	90.5%	91.7%	85.9%
Scottish Av. 2017	89.7%	91.1%	83.8%
Scottish Av. 2016	89%	90.6%	81.3%
Scottish Av. 2015	88.1%	89.3%	79.6%
Scottish Av.2014	87.8%	88.9%	78.4%

## 2.1 Tenant Satisfaction Comparison

Table 2 draws together the comparisons between elha, the Scottish average and the averages of the two benchmarking groups; it also illustrates the direction of travel. The Scottish averages have declined very slightly since last year, the ‘neighbours’ record slight reductions in performance against the two indicators and the peer group records more significant reductions against the three indicators. For quality of service, elha is 2.5% behind the neighbours’ average (which has fallen marginally by 1.3%); for provision of information, elha’s performance is 3.4% behind (neighbours’ performance has fallen by 1.4%). For opportunities to participate in decision-making, elha is 15% behind (which has fallen by 0.3%) behind the neighbours. Comparison with the peer group is more positive: elha performs better in terms of information provision and opportunities to participate.



In terms of the Scottish average, elha is furthest behind in terms of satisfaction with opportunities to participate (9.5%); that gap has reduced since last year. In general terms, elha’s performance is now more closely aligned with all of the comparison groups.

<b>Table 2 2019</b>	<b>Quality of service overall</b>	<b>Good at keeping informed about service &amp; outcomes</b>	<b>Satisfied with opportunities to participate in decision making</b>
elha	<b>86.2%</b>	<b>89.3%</b>	<b>77%</b>
Scottish Average	90.1% (2018: 90.5%)	91.6% (2018: 91.7%)	86.5% (2017: 85.9%)
Neighbours’ Average	88.7% (2018: 90%)	92.7% (2018: 93%)	92.3% (2018: 91.5%)
Peer Group Average	86.4% (2018: 89.8%)	85.7% (2018: 90.4%)	70.9% (2018: 76.9%)

### 3.0 Quality and Maintenance

Table 3 contains up to date information for elha based on the 2019 ARC together with the Scottish averages for the same period. As in previous years, elha is recording a slightly higher level of SHQS compliance than average (96.9% compared to the Scottish average of 94.1%). elha’s performance in respect of non-emergency repairs response remains slightly ahead of the Scottish average (until 2018, it was behind), but has declined in respect of non-emergency repairs response (now 6.4 days compared to 5.7 in 2018). Performance in completing repairs ‘right first time’ has improved by 3% over the last year and is now 2.3% ahead of the Scottish average (having fallen behind in 2018) and the number of repairs appointments kept has improved but is still behind the Scottish average, although by a reduced margin (-1.7% instead of almost -3% in 2019). Overall satisfaction with the repairs service has improved by almost 3% from last year and is now equal to the Scottish average.

Table 3						
Landlord	Meet SHQS	Av hrs for emerg. repair	Av days for non-emerg. repair	% reactive complete right 1 <sup>st</sup> time	% repairs app't. kept	% tenants satisfied with service
elha '19	96.9%	1.0	6.4	94.8%	93.9%	91.7%
elha '18	96.9%	1.5	5.7	91.8%	92.6%	88.9%
elha '17	96.7%	1.7	8.1	93.8%	93%	92.5%
elha '16	96.3%	1.7	7.2	90.9%	91%	88.9%
elha '15	97.1%	1.7	6.5	86.9%	92.2%	85%
elha '14	95.5%	1.8	6.4	82.7%	85.6%	85%
S Av '19	94.1%	3.6	6.6	92.5%	95.6%	91.7%
S Av '18	94.2%	4	6.4	92.2%	95.5%	92.1%
S Av '17	93.6%	4.7	7.1	92.4%	95.7%	90.6%
S Av '16	92.8%	5.1	7.5	91.3%	94.4%	89.9%
S Av '15	91%	5.9	7.9	90.2%	92.4%	89.3%
S Av '14	85.4%	6.9	8.2	87.2%	92.9%	87.6%

### 3.1 Quality and Maintenance Comparison

Table 4 looks at the same indicators as Table 3 but with additional comparisons to provide a broader picture. elha remains ahead in terms of SHQS compliance against each of the comparison groups and the Scottish average. For emergency repairs response, elha is also significantly ahead; peer group performance has declined from the significant improvement recorded in 2018 (3.3 hours compared to 1.5 in 2018). In 2017, it was noted that elha had fallen behind against both the Scottish and peer group averages for non-emergency repairs responses; elha's performance improved significantly in 2017/18 when it was recorded at 5.7; it has fallen back slightly in 2019 but remains ahead of the Scottish and the neighbours' averages but is slightly behind the peer group (-0.8%). elha's slight decline in performance relating to 'right first time' in 2018 has been reversed (better by 3%) and is now the best against all comparisons. Performance in keeping appointments has improved in 2019 and, although it is still behind the Scottish average, it is ahead of the neighbours' and peers' averages. elha's overall satisfaction with the repairs service has improved by almost 3%, redressing the decline in 2018, equalling the Scottish average and exceeding both the neighbours and peer groups. The slight increase in non-emergency response times means that elha is slightly ahead of the Scottish average; significantly ahead of the neighbours but poorer than the peer group.

Table 4	Meet SHQS	Av hrs for emerg. repair	Av days for non-emerg. repair	% reactive complete right 1 <sup>st</sup> time	% repairs app't. kept	% tenants satisfied with service
elha '19	<b>96.9%</b>	<b>1.0</b>	<b>6.4</b>	<b>94.8%</b>	<b>93.9%</b>	<b>91.7%</b>
elha '18	<b>96.9%</b>	<b>1.5</b>	<b>5.7</b>	<b>91.8%</b>	<b>92.6%</b>	<b>88.9%</b>
elha '17	<b>96.7%</b>	<b>1.7</b>	<b>8.1</b>	<b>93.8%</b>	<b>93%</b>	<b>92.5%</b>
elha '16	96.3%	1.7	7.2	90.9%	91%	88.9%
S Av '19	<b>94.1%</b>	<b>3.6</b>	<b>6.6</b>	<b>92.5%</b>	<b>95.6%</b>	<b>91.7%</b>
S Av '18	<b>94.2%</b>	<b>4</b>	<b>6.4</b>	<b>92.2%</b>	<b>95.5%</b>	<b>92.1%</b>
S Av '17	<b>93.6%</b>	<b>4.7</b>	<b>7.1</b>	<b>92.4%</b>	<b>95.7%</b>	<b>90.6%</b>
S Av '16	92.8%	5.1	7.5	91.3%	94.4%	89.9%
N Av '19	<b>93.9%</b>	<b>2.4</b>	<b>9.7</b>	<b>92.2%</b>	<b>93.2%</b>	<b>85.7%</b>
N Av '18	<b>94.8%</b>	<b>2.8</b>	<b>7.4</b>	<b>91.9%</b>	<b>94.7%</b>	<b>89.4%</b>
N Av '17	<b>94.8%</b>	<b>4.5</b>	<b>9.1</b>	<b>88.8%</b>	<b>95.3%</b>	<b>89.6%</b>
N Av '16	86.8%	3.7	5.1	92.7%	n/a	89.9%
P Av '19	<b>91.9%</b>	<b>3.3</b>	<b>5.6</b>	<b>88.8%</b>	89.6%	<b>87.6%</b>
P Av '18	<b>91.6%</b>	<b>1.5</b>	<b>5.7</b>	<b>91.8%</b>	n/a	<b>90.9%</b>
P Av '17	<b>88.6%</b>	<b>3.8</b>	<b>5.4</b>	<b>88%</b>	n/a	<b>92.5%</b>
P Av '16	92.5%	4.8	8.9	86.8%	95.2%	88.8%

(S Av = Scottish average; N Av = neighbours' average and P AV = peers' average).

**4.0 Neighbourhoods - ELHA**

Improvement continues in the number of ASB cases that elha is resolving within locally agreed targets (improved by almost 13% in 2019, with a slightly increased incidence of reports and by 33% compared to 2015). As in previous years, however, elha continues to record a higher number of ASB complaints than the comparator landlords, as shown in Table 6.

Table 5	ASB cases per 100 homes	% resolved within local targets
elha 2019	11.1	<b>79.3%</b>
elha 2018	9.8	<b>66.4%</b>
elha 2017	11.3	<b>59.7%</b>
elha 2016	16.1	52%
elha 2015	16.5	43.8%
elha 2014	14.7	52.8%
Scottish Av 2019		87.9%
Scottish Av 2018		87.9
Scottish Av 2017		87.2%
Scottish Av 2016		86.6%
Scottish Av 2015		83.2%
Scottish Av 2014		75.9%

**4.1 Neighbourhoods Comparison**

elha’s volume of ASB complaints has declined since the peak recorded in 2016 but remains higher than its peer group and its neighbours and has increased since last year. The significant improvement in elha’s resolution rate has narrowed the gap with both peers and neighbours: although elha’s performance is around 7% - 8% poorer than the Scottish and neighbours’ averages, it is now slightly better than the peer group.

Table 6	ASB cases per 100 homes	% resolved within local targets
elha 2019	11.1	79.3%
elha 2018	9.8	66.4%
elha 2017	11.3	59.7%
elha 2016	16.1	52%
Scottish Average 2019		87.9%
Scottish Average 2018		87.9%
Scottish Average 2017		87.2%
Scottish Average 2016		86.6%
Neighbours' Av 2019	6.0	86.1%
Neighbours' Av 2018	5.8	83.4%
Neighbours' Av 2017	7.2	83.6%
Neighbours' Av 2016	8.6	83.2%
Neighbours' Av 2015	8.5	79.7%
Peers' Av 2019	3.7	77%
Peers' Av 2018	3.4	79.9%
Peers' Av 2017	3.7	75%
Peers' Av 2016	4.1	73.6%
Peers' Av 2015	5.4	77.9%

**5.0 Value for Money: ELHA**

elha’s performance in collecting rent has improved by 1.4% and is now slightly ahead of the Scottish average (for the first time during the comparison period). Void performance has improved marginally but the time taken to re-let has slightly increased and is now 5.5 days’ longer than in 2014. elha’s performance continues to be better (by almost 8 days) than the Scottish average, which has increased slightly from 2018 after a period of gradual reductions which means that elha’s performance now reflects the Scottish average ‘trend’.

Table 7	% of total rent due collected	% rent not collected due to voids	Average number of days to re-let
elha 2019	<b>100.2%</b>	<b>0.3%</b>	<b>24</b>
elha 2018	<b>98.8%</b>	<b>0.5%</b>	<b>23.3</b>
elha 2017	<b>98.6%</b>	<b>0.4%</b>	<b>22.1</b>
elha 2016	99%	0.4%	19.1
elha 2015	99.8%	0.3%	15.2
elha 2014	99.5%	1.1%	18.6
Scottish Av 2019	<b>99.1%</b>	<b>0.9%</b>	<b>31.9</b>
Scottish Av 2018	<b>99.4%</b>	<b>0.8%</b>	<b>30.7</b>
Scottish Av 2017	<b>99.6%</b>	<b>0.9%</b>	<b>31.5</b>
Scottish Av 2016	99.5%	1%	35.4
Scottish Av 2015	99.5%	1.1%	36.8
Scottish Av 2014	99%	1.2%	35.7

**5.1 Value for Money Comparison**

Table 8 shows that elha’s performance is slightly better compared to that of the other groups but, as already indicated, it is important to monitor internal trends. Rent collection is an important indicator, especially in the context of welfare reform. As was the case last year, elha’s performance and that of its neighbours has improved very slightly, but peer performance has declined slightly, as has the Scottish average. both elha and the peer group have slightly improved their rent collection performance whilst the other comparators have marginally declined: this is notable given the gradual effects of the impact of welfare reform. Only the peer group has managed to reduce the average time taken to re-let a property; the rate of increase for elha is slightly slower than the other comparisons.

Table 8	% of total rent due collected	% rent not collected due to voids	Average number of days to re-let
elha 2019	<b>100.2%</b>	<b>0.3%</b>	<b>24</b>
elha 2018	<b>98.8%</b>	<b>0.5%</b>	<b>23.3</b>
elha 2017	<b>98.6%</b>	<b>0.4%</b>	<b>22.1</b>
elha 2016	99%	0.4%	19.1
Scottish Av 2019	<b>99.1%</b>	<b>0.9%</b>	<b>31.9</b>
Scottish Av 2018	<b>99.4%</b>	<b>0.8%</b>	<b>30.4</b>
Scottish Av 2017	<b>99.6%</b>	<b>0.9%</b>	<b>31.5</b>
Scottish Av 2016	99.5%	1%	35.4
Neighbours 2019	<b>100%</b>	<b>0.7%</b>	<b>30.8</b>
Neighbours 2018	<b>99.7%</b>	<b>0.6%</b>	<b>24.7</b>
Neighbours 2017	<b>99.3%</b>	<b>0.5%</b>	<b>27.3</b>
Neighbours 2016	99.8%	0.5%	22.1
Neighbours 2015	99.9%	0.7%	23.9
Peers 2019	<b>98.9%</b>	<b>0.9%</b>	<b>26.6</b>
Peers 2018	<b>99%</b>	<b>1%</b>	<b>28.2</b>
Peers 2017	<b>99.7%</b>	<b>1.1%</b>	<b>33.4</b>
Peers 2016	98.7%	1.1%	37.2
Peers 2016	96.7%	1%	32.5

## 6.0 Complaints Handling

SHR recommends that landlords monitor their performance in handling complaints and so, for the first time, such a comparison is included in this report. Table 9 shows that elha's performance is generally strong. The percentage of Stage 1 and Stage 2 complaints responded to in full is comparable to all other landlords in the exercise (ELC's performance is notably poorer). elha upheld the second highest number of complaints at Stage 1 but the third lowest at Stage 2 (this could suggest that elha's consideration of complaints is robust / open / effective). elha's performance in meeting SPSO recommended timescales for responding to Stage 1 complaints is the second highest of all the compared landlords and is 100% for Stage 2 complaints.

Table 9	Stage 1 responded in full	Stage 1 upheld	Stage 2 responded in full	Stage 2 upheld	Stage 1 responded in full in SPSO timescale	Stage 2 responde in full in SPSO timescale
elha	<b>98.3</b>	<b>62.71</b>	<b>100</b>	<b>33.3</b>	<b>91.53</b>	<b>100</b>
Albyn	<b>100</b>	<b>55.7</b>	<b>100</b>	<b>26.67</b>	<b>79.31</b>	<b>80</b>
CRE	100	<b>59.33</b>	94.74	<b>77.78</b>	<b>88.01</b>	52.78
Eildon	95.45	59.52	81.82	88.89	100	100
ELC	<b>79.83</b>	<b>41.36</b>	<b>45.45</b>	<b>40</b>	<b>54.45</b>	<b>53.33</b>
Fyne Homes	<b>100</b>	<b>55.56</b>	<b>100</b>	<b>80</b>	<b>100</b>	<b>90</b>
MEHA	97.59	<b>58.02</b>	100	<b>50</b>	<b>87.65</b>	75
Melville	98.72	74.03	75	0	89.61	100

**7.0 Conclusion and Recommendation**

The benchmarking comparison shows that elha’s performance has improved in some key areas and, generally, the ‘gap’ in elha’s performance has narrowed. In terms of the sector’s performance, the SHR reported that, as in previous years, sector performance has been maintained or improved against most indicators: elha’s performance reflects this trend. The Management Committee is asked to consider this report.



## Freedom of Information Policy

### Report by Martin Pollhammer, Chief Executive – for homologation

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#### 1.0 Introduction

The Freedom of Information (Scotland) Act 2002 extended to cover the majority of ELHA's activities from 11 November 2019. The activities covered by this extension of the Act are:

- The prevention and alleviation of homelessness
- The management of social housing accommodation (for which an RSL has granted a Scottish secure tenancy or short Scottish secure tenancy)
- The provision and management of sites for gypsies and travellers

This means that some areas of service provision, notably Care & Repair services, are not covered by this extension, but in general, as almost all other ELHA services relate in some way to the management of social housing accommodation, almost all other activity is now subject to the provisions of the Act.

As reported to the last meeting of the Management Committee in September 2019, the timescale for extension of the Act was short, with some model documentation not available until October 2019. The Chair was therefore asked to use Chair's Authority to ensure the required documentation and processes were approved (and that ELHA was therefore fully compliant with the new provisions), in advance of the implementation date. These documents are now presented to the Management Committee for homologation.

#### 2.0 Freedom of Information Policy

The **Policy Document** is attached to this report. This is based on a model document published by the Scottish Federation of Housing Associations (SFHA). No material changes have been made to the model.

This model document includes an Information Handling Procedure as Appendix 1 to the Policy Document. Normally procedures are kept separate from policy documents, but in this case the requirement to publish the procedure and adopt the model approach means that the procedure has been included with the policy.

The Management Committee is asked to homologate the Chair's decision to approve the Freedom of Information Policy.

**3.0 Guide to Information**

ELHA is now obliged by the Scottish Information Commissioner (SIC) to publish a Guide to Information (GTI). ELHA's GTI was published on elha.com in late October 2019, and is attached as **Appendix 1** to this report. This is based on a model document published by the SFHA, and again was published without any material changes being made to the model.

The GTI (and all the links contained within it) will be reviewed on an annual basis in October each year, and this task will be added to the Core Annual Tasks within the Business Plan Action Plan.

The Management Committee is asked to homologate the Chair's decision to approve the Guide to Information.

**4.0 Model Publication Scheme Notification Form**

The SIC has a Model Publication Scheme. By publishing the GTI based on the SFHA model, ELHA has fully complied with the Model Publication Scheme. The SIC requires all organisations that fall under the Freedom of Information Act to complete a Notification Form when they first publish a GTI and comply with the Model Publication Scheme. A copy of the form submitted is attached as **Appendix 2** to this report.

This process only needs to be followed once. The SIC has acknowledged receipt of ELHA's Notification Form. In this acknowledgement, the SIC noted the importance of maintaining the GTI and ensuring that procedures are in place to support ongoing routine publication.

For ELHA, routine publications include newsletters, other news articles, Management Committee reports and minutes, mileage and expenses forms submitted by the Senior Officer and Management Committee members, details of current Senior Management Team and Management Committee members, performance information, Assurance Statement, relevant policies and procedures and any information requests submitted to ELHA. All this information is now routinely published on elha.com.

**Recommendations**

The Management Committee is asked to:

- (a) Homologate the Chair's decision to approve the Freedom of Information Policy; and
- (b) Homologate the Chair's decision to approve the Guide to Information.

**Date Issued**            October 2019

**Last Review Date**    n/a

**Department**            Corporate

**Title**                      **Freedom of Information Policy**

**Objective**                To describe our arrangements for complying with requests submitted under the Freedom of Information (Scotland) Act and Environment Information (Scotland) Regulations

**Responsible**            Chief Executive

**Next Review Date**    October 2024

## **1.0 Introduction**

1.1 The Freedom of Information (Scotland) Act 2002 (“FOISA”) and the Environmental Information (Scotland) Regulations 2004 (“EIR”) place a general obligation on Scottish Public Authorities to allow the public access to information that they hold. Both FOISA and EIR are overseen by the Scottish Information Commissioner (“SIC”).

1.2 From 11 November 2019 we will be designated as Scottish Public Authority and will need to make information available in accordance with FOISA and EIR.

1.3 This is our Freedom of Information and Environmental Information Policy. This policy will:

- Provide a general understanding of FOISA and EIR
- Outline where responsibility lies for complying with our legal duties under FOISA and EIR

## **2.0 Policy Statement**

2.1 We are committed to the underlying principles of openness and transparency underpinning FOISA and EIR and complying fully with the requirements of this legislation. To this end, we will:

- Follow the relevant Scottish Ministers Codes of Practice relating to FOISA and EIR, as well as any relevant guidance issued by SIC
- Take into account the needs of individuals when presenting information under FOISA and EIR

- Make all employees aware of their responsibilities under FOISA and EIR and support them in fulfilling those responsibilities
- Publish a wide range of information through our Publication Scheme
- Monitor compliance with FOISA and EIR with a view to continuous improvement
- Respect data protection in accordance with the GDPR and Data Protection Act 2018 when complying with FOISA and EIR
- Only withhold information where we are entitled to do so under FOISA and EIR and explain why any information is withheld
- Provide advice and assistance to individuals seeking to access information

### **3.0 Responsibilities**

- 3.1 The Chief Executive has lead management responsibility for FOISA and EIR within ELHA (this will include effective implementation and regular review of this Policy).
- 3.2 Our Executive Support team will receive and process requests made under FOISA and EIR and will ensure requests are passed to the appropriate staff member to action. Our Chief Executive will review and quality check the final response before it is issued by the Executive Support Team.
- 3.3 The Executive Support team will also deal with any requests for a review, and ensure that links within our Guide to Information are kept up to date.
- 3.4 All employees are responsible for:
- Familiarising themselves with this policy
  - Forwarding information requests received to the Executive Support team as quickly as possible
  - Seeking guidance from their Line Manager or Executive Support Officer if they are unsure about any of the duties placed on us by FOISA or EIR
- 3.5 Employees should be aware that where an information request is received and an employee deletes or alters information held by us with the intention of preventing disclosure of that information a criminal offence is committed. Where employees are unsure if deletion or alteration of information may result in an offence, they should seek guidance from their Director.
- 3.6 Compliance with this policy is compulsory for all our employees. Any employee who fails to comply with this policy may be subject to disciplinary action.

#### **4.0 Scope of the Policy**

4.1 This policy applies to any information held by us which relates to one or more of the functions set out below, regardless of format. This will include information created internally and information received from third parties. It will also relate to information which is held on our behalf.

4.2 This policy applies to all ELHA employees.

#### **5.0 Background**

##### **5.1 Why are we subject to FOISA and EIR?**

5.1.1 We are subject to both FOISA and EIR by virtue of the: Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 (the "Order").

5.1.2 The Order came into effect on 11 November 2019 and brought all Registered Social Landlords ("RSLs") and certain RSL subsidiaries under the scope of FOISA and the EIR.

##### **5.2 What is subject to FOISA and EIR?**

5.2.1 In accordance with the terms of the Order, not everything that we do is subject to FOISA and EIR. Instead, we are only subject to these regimes in respect of certain functions, namely 'housing services' (as defined in s.165 of the Housing (Scotland) Act 2010) which ELHA carries out – subject to some restrictions. Looking at the definition of 'housing services' and the restrictions which are set out in the Order the following functions carried out by us are covered by FOISA and EIR:

- The prevention and alleviation of homelessness
- The management of social housing accommodation
- The supply of information to the Scottish Housing Regulator (SHR) by us in relation to our financial wellbeing and standards of governance

##### **5.3 What is the difference between FOISA and EIR?**

5.3.1 EIR provides a right of access to 'Environmental Information' held by us. Environmental Information has a very wide definition which is set out in Regulations. Where a request under FOISA is received for Environmental Information it should be processed in accordance with EIR.

5.3.2 Whilst the obligations under FOISA and EIR are similar – there are some key differences that employees must be aware of when dealing with requests for information. Further guidance on the differences are available on SIC's website.

## 6.0 Legal Duties

6.1 We have a number of legal duties which we must comply with under FOISA and EIR. These are set out in more detail in Sections 7.0 to 9.0 below:

## 7.0 Responding to Information Requests

7.1 People have the right to request information from us. Where the information requested is within the scope of the Order and we hold that information we must release the information unless an exemption (under FOISA) or an exception (under EIR) applies. We shall, when responding to requests for information from individuals, follow the Section 60 Code of Practice and any relevant guidance produced by SIC. The procedure for responding to a request is set out in **Appendix 1**.

7.2 We aim to respond to information requests promptly, and in any event within 20 working days of receiving the request (except in some circumstances under EIR where we are entitled to extend the timescale for responding by an additional 20 working days).

7.3 Where we are providing an individual with the information they have requested they will, in so far as is reasonable to do so, provide information in the format that the individual has requested and will adhere to any duties under the Equality Act 2010. Where we are refusing to provide information to individuals we will clearly explain to the individual what provision in FOISA or EIR allows us to withhold that information and why we believe that provision applies (including, where required, an explanation of how we have carried out the Public Interest Test).

7.4 Where we are asked to provide information which we do not hold, but we know that another Scottish Public Authority does hold the requested information, we will provide contact details of that Authority to the individual requesting the information and explain that the individual may wish to request the information from that Scottish Public Authority. Where a request is being handled under EIR and these circumstances apply, we will offer to transfer the individual's request to the other Scottish Public Authority.

7.5 We may choose to charge for fulfilling information requests received from individuals. Any charges made by us will be made in accordance with:

- For requests being handled under FOISA: the Freedom of Information (Fees for Required Disclosure) (Scotland) Regulations 2004
- For requests being handled under EIR: the Schedule of Charges set out in our Guide to Information

7.6 Any fee charged by us will be reasonable and will not exceed the costs of providing the requested information.

7.7 The Scottish Federation of Housing Associations has published a range of template letters to be used for responding to requests for information under FOISA and EIR. Rather than reproducing copies of this guidance, we will refer to and use the template letters wherever possible, depending on the nature of the individual enquiry.

## **8.0 Responding to Requests for Review**

8.1 Where someone has requested information from us and:

- We have failed to respond to the request within the 20 working day deadline (or extended deadline in respect of certain requests made under EIR)

Or

- The person requesting the information is unhappy with the response to the request (for example where information has been withheld under one of the exemptions or exceptions available under FOISA/EIR)

Then they have the right to request that we review the response to their request to determine whether or not the provisions of FOISA or EIR have been followed.

8.2 Where we perform a review and determine that a response to a request is not in accordance with FOISA or EIR, we will take immediate steps to rectify this (which could, for example, include releasing information which was previously withheld).

8.3 Where we perform a review and determine that a response to a request is in accordance with FOISA or EIR then we will notify the individual who asked for a review as quickly as possible.

8.4 In any event, we will handle all requests for review in accordance with the timescales set out in FOISA and EIR.

8.5 Where an individual is unhappy with the response to their review request, they may appeal to the SIC. If an appeal is made to the SIC and a decision handed down by them both we and the individual in question have a right to appeal to the courts on a point of law.

## **9.0 Provision of Advice and Assistance to Individuals**

9.1 We must provide individuals seeking to access information with advice and assistance. This advice and assistance will be provided with a view to ensuring that all barriers which may potentially prevent an individual from accessing information are removed. We will comply with this duty by following the guidance contained in the Section 60 Code of Practice issued by Scottish Ministers.

**10.0 Publication of Information**

10.1 We will publish information in accordance with our Publication Scheme through our Guide to Information. Our Guide to Information is available at [elha.com](http://elha.com) and a paper format will also be available on request.

**11.0 Data Protection**

11.1 We are committed to upholding our data protection obligations set out in the GDPR and the Data Protection Act 2018.

11.2 Under data protection laws, individuals have the right to request access to all of the information that we hold about them. This and other rights that individuals have under data protection are not covered by this policy. We have a separate Data Protection Policy which sets out how we respond to these requests.

**12.0 Policy Review**

12.1 This policy will be reviewed at least every five years, with any changes approved by our Management Committee



### Freedom of Information Request Handling Procedure

We have identified an 8-stage process to ensure that we respond appropriately to FOI requests within 20 working days:

1. Receive, identify, log
2. Clarify
3. Assess
4. Assign Request to department/individual – inform and consult
5. Locate and consider information to be disclosed
6. Consider response
7. Clearing response
8. Issue response

The process accounts for situations where we are asked for information which is covered by the terms of the Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 (the Order).

Only certain RSL and subsidiary functions are covered by FOI and EIR – these being:

- the prevention and alleviation of homelessness
- the management of social housing accommodation (for which an RSL has granted a Scottish secure tenancy or short Scottish secure tenancy)
- the provision and management of sites for gypsies and travellers
- the supply of information from an RSL to the Scottish Housing Regulator (SHR) in relation to its financial well-being and standards of governance

Where an information request does not relate to these functions we are not obliged under FOI or EIR to provide the information. However, there may be circumstances in which we are happy to disclose information requested even though we are not legally obliged to do so.

It is also important when considering whether to respond to such requests, to remember the general duty under the Scottish Social Housing Charter, under the Communications outcome:

*Social landlords manage their business so that:*

*tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.*

Where we are providing information that is not subject to the Order we do not need to consider if any FOI or EIR exemptions or exceptions apply and we will always be particularly careful where any information requested relates to personal data.

**Stage 1 – Receive, Identify & Log**

**Request Received (days 1-2)** Pass to **Executive Support**, who will Log details, validate request, ID Legislation & send acknowledgement

Pass the Request to the Executive Support team. They will:

- Evaluate the request and identify which legislation it will be processed under; is it:
  - Freedom of Information (Scotland) Act (FOISA)
  - Environmental Information Regulations (EIRs)
  - Data Protection Act (DPA)
- Log the request in the FOISA Information Request spreadsheet
- If the request is a complex / controversial case, inform the Senior Management Team
- Send an acknowledgement letter confirming receipt of the request, and the legislation under which it will be processed or proceed to Stage 2

**Stage 2 – Clarify**

**Clarify Request (days 1-2)** **Executive Support** to contact requester if necessary to seek further clarification

The Executive Support staff will ensure that the request is clear regarding what information is being asked for. If the request is unclear clarification will be sought.

**Stage 3 - Assess**

**Assess Request (days 3-5)** **Executive Support** to decide if: the information is covered by the Order; we hold the information & if it is already accessible

The Executive Support staff will assess:

- If the request relates to functions covered by The Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 (the Order):
  - If the information is covered by the Order we will proceed with next steps in Stage 3
  - If the information is not covered by the Order but we are willing to release some or all of the information proceed with next steps in stage 3
  - If the information is not covered by the Order and we are not willing to release any of the information a letter will be sent to the requestor informing them that we are not obliged to provide them with the information

- if we hold the information and if it is already accessible:
  - If we do not hold the information a letter will be sent to the requestor informing them the information is not held
  - If the information is held but is already published then a Section 25 exemption letter will be sent to the requestor informing them of where to find this information. Where the information is not covered by the Order we should simply write to the requester and inform them where to find the information
  - If the information is held and has not been published then the request process will proceed to stage 4

**Stage 4 - Assign Request to Site/Section - Inform & Consult**

Assign/Inform/Consult  
(days 3-5)

Executive Support will send request to appropriate department to request information held.

Relevant department will respond to Executive Support when information has been collected or to inform Executive Support that department does not hold information.

Consult with Executive Support to determine if fees are applicable. The Chief Executive will advise on applying fees.

**Stage 5 - Locate & Consider Information to be Disclosed**

Locate Information (days 3-5) Appropriate department collate information. The Senior Management Team will assist, support & advise

Appropriate department and Executive Support consider if the information can be supplied or whether any exemptions apply. Where the information requested is not covered by the Order you do not need to determine whether or not exemptions apply and can instead choose what information you are prepared to release.

The Senior Management Team will advise and assist in applying exemptions.

Appropriate department obtains information from all sources and collates. Appropriate department completes information request documents as appropriate.

**Stage 6 - Consider Response**

Consider Response (days 6-10) Executive Support review & draft response

Executive Support will review documents and prepare response letter

**Stage 7 - Clearing Response**

Clearing Response (days 11-15)

In cases of complex/controversial requests Executive Support staff will seek clearance and consult with the Senior Management Team and Chief Executive, who will liaise with the Association's solicitors and other legal advisors as necessary.

**Stage 8 - Issue Response**

Issue Response (days 16-20) Executive Support issue response after quality check by Chief Executive

The Chief Executive quality checks and passes back to Executive Support to issue information requested, stating any exemptions as appropriate.

## EAST LoTHIAN HOUSING ASSOCIATION GUIDE TO INFORMATION

LAST REVIEWED: OCTOBER 2019

## At a glance – terms used in this document

Term Used	Explanation
FOISA	Freedom of Information (Scotland) Act 2002  <i>Places a duty on those organisations covered to proactively publish certain types of information; and to respond to requests for information; and to provide advice and assistance to those making requests for information.</i>
EIRs	Environmental Information Regulations (Scotland) 2004  <i>Those organisations covered by EIRs have a duty to respond to requests for environmental information</i>
SIC	The Scottish Information Commissioner  <i>Who is responsible for ensuring that those bodies covered by FOISA and EIRs comply with the terms of the legislation.</i>
MPS	Model Publication Scheme  <i>Produced by the SIC – this details all of the information that those subject to FOISA should publish (if they hold it)</i>
Guide to Information	<i>A guide that all organisations subject to FOISA and adopting the MPS must produce to help people access the information it makes available</i>
Classes of Information	<i>Nine broad categories describing the types of information authorities should publish (if they hold it).</i>

**Background**

The Freedom of Information (Scotland) Act 2002 (FOISA) requires that all housing associations in Scotland must produce and maintain a publication scheme. This must detail all of the key information that we publish and how you can access it. This Guide to Information is our publication scheme, and contains links to where you can find all of the information listed.

East Lothian Housing Association has adopted the Scottish Information Commissioner's (SIC) [Model Publication Scheme \(MPS\)](#), and this Guide has been approved by the SIC.

**Formats other than online**

All of the information listed is available at [elha.com](http://elha.com) (unless stated), and completely free to access online. However, we understand that not everyone will have online access and where this is the case you can contact us to view this in our office (where this would be convenient).

If you would like a printed copy of any of the information listed, unfortunately we may have to charge a small fee to provide this. This fee will never exceed the cost of photocopying and postage – and we will let you know any total cost before we forward this to you.

A summary of our charges for providing any information detailed in this guide are summarised below:

<b>Format</b>	<b>Charge</b>
Online	Free
View at our office	Free
Print in black and white	10p per A4 sheet
Print in colour	20p per A4 sheet
CD Rom	£1.00
Posted document/CD Rom	Cost of postage incurred

If you would like to request information that we publish in a format other than online, or arrange a visit to our office to view information, please contact:

**[enquiries@elha.com](mailto:enquiries@elha.com)**

**Information that we cannot publish**

Whilst we will try to make all of the information we have detailed available, in rare cases there may be some information that we cannot make available. For example, sometimes if we were to publish certain Management Committee minutes, it could reveal personal details about an individual. This would be a breach of Data Protection legislation if we were to do so. When this is the case, we will remove any personal details before publication and highlight where and why we have done so.

**For how long will information be published?**

We aim, where possible, to publish information for at least the current and previous two financial years. When we review any document (for example, any of our policies), to avoid confusion we will only publish the current version once it has been updated.

**Copyright and re-use**

Where we hold the copyright on our published information, the information may be copied or reproduced without formal permission, provided that:

- It is copied accurately
- It is not used in a misleading context
- The source of the material is identified

**Contact us**

If you have any queries about anything contained within this Guide to Information, or if there is some information that you cannot find that you would like to access, please contact:

**enquiries@elha.com**

**East Lothian Housing Association  
18-20 Market Street  
Haddington  
East Lothain  
EH41 3JL**

**01620 825032**

**The Information that we make available to you**

Under the MPS, the information we provide must be listed under certain “classes” of information. These are the categories of information that are detailed below. As FOI applies to other bodies and sectors across Scotland (such as Scottish Government and Councils for example), this means that not all of the categories in the MPS apply to housing associations.<sup>1</sup>

The details of all the information we hold under each of the classes that apply to our organisation, and hyperlinks to access this information when available online, are outlined below.

Information	Where to access
<b>Class 1 - About Us</b>	
<i>Information about ELHA – w o we are, where to find us, how to contact us, how we are managed and our external relations.</i>	
<b>Descriptions of who we are</b>	
Mission Statement	None, we only have our Vision and Values document
Vision	Healthy Happy Homes
Values	Professional; Honest; Reliable; Friendly
Corporate Objectives	To provide Healthy, Happy Homes
Area(s) of operation	East Lothian
Key activities; strategic/corporate plan(s)	We are a housing association specialising in the provision and management of first class affordable rented homes. In addition, our Care & Repair Service promotes independent living by ensuring homes are maintained or adapted to suit individual needs
Business Plan Summary	Not previously published, to be published from May 2020 onwards
Customer Charter	<a href="https://www.elha.com/assets/elha/uploaded/files/ELHA%20Customer%20Service%20Charter%202018%20single%20pages%20(3).pdf">https://www.elha.com/assets/elha/uploaded/files/ELHA%20Customer%20Service%20Charter%202018%20single%20pages%20(3).pdf</a>
<b>Location and opening arrangements</b>	
Address	18-20 Market Street Haddington East Lothian EH41 3JL
Telephone number and e-mail address for general enquiries (and dedicated lines where appropriate)	<a href="mailto:enquiries@elha.com">enquiries@elha.com</a> 01620 825032
opening times	elha.com – 24/7 Office – 9.00 to 4.30 Monday to Thursday, 9.00 to 4.00 Friday
Contact details for making a complaint	Tenants should use their My Home account. Otherwise contact <a href="mailto:enquiries@elha.com">enquiries@elha.com</a>
<b>Information relating to Freedom of Information</b>	
Publication Scheme and Guide to Information	This Document

<sup>1</sup> In the MPS Class 8: Commercial Publications and Class 9: Our Open Data do not apply to RSLs.



Information	Where to access
Charging Schedule for Published Information	This Document (See the summary charges on Page 2 and the full schedule at the end of this document)
Contact details and advice on making an FOI request	enquiries@elha.com
Freedom of Information policies and procedures	<a href="https://www.elha.com/assets/elha/uploaded/files/Freedom%20of%20Information%20Policy%20Document(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Freedom%20of%20Information%20Policy%20Document(1).pdf</a>
Charging Schedule for environmental information provided in response to requests made under EIRs	Attached at the end of this document
<b>About our Governing Body</b>	
List of Governing Body Members <ul style="list-style-type: none"> <li>Names</li> <li>when they became a governing body member</li> <li>Professional biographical details</li> <li>office-bearing responsibilities</li> <li>when they became an office-bearer</li> </ul>	<a href="https://www.elha.com/who-we-are-and-what-we-do">https://www.elha.com/who-we-are-and-what-we-do</a>  <a href="https://www.elha.com/management-committee">https://www.elha.com/management-committee</a>
Description of the role of the Governing Body <ul style="list-style-type: none"> <li>governance structure chart (including sub-committees and working groups);</li> <li>remits for governing body and any sub-committees</li> </ul>	<a href="https://www.elha.com/who-we-are-and-what-we-do">https://www.elha.com/who-we-are-and-what-we-do</a>  <a href="https://www.elha.com/how-we-work-and-make-decisions">https://www.elha.com/how-we-work-and-make-decisions</a>
How to become part of the governing body	<a href="https://www.elha.com/assets/elha/uploaded/files/Management%20Committee%20Membership%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Management%20Committee%20Membership%20Policy%20Document.pdf</a>
<b>About our staff</b>	
List of senior management team, including professional biography and contact details	<a href="https://www.elha.com/who-we-are-and-what-we-do">https://www.elha.com/who-we-are-and-what-we-do</a>
Organisational structure	<a href="https://www.elha.com/who-we-are-and-what-we-do">https://www.elha.com/who-we-are-and-what-we-do</a>
<b>Governance Documents and Corporate Policies</b>	
Rules/Articles	<a href="https://www.elha.com/assets/elha/uploaded/files/ELHA%20Rules%20adopted%2028%20May%202015.pdf">https://www.elha.com/assets/elha/uploaded/files/ELHA%20Rules%20adopted%2028%20May%202015.pdf</a>
Standing Orders	<a href="https://www.elha.com/assets/elha/uploaded/files/Standing%20Orders%20Policy(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Standing%20Orders%20Policy(1).pdf</a>
Membership Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Association%20Membership%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Association%20Membership%20Policy%20Document.pdf</a>
Code of Conduct for Staff	<a href="https://www.elha.com/assets/elha/uploaded/files/Code%20of%20Conduct%20for%20Staff%20Document%20.pdf">https://www.elha.com/assets/elha/uploaded/files/Code%20of%20Conduct%20for%20Staff%20Document%20.pdf</a>
Code of Conduct for Governing Body Members	<a href="https://www.elha.com/assets/elha/uploaded/files/Code%20of%20Conduct%20for%20Management%20Committee%20Members%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Code%20of%20Conduct%20for%20Management%20Committee%20Members%20Document.pdf</a>

Information	Where to access
Entitlements Payments and Benefits Policy (or equivalent, including arrangements for payments for expenses and subsistence)	<a href="https://www.elha.com/assets/elha/uploaded/files/Entitlements%20Payments%20and%20Benefits%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Entitlements%20Payments%20and%20Benefits%20Policy%20Document.pdf</a>
Register of Interests	<a href="https://www.elha.com/assets/elha/uploaded/files/Register%20of%20Interests.pdf">https://www.elha.com/assets/elha/uploaded/files/Register%20of%20Interests.pdf</a>
Equalities Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Equalities%20and%20Diversity%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Equalities%20and%20Diversity%20Policy%20Document.pdf</a>
Health and Safety Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Health%20%26%20Safety%20Policy%20Statement.pdf">https://www.elha.com/assets/elha/uploaded/files/Health%20%26%20Safety%20Policy%20Statement.pdf</a>
Sustainability Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Sustainability%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Sustainability%20Policy%20Document.pdf</a>
<b>Relationship with Regulators</b>	
Engagement plan with Scottish Housing Regulator	<a href="https://www.elha.com/assets/elha/uploaded/files/Scottish Housing Regulator Engagement Plan .pdf">https://www.elha.com/assets/elha/uploaded/files/Scottish Housing Regulator Engagement Plan .pdf</a>
Assurance Statement	<a href="https://www.elha.com/assets/elha/uploaded/files/ELHA%20Assurance%20Statement%20October%202019.pdf">https://www.elha.com/assets/elha/uploaded/files/ELHA%20Assurance%20Statement%20October%202019.pdf</a>
Annual Return on Charter Submission to SHR	<a href="https://directory.scottishhousingregulator.gov.uk/Pages/LandlordSummary.aspx?LatoZNameQS=C1E83758-CFA9-E311-93F1-005056B555E6">https://directory.scottishhousingregulator.gov.uk/Pages/LandlordSummary.aspx?LatoZNameQS=C1E83758-CFA9-E311-93F1-005056B555E6</a>
Financial Returns to SHR	<a href="https://www.elha.com/our-income-and-how-we-spend-it">https://www.elha.com/our-income-and-how-we-spend-it</a>
Charter report to tenants	<a href="https://performance365.elha.com">https://performance365.elha.com</a>
Internal and External Audit arrangements	<a href="https://www.elha.com/who-we-work-with">https://www.elha.com/who-we-work-with</a>
<b>Group Details</b>	
Details of our subsidiaries	R3 Repairs Limited <a href="http://www.r3repairs.co.uk">www.r3repairs.co.uk</a>
<b>Key Partnerships</b>	
Strategic agreements with other organisations	We have a Strategic Alliance with Castle Rock Edinvar Housing Association for the provision of development services to ELHA
<b>Class 2 – How we deliver our functions and services</b> <i>Information about our work, our strategy and policies for delivering services and information for our service users.</i>	
<b>How to use our services</b>	
List of services provided	<a href="https://www.elha.com/our-services">https://www.elha.com/our-services</a>
How to report a repair	Use your My Home account and click the 'book a repair' button or contact us
Right to Repair information	<a href="https://www.elha.com/right_to_repair">https://www.elha.com/right_to_repair</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/RtR.pdf">https://www.elha.com/assets/elha/uploaded/files/RtR.pdf</a>

Information	Where to access
How to apply for a house	<a href="https://www.elha.com/housing">https://www.elha.com/housing</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Guide%20to%20Homehunt%202017(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Guide%20to%20Homehunt%202017(1).pdf</a>
How to get information about tenancy support	<a href="https://www.elha.com/tenancy-support">https://www.elha.com/tenancy-support</a>
How to make a complaint	Use your My Home account or contact us  <a href="https://www.elha.com/making-a-complaint">https://www.elha.com/making-a-complaint</a>
How to speak to a housing officer	Use Live Help, e-mail <a href="mailto:enquiries@elha.com">enquiries@elha.com</a> , or contact us
How we consult with tenants and other customers to inform and improve service delivery and develop new services	<a href="https://www.elha.com/how-we-measure-and-report-performance">https://www.elha.com/how-we-measure-and-report-performance</a>  <a href="https://www.elha.com/join-in">https://www.elha.com/join-in</a>
<b>Policies and Procedures</b>	
Allocations Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Allocations%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Allocations%20Policy%20Document.pdf</a>
Anti-Social Behaviour Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Anti-Social%20Behaviour%20Policy%20Document(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Anti-Social%20Behaviour%20Policy%20Document(1).pdf</a>
Asbestos Management Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Asbestos%20Policy(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Asbestos%20Policy(1).pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/ELHA%20Asbestos%202016.pdf">https://www.elha.com/assets/elha/uploaded/files/ELHA%20Asbestos%202016.pdf</a>
Arrears Management Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Rent%20Arrears%20Policy.pdf">https://www.elha.com/assets/elha/uploaded/files/Rent%20Arrears%20Policy.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Your%20Home%20Your%20Rent%202017.pdf">https://www.elha.com/assets/elha/uploaded/files/Your%20Home%20Your%20Rent%202017.pdf</a>
Asset Management Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Asset_Management_Strategy.pdf">https://www.elha.com/assets/elha/uploaded/files/Asset_Management_Strategy.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Maintenance%20Policy%20Document(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Maintenance%20Policy%20Document(1).pdf</a>
Customer Care Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Customer%20Care%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Customer%20Care%20Policy%20Document.pdf</a>
Data Protection Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Privacy%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Privacy%20Policy%20Document.pdf</a>
Equality and Diversity Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Equalities%20and%20Diversity%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Equalities%20and%20Diversity%20Policy%20Document.pdf</a>
Estate Management Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Tenancy%20Management%20Policy%20Document(2).pdf">https://www.elha.com/assets/elha/uploaded/files/Tenancy%20Management%20Policy%20Document(2).pdf</a>
Health and Safety Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Health%20%26%20Safety%20Policy%20Statement.pdf">https://www.elha.com/assets/elha/uploaded/files/Health%20%26%20Safety%20Policy%20Statement.pdf</a>

Information	Where to access
Legionnaires Inspection/Prevention Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/ELHA%20Legionella%202017%20single%20pages.pdf">https://www.elha.com/assets/elha/uploaded/files/ELHA%20Legionella%202017%20single%20pages.pdf</a>
Procurement Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Procurement%20Policy%20Document(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Procurement%20Policy%20Document(1).pdf</a>
Risk Management Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Risk%20Management%20Strategy%20Document(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Risk%20Management%20Strategy%20Document(1).pdf</a>
Rent Setting Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Rent%20and%20Service%20Charge%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Rent%20and%20Service%20Charge%20Policy%20Document.pdf</a>
Repairs Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Maintenance%20Policy%20Document(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Maintenance%20Policy%20Document(1).pdf</a>
Sustainability Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Sustainability%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Sustainability%20Policy%20Document.pdf</a>
Tenant Engagement Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Tenant%20Participation%20Strategy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Tenant%20Participation%20Strategy%20Document.pdf</a>
Tenancy Sustainment Policy	<a href="https://www.elha.com/assets/elha/uploaded/files/Tenancy%20Sustainment%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Tenancy%20Sustainment%20Policy%20Document.pdf</a>
<b>Class 3 – How we take decisions and what we have decided</b> <i>Information about the decisions we take, how we make decisions and how we involve others.</i>	
<b>Governing Body Meetings</b>	
Governing body meeting minutes	<a href="https://www.elha.com/minutes-of-meetings">https://www.elha.com/minutes-of-meetings</a>
Governing body meeting reports/papers	<a href="https://www.elha.com/reports">https://www.elha.com/reports</a>
Governing body agendas	<a href="https://www.elha.com/agendas">https://www.elha.com/agendas</a>
<b>Consultation and Participation</b>	
Tenant Participation Strategy	<a href="https://www.elha.com/assets/elha/uploaded/files/Tenant%20Participation%20Strategy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Tenant%20Participation%20Strategy%20Document.pdf</a>
Consultation reports noting the outcome of any recent consultations with tenants/others	<a href="https://www.elha.com/assets/elha/uploaded/files/Final%20TSS%20Report%202016%20-%209th%20June%202016.pdf">https://www.elha.com/assets/elha/uploaded/files/Final%20TSS%20Report%202016%20-%209th%20June%202016.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/2019%20Rent%20Increase%20Consultation%20Report.pdf">https://www.elha.com/assets/elha/uploaded/files/2019%20Rent%20Increase%20Consultation%20Report.pdf</a>
Tenant Scrutiny Panel composition	<a href="https://www.elha.com/tenant-scrutiny">https://www.elha.com/tenant-scrutiny</a>
Registered Tenant Organisations	<a href="https://www.elha.com/assets/elha/uploaded/files/Joint%20Policy%20in%20Registering%20Tenant%20Organisations%20Policy%20Document(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Joint%20Policy%20in%20Registering%20Tenant%20Organisations%20Policy%20Document(1).pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/RTO%20Register%20Updated%202019.pdf">https://www.elha.com/assets/elha/uploaded/files/RTO%20Register%20Updated%202019.pdf</a>

Information	Where to access
<b>Class 4 – What we spend and how we spend it</b> <i>Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has actually been spent).</i>	
<b>Information about our accounts and budgets</b>	
Description of funding sources	Revenue income is primarily from tenants in the form of rents and service charges and is used to fund the management and maintenance of our properties and to service our loans, and from local Government grants to fund our Care & Repair Service. Key sources of capital funding (for the acquisition / development of new homes) are Housing Association Grant, loans from banks and building societies and accumulated revenue surpluses
Audited accounts	<a href="https://www.elha.com/our-income-and-how-we-spend-it">https://www.elha.com/our-income-and-how-we-spend-it</a>
Budget policies and procedures	<a href="https://www.elha.com/assets/elha/uploaded/files/Budget%20Preparation%20Procedure.pdf">https://www.elha.com/assets/elha/uploaded/files/Budget%20Preparation%20Procedure.pdf</a>
Budget allocation to key service areas	Management and maintenance administrative costs £2,273,521 Service Costs £136,766 Planned and cyclical maintenance (including capital spend on component replacement) £1,611,044 Reactive maintenance costs £896,476 Bad debts (rent and service charges) £120,000 Depreciation of affordable let properties £1,948,600 Loan interest £976,988 Care & Repair Service and Small Repairs Service £361,814
<b>Our programme of work and projects</b>	
Brief details of any project funding and how it's being spent	Not applicable
Capital works programme/plans information (annual programme figure)	<a href="https://www.elha.com/our-income-and-how-we-spend-it">https://www.elha.com/our-income-and-how-we-spend-it</a>
<b>Spending relating to Staff and Governing Body</b>	
Expenses policies and procedures	<a href="https://www.elha.com/assets/elha/uploaded/files/Entitlements%20Payments%20and%20Benefits%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Entitlements%20Payments%20and%20Benefits%20Policy%20Document.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Employee%20Expenses%20Policy%20Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Employee%20Expenses%20Policy%20Document.pdf</a>

Information	Where to access
	<a href="https://www.elha.com/assets/elha/uploaded/files/Management%20Committee%20Member%20and%20R3%20Board%20Member%20Expenses%20Policy(2).pdf">https://www.elha.com/assets/elha/uploaded/files/Management%20Committee%20Member%20and%20R3%20Board%20Member%20Expenses%20Policy(2).pdf</a>
Senior staff/governing body member expenses	<a href="https://www.elha.com/staff-and-committee-expenses">https://www.elha.com/staff-and-committee-expenses</a>
Board member remuneration other than expenses	None
Pay and grading structure (levels of pay rather than individual salaries)	<a href="https://www.elha.com/assets/elha/uploaded/files/Pay%20and%20Grading%20Structure.pdf">https://www.elha.com/assets/elha/uploaded/files/Pay%20and%20Grading%20Structure.pdf</a>
General information about staff pension scheme	We offer staff pensions through the SHAPS scheme – more information is available here: <a href="http://www.tpt.org.uk/schemes/shaps-db-member/home">http://www.tpt.org.uk/schemes/shaps-db-member/home</a>
<b>Class 5 – How we manage our resources</b> Information about how we manage our human, physical and information resources	
<b>Human resources</b>	
Strategy and management of human resources	<a href="https://www.elha.com/assets/elha/uploaded/files/Staff%20Training%20Development%20Policy(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Staff%20Training%20Development%20Policy(1).pdf</a>
Staffing structure	<a href="https://www.elha.com/who-we-are-and-what-we-do">https://www.elha.com/who-we-are-and-what-we-do</a>
Human resources policies, covering: <ul style="list-style-type: none"> <li>• recruitment</li> <li>• performance management</li> <li>• salary and grading</li> <li>• pensions</li> <li>• discipline</li> <li>• grievance</li> <li>• staff development</li> <li>• Maintenance and retention of staff records</li> </ul>	<a href="https://www.elha.com/assets/elha/uploaded/files/Recruitment%20Policy%20Document%20(2).pdf">https://www.elha.com/assets/elha/uploaded/files/Recruitment%20Policy%20Document%20(2).pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Staff%20Appraisal.pdf">https://www.elha.com/assets/elha/uploaded/files/Staff%20Appraisal.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Pay%20and%20Grading%20Structure.pdf">https://www.elha.com/assets/elha/uploaded/files/Pay%20and%20Grading%20Structure.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Pensions%20Policy.pdf">https://www.elha.com/assets/elha/uploaded/files/Pensions%20Policy.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/EVH%20Statement%20of%20terms%20and%200conditions%20of%20employment%20April%202018.pdf">https://www.elha.com/assets/elha/uploaded/files/EVH%20Statement%20of%20terms%20and%200conditions%20of%20employment%20April%202018.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Staff%20Training%20Development%20Policy(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Staff%20Training%20Development%20Policy(1).pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Data%20Protection%20-%20Data%20Retention%20Schedule%20for%200Personal%20Information%20Only%20-%20ELHA.pdf">https://www.elha.com/assets/elha/uploaded/files/Data%20Protection%20-%20Data%20Retention%20Schedule%20for%200Personal%20Information%20Only%20-%20ELHA.pdf</a>
Trade Union information	Our relationship with Trade Unions is handled by our HR Support advisors, EVH – more information is available here: <a href="http://www.evh.org.uk">www.evh.org.uk</a>



Information	Where to access
Summary of professional organisations/trade bodies of which we are a member	Scottish Federation of Housing Associations, 3rd Floor, Sutherland House, 149 St Vincent Street Glasgow, G2 5NW  Employers in Voluntary Housing, 5th Floor, 137 Sauchiehall Street, Glasgow, G2 3EW
<b>Physical Resources</b>	
Management of our land and property assets, including environmental/sustainability reports	<a href="https://www.elha.com/assets/elha/uploaded/files/Asset_Management_Strategy.pdf">https://www.elha.com/assets/elha/uploaded/files/Asset_Management_Strategy.pdf</a>
General description of our land and property holdings	We own 1,415 properties, including 1,308 homes for affordable rent, 44 shared ownership properties and 65 other properties (such as garages, workshops and our office buildings)
Estate development plans	None
<b>Information Resources</b>	
Records management policy and records management plan, including records retention schedule	<a href="https://www.elha.com/how_we_use_your_personal_information">https://www.elha.com/how_we_use_your_personal_information</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Data%20Handling%20-%20Document%20retention%20schedule.pdf">https://www.elha.com/assets/elha/uploaded/files/Data%20Handling%20-%20Document%20retention%20schedule.pdf</a>
Data protection or privacy policy	" <a href="https://www.elha.com/assets/elha/uploaded/files/Privacy_Policy_Document.pdf">https://www.elha.com/assets/elha/uploaded/files/Privacy_Policy_Document.pdf</a> "  <a href="https://www.elha.com/privacy-policy">https://www.elha.com/privacy-policy</a>
<b>Class 6 - How we procure goods and services from external providers</b> Information about how we procure works, goods and services, and our contracts with external providers.	
<b>Our Contractors and suppliers</b>	
Information about our key service delivery contractors who carry out: <ul style="list-style-type: none"> <li>responsive repairs</li> <li>landscape maintenance</li> <li>planned/cyclical maintenance</li> </ul>	We used the following suppliers for repairs and maintenance services in 2018/19: Advanced Stairlifts Alba Glass & Glazing Company All Cleaned Up (Scotland) Chimney Scotland Dial A Rod Services Dolphin Stairlifts Dunbar Removals Eden Services Scotland Grange Energy Services H.E.S. Pest Management Specialists ICI Steel Fabricators Ideal Flooring Solutions John Rae Lothian Gas Orbis Protect R3 Repairs

Information	Where to access
	SCS Cleaning Services Tunstall Telecom Wood Group PSN
List of suppliers and contractors used by organisation (provided to staff under our Entitlements Payments and Benefits Policy)	<a href="https://www.elha.com/assets/elha/uploaded/files/Contractor%20List.pdf">https://www.elha.com/assets/elha/uploaded/files/Contractor%20List.pdf</a>  <a href="https://www.elha.com/assets/elha/uploaded/files/Supplier%20List.pdf">https://www.elha.com/assets/elha/uploaded/files/Supplier%20List.pdf</a>
Information about regulated procurement contracts awarded (value, scope, duration)	For up to date information, visit: <a href="https://www.publiccontractsscotland.gov.uk/search/search_mainpage.aspx">https://www.publiccontractsscotland.gov.uk/search/search_mainpage.aspx</a>  Type “East Lothian Housing Association” into the “Buyer Name” field, make sure the “Include Archived Contracts” box is ticked and choose a date range, then click “Search”.
<b>Our Procurement</b>	
Procurement Policy and procedures	<a href="https://www.elha.com/who-we-work-with">https://www.elha.com/who-we-work-with</a>
Information on how to tender for work and invitations to tender	<a href="https://www.elha.com/who-we-work-with">https://www.elha.com/who-we-work-with</a>
Register of contracts awarded which have gone through formal tendering, including name of supplier, period of contract and value	<a href="https://www.elha.com/register-of-contracts-awarded">https://www.elha.com/register-of-contracts-awarded</a>
Links to procurement information we publish on Public Contracts Scotland website	For up to date information, visit: <a href="https://www.publiccontractsscotland.gov.uk/search/search_mainpage.aspx">https://www.publiccontractsscotland.gov.uk/search/search_mainpage.aspx</a>  Type “East Lothian Housing Association” into the “Buyer Name” field, make sure the “Include Archived Contracts” box is ticked and choose a date range, then click “Search”.
Framework Agreements	None
<b>Class 7 – How we are performing</b> Information about how we perform as an organisation, and how well we deliver our functions and services	
Annual Report	None published
ARC report to tenants	<a href="https://performance365.elha.com/">https://performance365.elha.com/</a>
Performance Standards / indicators	<a href="https://directory.scottishhousingregulator.gov.uk/Pages/LandlordSummary.aspx?LAtoZNameQS=C1E83758-CFA9-E311-93F1-005056B555E6">https://directory.scottishhousingregulator.gov.uk/Pages/LandlordSummary.aspx?LAtoZNameQS=C1E83758-CFA9-E311-93F1-005056B555E6</a>
Benchmarking information	<a href="https://directory.scottishhousingregulator.gov.uk/Pages/LandlordSummary.aspx?LAtoZNameQS=C1E83758-CFA9-E311-93F1-005056B555E6">https://directory.scottishhousingregulator.gov.uk/Pages/LandlordSummary.aspx?LAtoZNameQS=C1E83758-CFA9-E311-93F1-005056B555E6</a>
Complaints policy, guidance and forms	<a href="https://www.elha.com/comments-complaints">https://www.elha.com/comments-complaints</a>



Information	Where to access
	<a href="https://www.elha.com/assets/elha/uploaded/files/Complaints_Procedure_new_logo.pdf">https://www.elha.com/assets/elha/uploaded/files/Complaints_Procedure_new_logo.pdf</a>
Complaints reports or equivalent to show how complaints are handled and influence service delivery (aggregate reports rather than individual outcomes).	<a href="https://www.elha.com/complaints-analysis">https://www.elha.com/complaints-analysis</a>
Tenant scrutiny reports	<a href="https://www.elha.com/tenant-scrutiny">https://www.elha.com/tenant-scrutiny</a>
<p><b>Class 8 – Our commercial publications</b>  <i>Information packaged and made available for sale on a commercial basis and sold at market value through a retail outlet e.g. bookshop, museum or research journal</i></p>	
This class does not apply to us as we do not produce any publications for sale.	Not applicable
<p><b>Class 9 – Our open data</b>                      Open data made available by us under the Scottish Government's <a href="#">Open Data Resource Pack</a> and available under open licence.</p>	
This class does not apply to us	Not applicable

**Full Charging Schedule**

This section explains when we may make a charge for our publications and how any charge will be calculated. There is no charge to view information on elha.com or at our premises. We may charge for providing information to you, but we will charge you no more than it costs us to do so. We will always tell you what the cost is before providing the information to you. Our photocopying charge per side of paper is shown in the tables below:

***Black and White Photocopying***

Size of Paper	Pence per sheet
A4	10p
A3	20p

***Colour Photocopying***

Size of Paper	Pence per sheet
A4	20p
A3	40p

***Alternative Formats***

Format	Charge
Computer Discs	£1.00

***Postage Costs***

Postage costs may be recharged at the rate we paid to send the information to you. Our charge is for sending information by Royal Mail First Class.

When providing copies of pre-printed publications, we will charge no more than the cost per copy of the total print run. We do not pass on any other costs to you in relation to our published information.

***Charges for information which is not available under the scheme***

If you submit a request to us for information which is not available in this Guide and we agree to supply it to you, the charges will be based on the following calculations:

**General information requests**

- There will be no charge for information requests which cost us £100 or less to process
- Where information costs between £100 and £600 to provide you may be asked to pay 10% of the cost. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50 calculated on the basis of a waiver for the first £100 and 10% of the remaining £500

- We are not obliged to respond to requests which will cost us over £600 to process
- In calculating any fee, staff time will be calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour
- We do not charge for the time to determine whether we hold the information requested, nor for the time it takes to decide whether the information can be released. Charges may be made for locating, retrieving and providing information to you
- In the event that we decide to impose a charge we will issue you with notification of the charge (a fees notice) and how it has been calculated. You will have three months from the date of issue of the fees notice in which to decide whether to pay the charge. The information will be provided to you on payment of the charge. If you decide not to proceed with the request there will be no charge to you.

**Charges for Environmental Information Environmental information is provided under the EIRs rather than FOISA.**

The rules for charging for environmental information are slightly different.

We do not charge for the time to determine whether we hold the environmental information requested or deciding whether the information can be released. Charges may be made for locating, retrieving and providing information to you e.g. photocopying and postage.

If we decide to impose a charge, we will issue you with notification of the charge and how it has been calculated. The information will be provided to you on payment of the charge.

If you decide not to proceed with the request there will be no charge to you. Charges are calculated based on the actual cost to us of providing the information:

- Photocopying is charged at 10p per A4 sheet for black and white copying, 20p per A4 sheet for colour copying.
- Postage is charged at actual rate for Royal Mail First Class.
- Staff time is calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour.

The first £100 worth of information will be provided to you without charge.

Where information costs between £100 and £600 to provide, you will be asked to pay 10% of the cost. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50, calculated on the basis of a waiver for the first £100 and 10% of the remaining £500.

Where it would cost more than £600 to provide the information to you, however, we will ask you to pay the full cost of providing the information, with no waiver for any portion of the cost.

**Charges for requesting for your own personal data**

There is no charge for requesting your own personal data under the General Data Protection Regulation (GDPR) Subject Access Request. We will provide a copy of the information free of charge.

However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we can charge for all subsequent access requests. The fee must be based on the administrative cost of providing the information.

Further information on GDPR can be found on the Information Commissioner's Office website. Click [here](#) to access.

## Model Publication Scheme Notification Form

This form is for use by authorities adopting the Commissioner’s Model Publication Scheme (the MPS) for the first time.

If your authority has previously notified us that it has adopted the MPS, or an annual edition of the MPS, it does not have to notify us again unless there has been a significant change to the authority e.g., a change of legal name or a merger with another authority.

### Notes on completion

**You must provide all of the information requested below.**

The information you provide in **Part 1** of the form will be published on the Commissioner’s website.

Information in **Part 2** is requested for our records, and will not be published on our website.

Please email your completed form to: [publicationschemes@itspublicknowledge.info](mailto:publicationschemes@itspublicknowledge.info).

We will acknowledge receipt of your form within 5 working days.

PART 1: The Authority (or Company)	
Name of Organisation:	East Lothian Housing Association
Corporate Address:	18-20 Market Street Haddington East Lothian
Postcode:	EH41 3JL
Telephone:	01620 825032
Fax:	01620 826596
Email address for FOI requests:	enquiries@elha.com
Website:	elha.com
Website address of the authority’s Guide to Information (direct URL):	<a href="https://www.elha.com/assets/elha/uploaded/files/Guide%20to%20Information(1).pdf">https://www.elha.com/assets/elha/uploaded/files/Guide%20to%20Information(1).pdf</a>

PART 2: Contact details	
<b>Name of Head of Organisation:</b>	Martin Pollhammer
Job Title (e.g. Chief Executive):	Chief Executive
Telephone:	01620 825032
Email:	Martin.pollhammer@elha.com
<b>Name of person with responsibility for the publication scheme:</b>	
Job title:	Martin Pollhammer
Address (if different from the corporate address):	
Email:	Martin.pollhammer@elha.com
Telephone:	01620 825032
<b>Name of person with responsibility for freedom of information requests to the authority:</b>	Janice Thomson
Job title:	Executive Support Officer
Address (if different from the corporate address):	
Email:	Janice.thomson@elha.com
Telephone:	01620 825032

Form submitted on behalf of the authority by:	
<b>Name:</b>	Martin Pollhammer
<b>Date:</b>	29 October 2019

## Staff Appraisal Policy Review

### Report by Martin Pollhammer, Chief Executive – for Approval

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A full review of the Staff Appraisal Policy took place in March 2017 where it was decided that although this policy would be reviewed under the normal review cycle (five years), it should also be kept under review by the Management team and JCC.

Following feedback from staff during the appraisal process, it was noted that staff found the whole process too long and that they rarely referred to the content of their appraisal form from one appraisal to the next. Managers also found that as it stood, the appraisal process was not a useful measurement tool for staff performance.

The Management Team reviewed the whole appraisal process including the layout and content of the appraisal form.

There were two main changes that the Management Team suggested:

- The appraisal form to be amended to a working document that is reviewed and updated on a regular basis
- Short appraisal reviews to take place each quarter with a final full review to take place in Quarter 4 (March) each year

Changes to the appraisal process was discussed and agreed at the Joint Consultative Committee (JCC). Following this, staff giving training on the new process at the Staff Away Day in September 2019, which also introduced the new appraisal form.

The Staff Appraisal Policy was amended to reflect the changes in the appraisal process. The revised **Policy Document** is attached to this report. The JCC has reviewed these changes and recommends them to the Management Committee.

#### **Recommendation**

The Management Committee is asked to approve the revised Staff Appraisal Policy.

ELHA POLICY

<b>Date Issued</b>	18 November 1999
<b>Last Revised</b>	November 2019
<b>Department</b>	Corporate
<b>Title</b>	<b>Staff Appraisal System</b>
<b>Objective</b>	To identify future priorities and requirements, review work performance and training during the previous year, and identify training requirements for the coming year, in order to ensure delivery of our Vision and our Business Plan
<b>Responsible</b>	Chief Executive
<b>Review Date</b>	November 2024

## 1.0 PURPOSE

- 1.1 The main reason for carrying out staff appraisals is to improve our performance in achieving our objectives and delivering our Vision and our Business Plan, by maximising individual employee and team potential.
- 1.2 It is recognised that a review of individual and team achievements in the context of Job Descriptions and workload can improve performance through:
  - Identification of an individual's contribution to the delivery of our Vision and Business Plan
  - Providing an opportunity for staff to contribute to the organisation's development
  - Clarification of an employee's duties and role in the team
  - Identification of training needs
  - Identification of support needs
  - Giving future direction to the job through the identification of objectives
  - Building good relationships between staff members

## 2.0 PRINCIPLES

- 2.1 We recognise that best results will only be achieved if the appraisal process is conducted in an atmosphere of mutual respect.
- 2.2 Our appraisal process supports our "Healthy Happy Homes" vision and Supportive Staff Structure.



- 2.3 Our appraisal process commences with staff from the Service Provision Zone down to Senior Management in the Strategy and Development Zone. This process runs in tandem with Management Committee Strategic Planning.
- 2.4 Our appraisal process will assess the overall achievements rather than day to day details and focus on staff ideas for ~~the~~ [Departmental Actions Plans and Business Plan](#).
- 2.5 Staff appraisals will normally be carried out ~~quarterly~~ [annually](#) with a ~~full-half~~ year review [annually](#).
- 2.6 The aim of our appraisal process is to achieve mutual assessment and agreement on the employee's performance in achieving their work priorities, setting their future work priorities to ensure delivery of our Vision and Business Plan, and identifying any training requirements.
- 2.7 The appraisal process should not be used as a mechanism to admonish or reward particular staff, nor should it be seen as an opportunity for the staff member to raise issues which have not previously been brought to the appraiser's attention.
- 2.8 We will ensure that Management Committee members, managers and staff involved in carrying out appraisals undertake appropriate training.
- 2.9 The success of the appraisal interview should not be influenced by the relationship between the appraiser and the appraisee at the time. This must be recognised by both parties to the interview and their expectations should realistically reflect this.
- 2.10 A completed Appraisal Form is a confidential document and only the employee, employee's line managers, Executive Support Officer and Chief Executive, will have access. Appraisal Forms will therefore be kept securely.
- 2.11 The Management Committee will receive an annual report from the Chief Executive on the implementation of the staff appraisal process.

### 3.0 APPRAISAL PROCESS

- 3.1 Appraisals will commence with staff and flow through the Managers to the Chief Executive. Staff appraisals will be held in [June, September, December and March](#) ~~November and December~~ each year [and must be completed by the last day of the month.](#)
- 3.2 [The quarterly review meetings should take approximately 15 minutes to discuss the progress of an individual's work/training plan and to evaluate the actions of the business plan.](#)

~~3.3~~ ~~The third quarter review meeting Staff appraisals~~ must be completed by Christmas so that each Manager develops a draft Departmental Action Plan. This Plan will include resource requirements and projects that the department wishes to take forwards in the coming year.

~~3.34~~ The draft Departmental Action Plan will feed into the budget and business planning processes along with actions arising from the Management Committee planning days. The budget will be set in February and the Business Plan in March.

~~3.4~~ ~~A half year staff appraisal review will be held each May to discuss the progress of an individual's work/training plan and to evaluate the actions of the Business Plan.~~

### 3.25 **The Appraisal Interview**

The employee will be given sufficient time during working hours to prepare for the interview and should understand the framework and objectives of the appraisal process. They should take time to fill in the Appraisal Form which will form the basis of discussion with their line manager at the appraisal interview. The appraiser should identify and clarify in advance if there are key areas for discussion at the appraisal. Managers and staff should have regular discussions about work, their contribution and its relationship to the organisation's objectives throughout the year.

### 3.36 **Who Appraises Who**

The intention is that all employees will be appraised. The person carrying out the appraisal must have direct influence and experience of the appraisee's work and performance, and be capable of implementing most of the recommendations arising from the appraisal. In the Chief Executive's case the appraisal will be carried out by the Chair and/or Vice Chair.

### 3.47 **The Appraisal Form**

The Line Manager will issue the Appraisal Form, ~~which includes a Competency Indicator Checklist (see Appendix 1a & 1b), a Job Description and Competency Guidelines (see Appendix 2)~~ to the employee at least 2 weeks before the ~~review meeting appraisal~~ is due to take place. The form will state the date it should be returned to the appraiser, usually one week prior to the appraisal interview.

The Appraisee should take time to complete the Appraisal Form, taking account of the guidance notes ~~and competency indicators~~, as this will form the basis of the discussion with their line manager. ~~The line manager should also complete a Competency Indicator Checklist on each member of their staff before seeing the completed Appraisal Form (it should be noted that the checklist is provided as a toolkit for staff use and will not be stored with the~~

~~appraisal form upon completion of the process.)~~ Upon receipt of the completed Appraisal Form, should the line manager feel there are significant areas for discussion then these should be highlighted to the appraisee before the meeting, bearing in mind that there should be no element of surprise, on either side.

### 3.58 The Appraisal

A period of 15 minutes should be allocated for each review meeting and 45 - 60 minutes should be allocated for the annual review meeting. ~~each appraisal interview.~~ The appraiser and appraisee will agree the work-/training plan objectives and timescales at the appraisal.

### 3.69 Post Interview Arrangements

After the interview, the appraiser will complete the appraiser's report section of the Appraisal Form electronically, on the key areas of discussion as well as the agreed work/training plan. This will be emailed to the appraisee who will have an opportunity to comment further. The appraisee should then print off a copy of the Appraisal Form with their comments, sign it and return the appraisal form to their line manager.

In the event that the appraiser and appraisee fail to reach agreement on any matter directly relating to the appraisal, the matter may be referred to the Director of the Service at the appraisee's request. In the Chief Executive's case, referral will be to a nominated Office Bearer that did not carry out the initial appraisal. The appraiser and appraisee should seek to reach agreement in the first instance.

Managers will meet with their staff on a quarterly basis to review ~~in May each year following the appraisal to~~ review the progress of the agreed work/training plan and review the Business Plan.

## 4.0 POLICY REVIEW

- 4.1 The Chief Executive will ensure that this policy is reviewed ~~after one full year of operation and that any amendments required are submitted to the Management Committee for approval. Thereafter the policy will be reviewed every five years.~~

# Tenancy Management Policy Review

## Report by Karen Barry, Director of Housing – for approval

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### 1.0 Introduction

The final legislative changes introduced by the Housing (Scotland) Act 2014 came into force on 1 November 2019, requiring the Tenancy Management Policy to be amended. These changes are highlighted in the **Policy Document** attached to this report.

Tenants have been informed of the legislative changes via letter, newsletters and Facebook during the year, consequently no formal consultation is required regarding the proposed changes to this Policy.

### 2.0 Summary of Amendments

The legislative changes related to new notification and residency requirements that must be met for subletting, assignation, adding a joint tenant and succession requests, and are all self-explanatory.

In addition, new statutory grounds for refusing an assignation, have also been introduced by the 2014 Act and are detailed in Appendix 1 of the Policy.

Paragraph 17.13 has been added to the policy to clarify what we will do in the event a person who wants to succeed to a tenancy is not a qualifying person.

### **Recommendation**

The Management Committee is asked to approve the amendments to the Tenancy Management Policy.

<b>Date Issued</b>	22 March 2007	<b>ELHA Policy Document</b>
<b>Last Reviewed</b>	<b>November 2019</b>	
<b>Department</b>	Housing Management	
<b>Title</b>	<b>Tenancy Management</b>	
<b>Responsible</b>	Director of Housing	
<b>Next Review</b>	November 2024	

## 1.0 Introduction

1.1 The term Tenancy Management covers many of the services we provide to tenants in our role as a landlord. This document details our policy in relation to the following matters;

- Abandonment of tenancy / joint tenancy
- Assignations
- Care of estates
- Care of gardens
- Car parking
- Garages / garage plots
- Pets
- Lodgers
- Mutual exchanges
- Running a business from home
- New tenancy visits
- Short Scottish secure tenancies
- Sublets
- Succession
- Tenancy terminations
- Transfer of tenancy and voluntary changes

1.2 We have separate policies for the following:

- Antisocial Behaviour
- Domestic Abuse
- Rent Arrears
- Empty Homes Management
- Tenancy Sustainment

1.3 This policy complies with the:

- Housing (Scotland) Acts 2001 & 2014
- Equalities Act 2010
- Scottish Social Housing Charter outcomes

1.4 Staff are provided with detailed procedures on every area covered by this policy. The procedures will cover how the policy objectives are to be achieved, recording and reporting mechanisms, and monitoring arrangements.

## **2.0 Policy Aims**

2.1 We aim to make sure that:

- Our tenants have access to clear information about their rights and responsibilities and our policies in relation to tenancy issues
- A clear framework exists to ensure that staff can respond effectively to enquiries from tenants on a range of tenancy management issues
- Our estates are well maintained and attractive  
A high level of service is provided to all regardless of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; special needs, geographical location or disability

## **3.0 General Principles**

3.1 We will adopt a preventative approach to all potential tenancy management problems by making sure that tenants are well informed about their tenancy rights and obligations. Where possible, we aim to “design out” problems.

3.2 We will adopt a customer centred approach when dealing with tenancy issues and will involve both individuals and groups of tenants in finding solutions.

3.3 We will deal with issues sensitively and in confidence. Some issues cannot be dealt with effectively whilst absolutely maintaining confidentiality. Where this is the case, it will be explained to the individual(s) concerned and they will be consulted on how to proceed.

3.4 We will use legal remedies such as Action of Specific Implement and Notice of Proceedings to resolve issues. If necessary, we will take action to end a tenancy but this will always be a last resort, when all other options have been exhausted.

- 3.5 We will develop effective working relationships and involve other agencies such as the Police, Environmental Health, Safer Communities Team and Social Work wherever appropriate.
- 3.6 Unless otherwise specified, requests from tenants required in terms of the Tenancy Agreement must be in writing and can be submitted through the tenant's My Home account. Where appropriate, forms will be provided to facilitate this and to ensure that all necessary information is collected at the outset.
- 3.7 We will provide leaflets, in plain English, explaining our policy and procedures in relation to particular requests, e.g. Mutual Exchanges, Permission for Lodgers etc. and these will be available online. On request and where appropriate, we will take practical steps to help tenants, such as arranging interpreting and translation, information on CD, in larger print and in ethnic languages.
- 3.8 In some instances (for example mutual exchanges, applications to take in lodgers) we are required by law to notify our decision within 28 days failing which our consent is assumed. If we do not have sufficient information to make the decision then the request may be refused in order to protect our position. A revised decision will be made and notified to the tenant as soon as the necessary information is available.
- 3.9 If we refuse a tenant's request, including in the circumstances outlined at 3.8 above, we will explain why in writing and the tenant will be advised of their right to appeal.

#### **4.0 Abandonment of Tenancy / Joint Tenancy**

- 4.1 We aim to prevent abandonment by ensuring that all tenants know how to terminate their tenancy, that a named emergency contact is provided by all new tenants and by good management of all tenancies.
- 4.2 If we have reasonable grounds to believe that someone has abandoned their tenancy we will give the tenant(s) 4 weeks' Notice of our intention to repossess the property. If at the end of that period the tenant has not made contact and we still have reasonable grounds for believing the tenancy has been abandoned then we will repossess the house by serving another Notice.
- 4.3 If during the period between service of the first and second Notices we have reason to believe that the property may be at risk (e.g. of vandalism or frozen pipes/flooding), 2 members of staff will enter the property for the purposes of ensuring that it is secure.

- 4.4 If we have reason to believe a joint tenant has abandoned the house we may give the abandoning tenant 4 weeks notice of our intention to end their part of the tenancy. If at the end of this period, we still have reasonable grounds for believing that the abandoning tenant is not occupying the property we will serve another Notice terminating their interest in the tenancy, which will end 8 weeks from the date of serving the second notice. The second Notice will be copied to the remaining joint tenant and the tenancy will then continue in their name only.
- 4.5 We may suspend the use of the Abandonment Procedure if the tenant(s) whereabouts are discovered at any stage.
- 4.6 If a tenant is unhappy about our decision to recover an abandoned house they have a right of Appeal to us. They also have recourse to court and may raise proceedings against us within 6 months of the tenancy being terminated.
- 4.7 If a joint tenant is unhappy with our decision to end their interest in a joint tenancy, they may appeal to us. They also have recourse to court and may raise proceedings against us within 8 weeks after the date of service of the second notice.
- 4.8 We maintain a register of all tenancies subject to the Abandonment procedure. We also maintain a public register of belongings left in abandoned property.
- 4.9 We will store abandoned belongings for a six-month period provided they are of sufficient value to meet the costs of storage. We will dispose of any belongings which are of insufficient value to cover the costs of storage.

## 5.0 Assignment

- 5.1 An assignation is when a tenant passes their tenancy (or part of their tenancy) over to another person who then becomes the tenant of the property. This is a continuation of the original tenancy and a new Scottish Secure Tenancy Agreement should not be signed.
- 5.2 All tenants have the right to assign their tenancy in accordance with the Housing (Scotland) Act 2001 provided they make their application in writing and they have received written consent from us. We may refuse consent if we have reasonable grounds for doing so (see Appendix 1).
- 5.3 ~~In order to qualify for an assignation the, assignee must have resided in the property as his/her principle home for a minimum of six months before the request is received. If the property is adapted or it will be under-occupied by more than 1 bedroom, we will not consent to the assignation but may offer suitable alternative accommodation.~~



The assignee must have resided in the property as his or her only or principle home for a minimum of 12 months before the date of the written request, and the tenant or assignee must have notified us that they were living there. The length of time the assignee has been living in the property as their only or principle home starts from the date we were notified. A tenant can update their details at any time in their My Home account, and the My Home software contains full audit trails that record the date and time of any change made. If we receive this information in any other way (for example in writing), our staff will update the tenant's My Home record for them. Therefore, the date recorded in the My Home software will normally be the date we use as the date we were informed that the assignee became a member of the household.

5.4 If the property is adapted or it will be under-occupied by more than 1 bedroom, we will not consent to the assignation but may offer suitable alternative accommodation

5.45 If a tenant is permanently hospitalised or moves to a nursing home and there is someone living in the property who would qualify for an assignation, we will consider such a request if the tenant is able to put it in writing. If the property is adapted or it will be under-occupied by more than 1 bedroom, we will not consent to the assignation but may offer suitable alternative accommodation. (See also 18.0, Tenancy Terminations)

5.56 We must respond to a request giving our decision within 28 days of receiving the original application. If we do not respond within this time then, by law, it will be taken that we have agreed to the request.

## **6.0 Care of Estates**

6.1 We will ensure our estates are maintained to a high standard by:

- Carrying out regular estate inspections throughout the year in every development in our stock. These will be done in consultation with tenants and/or tenant & resident groups where appropriate. This enables us to identify short-term repairs and improvements as well as build a picture of our neighbourhoods' requirements and our tenants' aspirations for the longer term.
- Making sure that all communal landscaped areas are regularly monitored to ensure that they are tidy and well maintained. Any problems will be raised with East Lothian Council or Contractors and Consultants as appropriate.
- Regularly monitoring the fabric and cleanliness of communal areas including stairs, bin stores, lock-up garages, parking areas and drying

facilities and taking appropriate remedial action to resolve any issues that may arise.

- Attending to repairs to walls, fences, gates, signposts, bin stores, lock-up garages or other communal property in our ownership promptly and in accordance with our maintenance policies and procedures.
- Regularly monitoring general environmental matters such as parking, street cleaning, lighting, refuse collection, condition of pavements etc. and taking appropriate action to remedy any issue which may arise.
- Dealing with issues such as vandalism including graffiti, damage to fences, etc promptly.
- Dealing with issues such as complaints of vermin and pest infestation promptly.

6.2 We will consider the use of all appropriate remedies, including the use of cleaning rotas, inclusion in service charges and, ultimately, legal action to keep our communal areas neat and tidy.

6.3 We operate a stair cleaning contract in many of our stairs for which residents are required to pay a service charge. (See Appendix 2 for specification). We monitor this contract on a regular basis to ensure that the work is being carried out satisfactorily. We will carry out an annual satisfaction survey of this contract to obtain tenants views and to ensure a high level of service is being achieved.

## **7.0 Care of Gardens**

7.1 We will outline the importance of garden maintenance to all new tenants at the start of their tenancy.

7.2 We will inspect gardens routinely when visiting estates on other matters.

7.3 We will carry out home visits to tenants whose gardens are not being maintained to identify the cause of the problem.

7.4 A Garden Care Scheme is available to all of our tenants who are unable to look after their garden. We will accept tenants on to the scheme provided that:

- They were able to do the garden when they were allocated and accepted the house.
- They have no-one living with them who could reasonably be expected to care for the garden.
- If under 70 years of age, they will need to provide medical evidence to support their application.

- That all other obligations of the tenancy are being met.

7.5 We will carry out an annual review of all tenants on this scheme to ensure that they continue to qualify and will measure their levels of satisfaction with the service.

7.6 We will maintain the gardens of our empty properties until we re-let them.

## **8.0 Car Parking**

8.1 Car parking spaces are available to tenants and their visitors in some of our developments. Since the number of spaces is limited it is not normally possible to allocate spaces for the sole use of specific tenants.

8.2 Our car parks are provided for the sole use of parking private cars belonging to residents and their visitors. We will consider the use of a permit holder only service where parking for our tenants becomes a problem. We will take appropriate measures to remove vehicles parked without authorisation (e.g. caravans, commercial vehicles) if they are causing a problem, or vehicles that have been abandoned in our car parks. Untaxed cars will be reported to East Lothian Council's Environmental Services who have the authority to remove them.

8.3 We will not allow major repair work on cars or other vehicles parked in car parks owned or managed by us.

## **9.0 Garages & Garage Plots**

9.1 We will accept enquiries for garage / plot lets in person, by telephone or in writing.

9.2 We will record the area which an applicant is interested in and add their details to the garage / plot waiting list. If no waiting list exists, we will advertise the garage/plot through elha.com and our office window.

9.3 We will give our tenants priority over non-tenants when allocating a garage otherwise we will make all allocations in date order.

9.4 There are no succession rights to garage leases. We will however give priority to spouses, civil partners and co-habitees if the tenant dies and the partner wishes to continue with the lease.

9.5 All tenants and non-tenants will only hold one garage / plot let. However, the Director of Housing may in exceptional circumstances consider a further let, i.e. where there are vacant garage / plots and there is no waiting list.

- 9.6 We will only grant permission for garages which can be dismantled to be erected on our garage plots.

#### **10.0 Pets**

- 10.1 Sections 2.6, 2.7 and 3.3 of the Tenancy Agreement state that tenants have the right to keep domestic pets; provided they recognise their responsibilities and obligations set out in the Agreement; including not allowing their pet to cause a nuisance. If a tenant does not comply with the Agreement, we can insist on the removal of the pet and will consider taking the appropriate legal action if necessary.
- 10.2 Due to the excessive number of complaints received relating to dogs living in flats, from 1 April 2017 we will not allow dogs in flats where there is no private garden. However, the Director of Housing may grant permission in exceptional circumstances only.
- 10.3 Provided they are complying with the terms of the Tenancy Agreement, no existing dog owner will be required to re-home their pet but any dog owner living in our flats before 1 April 2017 will be asked to register their dog(s) with us. If, after this date, their dog/s cause a nuisance we will request that the animal is removed and will take the appropriate legal action if the tenant fails to comply with our request.
- 10.4 When we advertise flats to which the ban on dogs applies this will be clearly stated in the advert to ensure that applicants are aware of the ban before they apply for the property.
- 10.5 We will also reiterate this information at pre allocation visits and check that the applicant does not own a dog.
- 10.6 From 1 April 2017 the only exception to the ban on dogs in common entrance flats will be assistance dogs.

#### **11.0 Lodgers**

- 11.1 A lodger can be defined as someone who has sole use of at least one room in a tenant's home and pays some form of rent. Family members will not normally be classed as lodgers.
- 11.2 All Scottish secure tenants have the right to take in a lodger provided they have applied in writing and have received our written consent. We may refuse consent if we have reasonable grounds for doing so. (See Appendix 1).

- 11.3 We will ensure that the tenant understands the implications of having a lodger and how this might affect their benefit entitlement. During the lodging period the tenant remains responsible for the payment of rent and adherence to the tenancy agreement.
- 11.4 There is no legal relationship between the lodger and us. If the presence of a lodger results in a breach of tenancy conditions, e.g. nuisance to neighbours, we will withdraw permission. We may take appropriate legal action if the tenant fails to comply with our withdrawal of lodger permission.
- 11.5 We must respond to requests for a lodger within 28 days of receiving the application with our decision. If we fail to respond within this timescale it will, by law, be taken that we have agreed to the request.

## **12.0 Mutual Exchanges**

- 12.1 Tenants have the right to exchange with another tenant of a local authority, other housing association, or a water authority or sewerage authority provided they have applied in writing and have received our written consent.
- 12.2 We may refuse consent if we have reasonable grounds for doing so (See Appendix 1).
- 12.3 No minimum period of tenancy applies before an exchange may be considered.
- 12.4 Exchanges are intended to satisfy long term housing need and may be refused where the exchange improves an applicant's situation but still leaves them in housing need.
- 12.5 Exchanges will be allowed where they will result in under-occupation of the property by no more than one bedroom.
- 12.6 We must respond to a request to exchange within 28 days of receiving the application with our decision. If we do not respond within this timescale it will, by law, be taken that we have agreed to the request.

## **13.0 Running a Business from Home**

- 13.1 We will normally grant permission to run a business from home provided that:
- The running of the business will not cause nuisance, annoyance or danger to neighbours or damage to property.
  - There will be no breach of other tenancy conditions.

- The business does not require a change of use in respect of the building or lead to objections from statutory authorities.

13.2 It is the tenant's responsibility to ensure that any necessary statutory consents, e.g. Planning Permission, are granted and that any conditions applying to such consents are fulfilled.

#### 14.0 New Tenancy Visits

14.1 We will carry out new tenancy visits to any tenant who requests a visit, or to tenants who are vulnerable or for whom early indicators suggest that it would be beneficial, to ensure that the tenancy is sustained. Please refer to our Tenancy Sustainment Policy.

14.2 The purpose of the new tenancy visit is to:

- Ensure that new tenants fully understand their rights and responsibilities, and our rights and responsibilities as a landlord
- Address any concerns that the tenant may have
- Prevent rent arrears
- Encourage tenant participation
- Provide general housing advice
- Provide additional support at the start of a new tenancy

#### 15.0 Short Scottish Secure Tenancies (SSST)

15.1 Our policy is to provide tenants with a Scottish Secure ~~T~~tenancy but we recognise that in some special circumstances there will be a requirement for a short Scottish Secure Tenancy (SSST).

We will grant SSST's for a minimum period of 6 months except where they are granted following complaints of anti- social behaviour. In such cases the minimum period will be 12 months (see 15.4). We will only extend SSST's for a further period of 6 months if the tenant is in receipt of housing support services and we have explained the reasons for the extension.

15.2 We may use an SSST in the following circumstances:

- If there is evidence that a tenant, anyone living with them or visiting them has behaved antisocially within the previous 3 years of the notice being served
- If there is evidence that a prospective tenant, or someone who will reside with them, has behaved anti-socially within 3 years of being considered for a tenancy

- Temporary lets to persons moving into the area to take up employment to enable them to seek accommodation
- Temporary lets pending development affecting a property
- Temporary lets to homeless persons for tenancies 6 months or over
- Temporary lets to persons requiring or receiving housing support services as defined in section 91(8) of the Housing (Scotland) Act 2001
- Temporary lets where other property owned
- Lets in houses leased by us from another body where the terms of the lease preclude us from subletting under an SST.

### 15.3 Rights of the SSST

- There is no right to succeed to the tenancy
- Security of tenure is limited
- Rights to assign, sublet or exchange are limited to the period of the SSST

### 15.4 SSST for Anti-Social Behaviour

We may convert a tenancy to a SSST when there is evidence that a tenant, someone living with them, a subtenant or visitor has behaved antisocially in or in the locality of the house during the preceding three years of serving a Notice. We may also create an SSST for a prospective tenant who has, or anyone living with them has behaved antisocially within three years of them being considered for a tenancy. The SSST will last for a minimum of 12 months and will convert to a SST unless we have taken action to evict the tenant. However, we can extend the SSST for a further one-off period of 6 months if the tenant is in receipt of housing support services and we have notified them of the reasons for the extension.

We will make it clear to tenants that the SSST is being granted because of certain behaviour and that it will convert to a SST in 12 months provided the tenancy is conducted satisfactorily. We will make it clear that certain support will be made available specifically to help the tenant to successfully convert to a SST.

If the tenant refuses support, we will decide whether to offer the SSST without the support or make acceptance of the support a condition of the offer.

If there are serious breaches of tenancy during the 12-month period (18 months where the extension applies) we will seek to recover possession at any time using the grounds set out in Schedule 2 of the Housing (Scotland) 2001 Act. However, if the tenant, someone living with them, a sub tenant or a visitor has been convicted of serious criminal or anti-social behaviour in or around the property which is punishable by imprisonment (irrespective of whether the conviction itself imposed a term of imprisonment), we may seek to recover possession using the

streamlined eviction process provided the conviction was within the previous 12 months and the criteria for the streamlined process is met.

If we serve Notice to commence repossession action, a tenant can apply to the Association to have the decision reviewed within 14 days of service of the Notice. The Association must notify the tenant of the decision of the review and if the decision is to seek recovery of possession, provide the tenant with an explanation.

- 15.5 If we serve Notice to commence repossession action, a tenant can apply to the Association to have the decision reviewed within 14 days of service of the Notice. The Association must notify the tenant of the decision of the review and if the decision is to seek recovery of possession, provide the tenant with an explanation.
- 15.6 Tenants have the right to appeal to the Courts if they are not satisfied with the type of tenancy or occupancy offered by us. We will make tenants aware of this right when offering a SSST and of their right to appeal our decision. In the event of an appeal we will not hold the property offered pending the outcome but if the tenant's appeal is upheld will offer the first available suitable property.

## 16.0 Sub-lets

- 16.1 All Scottish secure tenants have the right to sub-let provided they have made their request in writing and received our written permission. We may refuse consent if we have reasonable grounds for doing so (See Appendix 1).

16.2 If a tenant wants to sublet all or part of their home, they must have lived in the property as his or her principle home for a minimum of 12 months immediately before the date of their written request. If they were not the tenant throughout that period, it must have been their only or principle home during the previous 12 months, and the tenant must have told us they were living there. The length of time the person who wants to sublet the house has been living in the property starts from the date we were notified that they are living in the house as their only or principle home. A tenant can update their details at any time in their My Home account, and the My Home software contains full audit trails that record the date and time of any change made. If we receive this information in any other way (for example in writing), our staff will update the tenant's My Home record for them. Therefore, the date recorded in the My Home software will normally be the date we use as the date we were informed that someone became a member of the household.

~~16.2~~



~~16.3~~ We will normally only consider giving permission to sub-let when the tenant will be away from home for a temporary period. Permission to sub-let will only be granted for a specific period during which the tenant may be away, not normally exceeding 12 months. This period may be extended dependant upon individual circumstances and subject to the approval of the Director of Housing.

~~16.43~~ Permission will only be granted on condition that the tenant has registered as a Private landlord with the Local Authority and fulfils the criteria for registration.

~~16.54~~ We will consider applications to sublet workshops as it could be a means of alleviating business difficulties experienced by Workshop Homes tenants.

~~16.65~~ Permission to sub-let will be conditional upon us approving the tenancy agreement to be issued to the sub-tenant and the amount of rent to be charged.

~~16.76~~ The tenant will remain responsible for ensuring that all conditions of their tenancy are fulfilled throughout the period of the sub-let.

~~16.78~~ The property must be occupied only by the person(s) for whom we have given permission and we reserve the right to refuse an application to sub-let (see Appendix 1).

~~16.98~~ If, at the end of the sub-let, the tenant does not move back into the property and we have not granted an extension to the period of sub-let, we may raise proceedings to terminate the tenancy.

~~16.109~~ We must respond to requests to sub-let within 28 days of receiving the application giving our decision. If we fail to respond within this timescale it will, by law, be taken that we have agreed to the request.

## **17.0 Succession**

17.1 Succession to a Scottish secure tenancy means a person, who is a qualifying person, inheriting that tenancy on the death of the tenant.

17.2 A Scottish secure tenancy can only be succeeded to twice. Each time there are three levels of priority (See Appendix 3) if the tenancy has been inherited twice, the third death will normally end the tenancy. However, this will not happen if there is a surviving joint tenant, in which case the tenancy will continue.

17.3 We will grant a succession providing the following conditions are met:

- The tenant has died

- The successor must be a qualified person as stated in Clause 7 of the Scottish ~~s~~Secure ~~T~~enancy agreement (see Appendix 3)

17.4 Succession is an automatic right and cannot be refused on the basis of tenancy breaches by the deceased tenant.

17.5 Before granting a succession, we will need to be satisfied that the person applying to succeed ~~meets the rules~~ is a qualifying person. They also need to meet the notification and residency requirements (see Appendix 3). ~~set out in Appendix 3. We may refuse a succession request if we are unable to confirm that the property was his/her only or principal home at the time of the death of the tenant. In determining this, we may require proof such as Housing Benefit records, bank statements, GP registration or make enquiries with neighbours.~~

~~17.6 We may also require proof of residency such as Housing Benefit records, bank statements, GP registration or make enquiries with neighbours.~~

17.~~6~~7 If more than one person qualifies under any of the levels of priority (~~set out at Appendix 3~~) they must decide amongst themselves who should get the tenancy. If they cannot agree within 4 weeks of the tenant's death, we will make the decision.

17.~~7~~8 Qualifying successors will sign a slip which will be attached to the SST agreeing to be bound by the conditions of the original SST.

17.~~8~~9 If a qualifying person living in the property does not wish to succeed to the tenancy, they should tell us in writing within 4 weeks of the date of death of the tenant. They legally have up to 3 months from the date of death to vacate the property. They will be charged for occupancy at the same rate as the rent for the property, but payments will be taken as 'in lieu of occupancy charges' and no Scottish secure tenancy will be created.

17.~~9~~10 If the house is designed or substantially adapted for a person with special needs, only a person qualifying at level 1 can succeed to the tenancy in the first round of succession (see Appendix 3) unless that person has special needs requiring that type of accommodation. If a person would have qualified otherwise at level 2 or 3 we will make other suitable accommodation available. In these circumstances, the Scottish secure tenancy will continue and the person will pay an occupancy charge at the same rate as the rent until such time as suitable alternative accommodation is offered.

17.~~10~~4 Where paragraph 17.10 above applies and a person qualifying at level 1 has succeeded to the tenancy, a second round of succession will only be allowed to a qualifying person if that person has special needs requiring the design features or adaptations provided in the property.

17.1~~12~~<sup>123</sup> If, after two successions, the second successor dies and there is a person in the household who would otherwise qualify to succeed to the tenancy (but is not a joint tenant) they will be allowed to remain in the property for a maximum of 6 months following the date of death of the tenant. The person will be offered an occupancy agreement.

17.1~~23~~<sup>23</sup> If an applicant is not a qualifying person we do not have discretion over whether to grant a succession of tenancy. In such cases, where there are no other qualifying persons, the applicant will be allowed to remain in the home for up to three months whilst they seek alternative accommodation. They will be charged for occupancy at the same rate as the rent for the property, but payments will be taken as 'in lieu of occupancy charges' and no Scottish secure tenancy will be created.

17.13 In exceptional circumstances only, we may consider it appropriate to allocate a tenancy of either the existing tenancy or another property to the applicant. In these cases, a new tenancy will be granted and it will not be a succession. These cases will be reported to the ~~Housing & Property Services~~ SubAudit & Assurance Committee in accordance with our Allocations policy.

17.14 If anyone is dissatisfied with a decision regarding a right of succession they can appeal using our Complaints Procedure.

## 18.0 Tenancy Terminations

18.1 All tenancy terminations must be confirmed in writing; contain the tenant's signature and will normally be subject to one month's notice in accordance with the terms of the Tenancy Agreement. They can only be submitted by email or through My Home if accompanied by a scanned document containing the tenant's signature.

18.2 If the tenancy is being terminated due to the death of the tenant, two weeks rent free will be allowed for the family to clear the house. This may be extended to a maximum of four weeks with the approval of the Director of Housing.

18.3 If the termination is as a result of an offer of housing from another RSL or Local Authority, the period of notice may be reduced and the tenancy ended the day after the keys are received.

18.4 If a tenant is permanently hospitalised or moves to a nursing home, and they cannot sign a termination form, then the tenancy can only be terminated by someone with the legal power to do so e.g. a Power of Attorney. If the tenancy is terminated in this way and we have been told about someone living in the property who has been resident for at least 12 months before the tenant was hospitalised, we may offer the tenancy to that person, provided this complies with our allocations policy; for

example, if the property is adapted or will be under occupied by more than 1 bedroom we would offer suitable alternative accommodation.

- 18.5 At the termination of tenancy the tenant will be required to leave a clear rent account and the property in an acceptable condition in accordance with the terms of the SST.

## 19.0 Transfer of Tenancy

- 19.1 There is legally only one type of transfer which should be called a transfer of tenancy: - transfer from one spouse to another by the court under the terms of the Matrimonial Homes (Family Protection) (Scotland) Act 1981. Our consent to this is not required but we are able to object to the transfer by representation in Court.

- 19.2 When the Court makes such an order, the new tenant will assume all rights and obligations of the former tenant other than the rent arrears. However, where the tenancy was a joint tenancy, the tenants remain jointly and severally liable for any arrears accumulated before the Order. That means that either spouse can be obliged to repay the entire amount.

- 19.3 In all cases, a new Tenancy Agreement must be signed and we must retain a copy of the Court Order.

## 20.0 Voluntary Changes in Tenancy

### 20.1 Joint to Sole tenancy

If one joint tenant wishes to relinquish their share of the tenancy, then this must be done by written agreement between both joint tenants and us. This does not end the tenancy which will continue in the name of the remaining tenant, who assumes responsibility for all aspects of the tenancy, including for example, any rent arrears.

### 20.2 Sole to Joint tenancy

All Scottish Secure tenants have the right to a joint tenancy with one or more individuals, provided the proposed joint tenant has lived in the property as their only or principle home for the 12 months immediately before the date of the written request, and the tenant or proposed joint tenant had notified us of them moving in the property. The length of time the proposed joint tenant has been living in the property will start from the date we were notified of them living there as their only or principle home. A tenant can update their details at any time in their My Home account, and the My Home software contains full audit trails that record the date and time of any change made. If we receive this information in any other way (for example in writing), our staff will update the tenant's My Home

record for them. Therefore, the date recorded in the My Home software will normally be the date we use as the date we were informed that the assignee became a member of the household.

~~they have received written permission first.~~ The person the tenant wants to add as a joint tenant, and any existing joint tenants, must apply in writing along with the tenant.

We may refuse consent if we have reasonable grounds for doing so (See Appendix 1).

When we receive a joint tenancy request, we will explain the advantages and disadvantages of entering into such a contract. The main point being that, although both or all parties will have equal rights to the tenancy, it may be difficult in practice to exercise this right (e.g. when one party has been forced out of the house) but at the same time both / all tenants are jointly and severally responsible for the tenancy, including rent payments.

We must respond to a request for a joint tenancy within 28 days of receiving the request, giving our decision. If we fail to respond within this time it will, by law, be taken that we have agreed to the request.

## 21.0 Equal Opportunities

21.1 We will not discriminate unreasonably in the operation of this policy on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity; race, religion or belief, sex, or sexual orientation.

21.2 We aim to promote equal opportunities and comply with the requirements of the Equality Act 2010.

## 22.0 Training

22.1 All appropriate staff, particularly housing management staff, will receive training to enable them to ensure that the aims of this policy are achieved.

## 23.0 Performance Monitoring

~~23.1 We will carry out regular satisfaction surveys to monitor tenants' levels of satisfaction and obtain their views on our services. We will report these findings and our actions back to tenants and to the Housing and Property Services Sub-Committee.~~

23.12 The ~~Housing and Property Services Sub~~Audit & Assurance Committee will monitor the operation of this policy through the submission of quarterly reports.

#### 24.0 Review of Policy

24.1 The Director of Housing will ensure that this policy is reviewed every five years, or earlier if there is a significant change in legislation. Any amendments required will be submitted to the Management Committee~~Housing & Property Services Sub-Committee~~ for approval.  
~~Significant changes will require Management Committee approval.~~

**Tenancy Management Policy****Appendix 1**

The Housing (Scotland) Acts 2001 & 2014 state that we may refuse to consent to a request for an assignation, lodger, mutual exchange, sublet or joint tenancy providing we have reasonable grounds for doing so. The Acts sets out particular grounds for refusal but this does not take away our general right to refuse. Tenants aggrieved by a decision have access to an appeals procedure.

**Statutory Grounds for refusal [Housing (Scotland) Acts 2001 & 2014]**Assignation, subletting joint tenancy or lodgers

- We have served a Notice of Proceedings on the tenant warning that we may seek eviction on certain grounds because of the tenant's conduct
- We have obtained an order for eviction
- In the case of sub-letting and lodgers, the rent or deposit proposed is unreasonable
- The proposed change would lead to the criminal offence of overcrowding
- We intend to carry out work on the house (or building of which the house forms part) which would affect the part of the house connected with the proposed change
- We have not been notified that the relevant person has been living in the property as their only or principle home
- The relevant person has not been living in the property for the required 12 month period
- Where the proposed assignee would not be given reasonable preference (priority) under our Allocations Policy
- If the assignation would result in the house being under-occupied

Mutual Exchanges

- We have served a Notice of Proceedings on the tenant warning that we may seek eviction on certain grounds because of the tenant's conduct
- We have obtained an order for eviction
- The house was let to the tenant because of his/her employment with us.
- The house was designed or adapted for persons with special needs and if the exchange was allowed, there would be no person living in the house who required those designs or adaptations
- The house is substantially larger for the proposed tenant and his/her family needs or is not suitable for the needs of the proposed tenant and his/her family
- The proposed change would lead to the criminal offence of overcrowding

**Other Reasonable Grounds:**

General

- If there are rent arrears outstanding
- If the proposed tenant, sub tenant or lodger fails to meet the requirements set out in our Allocations policy in terms of eligibility for housing (in practice this means that they would be able to complete our Registration process and would not be placed 'on hold' for any reason if they were to register)
- We have information (from official sources) regarding the person/s who will become the tenant, sub-tenant or lodger that, were it in respect of a direct application for housing, would be sufficient to enable us to place that applicant 'on hold' on our housing register

Mutual Exchanges

- The house and garden of the incoming applicant is in an unsatisfactory condition or they have broken other tenancy conditions.
- Our tenant has altered the property without permission and needs to bring the property up to an acceptable standard.
- The exchange will result in under-occupation of more than one bedroom
- The Association's property is for designated special needs and the proposed incoming tenant does not meet the allocation criteria or require the facilities provided (e.g. wheelchair or amenity housing)
- An unsatisfactory report is received from the landlord of the incoming tenant.
- Either party has a medical condition and the proposed exchange property is unsuitable.
- Other social reasons in accordance with our allocations policy.

**The above list is not exhaustive and we may refuse consent if we have other reasonable grounds for doing so.**



Appendix 2

**SERVICE AGREEMENT**

- Client:** East Lothian Housing Association  
18-20 Market Street  
Haddington  
East Lothian EH41 3JL
- Contact:** Karen Barry.
- Telephone:** 01620 825032  
**Fax:** 01620 826596
- Contract Period:** 2 years
- Start Date:** 1 February 2017
- End Date:** 31 January 2019
- Review:** Annually
- Inspection:** Periodically by Housing Officer's
- Quality Monitoring:** ½ yearly meeting to be arranged by East Lothian Housing Association
- Access:** Keys will be provided by East Lothian Housing Association
- Invoice:** Invoices should be sent monthly to the Housing Manager by 28<sup>th</sup> of each month and should detail:
- dates of clean
  - cost of weekly, fortnightly & monthly clean
- Code of Conduct:** East Lothian Housing Association expects all contractors to be courteous and polite to all staff and tenants during the course of their work.
- Cleaning Materials:** Clean fresh water to be used for each stair. Water to be supplied by cleaning company.
- Cleaning Fluid:** To be agreed between East Lothian Housing Association and Cleaning Company.
- Health and Safety:** The Association requires a copy of the Cleaners' Health and Safety policy, in the absence of which they will be required to comply with the Association's policy.

- Equalities:** The Association requires a copy of the Cleaners’ Equalities policy statement, in the absence of which they will be required to comply with the Association’s
- Cleaning Equipment:** It is essential that clean, fresh mops are used.
- Insurance:** Certificate of Insurance to be provided by Contractor to cover period of contract.
- Termination of Contract:** Either party may terminate by giving 3 months notice. ELHA may terminate by giving 1 months notice if the contractor does not comply with the service agreement or does not clean to the required standards.

**STAIR CLEANING SPECIFICATION**

**FREQUENCY**

- |                   |  |             |
|-------------------|--|-------------|
| <b>Floors:</b>    | Vacuum all floor mats/carpets.<br>Sweep all passages and stairs from ground to top, including steps and uplift all litter.<br><br>Wash all floors and entrance using germicidal cleaner. | fortnightly |
| <b>Windows:</b>   | Wash windows internally and externally.  | 6 monthly   |
| <b>Doors:</b>     | Wash communal door inside and outside.   | monthly     |
| <b>Walls:</b>     | Internal walls to be washed  | 6 monthly   |
| <b>Binstores:</b> | Remove any rubbish, sweep out and wash using germicidal cleaner.   | monthly     |
| <b>General:</b>   | Clean lights, railings and skirtings, risers and tramlines. Stairs and landings should be left dry from excess water to prevent danger to public.  | monthly     |

## Appendix 3

## ORDER OF SUCCESSION

A Scottish secure tenancy can be inherited twice. Each time there are three levels of priority:

**Level 1**

Priority goes to the surviving spouse, civil partner or joint tenant provided the house was their only or principle home at the date of death.

Priority also goes to a co-habitee of either sex (providing the house has been his or her their only or principal home for at least 12six months immediately before the tenant's death,) or a joint tenant; and the tenant or co-habitee has notified us that they are living in the property. The length of time they have been living in the property as their only or principle homes starts from the date we were notified. A tenant can update their details at any time in their My Home account, and the My Home software contains full audit trails that record the date and time of any change made. If we receive this information in any other way (for example in writing), our staff will update the tenant's My Home record for them. Therefore, the date recorded in the My Home software will normally be the date we use as the date we were informed that the assignee became a member of the household.

**Level 2**

If nobody qualifies or chooses to succeed from the first priority group, priority goes to other members of the tenant's family, providing that they are aged 16 years or over, and the house was their only or principal home at the time of the tenants death. The property must has been his or her only or principle home for at least 12 months immediately before the tenant's death, and the tenant or family member must have notified us that they are living in the property. The length of time they have been living in the property as their only or principle homes starts from the date we were notified. A tenant can update their details at any time in their My Home account, and the My Home software contains full audit trails that record the date and time of any change made. If we receive this information in any other way (for example in writing), our staff will update the tenant's My Home record for them. Therefore, the date recorded in the My Home software will normally be the date we use as the date we were informed that the assignee became a member of the household.

**Level 3**

If nobody in any of the above categories qualifies or chooses to succeed, priority goes to carer's aged at least 16 where the house has beenwas their only or principal home at the time of the tenants deathfor at least 12 months immediately

before the tenant's death and where they have given up their only or principal home to care for the tenant or a member of the tenant's household.

The tenant or carer must have notified us of them living in the property, and the length of time they have been living in the property as their only or principle home starts from the date we were notified. A tenant can update their details at any time in their My Home account, and the My Home software contains full audit trails that record the date and time of any change made. If we receive this information in any other way (for example in writing), our staff will update the tenant's My Home record for them. Therefore, the date recorded in the My Home software will normally be the date we use as the date we were informed that the assignee became a member of the household.

Note:

If more than one person qualifies under any of the levels of priority stated above they must decide amongst themselves who should get the tenancy. If they cannot agree within 4 weeks of the tenant's death, we will make the decision.

# Tenant Participation Strategy Review

## Report by Karen Barry, Director of Housing, for approval

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### 1.0 Background

The Association's first Tenant Participation Strategy was approved in 2003 following the enactment of the Housing (Scotland) Act 2001, which introduced a requirement for all social landlords to have a Tenant Participation Strategy in place. During 2013 and 2014 key changes were approved by Management Committee which included shortening the review period from five to three years, new requirements around the Scottish Social Housing Charter, changes to the Tenant Involvement Group (TIG) remit and to include reference to Tenant Scrutiny.

The Strategy was last reviewed in 2016 when a desktop review involving only the TIG as no major changes were required.

The Strategy was scrutinised by the Tenant Participation Advisory Service (TPAS) as part of ELHA's re-accreditation process in Spring 2019, when the Association was again awarded Gold level accreditation. The TPAS Panel's report stated that they found the Strategy to be robust, containing focussed sections, and is a clear and useful strategic tool which reflects recognised good practice. TPAS praised the style of the Strategy, which is written in Plain English and noted the thorough overview of tenant participation and good level of information throughout. The Panel made one comment regarding the Strategy as a formal and corporate document, which they felt may put some tenants off engaging, and noted the Association had a summary of the Strategy which is currently under review.

### 2.0 Proposed Changes

There have been no legislative changes which impact on the Tenant Participation Strategy.

Tenants were invited to participate in the review through the Talkback newsletter, but no response was received. Consultation has been undertaken with staff, stakeholders, and through meetings with the TIG-Panel.

The TIG-Panel agreed that only minor changes are required at this time, as the Strategy demonstrates a strong commitment to tenant participation with an appropriate level of detail included. The recommended changes are highlighted on the **Strategy Document** attached to this report, and reflect changes in practice, examples of recent work on tenant participation and general formatting of the document.

The Summary Strategy leaflet will now be reviewed with the TIG-Panel, to make this as engaging as possible.

**Recommendation**

The Management Committee is asked to approve the revised Tenant Participation Strategy.

# Tenant Participation Strategy

## 2020-2023

## Contents

### Section 1: Introduction

What Tenant Participation Means to Us

Our Commitment

Scottish Social Housing Charter

Why We Have a Strategy

The Benefits of Participation

Our Key Principles

### Section 2: Our Strategy for Encouraging Involvement

### **S** Section 3: Our Management Committee, Membership & TIG

Our Management Committee

Becoming a Member

Our Tenant Involvement Group (TIG)

### Section 4: Tenant Involvement in Performance Assessment

Legal & Regulatory- Framework

Tenant Scrutiny

Scrutiny in Practice

### Section 5: Information & Consultation

Provision of Information

Tenant Consultation

Community Consultation

Satisfaction Surveys



My Home

**Section 6: Working with RTO's and Tenant Groups**

Working with Registered Tenants' Organisations

Supporting Tenant Groups

**Section 7: Improving Housing and Wider Action**

New Developments

Wider Action

**Section 8: Commitment to Resources**

Resource Provision and Training

Funding RTOs

**Section 9: Partnership Working**

**Section 10: Monitoring & Review**

Monitoring & Review

**Appendices**

- |                   |  |
|-------------------|--|
| <b>Appendix 1</b> | Remit of Tenant Involvement Group and Code of Conduct  |
| <b>Appendix 2</b> | Tenant Involvement in Performance Assessment Procedure |
| <b>Appendix 3</b> | Consultation and Research Procedures                   |
| <b>Appendix 4</b> | Performance Indicators                                 |

## Section 1: Introduction

### Tenant Participation – What it Means to Us

Tenant Participation is about tenants taking part in decision making and influencing decisions about:

- our policies that affect them
- housing conditions
- the services we provide
- issues that affect the wider community

It is a two-way process which involves the sharing of information, ideas and power. Its aim is to improve the standard of housing conditions, policies, and services.

### Our Commitment

We are committed to tenant participation. We aim to meet the needs and aspirations of tenants by providing opportunities for them to access all levels of the decision making process.

A lot of good work has been done since the last review of our Strategy in 2013<sup>36</sup>. Some of our successes include:

- ~~We have invited tenants to be actively involved in the development and review of our services. No significant changes have been made without prior consultation with tenants.~~
- ~~We have continued to develop new information leaflets for tenants and reviewed existing leaflets with the involvement of TIG. We have completed two large scale tenant satisfaction surveys; developed and implemented an Action Plan to address issues identified in the 2013 survey and are working on an action plan following completion of the 2016 survey~~
- ~~Increased Tenant satisfaction with nearly all of our services by working with tenants to address issues identified by tenants~~
- ~~Delivered TP awareness training to all staff~~
- ~~Involved tenants in Estate Inspections in all areas to promote participation and a sense of tenant ownership over estate improvements~~
- ~~Involved tenants in developing My Home (digital tenant accounts) resulting in increased use of elha.com and on-line office. Our Tenant Scrutiny Group have successfully completed two service audits and are preparing to carry out a third~~
- ~~A steady increase in the number of tenants using our Facebook page.~~
- ~~Improved partnership working with ELC and other RSL's, sharing ideas and best practice and identifying areas for joint working~~
- ~~We achieved Gold TPAS Accreditation in 2015~~
- We retained our Gold level accreditation with the Tenant Participation Advisory Service (TPAS); with a score of 6 out of 6 in all categories, improving on our average score of 5 out of 6 three years ago.

- The TIG-Panel have helped us to review some of our leaflets, including 'Getting Along with Neighbours', which look better, are clearer and a more interesting read
- We have increased our response rates to our annual Rent Increase Consultation substantially. In 2017, 7.1% of tenants responded, and in 2018, this had more than doubled to 14.7%. Much of the increase can be attributed to our Key Tenant Scheme, which rewards online participation with the highest level of rent discount
- Our Talkback newsletter has continued to develop, and most newsletters have been issued with surveys, allowing tenants to have their say on issues from whether we should allow dogs to live in our flats, to making changes to how we report our performance
- We won first place in the annual TPAS awards in 2018 in the category of 'Digital Participation' in recognition of the impact of our Key Tenant Scheme in improving digital participation
- Following feedback from tenants on the cost of our annual report and to improve the availability of information on how we are performing, we have introduced 'Performance 365' so that tenants (and other interested parties) can assess our performance
- We have introduced group meeting for residents of new developments to allow people to meet before they move into their new home, and to find out more together about our services and how they can become involved with the Association

This strategy sets out our plans for involving our tenants in making decisions and influencing policies and procedures about the houses they live in and the services they receive over the next three years and -

~~It outlines our commitment to working with our tenants to improve the services that we provide, encouraging them to influence decisions about their homes and their communities, and providing them with the means to do so. The strategy gives details of how we hope this process will be developed, by whom, and how tenants will play a bigger part in our activities in the future.~~

~~This strategy is closely linked to our key aim which is: our vision of healthy, happy homes. We are committed to provide:~~

- First class affordable rented homes
- Excellent customer care
- Expert maintenance services
- Support for independent living

Our services should always be provided in a professional, honest, reliable, and friendly manner.

This strategy outlines our commitment to working with our tenants to improve the services that we provide (including through scrutinising our work), encouraging them to influence decisions about their homes and their communities, and providing them with the means to do so. The strategy gives details of how we hope this process will

be developed, by whom, and how tenants will play a bigger part in our activities in the future.

~~“To promote balanced communities by providing locally managed quality homes and services which meet the needs and aspirations of local people.”~~

We will review the progress of the strategy regularly to identify and examine the issues that matter to and affect our tenants, and to make sure that we manage and maintain the services we provide for our tenants to achieve high levels of satisfaction.

Together with our tenants we want to deliver a high quality, regularly reviewed tenant participation process that demonstrates that we are doing what we say we will do and allows our tenants to be involved at the heart of all of our work.

### Scottish Social Housing Charter

The Scottish Social Housing Charter was introduced by the Housing (Scotland) Act 2010 and came into force on 1 April 2012. The revised Charter, which took effect from 1 April 2017 sets out the standards and outcomes that all social landlords should aim to achieve when performing their housing activities and offers tenants a new way to get involved and participate with us.

Outcome 3 of the Scottish Social Housing Charter states that:

“Social landlords manage their businesses so that: tenants and other customers find it easy to participate and influence their landlord’s decisions at a level they feel comfortable with.”

The Charter replaces the Performance Standards set out in the guidance issued under the Housing (Scotland) Act 2001 but it does not replace any legal duties under this Act.

The Scottish Housing Regulator is responsible for monitoring, assessing and reporting on how well landlords achieve the Charter outcomes. The results of their findings are reported in an Annual Report on the Charter (ARC). ~~Our tenants are involved in our self assessment of our services, most notably in deciding what we report to all of our tenants and the resultant report “How We’re Doing” has received positive feedback from tenants through scrutiny projects, regular discussions on performance, and through having an input into what is reported in our monthly and annual reports, through Performance 365.~~

## Benefits of Tenant Participation

We recognise the potential benefits of tenant participation in the delivery and development of our services. These include:

- Improving our services and achieving better value for money
- Improving overall tenant satisfaction with their home, community and the services that we provide
- Better communication between staff and tenants
- Chances for people to develop new knowledge and skills

We acknowledge that it may take time to achieve these benefits and ~~that tenant participation has to be developed at a pace tenants are comfortable with. Different types of opportunities to become involved must be available to suit different tenants.~~ We strongly believe that there is no 'one size fits all' approach to tenant participation and want to support interested tenants to participate in ways that work for them.

By involving tenants and supporting their involvement, we will continue to develop new and practical ways to improve the communities in which our tenants live.

## Our Key Principles

We have adopted the following key principles:

- Successful tenant participation requires a culture of mutual trust, respect and partnership between tenants, committee members, and staff at all levels, working together towards a common goal of better housing conditions and housing services.
- Tenant participation in practice is a continuous process where information and ideas are shared, common understanding of problems is sought and solutions are achieved.
- Effective tenant participation allows all partners to contribute to the agenda. All participants must have the full and detailed information they need to consider issues properly; information must be clear, timely and accessible and take account of equal opportunities.
- How the decision making process works should be open, clear and accountable.
- Tenants must be given enough time to consider issues properly. If they want to, tenants should have the opportunity to meet, discuss and work out a common view in advance of meeting with us.
- Effective tenant participation requires us, as landlord, to recognise and respect the independence of tenants' organisations.
- Good working relationships evolve gradually and should be flexible to adapt to local circumstances.

- Tenant organisations need adequate resources for organisation, training and support.
- Tenant participation in rural areas must be tailored to suit the particular circumstances and needs of tenants in such communities.
- Tenant participation must meet the requirements of current housing legislation and best practice and should help to remove barriers caused by age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, or sexual orientation.

**Section 2 : Encouraging Involvement**

The involvement and approval of all of our customers- but primarily our tenants- has always been important to us and so the additional legal requirements to provide opportunities for customers to become involved in our work resulting from the Housing (Scotland) Act 2010 only served to reinforce much of what we had been doing for years.

At the start of this strategy period, ~~T~~enant ~~P~~articipation is well established within ELHA and all of the processes, policies and resources are in place to enable effective customer involvement. However, we continue to strive to improve levels of participation and have found that we have achieved most significant gains through our efforts to promote digital involvement during the last three years.

In our TIG Panel we have a core of dedicated tenants without whom we would struggle to meet our legal obligations. We do, however, struggle to recruit new members prepared to give up their time to participate in the more traditional ways, principally by attending meetings. Our staff continue to promote membership of the TIG Panel and we have agreed targets for member recruitment with staff. -

This coupled with other changes within the social housing environment, particularly Welfare Reform, has prompted us to look at how we encourage and enable tenants to become involved. Over the three year strategy period, in addition to the work outlined in the remainder of this document, we will;

- Continue to develop the potential of My Home to enable tenants to voice their opinions and influence decisions in the most convenient ways
- ~~Encourage more tenants to participate in consultations by making this a minimum requirement for Platinum Key Tenant status~~Consider ways to promote Platinum level membership of the Key Tenant Scheme to assist in encouraging digital engagement
- Re-organise the workload within our Housing team to enable frontline staff to spend more time encouraging tenants to become involved
- Aim to better demonstrate the direct advantages of becoming involved in issues that affect whole communities by prioritising estate management expenditure to community led projects
- Instigate visits to tenants we don't normally see to garner their views and encourage them to get involved
- Continue to seek to~~Significantly~~ increase the number of tenants using My Home and paper free services where submitting comments and opinions can be done easily at any time
- Promote services like Praise or Grumble, facebook, 5 minute surveys and so on to get occasional snapshot views from our tenants
- Work on developing our social media presence to promote tenant participation and encourage engagement
- Designate a "Tenant Participation Champion" within the Housing Team to encourage colleagues and tenants alike to work together to improve services
- Ensure the resources needed for effective Tenant Involvement are available
- Involve the whole staff team in working with tenants to achieve improvements within our developments

- Record praise with the same consistency that we record complaints so that we benefit from positive feedback as well as acting on negative feedback



### Section 3: Our Management Committee, Membership and the Tenant Involvement Group

#### Our Management Committee

We are run by a voluntary Management Committee which is elected by our members at each Annual General Meeting (AGM). Management Committee members can be tenants or other people with a real interest in housing. We have strong community representation on our Management Committee and this helps us to know what issues are important to tenants and others in the communities we work in.

Our Management Committee is made up of 15 members, of whom up to 5 may be co-opted members. They control our business by:

- Setting the policies to be followed by staff
- Making sure that staff are carrying out our legal and financial responsibilities
- Giving authority to staff to carry out the decisions of the Management Committee and to attend to the day to day business

Management Committee members must work within our Rules. They are also accountable to the Scottish Housing Regulator.

#### Becoming a Member

The most direct way of participating in our work is to become a Member of the Association. Membership costs only £1.00 and is for life. We provide full details of how to become a member of the Association to all of our tenants. An information leaflet and application form is available from our office and on elha.com. Our members may attend the AGM and vote for, or be elected to, our Management Committee.

We believe that promoting membership of the Association, encouraging tenants to become members and attend our Annual General Meetings or other organised meetings is an important aspect of tenant participation.

For those Members who are elected onto the Management Committee, we will ensure that appropriate training is provided to ~~make sure they can do the jobs~~ support them in their role.

#### Our Tenant Involvement Group (TIG)

We have a Tenant Involvement Group (TIG) made up of tenants who have indicated an interest in getting involved in a variety of ways, for example, focus groups, surveys, via social media or My Home or being part of the TIG Panel.

The TIG Panel is responsible for reviewing and implementing our Tenant Participation Strategy, scrutinising our performance in relation to the Scottish Social

| Housing Charter outcomes and for working with us to increase ~~t~~Tenant ~~P~~participation in all areas of our work. The Panel generally meets six times each year and works with our staff to develop and review the Tenant Participation Action Plan each year. The remit of the TIG Panel is attached at **Appendix 1**.

## Section 4 : Tenant Involvement in Performance Assessment

### Legal and Regulatory Framework

The Housing (Scotland) Act 2010 sets out the foundations for the regulatory system that formally takes account of tenant's views and in April 2012 the Scottish Social Housing Charter (the Charter) was launched. Social landlords in Scotland are responsible for meeting the Charter standards and outcomes and gathering evidence to demonstrate that they are doing so.

The role of the Scottish Housing Regulator (SHR) is to monitor, report and assess how well social landlords are achieving the Charter standards and outcomes. The SHR is not prescriptive about how tenants can be involved but do require landlords to:

- Agree their approach to self assessment with tenants
- Ensure that -it is effective and meaningful
- Publicise the approach to tenants
- Demonstrate their approach is being implemented
- Provide a statement of how they will involve service users, customers, homeless people, homeowners and hard to reach groups in their self-assessment activities.

### Tenant Scrutiny

Tenant scrutiny aims to give tenants more power in holding their landlord to account for their decisions, performance and conduct. It is the name given to tenants being involved in agreeing the landlord's self assessment process then independently scrutinising the landlord's results in relation to the Charter Outcomes.

### Scrutiny in Practice

The Tenant Involvement Group's Scrutiny sub-group is responsible for scrutinising our performance to ensure that the outcomes in relation to the Charter are met. [The TIG-Scrutiny Group have been successful in working with the Association to improve practices, including assessing our telephone system and working with staff to make it easier for customers to speak to the right person first time.](#)

A procedure detailing how tenant scrutiny is implemented within ELHA can be found at **Appendix 2**. The process continues to evolve as the tenants involved gain experience and confidence.

**Section 5: Information, Consultation and Research**

**Provision of Information**

Individual tenants, Tenants Groups and Registered Tenant Organisations (RTOs) need accurate and accessible information if they are to make informed choices. We always aim to provide good, clear information, so that tenants, Tenants Groups and RTOs know what is happening. If it is not possible to provide any information requested, we will explain why.

All new tenants are provided with a menu of options for getting involved with our work and ~~this is discussed at a home visit shortly after the tenancy starts~~ we provide information on how people can get involved before their tenancy starts. Our 'My New Home' process allows applicants to make decisions on how they'd like us to communicate with them once they become a tenant and think before they even get their keys about what sort of ways that may suit them to get involved.

One of the options available to all of our tenants is joining our Tenant Involvement Group to ensure that they are consulted in the way that they want to be (by post, internet, face to face etc.), and can nominate specific topics in which they have a particular interest. On request, and where it is reasonable to do so, we will take practical steps, such as arranging interpreting and translation (we are members of Happy to Translate), information on CD, in larger print, and in languages other than English, if this is easier for tenants.

We provide tenants with a range of information either by post, in our office or through elha.com, Performance 365, and My Home including:

- A written tenancy agreement
- A regular Newsletter
- ~~A Tenant Handbook~~
- Information about our Complaints Procedure
- Information about Right to Repair
- Our performance against locally agreed targets and standards each year
- All Policies relating to tenants
- Detailed information about their rent account, repair history and tenant documents held in our systems
- Our Tenant Participation Strategy
- Non-confidential Management Committee papers and Minutes of meetings

and on request we will supply:

- Information about how decisions are made
- Full printed reports on the 3 yearly Tenant Satisfaction Survey
- ~~Non-confidential Management Committee papers~~

## **Tenant Consultation**

We consult with our tenants to give them the opportunity to comment on services, policies and procedures before they are finally agreed. Proposals for tenants to consider will have been developed before reaching this stage.

We will consult tenants en masse through our 5 minute comment cards issued with our Newsletter, individually, in informal groups, as part of a Registered Tenants Organisation (RTO) or a Focus Group, on the following:

- If we want to make changes to policy or service standards relating to housing management or repairs and maintenance, and the change would have a significant impact on tenants
- Our Tenant Participation Strategy
- Our rent increase proposals
- If we were to sell any of our properties that have tenants in them which would result in a change of Landlord or owner
- Local issues such as waste management

We will use a variety of ways to consult tenants in the way that suits them best. For example:

- Individual letters to tenants with reply slips
- Through our newsletter
- Door to door surveys
- On elha.com
- Facebook
- As part of an RTO or tenant group

We have set a minimum standard for all consultations with tenants. Every year we will:

- Advise tenants about the topics we propose to consult them on for the following year
- Provide a timetable of main events including time for responses by the tenants
- Explain what information we will make available to individual tenants to help them take an informed and effective part in the consultation

At the time of consultation, we will provide the following details:

- How the proposal may affect tenants
- A clear indication of what can be changed and clear information about what tenants can expect to see happen as a result of any survey
- How and within what timescale tenants can make their views known to us
- How and when a final decision will be taken
- Details of how tenants will be informed of the results of consultation.
- The staff members dealing with the matter
- Information on how and where to complain if the need arises.

Appendix 3 sets out our procedure for consultation and research.

### Community Consultation

There will be times when we will need to consult with the wider community on issues that affect them. For example, we would consult applicants who are registered with us for housing if we want to make changes to our Allocations policy or, if carrying out major work in a mixed tenure estate, we would consult those who may be affected by the work. In these circumstances we will follow the same procedure set out at **Appendix 3**.

### Satisfaction Surveys

We will always seek comments from tenants on our maintenance services, through feedback on routine repairs and surveys on maintenance projects such as window, door or kitchen renewals. Tenants will also be given opportunities to comment on the range and standard of all services through regular satisfaction surveys.

Every three years we will carry out a comprehensive, large scale Tenant Satisfaction Survey, and will employ an independent consultant to carry out this work.

The results of surveys will be monitored by the TIG Panel and our Management Committee and will be reported to tenants in our Newsletters.

### Online Housing Office

All of our housing services are accessible via elha.com and My Home (the only exception being where we need a person's signature). Tenants can apply for an available property, order and schedule repairs, view their rent account, pay rent, read our policies or information leaflets, obtain energy advice and make complaints. Every page has a praise or grumble feature which allows tenants to provide us with feedback, good or bad.

Tenants who have registered with My Home can sign up for our paper-free service. This is an opt-in service, but we strongly encourage tenants ~~with internet access to~~ [join do so](#), and tenants can change their preferences on My Home at any time.

elha.com and My Home are designed to be as accessible as possible, ~~and~~ set up to be easily navigated by tenants using screen readers or tabbed browsing, and are Browsealoud enabled. Every page of elha.com includes the option to translate the page into over 100 languages.

The Live Help service is essentially a phone call for people who cannot, or prefer not to, use the phone. The service is open Monday to Friday when tenants and other

customers have instant access to an on-line ~~advisor~~ [Officer](#) who can provide them with a range of information and advice.

Our expansion into social media (Facebook) has had a positive impact on tenant participation. We are now reaching tenants who do not normally engage in traditional ~~t~~ Tenant ~~p~~ Participation activities and we expect this to continue to grow.

These online tools are beneficial to both the Association and our customerseveryone and serve to enhance traditional methods of communication and engagement and not to replace them. Every tenant who uses the online services saves us time and money meaning more resources are available to engage with people through traditional methods of communication who prefer this option. It is also worth noting that working electronically reduces our carbon footprint.

**Section 6: Working with RTOs and Tenant Groups**

Developing a Tenant Participation Strategy committed to tenants is part of a process that aims to take people from being informed and consulted on options through to making decisions and acting together to make their voices heard. Meaningful and effective participation leads to liaising with, and including, other agencies and groups for wider action projects in our communities, where this is needed and wanted.

Many tenants may be satisfied with the quality of services provided by us but, in trying to further improve our performance, we want to build tenants confidence and skills so that they can decide and act on the things that affect their daily lives.

**Working with Registered Tenants' Organisations**

A Registered Tenants' Organisation (RTO) is an independent organisation set up by tenants to represent their housing and related interests. It will normally have elected office bearers and a formal constitution. These RTOs can represent the views of people from defined, specific areas or about a specific issue. The RTOs will also have a recognised role in the tenant participation process.

As we continue to develop tenant participation-, we make the following commitments:

- We will provide RTOs with advance notice of how and when decisions will be taken, which affect the management and maintenance of the housing stock. We will make sure that enough time is given to allow for meaningful participation and proper consideration of the tenant's views
- We will speak to RTOs about how they can be involved in our decision-making processes
- We will provide RTOs with a chance to make representations to our Management Committee, either in writing or in person
- Our policies and procedures will, where appropriate, reflect how we involve tenants and RTOs in the decision-making process
- We will allow flexibility for tenants' representatives to state their views on issues they would like to take forward so that they are not just dealing with issues that we want them to consider
- We will involve RTOs in agreeing on ways for collecting wider tenant opinion
- We will involve RTOs in the development and review of our Tenant Participation Strategy
- We will also normally work with informal groups of tenants who have either not yet registered as a tenants' organisation or choose not to go down this route

We have agreed a joint policy with East Lothian Council and Homes for Life Housing Partnership for Registering Tenants Organisations which is reviewed every five



years. This means that the registration process is the same for any tenants group in East Lothian, regardless of who their landlord is. To avoid bombarding tenants with information which is of no relevance to them, we consult only with the RTO's that represent areas in which we own properties.

**Section 7: Improving Housing and Wider Action**

**New Developments and Improvements**

We have regularly involved the local community and individual tenants in the planning of new housing developments or the upgrading of existing properties in the following ways:

- Through local councillors and officials involved in determining the overall housing strategy for East Lothian
- ~~Through the consultative process established to discuss the plans for particular areas, including presentations to Community Councils~~
- Through membership of our Management Committee
- Consultation with our tenants on our delivery plan for the Scottish Housing Quality Standard (SHQS) and the Energy Efficiency Standard for Social Housing (EESH).
- ~~Where properties are being upgraded, through our tenants being involved in making choices on details for their home~~
- Meeting with incoming tenants as a group when their new development is near to completion to provide information on their properties, the area, and the Association, encouraging community spirit and tenant involvement
- After each project is completed, through our tenants giving their views on the work carried out as a part of a Tenant Feedback Survey

We will continue to build on these arrangements for involving tenants, prospective tenants and the wider community in future plans through:

- ~~Continuing to work closely with East Lothian Council in the development of the Local Housing Strategy, through the Housing Forum and associated working groups~~
- ~~Developing stronger links with local groups such as Community Councils~~
- Providing information to all who need it in clear language and using models, drawings, etc. to help explain our plans
- ~~\_\_\_\_\_~~
- ~~\_\_\_\_\_~~
- Whenever possible continuing to offer a range of choices to tenants, while taking into account costs, the need to plan for future maintenance, and our legal responsibilities
- Further development of our online services allowing tenants to participate at times to suit them

**Wider Action**

Involvement with wider community groups (for example, Community Councils, Area Committees, Neighbourhood Watch Schemes, etc) will also be developed on request and where we can contribute to the enhancement of community life.

### Section 8: Funding and Resources

#### Resource provision (including training)

We recognise the need to provide training for both staff and tenants involved in tenant participation. We will provide resources for individual tenants or groups of tenants who get involved to encourage their further participation. This training commitment will be provided by us or by other bodies specialising in training, empowering and assisting the development of tenants (for example groups such as the Tenant Information Service (TIS) or the Tenant Participation Advisory Service (TPAS)).

Where Registered Tenant Organisations (RTOs) or informal tenants groups are formed, we will, if necessary, provide training for the tenants involved (for example, in running meetings, minute taking, keeping financial records etc). We have links with organisations that provide advice, information and training to tenants groups and will work with these organisations to help develop tailored training to meet the needs that tenants identify.

~~We will also consider support to tenant representatives who wish to apply for the Chartered Institute of Housing National Certificate in Tenant Participation by distance learning. Support may include paying all or part of the course fees.~~

Appropriate training will be provided to our Management Committee members, staff and tenants to ensure that they have the necessary information, skills and self confidence to contribute effectively. This training may be in-house or provided by external agencies. The full costs of any agreed training will be paid for by the Association.

As well as helping to identify training needs and funding courses for tenants, we will provide funding where possible for printing newsletters and other information. Our staff will help arrange and organise meetings and provide administrative support for groups seeking to form tenants' associations, or evolving into RTOs. Administrative support could include typing, photocopying and posting, computer access and support and help in setting up filing and storage systems. Direct support will also be provided by our Housing Officers.

Importantly, we will make sure that tenants are able to attend meetings at times convenient to them and at an appropriate venue (e.g. arranging a meeting for residents of a particular development as close as possible to their homes). Meetings with staff will be arranged at times that take account of the needs of the majority of tenants. We will also provide travel and childcare costs where these are relevant to attending training courses, meetings, etc.

Where required, our staff will be available to assist tenants in developing Forums, Panels, etc to maintain tenant involvement in monitoring and reviewing how our

services are provided. ~~Tenants will be encouraged to participate in such groups and meetings which will be held at convenient times and venues to encourage maximum attendance, the ultimate aim being for tenants to influence how resources, in monetary and people terms, are best used for the maximum benefit to tenants.~~

### Funding Tenant Groups

As RTOs and Tenants Groups ~~that may remain unregistered~~ develop, they will need funding to allow them to achieve their aims and to meet the requirements of registration.

Our properties are often in areas of mixed tenure and so we will pay grants proportionate to the number of tenancies we have in the area that a group covers. Grants payable at the start of this strategy are;

Start Up Grant: £~~23~~45.00 thereafter

Annual Grant: £~~98~~0.00 plus £1.~~50~~25 per tenancy

These amounts are reviewed at the same time as our strategy.

Annual grants will be payable to any group meeting registration conditions set out in our joint policy with ELC & HfLHP on Registering Tenant Organisations. These will be paid into the bank account of the group within one month of a claim being submitted and annually thereafter providing the group remains registered and continues to satisfy the registration criteria.

For any group in the process of getting started, legitimate expenses will be met by us from the start up grant, with any balance being paid into the bank account of the group once it has registered. Each RTO that receives a grant will be required to maintain annual accounts and show their accounts to us each year before an annual grant will be paid.

Tenants groups that choose not to register may still apply for funding and will have to specify how much money they need, what it will be used for, and how it will be protected for the use of the group. Such applications will be considered by the TIG Panel who will make a recommendation to the Management Committee as to whether the grant should be paid and any conditions that should be applied.

**Section 9 : Partnership Working**

-We recognise the importance of working in partnership with other agencies that provide and deliver services which affect the communities our tenants live in.

We have developed close working relationships with East Lothian Council and other Registered Social Landlords in East Lothian through the East Lothian TP Liaison Group. We will continue to improve working relations by exploring opportunities for joint working and sharing new ideas and good practice.

We will also continue to network with other Registered Social Landlords, agencies and tenant participationTP workers outwith East Lothian to promote tenant participation, share good practice and learn from their experiences.

**Section 10: Monitoring and Review**

This Strategy sets out how we will encourage and develop tenant participation during the next three years. We regularly review the progress of our Tenant Participation Strategy as required by law and the Scottish Housing Regulator with our tenants. ~~We encourage tenants to join our Tenant Involvement Group (TIG) and want tenants to be involved in monitoring the outcomes of work undertaken;~~ to ensure that our Tenant Participation activity is working well and having a positive impact.

The TIG Panel sets a three year action plan and an annual calendar of activity for implementing the strategy which details the work to be carried out to encourage effective participation. The Panel is also involved in setting the Tenant Participation budget each year to maximise tenant involvement in our activities.

Every three years, we engage independent consultants to complete a large-scale ~~t~~Tenant ~~s~~Satisfaction survey in partnership with our TIG-Panel. This survey provides a large amount of base line information to identify our strengths, weaknesses, opportunities and training needs. Having direction and information relating to the services we provide allows us to target what areas we need to consider and invite tenants to engage with us to prioritise these. The TIG Panel will agree and oversee the implementation of an action plan to bring about any improvements.

We have produced a performance monitoring framework (a list of indicators and outputs is detailed at **Appendix 4**) which will help us to record the quantitative and qualitative measures. Regular ~~quarterly~~ reports are provided to the TIG Panel and the ~~Housing and Property Services Sub-Committee~~ Audit and Assurance Committee who monitor ~~t~~Tenant ~~p~~Participation activity such as, (but not limited to):

- Tenant and staff training
- Meetings with Tenant Groups, RTO's, Focus or Community Groups
- Consultations
- Tenant satisfaction
- Use of elha.com and My Home
- Information and advice provided to tenants
- Contacts with external agencies (e.g East Lothian ~~TP Forum~~ TP Liaison Group)

An annual Tenant Participation report is also provided to our Management Committee.

~~as well as a report from the Tenant Involvement Group being presented at our Annual General meeting.~~

We will provide tenants with regular information about progress against our Strategy, principally through our regular newsletters.

**Appendix 1 – Tenant Involvement Group Remit****1 . Introduction**

Overall responsibility for ensuring that tenants are involved with the work of East Lothian Housing Association in accordance with law and good practice rests with the Management Committee. The Management Committee delegates some of its powers to the ~~Housing and Property Services Sub-Committee~~ Audit and Assurance Committee as laid out in Standing Orders which also allow for Working Groups to be formed to address particular areas of work. The Tenant Involvement Group Panel (TIG-Panel) is one such group.

For ease of monitoring, the Tenant Involvement Group functions are divided into TIG-Panel, who oversee TP activities and implement the TP Strategy and Action Plan, TIG-Scrutiny, who scrutinise our services, TIG-Web, an informal group who assist in the development of digital services, TIG-Focus, for tenants who only want to get involved at a local level or for a specific issue, and TIG-Other, for tenants who may be involved in some other aspect of TP.

**~~2. Aims and Objectives of the Tenant Involvement Group~~**

The Tenant Involvement Group is a permanent Working Group set up to operate on behalf of, and be driven by, tenants and other customers, to ensure that ELHA

- provides housing services that meet customers' needs
- ensures services are delivered to the highest standard
- works to continually review and improve housing services
- involves customers in the self-assessment of ELHA performance against the Scottish Social Housing Charter outcomes

**2. Aims and Objectives of the Tenant Involvement Group**

- To raise awareness of tenant participation and the role of scrutiny within the organisation resulting in an increased number of tenants becoming involved in the scrutiny of ELHA performance.
- To make recommendations to senior managers, ELHA Management and Sub-Committees and Local Authority Elected Members (if appropriate) on how housing services can be improved.
- To ensure that the ELHA Management Committee and staff demonstrate accountability to tenants and residents.

- To provide an opportunity for tenants to examine housing service performance and procedures, and challenge and question staff who manage and deliver the service.



### 3. The Remit of the Tenant Involvement Group Panel

- To develop and implement ELHA's Tenant Participation Strategy ~~and to recommend it to Management Committee for approval~~
- To oversee the Tenant Satisfaction Survey, including approval of the brief and appointment of a Consultant, considering the results, recommending an action plan to Management Committee for approval
- To develop appropriate policies relating to ~~t~~Tenant ~~p~~Participation for approval by the Management Committee
- In liaison with ~~customers and~~ ELHA, to agree the scrutiny priorities and approaches to tenant led scrutiny.
- To act as a link between ELHA customers (tenants, residents, sharing owners, those receiving factoring service, and applicants) ~~and staff / Management Committee in order to drive forward performance improvement.~~
- To request and review information and statistics on agreed priorities to enable housing services to be scrutinised.
- To examine the evidence and make recommendations for service improvements.
- To report recommendations to the Management Committee.
- To monitor and review agreed action plans.
- To share the work of TIG with other customers and encourage involvement.
- To play an active role in developing and encouraging digital tenant participation

### 4. Membership of the Tenant Involvement Group Panel

- Up to 12 places will be available for membership.
- Members should reflect the geographical and demographic nature of the housing stock, where possible.
- Residents of ELHA properties ~~ELHA customers (-)~~ will be eligible for membership.

- ELHA staff and other relevant people will be invited to attend TIG meetings to present information or provide support as required by the Panel.

## 5. Tenant Involvement Group Recruitment and Succession.

- TIG members will be recruited through a rolling recruitment process via an advertisement to all tenants. The article will be advertised on elha.com, Facebook, newsletters, in our office and through face to face contact between ELHA staff and customers.
- TIG members or ELHA staff will meet with interested customers to explain the role of TIG. Thereafter new TIG members will be mentored or have a buddy (existing TIG member) to ensure they understand their role and responsibilities as a TIG member.

## 6. Tenant Involvement Group Panel Meetings

- The TIG Panel will:
  - - Meet every two months at a time and place to suit the membership. Pre meetings may be required by members before attendance of staff at meetings
    - recognise that to ensure maximum participation within the meetings, the times of meeting may need to be varied and flexible.
    - keep meetings to no longer than 2 hours.
- The TIG- Panel -will form and consider the role of sub groups when required.
- A quorum will be more than 50% of members. Inquorate meetings will be noted and decisions ratified at the next quorate meeting.
- The Tenant Involvement Group will be supported and advised by staff in respect of the activities described in this remit
- The Tenant Involvement Group will have access to staff and Management Committee members to enable the terms of this remit to be fulfilled.
- The Convenor and Vice- Convenor of TIG will be an appropriate person and will be agreed by the Group following the ELHA AGM.

## 7. TIG-Panel Programme of Work

- In partnership with ELHA, TIG will develop a programme of scrutiny work and review this each year. The priority areas will be decided using feedback from all available sources including:
  - Performance reports
  - Reports from Service Review Groups, Tenant Inspectors, Mystery Shoppers, Focus Groups, eEstate inspections
  - Tenants and Residents Associations
  - Residents surveys
  - Complaints
  - Benchmarking

## 8. Tenant Involvement Group Panel Accountability to Tenants, Customers and ELHA

- The TIG will refer to a wide range of formal and informal sources to inform its work programme and priorities.
- TIG will gather the views of customers through elha.com and My Home, Facebook, customer comment cards and “Talk to the TIG” sessions.
- The TIG will consider if an existing programme of work should be revised to take account of any trigger or issue arising from customer feedback.
- The TIG minutes and all reports will be made available on My Homesite and to any customer on request.

## 9. Tenant Involvement Group Resources

- The TIG will receive administrative support and services from ELHA staff.
- ELHA has made a commitment through the Tenant Participation Budget to support the development of TIG and associated scrutiny activities. This commitment will be reviewed annually.
- ELHA will ensure that new members of TIG are provided with an opportunity to take part in a TIG induction programme.
- The training and capacity building requirements of all TIG members will be assessed on a regular basis.

- A training programme will be developed, delivered and regularly reviewed. A budget for training will be incorporated into the TIG resource and support requirements.
- TIG and ELHA may negotiate independent development support and training from external tenant support organisations as required.

#### **10. Tenant Involvement Group – Monitoring and Evaluation**

- TIG will monitor and evaluate its activities at an annual review session. A report on the impact of TIG activities will be presented to the ELHA Management [Board Committee](#) and senior staff. The report will also be available to customers on [elha.com](#).
- The assessment may be facilitated by an independent organisation. This could be an organisation with similar business to ELHA or an independent tenant support organisation.

Appendix 2

ELHA PROCEDURE

<b>Date Issued</b>	February 2014
<b>Department</b>	Corporate
<b>Title</b>	Tenant Involvement in Performance Assessment
<b>Objective</b>	<b>To ensure that tenant involvement in monitoring service delivery and performance is incorporated into our working practices and supported appropriately.</b>
<b>Responsible</b>	Housing Manager
<b>Date Reviewed:</b>	<u>November 2019</u>
<b>Next Review Date</b>	<del>February 2020</del> <u>November 2022</u>

## 1.0 INTRODUCTION

- 1.1 In terms of the Housing (Scotland) Act 2010 social landlords are expected to work together with their tenants to monitor performance and service delivery and to ensure that this results in improvements to services.
- 1.2 We have built upon the existing structures in place to deliver effective Tenant Participation and have agreed a new remit with our Tenant Involvement Group (TIG) enabling the TIG Panel to scrutinise our services and self- assessment processes and report their findings to our Management Committee.
- 1.3 This procedure describes how the process will work to ensure that the TIG Panel is appropriately supported in carrying out this important function whilst at the same time ensuring that Scrutiny activities are embedded into routine Group work plans.
- 1.4 It is the responsibility of the Senior Management Team to ensure that appropriate staff resources are made available to the TIG Panel to enable effective Tenant Scrutiny within ELHA.

## 2.0 PLANNING

- 2.1 The TIG Panel will plan scrutiny activities for the forthcoming year using all of the information available to it including, but not limited to;
  - The three yearly Tenant Satisfaction Survey (TSS)
  - Ad hoc Tenant Consultations

- Complaints data
- The Annual Return on the Charter (ARC)
- Self-Assessment Exercises against the Scottish Social Housing Charter outcomes
- Performance Reports
- Relevant internal audit reports
- Reports from Tenant Inspectors, Mystery Shopping. Focus groups and Estate Inspections
- Information from Tenant & Resident Associations

2.2 A proposed timetable including an estimate of how much time the audit will require and suggested dates will be passed to the Senior Management Team for consideration and inclusion in our work plans for the forthcoming year (See table 1 **Appendix 1**).

2.3 Wherever possible the plan will be approved but if there are any clashes e.g with other planned work or planned staff leave suggested revisions will be negotiated and agreed with the TIG Panel.

2.4 Once agreed the audit plan will be incorporated into the Group Business plan which is submitted to our Management Committee for approval in March each year.

2.5 The plan will also be a standing item on TIG meeting agendas so that the TIG Panel can monitor progress.

### 3.0 PREPARING FOR THE AUDIT

3.1 Once the annual plan is approved, individual audits will be considered by the TIG Panel. The Panel will consider the specific issues they want to look at, questions they would like to have answered, background information they will need, which staff need to be involved and how the audit will be conducted (review of policies/procedures; interviews with staff; shadowing; mystery shopping etc). ELHA staff will *assist* in this process.

3.2 This information will be pulled together into an audit action plan (template attached at **Appendix 1**) and passed to the relevant staff in advance of the audit allowing sufficient time for staff to provide the required information and plan any required activities.

3.3 If any of the information requested or planned activities cannot be accommodated (for example because it doesn't exist or because of other staff commitments) a full explanation will be offered and, wherever possible, an alternative will be suggested.

#### **4.0 DURING THE AUDIT**

- 4.1 All staff involved in the audit will be briefed beforehand.
- 4.2 The audit will be conducted in an open and transparent manner. The tenant auditors will be given access to any information they require unless there is very good reason why they can't when a full explanation will be offered.
- 4.3 If staff have any concerns about the sensitivity or confidentiality of information requested this will be referred immediately to a Manager/Director for a decision.

#### **5.0 AFTER THE AUDIT**

- 5.1 -On completion of the audit a report will be compiled giving a brief description of how the audit was conducted, highlighting areas that the auditors felt demonstrated good practice or were particularly good and areas that the auditors felt required attention or improvement. A list of suggested actions will be compiled.
- 5.2 The completed audit report will be passed to the Senior Management Team for consideration and response.
- 5.3 The staff response, including agreed actions with timescales and the Manager responsible for ensuring the action is taken will be passed back to the TIG Panel for agreement. If necessary, an explanation of why suggested actions cannot be implemented will be provided wherever possible with an alternative suggestion for improvement.
- 5.4 The TIG report will be made available on elha.com and to any customer on request.

#### **6.0 ONGOING MONITORING AND REPORTING**

- 6.1 Once agreed with TIG, approved actions will be incorporated into the Group Action Plans and progress will be monitored monthly at Business Management meetings along with other business priorities.
- 6.2 Progress will also be reported back to TIG as a regular agenda item.
- 6.3 The Chief Executive will include action agreed as a result of Tenant Scrutiny in the annual Group Business Action plan report submitted to the Management Committee in May each year.
- 6.4 The TIG will report to tenants on their activities and findings through the newsletter and on elha.com.



**7.0 PROCEDURE REVIEW**

7.1 At a minimum, the Housing Manager will ensure that the procedure is reviewed along with the Tenant Participation Strategy of which it forms part.

Appendix 1

TENANT SCRUTINY WORKPLAN (date to date)

Service Area to be Audited	Audit Dates	Time "On site"	Staff involved	Charter Outcome	Comments

AUDIT 1 PLAN

Name of Area to be Audited						
What do we want to examine/find out?	Background Information we will need	Who will provide it?	What do we want to do? Who will we need to see?	How long will it take?	Comments	Budget
List questions/issues here	List policies/procedures/meetings/reports/performance information needed	Staff member names	List suggested on site meetings, work shadowing proposals, customer surveys or anything else proposed as part of the audit			

<b>DEPARTMENT</b>	<b>Corporate</b>
<b>TITLE</b>	<b>Corporate Consultation Procedure</b>
<b>OBJECTIVE</b>	<b>To provide consistency in the consultation process</b>
<b>Date Issued:</b>	<b>December 2009</b>
<b>Review date:</b>	<b>March 2021</b>
<b>Responsible:</b>	<b>Customer Information Officer</b>

## **Introduction**

This procedure should be read in conjunction with our Tenant Participation Strategy and sets out the procedure for staff to follow when carrying out a consultation exercise. Appendix 1 to this procedure is a consultation table and provides details of the most common consultations exercises carried out in ELHA.

## **1.0 Planning a Consultation**

- 1.1 Planning should be undertaken **at least one month before the consultation is due to start**. This is to ensure that resources and critical staff will be available during the consultation period.
- 1.2 Record who you will be consulting with, (eg: spreadsheet with names & addresses)
- 1.3 Check the SDM extended database for tenants with any problems which may prevent them from taking part (eg: language barriers, disabilities), and assess the best way to consult with them.
- 1.4 Record the questions you want to ask, and how you want people to answer those questions, (eg: yes/no, limited options or free text).
- 1.5 Decide which methods you will use to consult (eg: letters, web forms, phone calls, interviews, etc) and ensure that you are able to carry them out.
- 1.6 Create draft letters/My Home or elha.com pages/PDA surveys, etc to be approved by the department manager or head of department.
- 1.7 Pass the approved drafts to the relevant member of staff to put in place in the SDMLetters folder

- 1.8 Set a realistic timeframe for the consultation period, eg: 10-14 days from mailing to consultation close for paper/electronic surveys, 14-30 days for face-to-face surveys.
- 1.9 Check available resources:
  - is there enough stationery?
  - inform Admin of the mailing in advance, including details of the SDM settings required and the deadline for postage
  - if a Royal Mail pick-up is required, let Admin know at least a week in advance the exact day it will be needed.
  - if additional staff are needed to stuff envelopes/make home visits/etc, check that they will be available when needed.
  - if information is required from a third-party source, ensure that you have the information before proceeding.
- 1.10 Decide how you will analyse and report on the data gathered.
- 1.11 Set up a result record – usually an Excel spreadsheet.
- 1.12 Make a note of which edition of Talkback the feedback will be included in, and put a placeholder file, (eg: a Word document named 'xxx consultation article') in the relevant folder in Corporate Publications

## **2.0 Consulting**

- 2.1 Carry out the consultation as planned above at 1.0 and record responses and any issues that arise during the consultation period.
- 2.2 Responses should be scanned and saved to the tenant's SDM record
- 2.3 Any consultation forms which have been returned with comments or complaints which require a response should be responded to within customer care timescales

## **3.0 Review**

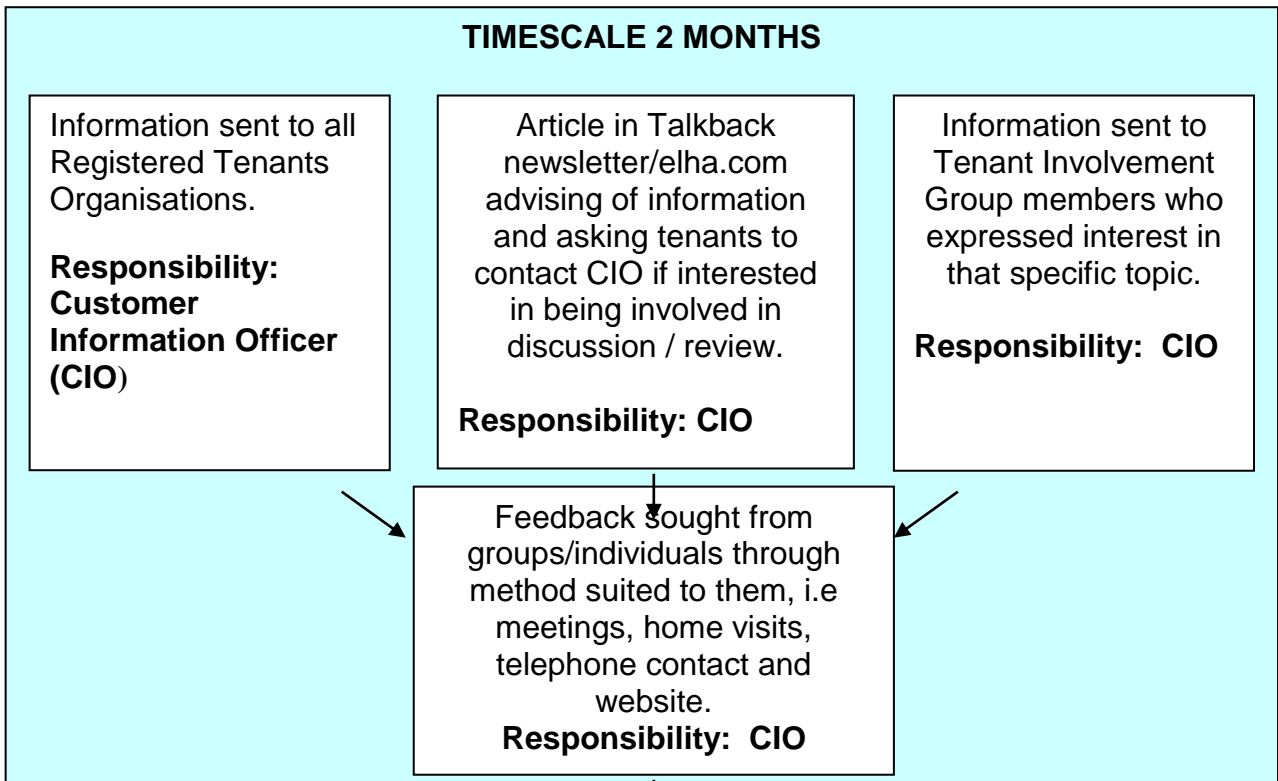
- 3.1 Analyse the data received as planned above at 1.0.
- 3.2 Write a report summarising the results received:
  - record the reason for consulting, (eg: legal requirement, checking customer satisfaction, seeking opinions on possible future projects).
  - record who you consulted with, and how many people responded.
  - if the consultation was undertaken to gauge customer preference for a possible future project, include the findings and recommend a course of action.
  - include appendices with statistical data, graphs, comments, etc.

**4.0 Feedback & Reporting**

- 4.1 The prepared report may go to the next appropriate TIG, Sub-Committee meeting and/or Committee meeting. If so, the report should be saved to the relevant folder in Meetings, and appropriate headers and footers applied.
- 4.2 Feedback to tenants is normally via Talkback, the tenant newsletter. An article based on a plain English version of the consultation report should be prepared and saved to the next issue folder in Corporate Publications. This should include any charts, but not individual tenant feedback.
- 4.3 Letters may also be sent out to interested parties. This should have already been scheduled in the planning stages, and any resources or staff time allocated.
- 4.4 If the consultation is for internal use only, the report (if required) should be passed to the relevant member of staff.

Appendix 3 – Consultation Flow Chart

Subject prepared (or updated) and approved by the Housing Manager and Director of Housing



Comments come back from all the above and are collated by CIO and reviewed by the Housing Manager. Report regarding feedback and recommendations prepared for Committee.  
**Responsibility: Housing Manager**

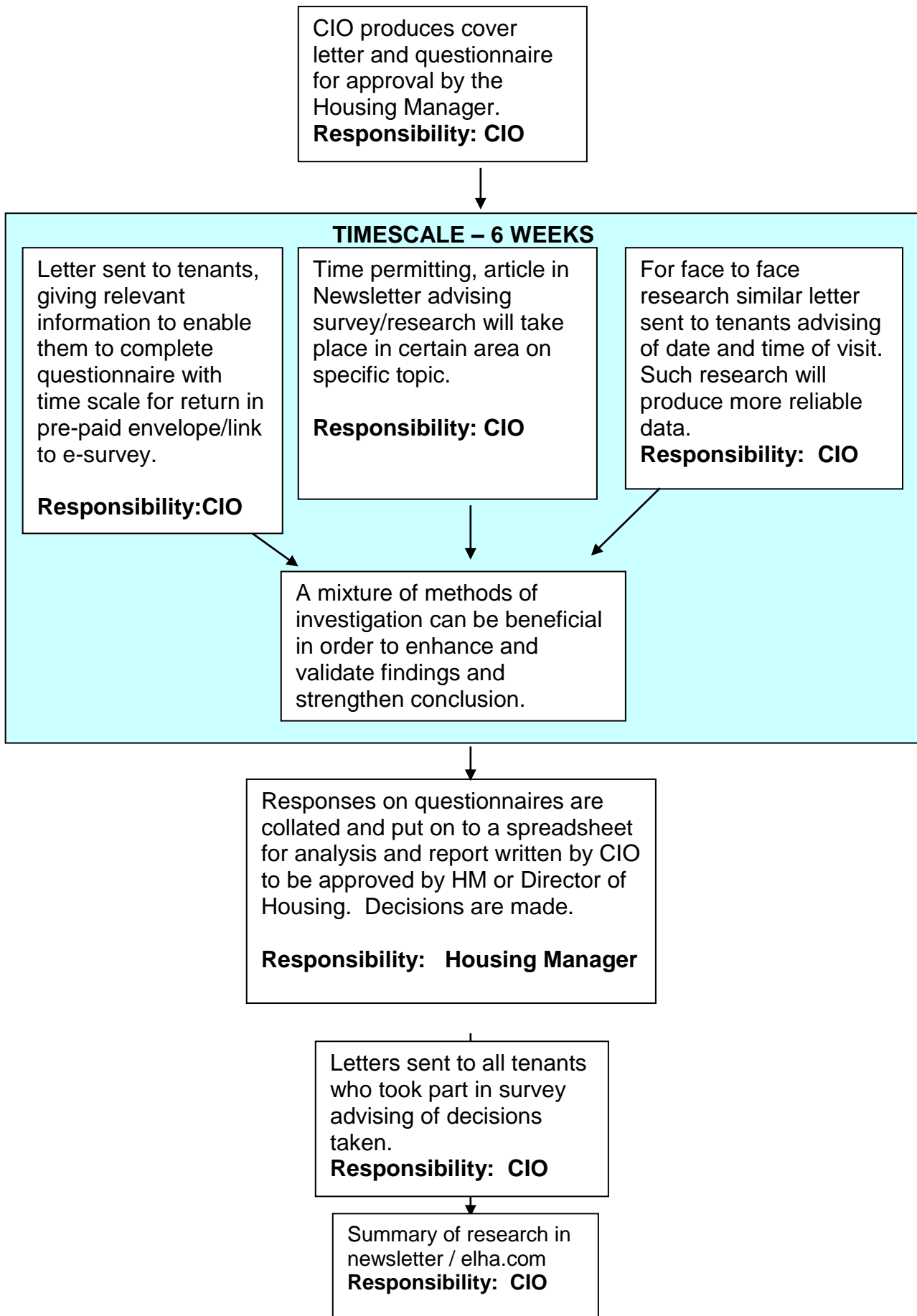


Report submitted to Committee.  
**Responsibility: Director of Housing**



Summary for tenants on outcome in Talkback newsletter / elha.com  
**Responsibility: CIO**

Research Flow Chart



**Appendix 4 – Tenant Participation Performance Indicators**

**Indicator**

**Tenants & Tenant Groups**

- No. of formal/informal groups formed
- No. of groups dissolved
- No. of RTO's and % of tenants this represents
- No. of tenants in the TIG
- No. of new tenants signed up to TIG
- Amount of grant funding paid to tenants organisations

**Meetings**

- No. of TIG Panel meetings held during the year
- No. of tenant group meetings attended during the year
- —No. of TP liaison group/network meetings attended during the year and any joint work carried out
- No. of estate inspections during the year and % of tenant representation
- Outcomes from the estate inspections
- No. of tenant events and % tenants attending during the year
- Facilities offered to encourage participation and maximise accessibility

**Consultation & Information**

- No. of consultations carried out during the year
- No. of RTO's consulted during the year
- Methods used for consultation and to maximise accessibility
- Methods used to encourage participation (e.g. Prize draws)
- No. of tenant surveys issued during the year
- Response rate to surveys
- How the results of surveys were fed back to tenants
- No. of newsletters issued during year
- No. of information leaflets introduced during year
- Level of tenant influence

**TP Training and Awareness**

- Staff attendance at training/awareness sessions
- Tenant/Panel member attendance at training/awareness sessions
- No. of training/information sessions provided by Association staff
- Membership of external bodies e.g. TIS or TPAS



**Budget**

- Amount budgeted for TP and actual amount spent during the year

**Outputs**

- TIG Panel Report to the AGM
- Annual Tenant Participation report to Management Committee
- Quarterly reports to Housing & Property Services Sub Committee
- Quarterly TIG Panel Minutes
- Tenant Participation Strategy Action Plan
- Consultation & Survey Reports
- Joint RTO Register
- Talkback Newsletter

## IT Systems Policy Review

### Report by Paula Oliver, Director of Finance – for approval

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The IT Systems Policy is due for review and is attached for approval.

The changes proposed are minimal and include reference to Two Factor Authentication for remote access to the Group's IT systems (which is currently being introduced), and to the General Data Protection Regulations (GDPR).

#### **Recommendations**

The Management Committee is asked to approve the proposed changes to the IT Systems Policy.

GROUP POLICY

<b>Date Issued</b>	December 2011
<b>Reviewed</b>	November 2019
<b>Department</b>	Corporate Services
<b>Title</b>	<b>Information Technology Systems</b>
<b>Objective</b>	To describe the Group's policy for managing its Information Technology Systems
<b>Responsible</b>	<b>Director of Finance</b>
<b>Next Review Date</b>	November 2024

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**1.0 Introduction**

- 1.1 We recognise that our Information Technology (IT) Systems are of critical importance to the efficient and effective working of the Group's operations and we will therefore ensure that these systems are kept secure, up to date, fully supported and their use maximised.
- 1.2 We require all users to adhere to a comprehensive set of procedures to ensure ~~that~~ the security of our IT systems/Network is maintained at the highest level. We require users to confirm their acceptance of these procedures and ensure that they are informed of any changes to them. We regard the unauthorised use of the Group's IT systems as a serious disciplinary offence and will take disciplinary action against any user who breaches our IT security and procedures.
- 1.3 We maintain an IT Strategy to ensure that the Group's IT systems are kept up to date and support the implementation of its Business Plans.
- 1.4 We will allocate adequate resources to ensure that both the integrity of our IT systems and data contained on them is managed and appropriately maintained through both internal and external support.
- 1.5 We will maximise our investment in IT Systems by ensuring that all employees are suitably trained in the use of those systems which enable them to carry out their duties and enhance overall performance.
- 1.6 We will maintain robust procedures to monitor and control access to the system, including, the use of complex passwords which require regular change, and two factor authentication for working remotely to access our systems as well as giving authority to work remotely.

1.7 We will develop and maintain full procedures to enable the Group and its staff to adhere to this Policy.

## 2.0 **Data Protection and General Data Protection Regulations (GDPR)**

2.1 We will mitigate any risk of breaching the Data Protection Act 2018 and The General Data Protection Regulations (GDPR) 1998, the Computer Misuse Act 1990 and the Obscene Publications Act, 1959 by providing all users with appropriate procedures to follow.

## 3.0 **Non-Business Work**

3.1 To protect the systems, we do not permit any unauthorised non-business work on the Group's IT equipment. If an employee wishes to undertake non-business work on their computer (in their own time) they must first obtain the approval of their line manager. Normally, such approval will not be unreasonably withheld.

3.2 Internet and E-mail use are for Group business. During work time, access to the World Wide Web will be limited to sites relevant to a person's job responsibility. The e-mail system is intended for business purposes only; however incidental non-business use will be tolerated, in the same way as personal use of telephones is accepted, and as set out in section 4.1 of the Use of Information Technology procedure paragraph 5.3 below. Specifically, though, employees must not access their own personal e-mail remotely (for example by logging in to a Hotmail account), since this can seriously compromise our security.

3.3 All use of the Group's internet and e-mail facilities must be in accordance with the Use of Information Technology procedures.

## 4.0 **Social Media Platforms**

4.1 We respect the right to a private life and that includes joining any social media platforms, for example Facebook, Twitter etc., employees wish. However, information posted on such sites is classed as public and is not private. Employees are therefore not allowed to disclose information relating to the Group, its customers, partners, suppliers, Committee or Board members, employees, or stakeholders on any social networking platform. It is also prohibited to post any comments about people and events connected to the Group or make remarks which could potentially bring us into disrepute.

4.2 The Group use Social Media for the promotion of activities, events and as a communication method and staff must use this in accordance with the "Use of Information Technology" procedure.

## 5.0 **Monitoring**

5.1 Our IT systems are critical essential to the running of the business and it is imperative that they are fully protected from unauthorised use which could lead to problems with business continuity. To help us achieve this protection, we will monitor the use of our IT systems in accordance with the Telecommunications (Lawful Business Practice)

(Interception of Communications) Regulations 2000 (“the Lawful Business Practice Regulations”).

- 5.2 We reserve the right to inspect copy, store and disclose the contents of electronic mail messages at any time. However, we will only do so if we believe it is appropriate to prevent or correct improper use, satisfy a legal obligation, or ensure proper operation of the electronic mail facilities. In addition, line managers are authorised to monitor the e-mail accounts of their staff in their absence.
- 5.3 Usage of the internet and our e-mail systems will be monitored by our line managers on a regular basis. Excessive non-business use and/or non-business use during working hours may lead to the privilege being withdrawn and disciplinary action being taken.

## **6.0 Breaches**

- 6.1 Breach of IT Security and the “Use of Information Technology Procedure” could lead to disciplinary action under the Group’s Grievance and/ or Disciplinary Procedures, ranging from suspension of E-mail/Internet services to the termination of employment.
- 6.2 Where a criminal offence may have been committed, the Chief Executive (or Chairman) will decide whether or not to involve the Police.

## **7.0 Implementation and Review**

- 7.1 The Corporate Services Manager will regularly monitor the implementation of this policy. Any breach of the policy will be reported to the Senior Management Team and Management Committee.
- 7.2 The Director of Finance will ensure that this policy is reviewed at least every five years and that any amendments required are submitted to the Management Committee for approval.