

April 2024

**Sanctuary Scotland Housing Association Limited**

**Mapping Exercise for Assurance Statement – Assurance and Notification**

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

SHR Regulatory Requirement and Evidence	Compliant?	Action Required/Commentary
<p><b><u>Requirement</u></b>  <b>Prepare an Annual Assurance Statement in accordance with SHR published guidance, submit it to us (SHR) between April and the end of October each year, and make it available to tenants and other service users.</b></p> <p><b><u>Evidence</u></b>                      2021, 2022 and 2023 Annual Assurance Statement approved, signed and submitted as per regulatory requirements.                      Annual Assurance Statement published on Sanctuary Scotland website.                      SMT review at monthly management team meetings. Timetable for 2024 approved by the Board of Management at the meeting in February 2024. This shows who will lead on each area and the topics that the National Residents review panel and the Area committees will be involved in.</p>	<p>YES</p>	

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<p><b><u>Requirement</u></b>  <b>Notify us (SHR) during the year of any material changes to the assurance in its Annual Assurance Statement.</b></p> <p><b><u>Evidence</u></b>            Cannot provide evidence of this as there has been no requirement to do so but scrutiny by the management team and keeping areas under review will ensure that any material changes will be notified</p>	<p><b>YES</b></p>	<p>The SMT monthly meetings discuss risk and hot spots. Mapping processes are in place to monitor, identify any actions required and consider if there are any material changes.</p>
<p><b><u>Requirement</u></b>  <b>Each landlord must have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety.</b></p> <p><b><u>Evidence</u></b></p> <p><b>In general terms</b>            We have a clear understanding of the legal requirements associated with our duties as an RSL and ensure we understand our external environment and the factors affecting our business. Specific examples of this:            Membership of the SFHA and CIH to ensure access to good practice briefings, papers, guidance            Training and awareness session with staff and board members e.g. Housing Scotland Act 2014, GDPR, Freedom of Information Scotland            Specialist legal advice taken from trusted partners to ensure clarity of requirement and that we act within the law            Our policies, procedures and process maps/info refer to and reflect relevant legislation and good practice requirements            Our Residents review panel participate in review of key policies e.g.</p>	<p><b>YES</b></p>	

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<p>Lettings policy in relation to changes following HAS 2014 – this gives assurance that we take account of customers views            New and reviewed policies approved by Board of Management to ensure active understanding and involvement in key requirements and changes            We have a Service Development Manager with specific responsibility for policy development and review            Our policy development and review process and use of Group policies where relevant gives assurance that our policies and procedures are compliant with the law            The internal audit function gives us assurance of independent scrutiny            External training            Landlord Association and Scottish Association of Landlords for MMR CPD.            New and reviewed policies are also reviewed by Senior Staff, internal subject matter experts and Area Committees.            Quality Assurance provides us with internal checks on consistency and good practice.            External (PWC) quality audits also provides assessment and recommendations for service improvement and compliance.</p> <p><b>Allocations</b>            Lettings Policy and procedures            Local lettings Strategies (reviewed annually) for every area that is considered by the Area Committees and approved by the Board of Management – this analysis gives reassurance that the terms of the lettings policy is being correctly implemented and that we are meeting our legal obligations to people who are homeless            Monitoring and Performance reports considered by Area Committees and Board of Management – this gives assurance that our stock is being used to meet housing need effectively and that housing stock being managed effectively</p>		

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<p>Common Housing Register participation and agreements            Internal auditors carried out a review of our allocations practices and gave highest level of satisfactory in terms of compliance            MMR process and practice will be subject to internal audit            Internal quality assurance processes audit randomly selected cases            Glasgow City Council; Renfrewshire Council, Aberdeen City and Aberdeenshire – quarterly returns on section 5 referrals (refused/ rejected / accepted offers – GCC) or just those allocated.            Six properties provided to GCC to make temporary furnished flats for their homelessness strategy.            Other local authorities are given dedicated properties to house homeless people.</p> <p><b>Anti-Social Behaviour</b>            ASB Policy and Associated procedures are compliant with legislation and good practice requirements            Use of React system to ensure consistent recording, approach and timescale management of ASB cases            Specialist legal advice taken if cases enrolled for court            Monitoring of ASB cases part of performance reporting to Area Committees            Majority of cases are closed within 28 days and responding within timescales.            Customers have the opportunity to report ASB cases through different means – telephone (24/7), email/letter, face to face.            At case closure – we will start a new process: call the customer to ask for any feedback as satisfaction surveys have not given a successful return rate. Any feedback recorded in ReACT. LR to explore if AM could get support from CSC to do this.</p> <p><b>Evictions</b></p>		

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<p>Income Management policy and procedures details approach to evictions and are compliant with legal and good practice requirements</p> <p>System Case management and escalation processes are designed to ensure compliance with legal requirements e.g. pre action requirements</p> <p>Specialist legal advice taken if cases enrolled for court</p> <p>Monitoring of arrears is part of performance reporting to Area Committees</p> <p>Eviction approval process ensures scrutiny of cases before utilisation of decree</p> <p>Annual eviction report to Board of Management summarises evictions, give assurance of good practice and compliance and analyses any overall trends</p> <p>Evictions – representation in court by solicitors.</p> <p>Checklist for post-court and pre-enforcing decree stage or when a case has been sisted/continued to ensure interventions have been made for welfare rights/ manager visit. Signposting to potential charity grants/crisis funds, check if they are employed, WRO help.</p> <p>Eviction prevention roles: Housing and Community connector roles in Priesthill, Toryglen and Cumbernauld with aim of reducing the numbers of preventable evictions and supporting tenancy sustainment.</p> <p><b>Abandonment</b></p> <p>The policy and procedure meet the legal requirements</p> <p>Staff are provided with appropriate training</p> <p>Information on abandonments included in Area Committee performance reporting</p> <p>Legal advice sought to ensure that we effectively implement the law in complex cases.</p> <p>Additional advice has been created in the last 12 months on the correct process for the storage and/or disposal of abandoned goods.</p>		

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<p><b>Tenancy Agreements</b>  Our Scottish Secure Tenancy and Short Scottish Secure Tenancy Agreements are based on the models and therefore contain all required statutory clauses  The changes required to these to meet the requirements of the Housing Scotland Act 2014, were made, consulted on and implemented by November 2019 as required. The policy updates required were approved by Board of Management by required date:  Lettings Policy  Tenancy Changes Policy</p> <p><b>Homelessness</b>  Our annual local letting strategies review our obligations, quantify how these were met and propose strategy for forthcoming year  Housing Options interviews support homeless applicants to consider their options  Performance monitoring and reporting to the Area committees  Housing and Community connector roles to focus on eviction prevention</p> <p><b>Equality and Human Rights</b>  See separate mapping/self assessment process on this subject to give assurance that we are compliant with legal and good practice requirements  In general terms:  All board reports reference equality considerations  All policy, procedure and processes are compliant with equality and human rights legislation e.g. Allocations policy, all staffing and recruitment practices  Training and equality and diversity is mandatory for all staff and board members</p>		

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<p><b>Tenant and Resident Safety</b>                      Our group compliance function monitors compliance with key requirements e.g. gas safety servicing, fire risk assessment, site actions arising for fire risk assessments, engineering, water hygiene and asbestos, EICR, smoke and fire alarm                      The Head of Compliance and Director – Sanctuary Scotland have a formal monthly catch up                      The Group has a dedicated Health and Safety function to ensure compliance with legal and good practice requirements                      RADAR system is used group wide to record and report accidents and incidents                      The Board of Management receives a Health, Safety and compliance report at every meeting to provide assurance on compliance with legal obligations                      2018 Fire Regulations – the requirement to upgrade smoke detectors etc has been included in the re-investment programme to ensure compliance by required deadline.                      Use of our internal maintenance service ensures control over safety processes and practices                      Our Contractor Framework approach ensures third party contractors can demonstrate compliance with legal requirements in relation to health and safety                      We also do ice and snow risk assessments.                      Estate Inspections/Block inspections to ensure no hazardous or dangerous goods are in public spaces. We will also assess any dangerous/hazardous goods when ensuring communal areas are being cleared.                      Abandoned cars process.                      Bed bugs and infestations process.                      Sanctuary Way – reporting issues with health and safety/assets in properties and buildings.</p>		

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<p>Compliance team get fire safety certificates.                      PCRA's completed with tenants where they may need assistance in an evacuation.                      New Wellbeing Service to support vulnerable tenants to life safely and independently in their own homes (e.g. with telecare support).                      Fire Safety visits co-ordinated by local operations with fire services.</p>		
<p><b>Requirement</b>                      Notify us (SHR) of any tenant and resident safety matters which have been reported to, or are being investigated by the Health and Safety Executive, or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.</p> <p><b>Evidence</b>                      Use of stock conditions surveys ensure we understand our stock and any resident safety matters that require to be addressed                      Our compliance levels with SHQS and EESSH requirements are reported to Board of Management and SHR via the Annual Return on the Charter                      Our re-investment programme reflects legislative, health and safety requirements                      The SHR notifiable event guidance is understood and followed                      The use of the RADAR system ensures a clear understanding of the nature of incidents, how they require to be followed up and notification required to a third party such as the Health and Safety executive</p>	<p><b>YES</b></p>	
<p><b>Requirement</b>                      Each landlord must make its Engagement Plan easily available and accessible to its tenants and service users, including online.</p> <p><b>Evidence</b></p>	<p><b>YES</b></p>	

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Sanctuary Scotland engagement plan is available on our website		