

## ABERDEEN CITY COUNCIL

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<b>COMMITTEE</b>	Operational Delivery
<b>DATE</b>	31 <sup>st</sup> August 2022
<b>EXEMPT</b>	No
<b>CONFIDENTIAL</b>	No
<b>REPORT TITLE</b>	Annual Assurance Statement
<b>REPORT NUMBER</b>	CUS/22/142
<b>DIRECTOR</b>	Andy MacDonald
<b>CHIEF OFFICER</b>	Derek McGowan
<b>REPORT AUTHOR</b>	Heather Murdoch
<b>TERMS OF REFERENCE</b>	1.1.1

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### 1. PURPOSE OF REPORT

- 1.1 To seek approval for the Council's Annual Assurance Statement for the year 2022/23, which must be submitted to the Scottish Housing Regulator by 31st October 2022;
- 1.2 To highlight to Committee the improvement areas identified from this assurance review are noncompliance with minimum standards and fire obligations for Gypsy Traveller sites, for which there is an existing action plan including Capital investment;
- 1.3 To highlight our engagement plan issued by the Scottish Housing Regulator.

### 2. RECOMMENDATION

That the Committee:-

- 2.1 Approve the Annual Assurance Statement appended to this report for submission to the Scottish Housing Regulator by 31<sup>st</sup> October 2022.

### 3. CURRENT SITUATION

- 3.1 The Scottish Housing Regulator regulates to protect the interests of people who receive the services of social landlords. Since introduced in 2012/2013 the Council has submitted its Annual Return of the Charter which sets out the Council's performance against the Scottish Social Housing Charter standards and outcomes. From 2018, the Regulator introduced a further requirement for all social landlords to complete an Assurance Statement in which we are required to provide confirmation each year that the Council meet the relevant requirements of section 3 of the Regulatory Framework which is laid out in appendix B.
- 3.2 Having reached an objective and evidenced-based judgement on compliance, ensuring sufficient evidence and information the Council is required to submit

a signed statement by our relevant Committee Convenor which confirms that we have appropriate assurance on compliance with:

- All relevant regulatory requirements set out in section 3 of the Regulatory Framework
- All relevant standards and outcomes of the Scottish Social Housing Charter and all relevant legislative duties

- 3.3 For any areas where the Council do not materially comply, we must describe these and our plans to improve.
- 3.4 Our Assurance Statement for 2021/22 indicated that Aberdeen City Council was compliant with the regulatory requirements set out in section 3 of the Regulatory Framework, with the exception of compliance with minimum site standards for our Gypsy Traveller site. There were also performance areas which were prioritised for improvement with action plans in place regarding void property management, customer satisfaction and rent management.
- 3.5 The Council's proposed Annual Assurance Statement for 2022/23 is appended to this report and has identified four areas for improvement which are services for people who are homeless, void property management, rent management and customer satisfaction. It also highlights that we are still not materially complying with the minimum site standards for Gypsy Travellers and fire safety obligations for our Gypsy Traveller site.

The Council acknowledge that the noncompliance with the minimum site standards has been an ongoing area of noncompliance but have committed to providing good quality, affordable accommodation that meets the Gypsy Travellers needs and have worked with the Gypsy Traveller community, other relevant organisations and groups to ensure that there has been meaningful engagement in the plans for the site. The tendering process for the site has just closed and the works are due to be completed by summer 2023.

- 3.6 In summary, the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 states that Local Authorities may provide unsuitable accommodation (as defined by Article 5 of the Order), such as hotels, to people experiencing homelessness – but for no longer than 7 days. Aberdeen City Council have breached that Order on 4 occasions during Quarter 1. Hotels are currently being used nightly with households being moved into more suitable temporary accommodation before a breach occurs.

We are converting more Council accommodation into temporary furnished flats to reduce our current reliance on hotels and also looking at our case management approach to ensure no-one is in temporary accommodation longer than they need to be.

The demand for temporary accommodation has also grown 29% (74 households) compared to quarter 1 last year. Homeless presentation has increased by 19% (65 households) when compared to quarter 1 last year. Increases have been reported against applicants becoming homeless from Local Authority tenancies, Registered Social Landlord accommodation and

Home Ownership, however the biggest increase has been recorded against Private Rented Tenancies.

- 3.7 The following evidence and information, relevant to the requirements that we are required to provide assurance for, are set out using the Good Governance Standard for Public Service principles from Chartered Institute for Public Finance and Accountancy.

### **3.7.1 Managing risks and performance through robust internal control and strong public financial management.**

The Council's system of governance provides assurance on our compliance with legal and statutory obligations at management level and also to elected members.

Following us being awarded the accreditation in 2020, Chartered Institute of Public Finance (CIPFA) undertook a return visit in 2022 and the council retained its accreditation awarded two years ago and was recognised for building on its achievements in governance in the intervening period despite the challenge of the Covid-19 pandemic.

At elected member level, the following internal controls are in place:

- Operational Delivery Committee is responsible for scrutinising service delivery in this area.
- Audit, Risk and Scrutiny Committee to which Housing and Homelessness audits (internal and external) are reported.

At management level, the following are in place:

- Regular review of risks by Housing and Homelessness management teams and maintenance of service risk registers.
- Performance management systems and operation of service improvement groups.
- The Risk Control Team in Building Services undertakes site visits to ensure compliance with all relevant Health and Safety requirements including compliance with the Health and Safety at Work etc. Act 1974, Control of Asbestos Regulations 2012 and Electricity at Work Regulations 1989.
- A contract log is in place which identifies responsibilities for differing elements of compliance along with contract manager and contractor details whether delivered in house or externally. Regular contract meetings are held to review compliance and for key risks such as asbestos and gas safety; external compliance portals are used. Corgi systems are used for gas compliance and MODUS – a software management company who specialise in asbestos data management - is being implemented for asbestos management.

- Strategies, policies and procedures are reviewed on an on-going basis in line with a risk-based Corporate Policy Framework. These include the Local Housing Strategy and Allocations Policy.
- Corporate Management Team signs off on the Annual Governance Statement, including any significant issues (control failures) which have occurred over the year. Corporate Management Team also receives notifications of health and safety contraventions, and resulting improvement plans, which would include health and safety issues affecting housing and homelessness.
- The Housing and Support service has designed and implemented a Quality Assurance and Performance Management framework.

### **3.7.2 Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.**

A Programme of internal audits, which are risk-based, identify any control failures including legal compliance in various areas such as rent management, void properties, and complaints management.

Audit Scotland undertook a Best Value audit during 2020/21 which was published in June 2021 and brought before Council for consideration. The previous audit was undertaken in 2015 and the Council were praised for the changes that had taken place since the previous audit. This audit acknowledged that the provision of housing services remains a challenge but noted good performance in Housing repairs and in our efforts to tackle homelessness. Through the introduction of our Rapid Rehousing Transition Plan in 2019 the Council have seen a reduction in the time between receiving an application and permanently housing a previously homeless person from 171 days in 2015/16 to 104 days in 2021/22. Performance now compares favourably with the national figure of 199 days. The Council is using a number of initiatives to drive improvements in Housing services overall, including implementing the new Housing and Support service and partnering with the Centre for Homelessness Impact.

In addition, the Council report quarterly to the Scottish Government on Homelessness presentations and outcomes for scrutiny.

The Council have a corporate system for reporting Health and Safety incidents and report relevant incidents to agencies such as the Health and Safety Executive if relevant.

The Council have a mechanism for reporting on hate crimes.

The Council's Health and Safety Team undertake Fire Risk Assessments in our sheltered housing complexes annually and in mainstream multi-storey buildings every three years. Our Health and Safety Team also undertake

routine compliance checks of housing related services as part of its corporate programme.

Housing & Support Officers are also undertaking 'Resident Led Inspections' within multistorey blocks to ensure that the Council are engaging with tenants around any issues they may be facing. A new procedure is being developed to ensure that these visits are conducted on a six-monthly basis and that local communities are engaged in the development of these inspections.

Our Tenant Participation work has developed over the last year, with the implementation of a Young Person's Housing group adding to our existing tenant scrutiny panels.

The Council's Engagement Plan from the Scottish Housing Regulator is published on the Council's website.

The Council's Engagement plan for 2021/22 set out that we were engaging with the Scottish Housing Regulator on Gypsy Traveller site standards. This engagement is still ongoing. The Council acknowledge that this has been an area of noncompliance but have committed to providing good quality, affordable accommodation that meets the Gypsy Travellers needs and have worked with the Gypsy Traveller community and other relevant organisations and groups to ensure that there has been meaningful engagement in the plans for the site. The tendering process for the works to update and improve the site has just closed and the works are due to be completed by Summer 2023.

The Council are appropriately registered with the Information Commissioner's Office.

### **3.7.3 Defining outcomes in terms of sustainable economic, social, and environmental benefits.**

The Local Outcome Improvement Plan (LOIP) has been refreshed and sets out to ensure that Aberdeen's continued economic, health and social recovery is the focus. The vision set out in the LOIP is that Aberdeen will be 'a place where all people can prosper' by 2026.

The Council's Delivery Plan 2021/2022 aligns all Council strategies and plans to the Local Outcome Improvement Plan, ensuring clear delivery plans for the Council's own set of strategies and priorities.

The implementation of the Housing and Support service on the 14<sup>th</sup> March 2022 created 85 Housing and Support Officer posts, each with an average patch size of 250 tenancies, with a focussed job profile aimed at meeting the changing needs of tenants. The primary role of the Housing and Support Officer is to ensure tenancy sustainment, through creating strong relationships with tenants and providing person centred support. This holistic and outcome focussed approach is aligned with the Local Outcome Improvement Plan outcomes of People, Place and Economy, supported by an extensive,

personalised training plan to ensure all officers have the appropriate skills to achieve the best outcome for tenants.

### **3.7.4 Determining the interventions necessary to optimise the achievement of the intended outcomes.**

The Council deliver a highly acclaimed Tenant Participation Strategy. The Housing Service Review Group comprises tenants and residents and provides scrutiny of our service performance and the Housing Revenue Account. The group also undertake in-depth service reviews and have previously reviewed Housing Repairs, Housing Management and Customer Feedback and more recently, Housing Assets. At the conclusion of each review a report with recommendations is produced.

Monthly performance reports are provided for scrutiny, with appropriate improvement plans developed where necessary. In particular, the Council's performance in Homelessness services is sector leading, and there has also been a significant improvement in performance on evictions for rent arrears through a more targeted and efficient approach is being developed.

### **3.7.5 Ensuring openness and comprehensive stakeholder engagement.**

Since 2013, each year the Council have submitted our Annual Return of the Charter in accordance with the published guidance.

The Housing Service Review Group participates in the preparation and scrutiny of performance information and is comprised of tenants and residents. The group meets monthly and receives routine reports on our performance against the Charter outcomes and standards. All reports are published on our website.

The Housing Service Review Group also participates in developing our annual report on performance. This includes reviewing performance trends, benchmarking with our peers and options for improvements where relevant. The group helps determine report format and proposed using a digital animation in addition to a written report for 2018/2019 and this will be replicated for 2022/23. The annual report is also available in hard copy and is reported in our Newsbite publication.

The monthly and annual reports are available on a dedicated [Housing Performance](#) page on our website.

An Asset management review has just been undertaken and a report is being drafted advising of the recommendations from the group. The Housing Assets Team is responsible for assessing how well the council's housing stock is performing in relation to the Scottish Housing Quality Standard (SHQS) and Energy Efficiency Standard for Social Housing (ESSH); maintaining Council housing; managing Asbestos in council properties; the acquisition of former Council housing; and the preparation, management and monitoring of the Housing Capital Expenditure budget and the report and recommendations is expected to be shared by end of August 2022.

### **3.7.6 Implementing good practices in transparency, reporting, and audit to deliver effective accountability.**

Information on our Complaints Handling Procedure, including how to make a complaint is published on our website and a complaints leaflet is available at all offices. A person can make a complaint by using our online form or in person at any council office. Alternatively, they may contact us in writing or by telephone.

The Council have published the Scottish Housing Regulator's 'Significant Performance Failure' leaflet on our website and the reporting form is also available.

The Council follow the Model Complaints Handling Procedure set out by the Scottish Public Services Ombudsman (SPSO).

Upon closure of every complaint, responding officers systematically identify any learning points. This is particularly important where complaints are upheld, but even a complaint which is not upheld can highlight the need for change. For example, complaints have highlighted where we need to improve communications and change some of our internal procedures.

The Council's performance is scrutinised at each Operational Delivery Committee, the papers for which are all available through our Council website.

Where appropriate, the Council collect and record data on protected characteristics for tenants, applicants, homeless people and people who use our Gypsy Traveller site on our housing management system.

### **3.7.7 Developing the entity's capacity, including the capability of its leadership and the individuals within it.**

Aberdeen City Council has agreed an Equalities Outcome Mainstreaming Plan to promote and embed equality in our services from 2021 to 2025.

The key piece of legislation which governs what we do is the Equality Act 2010. The General Duties within the Act require us to eliminate discrimination; advance equality of opportunity; and foster good relations between persons who share a protected characteristic and those who do not. The protected characteristics as defined by the Equality Act 2010 are: Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Our Equality Outcomes as a service provider are to ensure:

- EO 1 - All people with protected characteristics will access information, goods and services knowing that social and physical barriers are identified and removed, with a focus on Age, Gender reassignment and Disability.

- EO 2- Diverse communities in Aberdeen will have an increased sense of safety and belonging within their neighbourhood and City, with a focus on Race (including Gypsy/Travellers), Religion and Sexual Orientation.
- EO 3 – Representation in civic participation of people with protected characteristics will be improved by ensuring our leaders, staff and organisation champion the equality agenda in the City, with a focus on Disability, Race and Sex.

The next phase of this work is to engage further with communities to develop specific actions to help us achieve our Equality Outcomes.

During 2020/2021 the Council introduced a new Integrated Impact Assessment (IIA) process to capture equality, human rights, children's rights and socio-economic disadvantage information and evidence. An Integrated Impact assessment (IIA) is undertaken to systematically consider relevant evidence to determine if there may be an unfair or unequal effect on different groups of people within the community or the workforce as a result of a policy or proposal.

To ensure compliance with the Equality Act 2010, the IIA will help to:

- Ensure that the proposal does not discriminate
- Consider how the proposal might better advance equality of opportunity
- Consider whether the proposal will affect relations between different groups.

Our Integrated Impact Assessments are published on our website with relevant committee papers.

During 2021/22 Housing Management and Housing Support merged into one service which meant that a large-scale training and induction plan was rolled out to ensure all staff understood the expectations of the new combined role. Staff were trained in a number of different areas such as the expectations of providing support under a registered service, digital skills, recording information along with the continued roll out of training for frontline staff so they can distribute and administering Naloxone in an effort to reduce instances of opiate overdoses within the community.

Continuous improvement will be an ongoing process to ensure that all staff are qualified, confident and knowledgeable so they can deliver a high quality service. There are also working groups which have been established to review how we deliver housing support and these are attended by frontline staff along with a working group who are looking at all the service procedures to ensure they maximise support opportunities in line with the Housing and Support model along with streamlining and digitalising process where required.

A major upgrade of the online portal was rolled out at the start of 2022 with the aim of reducing call wait times and ensuring that we are providing more comprehensive information on the website. This upgrade allows for customers to create an online account which they can then use to get their housing options, create and amend housing applications, view their rent account and also contact Council officers regarding a range of issues from requesting pet permission to terminating their tenancy.

#### 4. FINANCIAL IMPLICATIONS

4.1 There are no direct financial implications arising from the recommendations of this report.

#### 5. LEGAL IMPLICATIONS

5.1 The requirement for Annual Assurance Statements is set out in statutory guidance issued by the Scottish Housing Regulator under the Housing (Scotland) Act 2010. The recommendations of this report will enable the Council to comply with that requirement.

#### 6. ENVIROMENTAL IMPLICATIONS

6.1 There are no direct environmental implications arising from the recommendations of this report.

#### 7. RISK

Category	Risks	Primary Controls/Control Actions to achieve Target Risk Level	*Target Risk Level (L, M or H)  *taking into account controls/control actions	*Does Target Risk Level Match Appetite Set?
<b>Strategic Risk</b>	No significant risks identified			Yes
<b>Compliance</b>	If the Council does not submit the Annual Assurance Statement by 31st October 2022, the Council will not meet regulatory requirements.	Approval to submit the Annual Assurance Statement given by committee	L	Yes
<b>Operational</b>	There are no significant			Yes

	risks identified			
<b>Financial</b>	There are no significant risks identified			Yes
<b>Reputational</b>	The Annual Assurance Statement identifies areas for Improvement.	The Council have identified improvement plans to be implemented.	M	Yes
<b>Environment / Climate</b>	There are no significant risks identified			Yes

## 8. OUTCOMES

<b><u>COUNCIL DELIVERY PLAN</u></b>	
	<b>Impact of Report</b>
<b>Aberdeen City Council Policy Statement</b>	This report has no impact on the policy statement.
<b>Aberdeen City Local Outcome Improvement Plan</b>	This report has no impact on the Local Outcome Improvement Plan.
<b>Regional and City Strategies</b>	This report has no impact on regional and city strategies.
<b>UK and Scottish Legislative and Policy Programmes</b>	This report ensures that we are compliant with the regulatory requirements set out by the Scottish Housing Regulator.

## 9. IMPACT ASSESSMENTS

<b>Assessment</b>	<b>Outcome</b>
<b>Impact Assessment</b>	Stage 1 assessment complete.
<b>Data Protection Impact Assessment</b>	Not required
<b>Other</b>	None

## 10. BACKGROUND PAPERS

Scottish Housing Regulator – Regulation of Social Housing in Scotland

Scottish Housing Regulator – Statutory Guidance  
Scottish Housing Regulator – Annual Assurance Statement  
Annual Return on the Charter – Aberdeen City Council 2021/2022

## 11. APPENDICES

A - Draft Annual Assurance Statement

B - Scottish Housing Regulator Regulatory Requirements– Section 3

## 12. REPORT AUTHOR CONTACT DETAILS

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## Appendix A



Aberdeen City Council complies with the regulatory requirements set out in Chapter 3 of the Regulatory Framework, all relevant standards and outcomes in the Scottish Social Housing Charter and all relevant legislative duties, with the following exceptions:

- compliance with minimum site standards for our Gypsy Traveller site
- fire safety obligations for our Gypsy Traveller site.

Last year designs were produced to completely renew the site and by working with the Scottish Government to secure funds, the Council has recently gone through the tender process to find a contractor to develop the site as a demonstration model of national best practice.

Aberdeen City Council are also in the process of reviewing its approach to the collection of equalities information ensuring that a human rights approach is taken in all areas of the service.

The following performance areas are priorities for improvement with action plans in place:

- Services for people who are homeless – the Council is looking to build on sector leading performance in homelessness through our partnership with the Centre for Homelessness Impact. The Council is also increasing its temporary accommodation stock to ensure we can meet the increasing demand for temporary accommodation and avoid prolonged stays in unsuitable accommodation as per the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014.
- Void property management – key improvement actions include reducing the number of void properties; reducing the average relet time, and reducing the rate of void rent loss.
- Rent Management – Since the creation of a specialist corporate debt team in November 2021, processes and policies have been reviewed to complement the introduction of the Housing and Support service. Key to this is refreshed rent escalation policy. Training has been rolled out to all staff.
- Customer Satisfaction – key improvement actions: Improve communication with tenants through digital delivery, with the implementation of Choice Based Letting and development of the Housing Online platform. Improvement in engagement through Tenant Participation and resident led inspections by using 'Gov.Notify' to provide regular updates to our tenants through email.

I confirm Aberdeen City Council has seen and considered appropriate evidence in approving this Annual Assurance Statement at our Operational Delivery Committee on 31<sup>st</sup> August 2022.

Councillor Miranda Radley  
Convener – Operational Delivery Committee  
Aberdeen City Council

## Regulatory requirements

In this section we set out regulatory requirements for all social landlords and the standards of governance and financial management for RSLs.

### 3.2

All of these requirements are based in the powers given to us in the [Housing \(Scotland\) Act 2010](#).

### 3.3

We do not replicate here the range of duties, obligations and responsibilities placed on landlords by legislation and through statutory guidance. These include achieving the standards and outcomes in the Scottish Social Housing Charter, duties to help people who are homeless, duties around the safety of tenants' homes, and promoting equality and human rights.

### 3.4

Landlords also have requirements placed on them by other regulatory bodies, including the Office of the Scottish Charities Regulator, the Equality and Human Rights Commission, the Care Inspectorate, Audit Scotland and the Scottish Public Services Ombudsman.

### 3.5

Landlords must ensure that they meet all their legal duties and responsibilities and that they adhere to relevant guidance and the requirements of other regulators.

### 3.6

For local authorities, this includes ensuring that they meet their statutory duties to prevent and alleviate homelessness. Local authorities must confirm that they meet these duties in their Annual Assurance Statement or set out how they are addressing any material non-compliance.

### 3.7

Landlords should adhere to our statutory guidance. In certain cases, where exceptional circumstances exist, it may be appropriate for a landlord to depart from our [statutory guidance](#). Where a landlord is considering departing from statutory guidance, it should discuss with us why a departure from the guidance is necessary before acting. The landlord should keep a record of the reasons for the departure.

### 3.8

Landlords should take account of regulatory advice from us and from other regulators. Advisory guidance may include recommended practice and

recommendations from thematic work. Landlords should consider applying any recommendations in advisory guidance but are not required to follow advisory guidance. Landlords are not required to discuss a departure from advisory guidance with us before acting. A list of our advisory guidance is available on our website. Below we set out what landlords must do.

## Regulatory requirements for local authorities and RSLs

### Assurance and notification

- Prepare an Annual Assurance Statement in accordance with our published guidance, submit it to us between April and the end of October each year, and make it available to tenants and other service users.
- Notify us during the year of any material changes to the assurance in its Assurance Statement.
- 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.
- Notify us 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.
- Make its Engagement Plan easily available and accessible to its tenants and service users, including online.

### Scottish Social Housing Charter Performance

Submit an Annual Return on the Charter to us each year in accordance with our published guidance.

Involve tenants, and where relevant other service users, in the preparation and scrutiny of performance information. It **must**:

- agree its approach with tenants
- ensure that it is effective and meaningful – that the chosen approach gives tenants a real and demonstrable say in the assessment of performance
- publicise the approach to tenants
- ensure that it can be verified and be able to show that the agreed approach to involving tenants has happened
- involve other service users in an appropriate way, having asked and had regard to their needs and wishes.
- Report its performance in achieving or progressing towards the Charter outcomes and standards to its tenants and other service users (no later than October each year). It must agree the format of performance

reporting with tenants, ensuring that it is accessible for tenants and other service users, with plain and jargon-free language.

When reporting its performance to tenants and other service users it **must**:

- provide them with an assessment of performance in delivering each of the Charter outcomes and standards which are relevant to the landlord include relevant comparisons – these should include comparisons with previous years, with other landlords and with national performance set out how and when the landlord intends to address areas for improvement
- give tenants and other service users a way to feed back their views on the style and form of the reporting.
- Make our report on its performance easily available to its tenants, including online.

### **Tenant and service user redress**

- Make information on reporting significant performance failures, including our leaflet, available to its tenants.
- Provide tenants and other service users with the information they need to exercise their right to complain and seek redress, and respond to tenants within the timescales outlined in its service standards, in accordance with guidance from the Scottish Public Services Ombudsman (SPSO).
- Ensure it has effective arrangements to learn from complaints and from other tenant and service user feedback, in accordance with SPSO guidance.

### **Whistleblowing**

- Have effective arrangements and a policy for whistleblowing by staff and governing body/elected members which it makes easily available and which it promotes.

### **Equalities and human rights**

- Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.
- To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff. Local authorities must also collect data on protected characteristics for people who apply to them as homeless. Landlords who provide Gypsy/Traveller

sites must collect data on protected characteristics for these service users.