

## 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 Board on 27 November 2025, and confirms the actions taken.

Minute Ref	Action Required	Action By	Action Taken
3	Publish the minutes and papers from the September 2025 meeting on elha.com	ES	Complete
4	Adopt the revised wording in Section 12 of the Financial Regulations in the ELHA File Structure and elha.com	ES	Complete
6	Cancel the Memberships as approved	ES	Complete
8	Pass on comments to staff on performance	MP	Noted at Staff Brief on 9 December 2025
10	Update the Disciplinary Policy on the ELHA file structure, ELHA Board area of elha.com and update the Policy Review Calendar	ES	Complete
10	Update the Gifts & Hospitality, Dignity at Work and Special Leave (Volunteer Reserve Forces) Policies on the ELHA file structure, elha.com and update the Policy Review Calendar	ES	Complete
11	Update the Authorisations and Standard Charges / Allowancies Policy on the ELHA file structure and elha.com	ES	Complete

## Secretary's Report – for information

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### 1.0 Membership

No new applications for membership have been received.

### 2.0 Use of Seal for Homologation

No use of the Seal to report.

# Key Performance Indicators 2025/26

## 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 third quarter of 2025/26 are attached as **Appendix 1** to this report.

### 2.0 ELHA Performance

The Association has missed the following targets:

#### 2.1 Number of Evictions Carried Out

Following the Governance Review, a new target of zero has been set for 2025/26 to ensure that any evictions carried out during the course of the year are reported to the Board. No evictions were carried out in Quarter Three but one was carried out in the First Quarter (and reported to the Board previously).

#### 2.2 Bronze, Gold & Platinum Key Tenants

There has been an increase in both Bronze and Platinum Key Tenants, with the percentage of Gold Key Tenants remaining the same. The main limiting factor for Gold Tenants who have not upgraded is rent arrears. The main limiting factor for Bronze Key Tenants who have not upgraded is that the tenant is in receipt of Housing Benefit or Universal Credit Direct Payments.

#### 2.3 Short Term Sickness

Short term sickness absence was 0.6% above target for Quarter Three (2.6% against 2%), representing an increase of 0.2% compared with Quarter Two (2.4%).

A key factor was a small number of staff with extended short term sickness absences (defined as absences lasting less than four weeks). The longest short-term sickness absence accounted for 1.4% of the organisation's total sickness absence.

The combined short term sickness absence rate for Quarter One to Quarter Three was 1.9%, remaining below the target level.

#### 2.4 ELHA Board Attendance

This was below target again for Quarter Three (64% against a target of 75%) as only seven of eleven members attended the meeting in November 2025.

The Year-to-Date (YTD) figure has also dropped marginally below target (at 73%) due to the lower attendance in Quarter Three. It is hoped that attendance will improve for Quarter Four meetings which might bring the Year-to-Date (YTD) figure back in line with target.

**2.5 Percentage of Tenants Using Their My Home Account**

Figures have remained slightly under target at 91% for the first three quarters of 2025/26. Staff continue to promote the Help Me! service to assist tenants to get online, and there are four tenants currently using the Friends & Family Service.

**2.6 Percentage of Tenant Paper-Free**

The percentage of paper free tenants has remained steady at 87%.

**2.7 Average time to respond to Stage Two complaints (days)**

The last two quarters has seen the Association either achieve or exceed the 12-day target, however as figures were above target in Quarter 1, so the overall year to date figure continues to sit slightly above target. This should reduce during Quarter 4 provided further Stage 2 complaints are received this financial year. All Stage Two complaints have been responded to within the SPSO response target of 20 working days.

Key Performance Indicators 2025/26

Performance Indicator	2025/26 Quarterly Target	Q1	Q2	Q3	Q4	2025/26 Target	2024/25 Actual	Year to Date	Status
<b>Rental Income</b>									
Non-technical arrears as % of rental income	2.6%	2.27%	2.37%	2.60%		2.6%	2.33%	2.60%	😊
Bad debts written off as % rental income	1.50%	0.06%	0.05%	0.32%		1.5%	0.92%	0.32%	😊
Voids as % of rental income	0.75%	0.45%	0.45%	0.41%		0.75%	0.71%	0.41%	😊
<b>Finance / Treasury</b>									
Interest cover (loan covenants)	110%	285%	300%	295%		>110%	257%	295%	😊
Gearing (loan covenants FRS102 definition)	<37%	23%	23%	23%		<37%	24%	23%	😊
Maximum annual new borrowing	<£3m	£0m	£0m	£0m		<£3m	£3.05m	£0m	😊
Maximum borrowing per unit	<£26,000	£18k	£17k	£17k		<£26,000	£18k	£17k	😊
Minimum cash balance held	>£500k	£2.4m	£2.5m	£2.5m		>£500k	n/a	£2.5m	😊
Cash as a % of net cash outflows for next two quarters	100%	796%	586%	576%		100%	n/a	576%	😊
Unit management costs	£2,219	£2,036	£2,050	£2,109		£2,258	£2,032	£2,109	😊
Unit reactive maintenance costs	£1,035	£1,126	£1,038	£912		£989	£1,028	£912	😊
<b>Asset Management</b>									
Stock condition inspections completed	cumulative	0%	6%	40%		20%	20%	46%	😊
Gas services completed within timescale	cumulative	100%	100%	100%		100%	100%	100%	😊
Planned maintenance contracts with >5% overspend	0	0	0	0		0%	0	0	😊
Average length of time taken to complete emergency repairs	<2 hours	01:19:29	01:18:57	01:39:04		<2 hours	01:20:49	01:25:50	😊
Average length of time taken to complete non-emergency repairs	< 6 days	3.75	4.26	3.90		< 6 days	4.0	3.97	😊
Repairs completed right first time	85%	97%	97%	97.2%		85%	95.05%	97%	😊
Repair appointments kept	93%	97%	96%	97%		93%	96.25%	97%	😊
<b>Housing Management</b>									
Properties allocated after 3 or more refusals	0	0	0	0		0	0	0	😊
Number of evictions carried out	0	1	0	0		0	1	1	😞
Bronze Key Tenants	<40%	51%	24%	25%		<40%	51%	25%	😊
Gold Key Tenants	20%	10%	11%	11%		20%	11%	11%	😞
Platinum Key Tenants	25%	26%	25%	26%		25%	25%	26%	😊
Percentage of Eligible Tenants Signed up to Housing Perks	50%	38%	49%	50%		50%	38%	50%	😊
<b>Corporate</b>									
Number of accidents reportable to HSE	0	0	0	0		0	0	0	😊
Network Availability	99%	100%	100%	100%		99%	100%	100%	😊
% working days lost through long term sick leave	5%	0%	0%	0.0%		5%	1.5%	0%	😊
% working days lost through short term sick leave	2%	0.6%	2.4%	2.6%		2%	1.1%	1.9%	😞
ELHA Board attendance	75%	82%	73%	64%		75%	74%	73%	😞
Risk & Audit Committee attendance	67%	67%	67%	71%		67%	n/a	68%	😊
Governance Committee attendance	67%	67%	n/a	67%		67%	n/a	67%	😊
% of tenants using their My Home account	92%	91%	91%	91%		92%	91%	91%	😞
% of tenants paper-free	89%	88%	87%	87%		89%	87%	87%	😞
% of tenants with a connected Rent Collector account	60%	53%	64%	65%		60%	52%	65%	😊
Average time to respond to Stage 1 complaints	3 days	2.37	1.53	1.81		3 days	n/a	1.92	😊
Number of Stage 1 response extensions required	0	0	0	0		0	n/a	0	😊
Average time to respond to Stage 2 complaints (days)	12 days	15.78	10.50	12.00		12 days	n/a	13.18	😞

😊 Performance Excellent    😞 Performance Satisfactory    😞 Performance Poor

# Care & Repair Quarterly Management Accounts for the Period to 31 December 2025

## Report by Gary Alison, Director of Finance & Corporate Services – for Information

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### 1.0 Introduction

The Care & Repair Income and Expenditure Account for the period to 31 December 2025, shows income on budget and total expenditure £8.3k over budget, giving rise to a net deficit of £8.3k, compared to a budget of breakeven.

It should be noted that the ELHA Management Accounts budget differs from the Care & Repair budget, as the ELHA budget was revised in September 2025. The budget in this report is unchanged from the original budget presented to East Lothian Council.

There are no significant variances compared to budget, however the notable ones are discussed below.

### 1.1 Other Income & Other Costs - £0.5k & (£3.7k)

The Other Income in the current year represents client contributions to supplement the grant income.

A £5k grant from Electrical Safety First was received in February 2025. The grant income should have been deferred and income recognised as the cost was incurred. However, the grant was fully recognised in 2024/25.

### 1.2 Salaries – £1.4k

Redundancy costs were accrued in the 2024/25 year end accounts, but the actual salary payment for the month of April 2025 was missed. These will therefore be a permanent variance throughout the year.

### 1.3 Various overheads – (£6.1k)

Various costs are recharged from ELHA to Care & Repair for the maintenance of office facilities, and the provision of software, licences, corporate costs and other administrative overheads. The recharge is allocated based on the headcount of C&R staff, and ELHA staff. The recharge is therefore directly reflective of the over / under spends in the full ELHA accounts. Expenditure on the new IT system was not included in the C&R budget, driving 60% of the variance in office overhead recharges,

The projected outturn for overheads is higher than the trend for Quarter Three due to IT development spend in Quarter Four on the Homemaster system transition.

## 2.0 Income and Expenditure Account

	Notes	Actual to 31/12/2025 £	Budget to 31/12/2025 £	Variance to 31/12/2025 £	Projected outturn for the year £	Budget for the year £	Projected variance for the year £
<b>INCOME:-</b>							
ELC		147,243	147,244	(1)	196,325	196,325	-
Medical Adaptations Administration Fees		2,422	3,345	(923)	4,460	4,460	-
SRS Client Contributions for Materials		369	-	369	-	-	-
Electrical Safety First funding		-	-	-	-	-	-
Other income	1.1	470	-	470	-	-	-
<b>TOTAL INCOME</b>		<b>150,504</b>	<b>150,589</b>	<b>(84)</b>	<b>200,785</b>	<b>200,785</b>	<b>-</b>
<b>EXPENDITURE:-</b>							
<b>DIRECT COSTS:-</b>							
Salaries	1.2	(57,533)	(56,157)	(1,376)	(76,711)	(74,876)	(1,835)
Employers NI		(8,320)	(8,163)	(157)	(11,094)	(10,885)	(209)
Employers pension contributions		(24,788)	(23,619)	(1,169)	(33,050)	(31,492)	(1,558)
EV Costs		(4,932)	(4,932)	0	(6,576)	(6,576)	-
Other staff costs and training		(1,345)	(1,204)	(140)	(1,793)	(1,606)	(187)
Electrical Safety Service		-	-	-	-	-	-
<b>TOTAL DIRECT STAFF</b>		<b>(96,918)</b>	<b>(94,076)</b>	<b>(2,842)</b>	<b>(129,223)</b>	<b>(125,434)</b>	<b>(3,789)</b>
<b>INDIRECT COSTS:-</b>							
<b>ADMIN &amp; MGMT SERVICES</b>							
		(18,074)	(18,074)	-	(24,098)	(24,098)	-
<b>TRAVEL/SUBSISTENCE</b>							
Essential car user allowance		(5,124)	(5,123)	(1)	(6,831)	(6,831)	-
Vehicle leasing, fuel, and maintenance		(9)	-	(9)	(9)	-	(9)
Vehicle Insurance		-	-	-	-	-	-
Travel/Subsistence		(465)	(1,274)	808	(1,698)	(1,698)	-
<b>TOTAL TRAVEL/SUBSIST</b>		<b>(5,598)</b>	<b>(6,397)</b>	<b>799</b>	<b>(8,538)</b>	<b>(8,529)</b>	<b>(9)</b>
<b>OFFICE OVERHEADS</b>							
New C&R Software/IT System		-	-	-	-	-	-
Other Costs	1.1, 1/3	(3,714)	-	(3,714)	(4,940)	-	(4,940)
SRS Materials, Tools & Equipment	1.3	(489)	-	(489)	(489)	-	(489)
Office Premises Overhead	1.3	(8,091)	(6,514)	(1,577)	(11,367)	(8,685)	(2,682)
Office Equipment Overhead	1.3	(1,041)	(1,847)	806	(1,388)	(2,462)	1,074
Office Administration Overhead	1.3	(1,030)	(1,381)	351	(1,374)	(1,841)	467
Computer/IT Systems Overhead	1.3	(13,869)	(11,874)	(1,995)	(20,429)	(15,831)	(4,598)
Corporate Costs (inc Audit)	1.3	(9,941)	(10,428)	487	(13,904)	(13,904)	-
<b>TOTAL INDIRECT O/HEADS</b>		<b>(38,174)</b>	<b>(32,043)</b>	<b>(6,131)</b>	<b>(53,891)</b>	<b>(42,724)</b>	<b>(11,168)</b>
<b>TOTAL EXPENDITURE</b>		<b>(158,763)</b>	<b>(150,589)</b>	<b>(8,175)</b>	<b>(215,751)</b>	<b>(200,785)</b>	<b>(14,966)</b>
<b>SURPLUS/DEFICIT</b>		<b>(8,259)</b>	<b>-</b>	<b>(8,259)</b>	<b>(14,966)</b>	<b>-</b>	<b>(14,966)</b>

## Care & Repair Budget 2026/27

### Report by Gary Alison, Director of Finance & Corporate Services – for Information

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#### 1.0 Introduction

Table 1 shows the proposed Budget for the Care & Repair service for 2026/27.

For the eight years prior to 2025/26, the Association was awarded funding of £329.9k to deliver the Care & Repair Service by ELC. ELC provided £196k funding in 2025/26, to deliver the statutory elements of the service, and the same level of funding has been anticipated for 2026/27.

#### 2.0 2026/27 Budget

The income budget set in 2025/26 was based on what ELHA budgeted in terms of staffing costs and share of overheads, to allow the service to break-even. ELHA advised ELC that funding of £196k was required, and this was accepted.

ELC have indicated the same level of funding for 2026/27, however at the time of writing this report, their budget is still to be confirmed. As the grant funding is unchanged from 2025/26 and overheads are budgeted to increase, a deficit of £2,572 is included in the budget.

Whilst operating the service at a deficit is requiring ELHA funds to support the service, this position can be accommodated for the next financial year, until ELC complete their review of the service. If the service was not delivered, whilst some overhead costs would reduce, ELHA would have to absorb more than the £2.5k deficit in additional overhead premise costs, which remain fixed costs.

Staff salaries (including pension contributions, Employers National Insurance, EV and Essential Car Users Allowances) are fixed for the year based on the EVH agreed upon 5.1% salary increase.

Variable elements of other staff costs, such as travel, administration services and office overheads could result in a variance from the budgeted deficit.

**Table 1**

<b>CARE AND REPAIR SERVICE</b>	<b>Budget 2026/27</b>
<b>Inflation Rate Assumed - RPI</b>	<b>4.30%</b>
<b>Inflation Rate Assumed - Salaries</b>	<b>5.10%</b>
	<b>£</b>
<b>INCOME:-</b>	
ELC	196,325
Medical Adaptations Administration Fees	4,460
SRS Client Contributions for Materials	-
Other Income	-
<b>TOTAL INCOME</b>	<b>200,785</b>
<b>EXPENDITURE:-</b>	
<b>DIRECT COSTS:-</b>	
Salaries	80,415
Employers NI	11,768
Employers Pension Contributions	20,411
Employers Pension Deficit Payment	-
EV Costs	6,576
Other Staff Costs and Training	1,662
Electrical Safety Service	-
<b>TOTAL DIRECT STAFF</b>	<b>120,833</b>
<b>INDIRECT COSTS:-</b>	
<b>ADMIN &amp; MGMT SERVICES</b>	<b>25,207</b>
<b>TRAVEL/SUBSISTENCE</b>	
Essential Car User Allowance	7,180
Vehicle leasing, fuel, and maintenance	-
Vehicle Insurance	-
Travel/Subsistence	1,777
<b>TOTAL TRAVEL/SUBSIST</b>	<b>8,957</b>
<b>OFFICE OVERHEADS</b>	
New C&R Software/IT System	-
Other Costs	-
SRS Materials, Tools & Equipment	-
Office Premises Overhead	9,976
Office Equipment Overhead	1,547
Office Administration Overhead	2,049
Computer/IT Systems Overhead	21,531
Corporate Costs (inc Audit)	13,258
<b>TOTAL INDIRECT O/HEADS</b>	<b>48,361</b>
<b>TOTAL EXPENDITURE</b>	<b>203,357</b>
<b>SURPLUS/DEFICIT</b>	<b>(2,572)</b>

Inputs

- Salaries based on 5.1% increase as per ELHA Budget
- Office overheads are budgeted based on Care & Repair staff numbers divided by ELHA staff total number multiplied by ELHA budgeted overheads

Assumptions

- Travel and subsistence costs uplifted from 2025/26 figures by inflation

## Policy Review Summary

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

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The table below sets out policies reviewed by the Senior Management where they have Delegated Authority to undertake the review, since the last ELHA Board meeting.

<b>Policy Title</b>	<b>Reviewed By</b>	<b>Where the revised policy is available</b>	<b>SMT Delegated Approval</b>
Complaints	Karen Barry	Elha.com	Minor Changes
ICT Security	Gary Alison	Elha.com	Minor Changes

**ELHA POLICY**

<b>Date Issued</b>	19 February 2026
<b>Last Reviewed</b>	N/A
<b>Department</b>	Asset Management
<b>Title</b>	Electrical Safety Policy
<b>Objective</b>	To describe the arrangements for managing electrical safety
<b>Responsible</b>	Director of R3 & Asset Management
<b>Next Review Date</b>	February 2031

## **1.0 INTRODUCTION**

- 1.1 The aim of this Policy is to ensure the effective inspection, maintenance and management of all electrical installations, fixtures and appliances within premises controlled by East Lothian Housing Association (ELHA)
- 1.2 All electrical repair work and Electrical Installation Condition Reports will be sub-contracted to an external competent body.
- 1.3 The procedures detailed within this section are intended to facilitate the effective management of electrical safety, ensuring that all reasonable steps are taken to comply with the Consumer Protection Act 1987 and the Electrical Equipment (Safety) Regulations 1994.

## **2.0 DEFINITIONS**

**Competent Person** – person suitably trained and qualified by knowledge and practical experience, and provided with the necessary instructions, to enable the required task(s) to be carried out correctly.

## **3.0 LEGAL & REGULATORY FRAMEWORK**

- 2.1 We will comply with all relevant legislation and regulations including the following (the list is not exhaustive):
  - British Standard BS7671:2018+A2:2022
  - Electricity at Work Regulations 1989
  - Building Regulations Part P (2010)

- The Consumer Protection Act 1987
- The Electrical Equipment (Safety) Regulations 1994

2.2 This policy also takes account of the following policies and procedures:

- Maintenance Legal Obligations Policy
- Empty Homes Policy
- Mutual Exchange Policy
- Chargeable Repairs Policy
- Mutual Repairs Policy
- Complaints Policy and Procedure
- Health & Safety at Work Policy

### **3.0 OBJECTIVES OF ELECTRICAL SAFETY**

3.1 The objectives of the Electrical Safety Policy are that:

- The Organisation will ensure that all electrical installations, fixtures, fittings, and any electrical equipment provided, is safe, in a reasonable state of repair and in proper working order at the start of the tenancy and throughout its duration.
- Visual inspections on all electrical appliances will be carried out by a competent person before a tenant moves in and regularly throughout the tenancy.
- The Organisation will ensure that service contractors carrying out Electrical Installation Condition Reports (EICR) are competent within the terms of the Regulations and are members of recognised professional bodies.
- The EICR will be carried out every 5 years and at the start of a new tenancy if there have been new electrical installations fitted, or defects identified.
- The Organisation will retain a copy of the Electrical Installation Condition Report for six years. A copy of the most recent report will be issued to the tenant before a tenancy starts. If an inspection is carried out during a tenancy, a copy relating to that inspection will also be given to the tenant.

#### **4.0 REPAIRS AND EMERGENCIES**

- 4.1 Should any faulty equipment be observed, the Organisation will ask the tenant to take the item out of service until it is repaired or replaced.
- 4.2 The Organisation will use a competent service contractor to carry out repairs and emergency responses.

#### **5.0 PERIODIC INSPECTION AND TESTING**

- 5.1 All electrical repair work and Electrical Installation Condition Reports will be carried out by a competent contractor.
- All contractors must be qualified, competent, and hold appropriate insurance and accreditations.
  - Work must be carried out to current regulations (BS 7671).
  - Contractors will be regularly monitored through audits and performance reviews
  - Remedial works must be carried out within 21 days and a Minor Electrical Installation Work Certificate and for major installations an Electrical Installation Certificate (EIC) to be issued to ELHA.

#### **6.0 VOID PROPERTIES AND LETTINGS**

- 6.1 ELHA will carry out an EICR at the start of every new tenancy.

#### **7.0 TENANT RESPONSIBILITIES**

- 7.1 Tenants will be issued with information leaflets on electrical safety.
- 7.2 Tenants will be advised to report any electrical faults immediately.
- 7.3 Tenants will be informed of any electrical items which are prohibited within Organisation premises.
- 7.4 Tenants will be provided with advice on the safe usage and storage of electric bikes and scooters. This will include guidance on the following topics:
- Safe purchasing of electric bikes, scooters, batteries and chargers, including ensuring they are purchased from reputable suppliers and should meet relevant British or European safety standards.

- Registering purchased products with the manufacturer so that they can be contacted if any products are recalled or safety information is published.
- Safe storage of electric scooters or bikes such as ensuring they are not stored or left to charge in escape routes or in communal areas and that e-bikes, e-scooters, and any batteries for them should be stored in a cool place and in line with manufacturer's instructions.
- Keeping and charging e-bikes, e-scooters and batteries away from combustible or flammable materials
- Safe charging practices including:
  - Unplugging chargers when charging is finished
  - Not charging while users are asleep or away from their home in case a fire breaks out.
  - Ensuring there are working smoke or heat alarms in the charging area, as per guidance produced by the Scottish Fire and Rescue Service
  - Using manufacturer's approved chargers that are in good condition
  - Ensuring items are not covered when charging.
  - Ensuring only appropriate, uncoiled and appropriately rated extension leads are used for charging and that they are not overloaded
- Actions to take if a fire caused by an e-bike or e-scooter breaks out.
  - Checking batteries regularly for signs of damage.
  - Safe disposal methods for batteries.

## **8.0 MONITORING AND REVIEW**

- 8.1 The Asset Manager will submit reports on the performance of the Electrical Safety to the H&S Committee. The reports will include performance against set targets or standards, progress on compliance safety inspections and expenditure compared with budget.
- 8.2 The Director of R3 & Asset Management is responsible for ensuring that all staff involved comply with this policy and the supporting procedures.

## **9.0 POLICY REVIEW**

- 9.1 The Director of R3 & Asset Management will review this policy every five years or sooner if required by changes in legislation or organisational practise. Any material changes will be submitted to the ELHA Board for approval.

**ELHA POLICY**

<b>Date Issued</b>	19 February 2026
<b>Last Reviewed</b>	N/A
<b>Department</b>	Asset Management
<b>Title</b>	Energy Performance Certificate (EPC)
<b>Objective</b>	To describe the arrangements for ensuring all properties have a valid EPC
<b>Responsible</b>	Director of R3 & Asset Management
<b>Next Review Date</b>	February 2031

**1.0 Introduction**

- 1.1 The aim of this policy is to ensure that all relevant properties controlled by East Lothian Housing Association (ELHA) have a valid Energy Performance Certificate (EPC).
- 1.2 The procedures detailed within this section have been written to ensure all reasonable steps have been taken to comply with the Energy Act 2011, The Energy Performance of Buildings (Scotland) Regulations 2008 and all other relevant legislation.

**2.0 Legal and Regulatory Framework**

- 2.1 We will comply with all relevant legislation and regulations including the following (the list is not exhaustive):
- Energy Act 2011
  - Energy Efficiency Directive 2012
  - The Energy Performance of Buildings (Scotland) Regulations 2008
- 2.2 The Energy Efficiency Standard for Social Housing (ESSH)

The ESSH requires that:

“All social housing meets, or can be treated as meeting, EPC Band B (Energy Efficiency rating), or is as energy efficient as practically possible, by the end of December 2032 and within the limits of cost, technology and necessary consent.”

In addition, no social housing below EPC Band D should be re-let from December 2025, subject to temporary specified exemptions outlined by the Scottish Government.

### **3.0 Objective of an Energy Performance Certificate**

3.1 The objectives of the EPC are:

- An EPC is a document which states the energy efficiency of a building based on the standardised way the building is used and provides the building owner with recommendations on how the efficiency could be improved.
  
- An EPC is needed when a property is:
  - Built
  - Sold
  - Rented

### **4.0 Definition**

**EPC** - A legally required document that provides energy efficiency and environmental impact of the property.

### **5.0 Period Inspection and Testing**

5.1 All EPCs are valid for 10 years.

5.2 A new EPC will be required if a new occupant assumes tenancy or after the 10-year period.

5.3 EPCs may be updated if significant alterations have been made to a property after the EPC was issued.

### **6.0 Routine Maintenance**

6.1 ELHA will arrange for an EPC to be prepared by an approved EPC Assessor where a building is to be sold or let.

6.2 ELHA will provide the EPC free of charge to a prospective tenant or buyer.

6.3 Where the property is used as a public building, the EPC will be clearly visible to visitors.

6.4 ELHA will consider the recommendations of each EPC and determine whether improvements could/should be made to improve the energy efficiency performance of the premises.

**7.0 Void Properties and Lettings**

7.1 ELHA will provide the EPC certificate at the start of every new tenancy.

**8.0 Monitoring and Review**

8.1 The Asset Manager will submit reports on the performance of the Energy Efficiency to the H&S Committee. The reports will include performance against set targets or standards, progress on compliance safety inspections and expenditure compared with budget.

8.2 Director of R3 & Asset Management is responsible for ensuring that all staff involved comply with this policy and the supporting procedures.

**9.0 Policy Review**

9.1 The Director of R3 & Asset Management will review this policy every five years or sooner if required by changes in legislation or organisational practise. Any material changes will be submitted to the ELHA Board for approval.

<b>Date Issued</b>	19 February 2026
<b>Last Reviewed</b>	N/A
<b>Department</b>	Asset Management
<b>Title</b>	Fire Safety in Housing Stock and Common Areas
<b>Objective</b>	To provide a robust fire safety framework
<b>Responsible</b>	Director of R3 & Asset Management
<b>Next Review Date</b>	February 2031

## **1.0 Introduction**

- 1.1 The aim of this policy is to provide a robust fire safety framework which can be implemented to secure the safety and wellbeing of tenants, visitors and firefighters.
- 1.2 The procedures detailed within this section are intended to facilitate the effective management of fire safety, ensuring that all reasonable steps are taken to comply with the Fire (Scotland) Act 2005, the Fire Safety (Scotland) Regulations 2006 and all other relevant legislation.

## **2.0 Legal and Regulatory Framework**

- 2.1 We will comply with all relevant legislation and regulations including the following (the list is not exhaustive):
  - BS 5839-6:2019+A1:2020
  - Building (Scotland) Regulations 2004
  - Domestic Technical Handbook (as revised)
  - Electrical Equipment (Safety) Regulations 1994
  - Fire (Scotland) Act 2005
  - Fire Safety (Scotland) Regulations 2006
  - Furniture and Furnishings (Fire) (Safety) Regulations 1988
  - Gas Safety (Installation and Use) Regulations 1998

- Health and Safety (Safety Signs and Signals) Regulations 1996
- Health and Safety at Work etc. Act 1974
- Scottish Government Practical Fire Safety Guidance for Existing High-Rise Domestic Buildings

2.2 This policy also takes account of the following policies and procedures:

- Maintenance Policy
- Empty Homes Policy
- Mutual Exchange Policy
- Chargeable Repairs Policy
- Mutual Repairs Policy
- Complaints Policy and Procedure
- Tenant Participation Strategy
- Communication Strategy
- Customer Care Policy and Procedure
- Health & Safety at Work Policy

### 3.0 Objectives of Fire Safety

3.1 The objective of this policy is to prevent fires starting, ensure safe and rapid escape routes for all tenants, contractors and staff, enable early detection and suppression of fires and limit damage to property.

### 4.0 Definitions

**Common Area** – A common area is a portion of a property that is shared and used by multiple residents. This would include areas such as the lobby, stairway and hallway.

**Compartmentation** – subdivision of a building by fire-resisting walls and/or floors for the purpose of limiting fire spread within the building.

**Competent Person** – person, suitably trained and qualified by knowledge and practical experience, and provided with the necessary instructions, to enable the required task(s) to be carried out correctly.

**Dwelling** – a house, flat, or other place of residence.

**Emergency Lighting** – lighting provided for use when the supply to normal lighting fails.

**Fire Door** – door or shutter provided for the passage of people, air or objects which, together with its frame and furniture as installed in a building, is intended (when closed) to resist the passage of fire and/or gaseous products of combustion, and is capable of meeting specified performance criteria to those ends.

**Smoke Alarm** – device containing, within one housing, all the components, necessary for detecting smoke and for giving an audible alarm.

**Sprinkler System** – a system comprising thermosensitive devices designed to react at a pre-determined temperature to automatically release a stream of water and distribute it in a specified pattern and quantity over a designated area.

**HMO** – a house, premises or a group of premises with shared amenities, occupied by three or more persons from three or more families as their only or main residence.

## 5.0 Periodic Inspection and Testing

### 5.1 Fire and Smoke alarms, ELHA will provide:

- one functioning smoke alarm in the room which is frequently used by the occupants for general daytime living purposes.
- one functioning smoke alarm in every circulation space, such as hallways and landings.
- one heat alarm in every kitchen.

5.2 All alarms will be interlinked, either mains powered or using sealed battery alarms, and provided with an integral stand-by power supply (a minimum of class D).

5.3 ELHA will ensure that fire and smoke alarms are in proper working order at the start of each tenancy. Alarms have a 10 year lifespan and ELHA will have a cyclical programme to replace these prior to the expiry date.

- 5.4 ELHA will ensure that all smoke alarms are installed in accordance with the recommendations contained in BS EN14604:2005 and heat alarms comply with BS 5446-2:2003.
- 5.5 Tenants will be advised to test alarms on a weekly basis, and report any repairs required to ELHA immediately.
- 5.6 Where a property is held in shared ownership, responsibilities for compliance with this standard will be set out in the occupancy agreement. Proportion owners will be informed of the requirement to comply with this standard and all reasonable steps taken to achieve compliance.

NB: The Nest Protect System will not be sufficient to comply with the relevant standards and, as such, will not be used.

#### **5.7 Carbon Monoxide Alarms**

- Carbon monoxide alarms will be installed in any room containing a fossil fuel burning appliance.
- Carbon Monoxide alarms will comply with British Kitemark EN 50291-1:2018.

#### **5.8 Emergency Lighting**

- For blocks of flats and maisonettes, emergency lighting will be present in all communal areas and common escape routes. Where the emergency lighting provision is under the control of a third party (e.g. Local Authority), all reasonable steps will be taken to communicate with the third party in an attempt to ensure compliance with the procedures below.
- The emergency lighting system will be designed to automatically illuminate upon the failure of the power supply.
- The emergency lighting system will be tested on a monthly basis by a member of staff with a record of the test maintained for 3 years.
- An annual discharge test will be performed by a competent person. This will involve simulating a power failure and conducting a test of the full rated duration of the emergency lights (e.g. 3 hours).
- Tenant to report and faults or failures to ELHA promptly.

#### **5.9 Fire Doors and Compartmentation**

- 5.10 Buildings containing flats and maisonettes will be split into fire-resisting compartments by fire-resisting doors, walls and floors which will provide a physical barrier to fire.

5.11 Doors connecting shared parts of a multi-occupancy dwelling, such as the doors to individual flats or apartments will be rated fire doors.

5.12 For homes with an integral garage, the door that joins the garage to the main part of the house will be a fire door.

5.13 Doors used for plant rooms and service penetrations such as rubbish chutes will be fire rated.

**5.14 Emergency Exit Doors**

- ELHA will ensure all doors which are to be used in an emergency can be opened from the inside without the use of a key and be clearly marked.

**5.15 Smoke Ventilation**

- Communal areas will have adequate smoke ventilation either through natural means or by mechanical ventilation.
- Any ventilation ducts supplying or removing air from a protected stairway or entrance hall will not serve any other areas.
- All buildings will have adequate means for venting heat and smoke from a fire in the basement.

**5.16 Fire Equipment**

5.17 Sprinklers will be installed where ELHA is unable to reduce particular risks by other means.

5.18 Fire extinguishers will not be installed in dwellings as tenants will not be trained on the safe use of extinguishers. Accidents can occur if tenants try to use them in the event of a fire or if they are discharged through malice or horseplay.

5.19 To assist the Fire and Rescue Service:

- Dry risers will be installed in any building that is over 18 metres in height.
- Wet risers will be installed in buildings over 50 metres in height.
- Outlets will be present on each floor and located in a fire escape staircase or similar protected location.

5.20 Both dry and wet risers will be subject to a recorded visual inspection every 6 months.

5.20 Both dry and wet risers will be subject to a recorded pressure test every year by a competent person.

## **6.0 Evacuation Policy**

- 6.1 Fire evacuation procedures and fire assembly points will be clearly contained in tenancy handbooks or tenancy start-up packs which will be issued to all tenants at the start of a tenancy.
- 6.2 Alternative methods will be available for tenants with language or learning difficulties (e.g. an interpreter will be used, a copy will be in braille, an audio version will be available etc.).

## **7.0 Signage**

- 7.1 Fire action signs will be placed in corridors (on every level), entrance doors and common areas. Where fire safety signs are provided, they will be in accordance with BS 5499 and the Health and Safety (Safety Signs and Signals) Regulations 1996.

## **8.0 Maintenance and Repairs**

- 8.1 ELHA will ensure premises, equipment and devices provided for fire safety are subject to a suitable system of maintenance, are maintained in an efficient state, in efficient working order and in good repair.
- 8.2 All repairs will be carried out within the timescale set in the ELHA Maintenance Policy by a competent person.
- 8.3 Clear records will be maintained of the processes in place and actions carried out.

## **9.0 Access and Facilities for the Fire Service**

- 9.1 The Organisation will ensure:
- there is sufficient means of external access to enable fire appliances to be brought near to the building for effective use.
  - there is sufficient means of access into, and within, the building for firefighting personnel to effect search and rescue and fight fire; and that
  - the building is provided with sufficient internal fire mains and other facilities to assist firefighters in their tasks.

**10.0 Fire Risk Assessment**

10.1 The legal requirements relating to Fire Risk Assessing are complex and are often taken to exclude domestic premises. However, ELHA has a legal duty to risk assess all areas defined as 'workplaces', which will include plant rooms and other non-tenant-accessible areas. Furthermore, the fire regulations require common areas to be maintained in a certain condition suitable for the fire authority, which can often only be ensured by carrying out a risk assessment.

Therefore, the Organisation will devise a Fire Risk Assessment Strategy and arrange for the undertaking of fire risk assessments (and regular reviews) by competent consultants in accordance with the Strategy.

The following will be considered in developing the risk assessment strategy:

- Fire Risk Assessments should be carried out by a competent, qualified Fire Risk Assessor
- High rise buildings pose a particular risk to tenants and often exhibit significant uncontrolled risks.
- 'Workplaces' such as plant rooms come within the scope of the regulations so far as fire risk assessing is required.
- Common areas of domestic premises require to be maintained in a certain condition and may benefit from a 'representative' risk assessing programme.
- Particular risks may be posed by external wall systems, e.g. cladding (recognising that specialised intrusive inspection and fire performance testing may be required in some circumstances).

**11.0 Tenant Responsibilities and Communication**

11.1 ELHA will include fire safety obligations within tenancy agreements and will issue regular fire safety information packs and leaflets to remind tenants to:

- Test smoke alarms on a weekly basis.
- Ensure all communal areas are not obstructed.
- Ensure fire doors are not propped open or otherwise disabled.
- Tenants to report any faults or failures promptly.

11.2 Tenants will be provided with information on the fire detection system and evacuation procedures / assembly points.

11.3 Tenancy agreements will specifically state that front doors cannot be changed without the express permission of the Organisation.

11.4 Communication methods will take account of tenants with language or learning difficulties (e.g. braille, audio, different language, etc.).

## **12.0 Licensed Houses of Multiple Occupancy (HMOs) and commercial premises**

12.1 All policies listed above will be applied. In addition to these, all licensed HMOs and commercial premises managed by the ELHA:

- Will be fire risk assessed by a competent assessor, with periodicity determined by the fire risk assessment.
- Will have doors opening in the direction of escape.
- Will be supplied with appropriate, maintained extinguishers
- Will have the fire evacuation procedure details relayed to relevant persons.
- Within commercial premises not managed by ELA, the responsibility for the completion of the fire risk assessment will fall upon the tenant. A copy of the completed fire risk assessment will be held by both the tenant and ELHA.

## **13.0 Documentation and Reporting**

13.1 ELHA to maintain accurate records of all servicing reports and Fire Risk Assessments of communal areas.

13.2 The Asset Manager will submit reports on the performance of Fire Safety to the H&S Committee. The reports will include performance against set targets or standards, progress on compliance safety inspections and expenditure compared with budget.

## **14.0 MONITORING AND REVIEW**

14.1 Director of R3 & Asset Management is responsible for ensuring that all staff involved comply with this policy and the supporting procedures.

**15.0 POLICY REVIEW**

- 15.1 The Director of R3 & Asset Management will review this policy every five years or sooner if required by changes in legislation or organisational practise. Any material changes will be submitted to the ELHA Board for approval.

## Tenant Debt Write Offs

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

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#### 1.0 Introduction

Housing staff have reviewed and recommend the write off of former tenancy debts as detailed in **Appendix 1**.

#### 2.0 Debts to be Written Off

Following the Internal Audit review, all older debts were passed to a new Debt Collection Agency for recovery. Staff continue to systematically work through these accounts which are reducing in number, and in some cases, legal action is now being instructed where there is a slight possibility of recovery. All debts have already been fully provided for.

Normally, almost all former tenancy debts are passed to a Debt Collection Agency for recovery where a former tenant has failed to make or maintain a repayment agreement, unless the tenant has died, has been sequestered, or the debt is very small making it uneconomical to pursue.

The debts recommended for write off at **Appendix 1** are total debts in excess of £750 for which Board approval is required. All attempts have been made to recover these debts, and legal action is not considered appropriate in these cases.

#### **Recommendation**

The ELHA Board is asked to approve the write off of former tenancy debts totalling £35,837.76.

## Former Tenancy Debts Over £750 to be Written Off

Tenant Number	Total Amount	Rent	Rechargeable Repairs	Housing Benefit/DHP Overpayment	Sheriff Officer Fees/ Legal Expenses	Tenancy End Date	Reason
13604953	11,575.92	1,276.11	9,976.29		323.52	29/08/2017	FT paid towards debt with limited success until 2021. DCA attempts to pursue have been unsuccessful, with a reporting following trace and local enquiries that FT is believed to be a single parent not in employment. Debt is over 8 years old
10710336	1,340.62	477.06	672.00	191.56		28/06/2018	Debt Collection Agency (DCA) traced tenant but no response to attempts to contact. FT does not appear to be in employment at this time, with potential current residence in poor visual condition. Debt over 7 years old
240258	5,054.64	2,139.51	1,662.00	703.22	549.91	01/08/2018	FT with mental health issues, residing care of parents and not in employment. Two DCA's attempted to collect and were unsuccessful. Debt over 8 years old.
13707732	3,378.51	1,163.84	1,281.48	330.21	602.98	01/08/2018	Decree granted in 2018 – unable to exercise as FT not in employment. 2 DCA's have attempted recovery. Debt over 8 years old.
11202454	1,291.49		1,291.49			11/08/2021	DCA has attempted recovery and recommends write off. This tenant has a very chaotic life, and unlikely to ever be in a position to repay this.

Tenant Number	Total Amount	Rent	Rechargeable Repairs	Housing Benefit/DHP Overpayment	Sheriff Officer Fees/ Legal Expenses	Tenancy End Date	Reason
060331	944.44		944.44			24/09/2021	Tenant deceased - attempts to confirm position regarding estate unsuccessful but tenant had been in receipt of benefits to pay full housing costs so likelihood of an estate slim.
06034	1,076.73	1,076.73				19/12/2021	Tenant deceased - attempts to confirm position regarding estate unsuccessful but tenant had been in receipt of benefits to pay full housing costs so likelihood of an estate slim.
12300105	1,757.06	983.06	774.00			21/03/2022	Two DCAs have attempted recovery, with three payments received in 2023 but no success since. A trace has been carried out and DCA have not been able to establish further information about the FT.
12602302	2,198.49		2,198.46			28/10/2022	Tenancy abandoned. Last traceable address was temporary accommodation & DCA unable to find further details.
090035	1,415.38	595.44	819.94			15/05/2023	Tenant deceased - Executor confirmed no estate.
14702802	4,764.38	3,114.43	1,278.00		371.95	14/08/2023	DCA have had no success with contacting FT, and initial investigations have found the FT has likely left the country.

Tenant Number	Total Amount	Rent	Rechargeable Repairs	Housing Benefit/DHP Overpayment	Sheriff Officer Fees/ Legal Expenses	Tenancy End Date	Reason
033807	1,040.13	806.49	233.64			16/10/2024	Tenancy ended via abandonment. DCA attempts to pursue have been unsuccessful. FT was not in employment at tenancy end & not considered a reasonable prospect of recovery.
<b>TOTAL</b>	<b>35,837.76</b>	<b>12,840.25</b>	<b>19,840.25</b>	<b>1,224.99</b>	<b>1,848.36</b>		