



<b>Policy:</b>	<b>Estate Management</b>
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**Housing Services**

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**CONTENTS**

**Page Number**

- 1. Introduction.....3
- 2. Estate Management Policy.....4
- 3. Scottish Social Housing Charter Outcomes.....4
- 4. Annual Return on the Charter (ARC) Indicators.....5
- 5. Partnership Working.....6
- 6. Community Wellbeing.....6
- 7. Preventative & Proactive Measures.....7
- 8. Property & Environment Standards.....8
- 9. Proactive Services.....9
- 10. Reactive Services.....11
- 11. Monitoring & Reporting.....12
- 12. Benchmarking.....12
- 13. Equality & Diversity.....12
- 14. Legal Framework .....13
- 15. Guidance & Good Practice.....13
- 16. Role of Management Committee.....13
- 17. Delegated Authority.....14
- 18. Decision Review.....14
- 19. Complaints.....14
- 20. Audit Trail.....14
- 21. Review of Policy.....15

## 1.0 Introduction

- 1.1 Provanhall Housing Association is a community based not-for-profit organisation located in the Provanhall area of Easterhouse. The Association is run by an elected and voluntary Management Committee made up of local tenants and residents. Policies of the Association are agreed and approved by the Management Committee with the implementation of these policies the responsibility of staff.
- 1.2 The Association strongly believes that Provanhall should be an attractive, well-maintained and safe place to live. This is best achieved through Housing Services and Technical Services staff, together with statutory and partner agencies and contractors, working proactively and closely together to manage our properties, common areas and the local environment effectively.
- 1.3 The Association recognises that effective estate management is not simply concerned with looking after buildings and the physical environment. Estate Management involves a diverse range of issues and many other policies of the Association including:
  - 1.4 Tenancy Agreement
  - 1.5 Allocations & Internal Transfer Policies
  - 1.6 Repairs and Maintenance Policy
  - 1.7 General Conditions of Contract Policy
  - 1.8 Antisocial Behaviour Policy
  - 1.9 Voids Policy
  - 1.10 Abandoned Tenancies Procedure
  - 1.11 Animals Policy
  - 1.12 Complaints Policy
- 1.13 In addition to addressing property standards, this Policy also focuses on environmental issues, including environmental antisocial behaviour. These all directly affect the management and maintenance of our properties and the estate so that residents can enjoy a clean and peaceful environment. The Scottish Government definition of environmental antisocial behaviour includes:
  - 1.14 Graffiti
  - 1.15 Fly-tipping
  - 1.16 Littering and waste dumping
  - 1.17 Dog fouling
  - 1.18 Vandalism / criminal damage
  - 1.19 Abandoned vehicles
- 1.20 Estate Management responsibilities of the Association include:
  - 1.21 Property standards and maintenance
  - 1.22 Maintenance, security and safety in closes
  - 1.23 Close cleaning
  - 1.24 Garden maintenance
  - 1.25 Common area maintenance
  - 1.26 Wheelie bin management
  - 1.27 Disposal of domestic and bulk refuse

- 1.28 Graffiti
- 1.29 Vandalism & criminal damage
- 1.30 Abandoned vehicles

## **2.0 Aims of the Estate Management Policy**

- 2.1 Aims of the Estate Management Policy are:
- 2.2 Protect the Association's investment by maintaining our properties and the local environment to the best possible standard
- 2.3 Provide a clear division of rights and responsibilities for staff and tenants in order to achieve and maintain high property and environment standards
- 2.4 Ensure there are fair and effective procedures for dealing with estate management issues or problems, including environmental antisocial behaviour, that also adhere to legal requirements and good practice
- 2.5 Encourage positive and productive relationships between the Association and its tenants and residents by providing both a proactive and prompt reactive response to estate management problems
- 2.6 Monitor, liaise and work in partnership with contractors and statutory or partner agencies, to ensure they meet their legal or contractual obligations to provide high standards of service
- 2.7 Comply with Scottish Government, Scottish Housing Regulator and other relevant performance outcomes and standards in relation to estate management

## **3.0 Scottish Social Housing Charter Outcomes**

- 3.1 The following charter outcomes and standards are relevant to the Estate Management Policy:
- 3.2 **Charter Outcome 1 'Equalities':**  
*'every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services'.*
- 3.3 **Charter Outcome 2 'Communication':**  
*'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'.*
- 3.4 **Charter Outcome 4 'Quality of housing':**  
*'tenants' homes, as a minimum, meet the Scottish Housing Quality Standard (SHQS) when they are allocated; are always clean, tidy and in a good state of repair; and also meet the Energy Efficiency Standard for Social Housing (ESSH) by December 2020'.*

- 3.5 **Charter Outcome 5 ‘Repairs, maintenance and improvements’:**  
*‘tenants’ homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done’.*
- 3.6 **Charter Outcome 6 ‘Estate management, antisocial behaviour, neighbour nuisance and tenancy disputes’.**  
*‘Social landlords, working in partnership with other agencies, help ensure that: tenants and other customers live in well-maintained neighbourhoods where they feel safe’.*
- 3.7 **Charter Outcome 11 ‘Tenancy Sustainment’:**  
*‘tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations’.*

#### **4.0 Annual Return on the Charter (ARC) Indicators**

- 4.1 The following Annual Return on the Charter (ARC) Indicators are relevant to the Estate Management Policy:
- 4.2 Charter Indicator 6 *‘Percentage of stock meeting the Scottish Housing Quality Standard’*
- 4.3 Charter Indicator 7 *‘Percentage of tenants satisfied with the quality of their home’*
- 4.4 Charter Indicator 12 *‘Percentage of tenants who have had repairs or maintenance carried out in last 12 months satisfied with the repairs and maintenance service’*
- 4.5 Charter Indicator 13 *‘Percentage of tenants satisfied with the landlord’s contribution to the management of the neighbourhood they live in’*
- 4.6 Charter Indicator 15 *‘Percentage of antisocial behaviour cases reported in the last year which were resolved’*
- 4.7 Charter Indicator 22 *‘Percentage of court actions initiated which resulted in eviction and the reasons for eviction’*
- 4.8 Charter Contextual Indicator C4 *‘Number of abandoned properties during the reporting year’*

## 5.0 Partnership Working

- 5.1 To meet fully the aims of this policy and the legislative, guidance and good practice requirements, Housing Services and Technical Services staff, together with statutory and partner agencies and contractors, must work proactively and closely together to manage our properties, common areas and the local environment effectively. The main partner organisations under this policy we either currently contract estate management services to or are themselves service providers include:
- 5.2 Clyde Valley Landscape Services (estate management contractor)
  - 5.3 Total Homes Co-operative (close cleaning & bulk removal contractor)
  - 5.4 Glasgow City Council – Neighbourhoods & Sustainability (cleansing services, footpath & road services, environmental health)
  - 5.5 Glasgow City Health & Social Care Partnership (HSCP) - (North East Community Homeless Team, Children & Family Services, Addiction Services, Mental Health Services, Restorative Justice Service)
  - 5.6 Loretto Care (tenancy support service)
  - 5.7 Addaction (alcohol and tenancy support service)
  - 5.8 Greater Easterhouse Alcohol Awareness Project (GEAAP) (alcohol and tenancy support service)

## 6.0 Community Wellbeing

- 6.1 The appearance of the local environment continues to be recognised as having a major impact on the quality of life within communities and on the wellbeing of residents. Over the years housing bodies and local authorities established community environment standards or charters to ensure *'people live in a safe, secure and attractive environment'*. Terms such as *'environmental antisocial behaviour'* or *'environmental incivility'* were defined as *'any act which is harmful to or contributes to the degradation of your living environment. This can include vandalism, fly tipping, littering and graffiti'*. *'Environmental incivility is any aspect of the environment that you can see, hear, touch or smell, that you could feel negatively about. This might be at street level (for example, littering, dog fouling or graffiti), or it might be things that are absent, like somewhere safe and pleasant to walk, sit or play'*.
- 6.2 The Scottish Government also recognised that the quality and tenure mix of houses were *'not the only factors in creating vibrant, mixed and sustainable communities'*. They acknowledge that *'the quality and management of the environment and public space are also critical elements'*.
- 6.3 The Association has long recognised these important factors. Estate management services were developed and established many years ago for the benefit of all tenants and residents within the Provanhall community.
- 6.4 The Housing (Scotland) Act 2010 introduced the Scottish Social Housing Charter standards and the relevant estate management outcomes and indicators outlined in Sections 3 and 4. No further estate management legislative changes or requirements for social landlords have been introduced since.

## 7.0 Preventative & Proactive Measures

- 7.1 A preventative and proactive approach by the Association to *'protect the Association's investment by striving to maintain our properties and the local environment to the best possible standard'* is the main priority for Management Committee and staff. Focussing on preventative and proactive measures is essential to achieve the best possible standard. The following methods will at all times emphasise:
- 7.2 Promotion of high property and environment standards
- 7.3 Promotion of the 'Use of the Home and Common Parts', 'Respect for Others' and 'Repairs and Maintenance' sections of the Scottish Secure Tenancy Agreement (SSTA).
- 7.4 Promotion of the range of options by which residents can report estate management problems including environmental antisocial behaviour
- 7.5 Promotion of the positive outcomes of encouraging residents to report problems in order for staff to act upon and resolve quickly
- 7.6 The responsibility of tenants regarding their own behaviour and the behaviour of other household members and their visitors
- 7.7 The serious personal consequences for tenants and their household if the standard of their property deteriorates and does not improve or environmental antisocial behaviour problems for which they are responsible occur and continue
- 7.8 Estate Management issues have already been identified as affecting all levels of operation within the Association. General preventative and proactive methods to avoid or reduce estate management problems across the Association will include the following:
- 7.9 Prompt response times to deal with all estate management and environmental antisocial behaviour problems e.g. removal of rubbish being dumped, removal of graffiti or repairing vandalism / criminal damage to common closes and security door entry systems. It is widely acknowledged that signs of environmental antisocial behaviour can quickly give a community the appearance of decline and can make other forms of antisocial behaviour seem more acceptable in the community. This can also have a negative impact on many other issues such as properties becoming less desirable leading to low demand for our properties
- 7.10 Working with a range of statutory and other partner organisations and agencies, including the purchasing of services, to improve community wellbeing for residents by addressing and tackling issues relating to social, financial and digital exclusion, economic deprivation and unemployment. These are often contributory factors to low environmental standards. Improving wellbeing examples include: increasing employment opportunities, securing additional income for residents and help to tackle debt issues and providing additional services for residents such as youth groups and opportunities via the Connie and Connect Community Trust
- 7.11 All Association new build developments will endeavour to be awarded 'Secure by Design Accreditation' to minimise opportunities for crime and antisocial behaviour through the design and layout of projects

- 7.12 The Association through its Development and Planned Maintenance programmes will endeavour to improve safety and security and minimise environmental antisocial behaviour within its properties and common closes
- 7.13 Staff promotion of high standards both in our properties and the surrounding environment through preventative and proactive measures will include:
- 7.14 Prior to allocating property – reference from previous landlord/s
- 7.15 House visit prior to offer of housing being made
- 7.16 Accompanied viewing of the house being offered
- 7.17 Pre tenancy advice and assistance
- 7.18 Sign up process
- 7.19 Tenants handbook
- 7.20 New tenant visit
- 7.21 Regular tenancy visit
- 7.22 Personal contact with tenants
- 7.23 Annual garden competition
- 7.24 Quarterly newsletters & Annual Report
- 7.25 Other promotional & publicity material as required

## **8.0 Property & Environment Standards**

- 8.1 The Scottish Secure Tenancy Agreement (SSTA) signed by each tenant outlines their legal and contractual obligation on areas that impact on the standards expected by the Association as the landlord. It includes property standards within their own home and common parts of the property in addition to the local environment. Under the following sections of the SSTA the tenant must:
- 8.2 Occupy and furnish the house as their principal home (2.1)
- 8.3 Take reasonable care of the house including internal decoration (5.16)
- 8.4 Keep the house in a reasonable state of cleanliness (5.16)
- 8.5 Report any damage to the house or common parts (5.15)
- 8.6 Take reasonable care to prevent damage to the house, decoration, fixtures and fittings, the common parts, neighbours' property (2.3)
- 8.7 Properly bag and dispose of rubbish and household goods (2.14)
- 8.8 Not leave rubbish in unauthorised places (3.3)
- 8.9 Maintain private garden areas in a neat and tidy condition (2.11)
- 8.10 Maintain the common stairs and landings in a clean and tidy condition (2.9)
- 8.11 Not store property in the common stair and landing (2.13)
- 8.12 Not park any type of vehicle that causes a nuisance or annoyance to neighbours (2.16)
- 8.13 Not vandalise or damage the property or any of the common parts or neighbourhood (3.3)
- 8.14 Tell us if they are going away for more than 4 weeks (2.3)
- 8.15 Not use the property for any illegal or improper purposes (2.7)
- 8.16 Not act in an antisocial manner or allow visitors to the house to act in an antisocial manner (3.1)
- 8.17 Not make excessive noise (3.3)
- 8.18 Not fail to properly control animals (3.3)



- 8.19 The above demonstrates the Association can take all action considered necessary, including legal action, to recover the tenancy by court order due to issues such as cleanliness of the house or damage to it.
- 8.20 SSTA Section 6 'Ending the Tenancy', 6.3 explicitly makes clear court action can be taken if *'the condition of the house or common parts.....has deteriorated because of the fault of you, your subtenant or somebody in your household'*.
- 8.21 Please refer to the Antisocial Behaviour and Rent Management Policy and Procedures for details regarding encouraging reports and complaints, categories of complaints and management and legal remedies. To reiterate our aim is:
- 8.22 To ensure that legal action measures are used appropriately and court action is only ever instigated as a last resort
- 8.23 To work in partnership with others to avoid the use of eviction and prevent homelessness if at all possible
- 8.24 Although the Association does provide estate management services such as private garden maintenance and communal close cleaning, this does not absolve the tenant of their responsibilities under their SSTA. For instance, if a spillage in a close landing occurs or there is a buildup of litter and the weekly close cleaning contractor is not due to return for several days, it would be reasonable to expect, and for staff to request, tenants in the landing fulfill their obligation under the SSTA to take appropriate action to ensure their common landing is in a clean and tidy condition. Simply not doing anything and waiting until the next close cleaning service day would be unreasonable given the environmental eyesore this creates and the subsequent negative impact on other residents and the community previously highlighted.

## **9.0 Proactive Services**

### **9.1 Property Standards and Maintenance**

#### **9.2 Repairs & Maintenance**

Please refer to the Repairs and Maintenance Policy that covers all classifications and types of repairs and maintenance. This policy also includes details on cyclical and planned maintenance programmes. Combined these help to maintain our properties to the best possible standard.

#### **9.3 Regular Tenancy Visit**

Regular visits by Housing Services staff to each property will ensure we continue to provide a high level of service to tenants. This also allows an inspection of each property to assess if tenants are meeting their SSTA requirement to keep the house in a reasonable state of care and cleanliness. SSTA Section 5 'Repairs, Maintenance, Improvements and Alterations', 5.11 states *'We have the right to come into your house to inspect it and its fixtures and fittings...during reasonable times of the day. We will give you at least 24 hours' notice in writing. If you refuse us entry, we will have the right to make*

*forcible entry provided we have given you reasonable opportunity to let us in voluntarily.'*

#### 9.4 **Maintenance, Security and Safety in Closes**

We maintain controlled entry systems, close and external lighting to encourage safety and security for residents and to protect our properties. Fobs will be issued and replacement fobs for purchase will be available. Residents will be encouraged to be vigilant in keeping all security doors closed and locked.

9.5 As per SSTA, tenants will be deterred from storing items on close landings that may cause danger, nuisance or obstruction to their neighbours. Items such as prams, bikes, etc must be stored either in their own home or in cellars where applicable.

9.6 Should there be frequent incidents of vandalism within a specific property all action necessary will be considered to identify the cause of the problem; regular and sustained contact with all residents, close meetings, police involvement and recharging those responsible or their parent / guardian. If due to a lack of cooperation and assistance from residents despite the best efforts of staff to try and identify the cause or who is responsible, the Association may recharge all the tenants within the close a share of the cost of such repairs plus consider other security measures as required.

#### 9.7 **Environmental Services**

Please refer to Contract Specification documentation for further details of the following services.

#### 9.8 **Communal Close Cleaning Service**

##### 9.9 Tenemental Properties – Weekly Clean

Removing all litter from landings and stairs and sweeping and removing all other debris prior to washing and disinfecting landings and stairs. Litter is also removed from the close entrance, steps & pathway leading to the pavement. The front & rear close doors, including push plate, door entry panel and any glazed panes are also cleaned.

##### 9.10 Tenemental Properties – Monthly Clean

Cleaning all wall tiles and handrails, both sides of tilt & turn close windows, window cills and removing any cobwebs if required.

#### 9.11 **Environmental Ground Maintenance Service**

##### 9.12 Common Areas

Delitter weekly – including around hedges and fences. Common areas also include parking bays and tenemental close entrances and bin stores. Grass will be cut, edges trimmed and sweeping of hard surfaces after each cut. Edging to planting beds and hard surfaces areas will also be carried out.

##### 9.13 Front Gardens

Grass will be cut, edges trimmed and sweeping of hard surfaces after each cut. Edging to planting beds and hard surfaces areas will also be carried out.

##### 9.14 Main Door Back Gardens

Grass will be cut, edges trimmed and sweeping of hard surfaces after each cut. Edging to planting beds and hard surfaces areas will also be carried out.

- 9.15 Tenemental Back Courts  
Delitter weekly - including around hedges and fences. Grass will be cut, edges trimmed and sweeping of hard surfaces after each cut. Edging to planting beds and hard surfaces areas will also be carried out.
- 9.16 Planting Beds / Slabbed & Hard Landscaped Areas  
Applying herbicide / weed killer and hand weeding / turning over services are also provided to these areas.
- 9.17 **Wheelie Bin Service**
- 9.18 Main Door Properties  
Domestic green, blue and purple wheelie bins will be removed and positioned on the front footpath adjacent to the property for emptying by Glasgow City Council on their service day. Once emptied, all bins must be put back in their original position.
- 9.19 Tenemental Properties  
Once green wheelie bins removed from communal bin store the same process for main door properties apply. The contractor must take particular care to ensure that existing close tiles / floor covering are not damaged when transfer through the close is required.
- 9.20 **Bulk Removal Service**
- 9.21 Tenemental Properties Only  
Removal of all bulk items from backcourts and bin stores. Our contractor aims to upcycle and recycle as much of the bulk as possible to reduce landfill waste.
- 9.22 **Annual Garden Competition**  
Open to all tenants and owners for stock we manage within Provanhall. Aim is to promote a sense of community and responsibility among our tenants and reward those who positively contribute to the local environment. This improves overall the appearance of the Provanhall area making it a more desirable place in which to live for both current and future residents.

## **10.0 Reactive Services**

- 10.1 Estate Management Property & Environmental Inspections  
Both Housing Services and Technical Services staff carry out a weekly or monthly programme of inspections of both our properties and the local environment and take action as appropriate. In addition proactive inspections also take place on a daily basis and while staff are out in the area carrying out other duties. Inspections include monitoring service delivery of our own estate management contractors plus that of Glasgow City Council's own service departments. Please refer to the Estate Management Procedures for further details. Please also refer to the Antisocial Behaviour Policy and Procedure for further action information.
- 10.2 Graffiti Removal  
The Association operates a graffiti removal procedure whereby affected areas are cleaned under an Urgent Repair category which is 3 working days. Graffiti of an offending nature will be removed within 24 hours of the report being received or identified. If the identity of those responsible is known, the Antisocial Behaviour Policy and Procedure will be instigated and costs will likely be recharged.

### 10.3 Vandalism / Criminal Damage

Repairs will be carried out to current timescales as outlined in the Repairs and Maintenance Policy. To do all we can to deter acts of vandalism or other criminal damage to our properties, just like graffiti removal, if the identity of those responsible is known, the Antisocial Behaviour Policy and Procedure will be instigated and costs will likely be recharged.

### 10.4 Abandoned Vehicles

Abandoned vehicles can be a nuisance to local communities. Apart from being an eyesore they can also become a danger to the public. A vehicle is considered to be abandoned if it meets the following criteria:

- 10.5 The vehicle structure/glass has been damaged by vandalism as opposed to damage caused by a road traffic accident or
- 10.6 The vehicle has unsecured doors, boot open etc.
- 10.7 The vehicle has been partially or fully burnt out
- 10.8 Staff or residents who notice a vehicle that meets any of the above criteria can contact Glasgow City Council Abandoned Vehicles Section. Please refer to Estate Management Procedure for contact details, including the Abandoned Vehicles Helpline. The Council will require as much of the following information as possible: make and model, colour, registration number, exact location and general condition of vehicle.

## **11.0 Monitoring and Reporting**

- 11.1 It is important to establish whether the aims of the Estate Management Policy are being met. Regular monitoring and reporting of estate management issues and contractor or service department performance, helps to establish whether or not these aims are being met and assist in future policy reviews. This will also help in the review of performance indicators and targets.

## **12.0 Benchmarking**

- 12.1 The Association will benchmark its performance and use this to set, monitor and report targets. This will be done via Management Committee, Annual General Meeting, Scottish Housing Regulator Landlord Report, Annual Report and newsletters. .

## **13.0 Equality & Diversity**

- 13.1 Provanhall Housing Association is committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. The Estate Management Policy and Procedure in its operation will adhere to all parts of the Equality & Diversity Policy.
- 13.2 The Association wishes to ensure there are no barriers in accessing its services. Relevant documents can therefore be translated into a range of languages on request. We will also ensure that translation services are

available for those who wish more detailed information and to assist those who wish to make personal enquiries. For anyone with visual or audio impairment relevant documents can also, on request, be made available in larger print, on tape, in Braille or on any format required.

## **14.0 Legal Framework**

- 14.1 All aspects of the Estate Management Policy and Procedure adhere to the following equality, housing & other relevant legislation:
- 14.2 Equality Act 2010
- 14.3 Housing (Scotland) Acts: 2001, 2010
- 14.4 Data Protection Act 2018 (incorporates GDPR 2016)
- 14.5 Civic Government (Scotland) Act 1982
- 14.6 Dangerous Dogs Act 1989 & 1991
- 14.7 Environmental Protection Act 1990
- 14.8 Crime and Disorder Act 1998
- 14.9 Homelessness etc. (Scotland) Act 2003
- 14.10 Dog Fouling (Scotland) Act 2003
- 14.11 Antisocial Behaviour etc. (Scotland) Act 2004

## **15.0 Guidance and Good Practice**

- 15.1 Every effort has been made to develop the policy and procedure with regards to the following information, guidance and good practice on estate management:
- 15.2 The Scottish Social Housing Charter (Scottish Government, 2017)
- 15.3 Scottish Social Housing Charter, Technical Guidance for Landlords (Scottish Housing Regulator, 2020)
- 15.4 Model Scottish Secure Tenancy Agreement (Scottish Executive, 2001)
- 15.5 Improving the Neighbourhood – A Community Environment Standard for Scotland (CIH, 2006)
- 15.6 Action Plan for a Community Environment Standard (CIH, 2008)
- 15.7 Firm Foundations: The Future of Housing in Scotland (Scottish Government, 2007)

## **16.0 Role of the Management Committee**

- 16.1 Staff will undertake the day to day operation of every aspect of the estate management policy and procedure. The role of the Management Committee is to agree and review the policy and procedures. This includes agreement and approval of estate management services to be provided, approve and appoint estate management contractors, monitor estate management reports and agree or approve action to be taken as required. The Management Committee will monitor and review the outcomes of the policy.

## **17.0 Delegated Authority**

- 17.1 The Management Committee has delegated the Housing Services Sub-Committee authority to approve and appoint estate management contractors, monitor estate management reports and take action as required. This includes for tenants instigating legal action and seeking decree at court. Any decision to enforce decree and proceed with eviction will require advance approval by the full Management Committee.
- 17.2 Any decision to take formal action against an estate management contractor, including termination of contract, will be in accordance with Technical Services' General Conditions of Contract Policy.

## **18.0 Decision Review**

- 18.1 A tenant or resident dissatisfied with any decision taken regarding the estate management policy or procedure has the right to request a review of the decision. A tenant or resident is advised the review process is as follows:
- 18.2 A tenant or resident can request a review of the decision to the Housing Services Manager of the Association. Their review request can be made in person by making an appointment or by phone, email, via the Association's website or in writing. The Housing Services Manager will provide a written response within 5 working days.
- 18.3 If the tenant does not agree or accept the decision of the Housing Services Manager, they have the right to make a final decision review request to the Director of the Association. Their review request can be made in person by making an appointment or by phone, email, via the Association's website or in writing. The Director will provide a written response within 5 working days. The Director's decision will be final.

## **19.0 Complaints**

- 19.1 A tenant has the right to complain if they are unhappy. We value any complaint a tenant may have as this can help improve the service we provide. See the Complaints Policy and Procedure for details.
- 19.2 Scottish Social Housing Charter indicators relating to estate management and reported annually through the Annual Return on the Charter (ARC) requirements will also be provided to Management Committee.

## **20.0 Audit Trail**

- 20.1 An audit trail of monitoring and reporting inspections and performance outcomes shall be recorded. This audit trail will clearly demonstrate the need for the escalation stages of this or other relevant policies and procedures.

## **21.0 Review of Policy**

21.1 This policy will be reviewed five years from date of approval or sooner due to legislative, guidance or good practice requirements.