

Safer Staffing Compliance Report (2024/25)

Internal and Commissioned Housing Support
Services

Health and Care (Staffing) (Scotland) Act 2019: Annual Report

Declaration

- **Name of local authority / integration authority:** North Lanarkshire Council
- **Report authorised by:**
 - Name: **Stephen Llewellyn**
 - Designation: **Chief Officer**
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1. Introduction

This report provides an overview of how North Lanarkshire Council's Housing Service has ensured compliance with the Health and Care (Staffing) (Scotland) Act 2019 across both its internal and commissioned housing support provision for the financial year 2024/25. The Council remains committed to maintaining safer staffing standards and ensuring that housing support, whether delivered by commissioned providers or by internal housing support officers, complies with safer staffing principles and the Scottish Social Services Council (SSSC) Codes of Practice¹.

Intensive Housing Support services are currently provided by three commissioned providers: Simon Community Scotland, Barnardo's, and Blue Triangle Housing Association. These services were procured through a competitive tendering process, with the current contracts due to expire on 31 July 2025. The commissioned provision includes both supported accommodation and outreach housing support, as well as a separately commissioned Homes First initiative. All services are registered with the Care Inspectorate and operate in accordance with the Health and Social Care Standards.

With the contracts reaching their end, as well as the requirement to ensure continued compliance with the Act, the Council completed a comprehensive review of its commissioned housing support service. The aim of the review was to evaluate and improve the effectiveness, efficiency and impact of the service provision delivered to households experiencing or at risk of homelessness. Following the review, a re-tendering process was completed, resulting in new contracts awarded to Simon Community Scotland and Blue Triangle Housing Association, beginning, 1 August 2025.

In addition to the commissioned services, housing support is also delivered by internal Housing (Support) Officers. These Housing Officers provide low-level, preventative support to tenants, helping to sustain tenancies, reduce homelessness, and support resettlement for customers assessed as homeless and have a support need. Housing staff operate within a safer staffing framework, ensuring that support is person-centred, safe and delivered by appropriately trained and supervised staff, who are registered with the SSSC. This report is submitted in accordance with Section 3(6) of the Health and Care (Staffing) (Scotland) Act 2019, which requires local authorities to publish information annually on the steps taken to comply with Section 3(2).

2. Legislative Context

The Health and Care (Staffing) (Scotland) Act 2019² establishes a statutory framework that ensures health and social care services across Scotland are appropriately staffed to deliver safe, effective, person-centred support. This includes housing support services commissioned by the local authority as well as housing support services delivered by internal housing officers.

Compliance with the Act reinforces the Council's commitment to ensuring that the housing support provided, is delivered by staff who are appropriately trained, supported, and resourced to deliver safe, high-quality housing support to vulnerable individuals.

Local authorities have a duty under section 3(2) of the Act to ensure that when planning and delivering a support provision, that they consider the guiding principles for health and care staffing. This means that when the council commissions housing support services, it must ensure that providers are registered with the Care Inspectorate, classified as regulated care services under the Public Services Reform (Scotland) Act 2010³, and can meet the staffing requirements of the 2019 Act. This includes ensuring appropriate levels of staff, supervision as well as training to meet the needs of the customers using the service.

¹ [Codes of Practice | Scottish Social Services Council](#)

² [Safe Staffing Project | Care Inspectorate Hub](#)

³ [14. Duty to Ensure Appropriate Staffing and Guiding Principles in Care Services - Health and Care \(Staffing\) \(Scotland\) Act 2019: statutory guidance - gov.scot](#)

The next section of this report outlines how the commissioned housing support services have applied the guiding principles of the Act in practice, in accordance with the expectations detailed within the statutory guidance. This includes duties relating to the implementation of safer staffing principles and annual reporting requirements, as outlined in the Act and accompanying guidance.

3. Steps Taken to Comply with Section 3(2)

Commissioned Housing Support Service

Housing support services commissioned by the Council must be registered with the Care Inspectorate and are considered regulated care services under the 2010 Act and are legally required to comply with the requirements of the 2019 Act.

In line with the statutory guidance, the Council has in place robust contract monitoring mechanisms to assess compliance with the Act, identify risks and support continuous improvement. This ensures that that commissioned providers meet the expectations around staffing levels, training, supervision, and the application of the guiding principles of the Act.

The commissioned providers have in place procedures to evidence and report on their compliance with the Act. This includes the use of staffing needs assessments, use of safer staffing assurance tools, and internal reporting which aligns with the Act's guiding principles.

Each provider has demonstrated how they ensure appropriate staffing levels, training, supervision, and staff wellbeing. These measures are reviewed through regular contract monitoring and quality assurance processes.

Regular steering group meetings and individual contract monitoring meetings are held with each provider. This provides an opportunity to discuss any issues or concerns in relation to service delivery, which includes any staffing related concerns. In addition, providers submit an annual report on service activity and performance, which highlight achievements as well as providing evidence of compliance with safer staffing requirements. The annual reports for the period 2024/25 are due to be submitted in June 2025.

The Council's procurement and commissioning procedures require providers to demonstrate how they comply with the requirements outlined in Sections 7–10 of the Act, which includes appropriate staffing levels, staff training, supervision, and wellbeing.

Internal Housing Support Service

To comply with Section 3(2) of the Act, the Council has incorporated safer staffing principles into its internal housing support service. This includes conducting regular workforce planning and needs assessments to ensure that staffing levels are appropriate and responsive to service demands. Housing Officers are required to be registered with the SSSC and operate in accordance with the Health and Social Care Standards.

Locality housing managers ensure that support staff maintain manageable caseloads and receive regular supervision and reflective practice opportunities to support their wellbeing, professional development, and competence. Training is coordinated by the Council's Talent and Organisational Development team and includes a blend of online and in-person learning, targeted development programmes, and access to professional qualifications such as Scottish Vocational Qualifications (SVQs) and Chartered Management Institute (CMI) courses.

These learning and development activities reflect the guiding principles of the Act, including the promotion of dignity, compassion, respect, and responsiveness in service delivery. These measures ensure that internal housing support services are not only compliant with legislative requirements but also contribute to the overall resilience and quality of housing support across North Lanarkshire.

North Lanarkshire Council Housing Support delivery - Evidence of Compliance with the section 3(2) of the Act

Factors	What we do
Appropriate staff are recruited and checked prior to employment	Recruitment and selection plays a fundamental role in the operation and development of the Council's activities. The ability of the Council to adapt to changing demands is dependent on the recruitment of employees who are flexible and committed. The Council recognises the importance of having the right people, in the right job at the right time, with the right skills, abilities and attributes to fulfil our aim of delivering excellent services to the communities we serve. Effective recruitment will help the Council to attract and retain employees who are committed to delivering excellent public service. It is essential that the Council complies with employment and equality legislation and applies a sound professional, consistent and transparent approach throughout the recruitment process. The Council gives the commitment that all employees or job applicants will be assessed only according to their capability to carry out a given job, based on justifiable, objective criteria which are clearly related to the duties of the job. It is recognised that the recruitment process is a high-profile interface with the general public and, therefore, the Council should strive to project a positive image by displaying the highest level of standards, conduct and professionalism.
Identify staff availability	Staffing allocations for the Tenancy Support service are determined at the locality level based on assessed service demand. These allocations are subject to continuous evaluation through established performance monitoring frameworks to ensure alignment with operational requirements and service delivery objectives.
Identify planned time for staff development	Staff Learning and Development Portal (myNL) - All employees have access to a dedicated learning portal, which hosts a range of mandatory training modules that must be completed and regularly refreshed. In addition to compulsory training, staff are encouraged to self-nominate for a variety of online and in-person training events, as well as pursue professional qualifications. The portal also serves as a central repository for employees' Performance, Review, and Development (PRD) discussions and plans, which are documented in collaboration with their line managers. Additionally, within support, 1-1 Case reviews take place monthly. Each locality has a development day on a monthly basis. Staff also have access to various supports, through the "Employee Assistance Programme" – includes. • Digital Wellbeing programmes • My wellbeing • My work life • My money • My health • Podcasts • Inspiration • Healthy recipes • My homelife

Factors	What we do
Identify planned time for allocated tasks including to complete tasks away from direct practice	Tenancy Support Monitoring and Workload Management Tenancy support activities are monitored and managed through a bespoke housing management system. This system enables effective workload allocation by assigning dedicated support hours to each case. These hours encompass direct support provision, documentation updates, and the recording of case notes. This structured approach ensures that staff have the necessary time and resources to deliver a tailored support plan that meets the individual needs of each service users. Cases and workloads are reviewed by the Housing Co-ordinator regularly, and case reviews carried out, a minimum of 6 weekly, or can be less depending on the service users' needs and risks.
Identify planned time for supporting induction	All new members of staff receive an in-depth induction to the service.
Identify planned time needed by staff to complete tasks away from direct practice	Each Locality have a development day 1 per month, this also will include team building and networking with other staff within the locality.

4. Ongoing Risks

Commissioned Housing Support Service

Ongoing challenges continue to impact staffing across commissioned housing support services, with funding pressures remaining a significant concern. The sustainability of the contracts is reliant on the Scottish Government's annual funding uplifts to support the Real Living Wage⁴ for support staff. While these payments are essential to maintaining fair pay and workforce stability, the payments are not guaranteed and can make long term staffing and financial planning difficult, creating uncertainty for providers.

The recent increase in Employer National Insurance contributions⁵ has also raised staffing costs. It is estimated that the increase has led to an average cost increase of 39.5% for employers. Without additional funding or exemptions, this could impact the viability of some not-for-profit and charitable organisations delivering housing support.

There has yet to be any formal announcement linked to mitigating the financial pressure, however, the housing service continues to collaborate with commissioned providers and to advocate for funding decisions that support safe staffing and service sustainability.

In addition to increasing levels of homelessness, there has also been an increase in applicants presenting with complex needs, including a history of trauma, substance use, and mental health challenges, which has increased the demand on support staff.

Lone working within supported accommodation, remains a challenge, particularly in evening and weekend shifts. The complexity of service users' needs requires high staff competence and resilience. To address the risks, commissioned providers are actively working on mitigation strategies, including plans to implement a lone working safety app to enhance real-time support, working with the Council to explore

⁴ [What is the real Living Wage? | Living Wage Foundation](#)

⁵ [SC-Financial-Toll-NI-Report-Nov-24.pdf](#)

increased housing benefit rates to support safer staffing, and continued investment in staff training, wellbeing, and reflective practice to build resilience and strengthen workforce capacity.

Internal Housing Support Service

Internal housing support services continue to face challenges similar to those experienced by commissioned services. These include the increasing complexity of tenant support needs, as well as difficulties in recruiting and retaining frontline staff. To mitigate these risks, the Council actively monitors service demand, enabling a more responsive and informed approach to service planning. It also invests in ongoing staff training and development and explores new pathways to attract individuals into housing support roles. One such initiative is the introduction of modern apprenticeships, which provide on-the-job training while enabling participants to work towards a recognised qualification.

5. Future Compliance Measures

Commissioned Housing Support Service

The newly contracted providers, Simon Community Scotland and Blue Triangle Housing Association, have committed to embedding long-term risk mitigation strategies to ensure continued compliance with the 2019 Act beyond 2024/25. These strategies are designed to address key workforce challenges while enhancing service resilience and regulatory compliance.

To ensure safer staffing remains a priority, the Housing Service will require providers to produce documented staffing assessments that address lone working, funding constraints, and broader workforce challenges. Providers will also be expected to embed workforce development initiatives and strengthen financial advocacy to support long-term workforce sustainability.

These measures will be integrated into future contractual agreements, compliance reporting, and policy engagement, ensuring a consistent and sustainable approach to safer staffing across all commissioned services.

Internal Housing Support Service

To support ongoing compliance with the Act, the Council will continue to strengthen internal reporting mechanisms. Training opportunities for Housing Officers will be expanded, with a focus on increasing access to digital learning, peer support, and role-specific development. The Council will continue to review and develop data collection processes relating to staffing levels, service outcomes, and customer feedback, ensuring that this information informs continuous improvement.

6. Conclusion

North Lanarkshire Council remains firmly committed to upholding the principles of the Health and Care (Staffing) (Scotland) Act 2019. The actions taken throughout 2024/25 reflect a proactive and strategic approach to embedding high-quality workforce practices and ensuring that both internal and commissioned housing support services meet their statutory responsibilities.

The Council recognises the vital role of internal Housing (Support) Officers in delivering safe, effective, and person-centred support. By embedding safer staffing principles into all aspects of service delivery, the Council ensures that housing support, whether it is provided internally or through our commissioned partners, continues to align with the standards set out in the Act.

The Council will continue to work in partnership with commissioned providers to enhance service quality and maintain compliance with the Act's requirements for safer staffing and continuous improvement. This includes

a strong emphasis on embedding Fair Work⁶ principles, such as payment of the Real Living Wage, and ensuring that commissioned services reflect national policy priorities.

By continuing to strengthen contract monitoring, refining workforce development strategies, and advocating for sustainable funding models, the Council will support the delivery of resilient, person-centred housing support services that meet the needs of vulnerable individuals across North Lanarkshire.

These efforts will ensure that newly contracted providers and internal housing support provision remain compatible with the 2019 Act and contribute to the long-term sustainability of high-quality, responsive housing support for those who are most in need.

⁶ [Fair Work First: the approach and what it aims to achieve - Fair Work First: guidance - March 2023 - gov.scot](#)