



**WHEATLEY HOUSING GROUP LIMITED
BOARD MEETING**

**Wednesday 25 September at 2.45pm
New Mart Road, Edinburgh**

AGENDA

1. Apologies for absence
2. Declarations of interest
3. a) Minutes of meetings held on 28 August 2024 and matters arising
b) Action list
4. Group CEO update

Main Business

5. Grenfell inquiry findings
6. Sustainability update
7. Delivering Personalised Services Strategy
8. New build performance report

Other Business

9. Governance update
10. Equality, Diversity and Inclusion update
11. AOCB

Report

To: Wheatley Housing Group Board

By: Frank McCafferty, Group Director of Repairs and Assets

Approved by: Steven Henderson, Group Chief Executive

Subject: Grenfell inquiry findings

Date of Meeting: 25 September 2024

1. Purpose

1.1 This report:

- Summarises the Grenfell Tower Inquiry Phase 2 Report and its key findings;
- Recaps the key elements of our approach to fire safety in high rise buildings; and
- Sets out recommendations to further enhance our strong approach to fire prevention and mitigation in high rise buildings.

2. Authorising and strategic context

- 2.1 The Board has overall responsibility for compliance and risk across the Group. The Board approves governance arrangements across the Group that allow it to gain assurance on how we discharge our compliance responsibilities and manage and mitigate risks.
- 2.2 One of the key criticisms of the Royal Borough of Kensington and Chelsea (“RBKC”) Council and the Board of the Tenant Management Organisation (“the TMO”) was they did not take risks relating to fire safety seriously enough.
- 2.3 We have always identified fire safety as a high-risk area, taken it very seriously and embedded it within our governance and operational arrangements. Our Community Improvement Partnership (“CIP”) was established by Wheatley Homes Glasgow in 2010/11 with a dedicated team of police officers and senior fire officers to deal with crimes and fire risks in our communities. It was the first of its kind in the UK and reflects how high a priority mitigating risk relating to fire safety was well over a decade ago.
- 2.4 Since 2011 we have continually refined our approach to fire safety within our governance arrangements. Our overarching approach to fire safety is our Group Fire Safety and Mitigation Framework (“the Framework”). The Framework was first approved by the Board in 2017 and any changes to the Framework are reserved to this Board.

- 2.5 As part of the 2022 review of the Framework the Board considered and formally approved our cycle of Fire Risk Assessments for 2022-2025. This included care, corporate, houses in multiple occupations, Neighbourhood Environmental Teams (“NETs”) depots, Livingwell properties, Multi Storey Flats and Person Centred Risk Assessments (“PCRAs”). The Framework is reviewed regularly and was last considered and reviewed by the Board in April this year.
- 2.6 The Framework was subsequently supplemented by a Fire Prevention Charter (“the Charter”) between us and the Scottish Fire and Rescue Service which the board reviewed and approved in 2019. The Charter is scheduled for review this year and an updated version will be subject to Board approval.
- 2.7 In addition to this fire safety is a feature in both our Board approved Group and Registered Social Landlord (“RSL”) strategies, including specific measures in relation to Accidental Dwelling Fires. This was incorporated into our performance framework reviewed and approved by the Board with performance reported to Boards quarterly. Alongside this, we also report to Boards quarterly on the status of Fire Risk Assessments.
- 2.8 Following Board feedback at the previous meeting, we agreed that future performance reports will also include progress with the implementation of recommendations arising from Fire Risk Assessments (“FRAs”) and PCRAs.
- 2.9 In addition to this, we recently agreed that the bi-annual thematic update on fire safety to the Group Audit Committee now be undertaken by all relevant Boards. This is in addition to the annual fire safety update and review of the Framework.
- 2.10 We also report to all Boards our assessment of risk and our mitigations relating to fire safety through the corporate risk register. The risk register is subject to Board review and formal approval.
- 2.11 All instances of whistleblowing are reported to the Group Audit Committee. If any tenant enacted our whistleblowing policy in relation to fire safety this would require it to be considered by the Group Audit Committee. It should be noted that under our policy whistleblowing allegations are handled independently by our Chief Internal Auditor. The Chief Internal Auditor, not a member of the Group Executive Team, would decide how this is communicated with the Group Audit Committee.
- 2.12 The Chair of the Group Audit Committee would also, via the Chair update, be expected to raise such an occurrence with the Board. We have not had any whistleblowing in relation to fire safety concerns or practices.

3. Background

- 3.1 In the early hours of Wednesday 14 June 2017 a fire broke out in the kitchen of Flat 16 Grenfell Tower, a high-rise residential building in North Kensington, West London. Grenfell Tower was owned by the RBKC and managed by the TMO.
- 3.2 Kitchen fires are not uncommon and in terms of its magnitude the initial fire at Grenfell was not uncommon. However, the fire, which should have been contained within the confines of Flat 16, escaped from the kitchen into the external envelope of the building. The fire tragically claimed the lives of 72 people who were present in the tower that night.

- 3.3 On 15 August 2017 an Inquiry was formally set up under the Inquiries Act 2005;. The primary focus of the Inquiry was to investigate the cause and origin of the fire, the means by which it was able to spread throughout the building, and how the building came to be in a condition which allowed that to happen.
- 3.4 Part 1 of the inquiry was published in October 2019 and included a number of recommendations.
- 3.5 The UK Government responded by introducing - in England and Wales - the Fire Safety Act 2021, which set out a series of obligations on building owners and managers. For social landlords, key changes included a requirement to inspect fire doors in communal parts of any building above 11m in height every three months and using their 'best endeavours' to check the fire doors of individual premises at least every 12 months. Fire door checks include ensuring that the self-closers are working.
- 3.6 The England and Wales regulations also set out requirements that relate to high-rise residential buildings (above 18m), such as including the structure and external wall system as part of a building's fire risk assessment, ensuring the fire service has key information about a building including floor plans, installing and maintaining a 'secure information box' that contains key information about a building, and carrying out monthly checks of the lifts and fire-safety equipment.
- 3.7 The Scottish Government has taken a different approach to the UK Government in responding to some aspects of the Phase 1 report. It published the "*Scottish Government response to the Grenfell inquiry Phase 1*" in October 2020, following the work of its Building and Fire Safety Ministerial Working Group, set up immediately after the Grenfell Tower Fire in 2017. The Scottish Government has introduced a range of measures including:
- in October 2019, strengthened guidance in relation to combustible cladding, means of escape and measures to assist the fire service
 - in March 2021, it introduced legislation to require the installation of automatic fire suppression systems in all new build flats and maisonettes, social housing dwellings and multi-occupied shared residential buildings
 - from February 2022, a requirement for all residential dwellings in Scotland (including in high rise flats) to have interlinked smoke and heat detectors
 - publication of 'Practical Fire Safety Guidance for Existing High Rise Domestic Buildings', last reviewed February 2022
 - revising the Scottish Advice Note on determining the fire risk posed by external wall systems in existing multi-storey residential buildings in December 2022
- 3.8 Scottish Fire and Rescue have a "stay-put" policy for incidents in multi-storey high-rise blocks, over 18m, which has remained central to the Scottish Government's legislation and guidance. In this context, full evacuation should not usually be required. However, the Phase 1 Grenfell report considers in detail the scenario where the fire service may be required to move from the stay-put policy to an evacuation approach during a fire, as happened at Grenfell.

- 3.9 In the Phase 1 report, it was recommended that the Responsible Person for the building should be required to prepare a Personal Emergency Evacuation Plan (“PEEP”) for every resident in a high-rise residential building who self-identifies as unable to self-evacuate and to do so in consultation with them. This has not been adopted as required legal practice in any part of the UK at present.
- 3.10 In England and Wales, the UK Government is currently consulting on this issue of PEEPs. Following detailed consideration by its Building and Fire Safety Working Group, the Scottish Government did not support the general use of PEEPs in high rise domestic buildings. In an evacuation scenario “SFRS would undertake a rescue of any person who is unable to self-evacuate, immaterial of whether there is a PEEP”, this is contained within the Scottish Government’s response to the Phase 1 report in 2020.
- 3.11 The Scottish Government guidance from February 2022 also states:
- It is likely that there will be residents with mobility difficulties, physical disability and mental health issues that impact on their ability to evacuate. It is **not** usually expected that those responsible for fire safety in the building need to plan or put special arrangements in place.*
- 3.12 Phase 2 of the Inquiry was published earlier this month and contained additional recommendations as well as updates on recommendations from Part 1.
- 3.13 Set out in the report is a summary of recommendations from Phases 1 and 2 of the Inquiry which have direct implications for us, together with other relevant findings from the Inquiry which relate to wider group activities. Across the Group, we have 132 occupied blocks of Multi Storey Flats (“MSFs”) above 18m, to which these recommendations and findings are particularly relevant.

4. Discussion

- 4.1 We have a well-established, highly structured approach to Fire Safety which includes a dedicated Fire Safety Team. Our approach includes the following activities:
- Recorded **daily check** of MSF fire safety elements by our staff (conciierge) located on-site
 - **3 monthly** Operational Assurance Visits (“OAVs”) of MSFs by the Scottish Fire and Rescue Service (“SFRS”)
 - **Ongoing secondment** of a qualified and experienced SFRS employee to our Fire Safety Team
 - **3-yearly** PAS 79 (assessment methodology for fire risk assessment) MSF Fire Risk Assessments by our Fire Safety Team
 - **500 annual** Person Centred Fire Risk Assessments (“PCFRA”) of vulnerable clients referred from various agencies by our Fire Safety Team
 - **6 monthly** Lifting Operations and Lifting Equipment Regulations (“LOLER”) inspection and annual servicing of MSF lifts
 - **5 yearly maintenance** inspections of MSF domestic electrical systems
 - **5 yearly maintenance** inspections of MSF common area electrical systems

Cladding

- 4.2 We have 132 occupied MSFs. Our MSFs also have owners within many of them. All MSF blocks are owned by Wheatley Homes Glasgow (WH-G), with one at Ibroxholm Oval being leased to and managed by Lowther Homes. Additionally, Lowther also provides factoring services for the MSF at the “Bond” in Edinburgh where there was a fire earlier this year.

- 4.3 None of the cladding within our MSFs is of the same type as Grenfell Tower. A breakdown of the ownership and tenure of properties in our MSF blocks is set out below:

Ownership	
WH-G	64
Mixed ownership	68
Total number of occupied MSF blocks	132
Number of Tenants	9732
Number of Owner/Occupiers	441
Total properties in MSFs	10,173

- 4.4 The Board were updated in February this year on the Scottish Government Technical Advice Note to assist in determining the fire risk posed by external wall systems in multi-storey residential buildings. This included an external wall appraisal to ensure that people are not placed at undue risk of harm from fire spread over or within the external wall system.
- 4.5 We have detailed records of the external wall insulation systems in our MSF blocks, and we hold this in our asset management system PIMMS. Following a review of this information we identified 9 blocks, 3 at Cranhill and 6 at Milton, where the information held did not meet the criteria required by the updated guidance. We engaged qualified Building Surveyors and Fire Engineers to undertake intrusive surveys of 2 of blocks at Milton and 1 block at Cranhill to supplement the information we hold for these buildings. These surveys have confirmed that the blocks at both locations are not high risk and no immediate remedial measures were identified in either report.
- 4.6 We continue to liaise with the Scottish Government teams responsible for cladding and have commenced a desktop review of buildings between 11m – 18m, where we have over 1,700 blocks across the Group, which is planned to be complete in March 2025. This will be followed by buildings of a lower height.
- 4.7 We also undertake regular surveys of our cladding systems, delivered by an external technical specialist, CAN Structures. These use rope access to visually inspect the cladding on all of our MSFs every 2 years. Our MSF blocks have also been extensively surveyed to assess all aspects of their structural condition, including cladding, in 2017 and more recently as part of our review of the potential use of RAAC and checks on Large Panel System (“LPS”) blocks.
- 4.8 Our PIMSS system has been developed to record reviews and intrusive surveys, in the format recommended by the SG Technical Advice Note.

Recommendations within the Inquiry Reports

- 4.9 The Inquiry contained a number of recommendations for defined sectors, including Social Landlords. Within the wider report, there are also findings which are pertinent to our activities. A summary of the key recommendations alongside the Scottish Government (“SG”) and SFRS position and our position in relation to each is set out in the table below:

Recommendation from Phase 1 (2019)	SG/SFRS response (2020/2022)	Group position
Owner/ RSL to provide info to Fire Service in respect of MSF external wall design	Owner to survey/ identify MSF external wall issues (cladding) & advise SFRS of any dangers	<ul style="list-style-type: none"> ▪ No issues identified with MSF stock cladding ▪ No issues required to be communicated to SFRS
Owner/ RSL to provide information to Fire Service on floor plans and location of fire systems and place in info boxes	The existing practice of provision of wall plates/ diagrams in situ is deemed adequate by SFRS	<ul style="list-style-type: none"> ▪ Wall plates/ diagrams provided at all MSF locations ▪ Daily checks by NETS ▪ Verified by 3 yearly FRA by Fire Team
Owner/ RSL to carry out monthly inspection of fire-fighting lifts and lift control mechanisms and advise SFRS as well as check annual maintenance	Agreed RSLs should do this; OAV visits by SFRS also check these standards	<ul style="list-style-type: none"> ▪ Daily checks by on-site staff, including the functioning of lifts ▪ Annual maintenance by external contractor ▪ 3 yearly FRA review by our fire safety team <p>Planned actions</p> <ul style="list-style-type: none"> ▪ Audit of NETs checks by Fire Team
Owner/ RSL to put in place evacuation plans in understandable format	Confirmed continuation of 'stay put' policy is adequate for MSF	<ul style="list-style-type: none"> ▪ Fire evacuation information is located adjacent to lifts and on each floor within our MSFs
Owner/ RSL to create PEEPs for residents with impairments	Confirmed only required for higher risk properties and not MSF properties	<ul style="list-style-type: none"> ▪ PEEPs are only required in 3 of our care facilities (non high rise) due to the vulnerable nature of residents, and these are in place.
Owner/ RSL to provide floor number signage at lobbies and floors	Confirmed required and incorporated into SG/ SFRS guidance. Clear floor number signage is required in lobbies and stairwells.	<ul style="list-style-type: none"> ▪ We provide the required signage and this is checked by SFRS during their quarterly operational assurance visits ▪ Daily checks by NETS ▪ Verified at 3 yearly FRA visits by the fire safety team
Owner/ RSL to carry out urgent inspection of MSF internal fire doors/ self-closers and thereafter put in place a minimum 3 monthly check	The 2022 Scottish Government MSF guidance recommends 6-monthly checks of internal fire doors (including dwellings).	<ul style="list-style-type: none"> ▪ We have been scaling up our fire door technical inspection programme, and plan to have carried out an inspection of all flat and common fire doors this financial year. Thereafter, we will move to a 6-monthly cycle.

	<p>Note the England and Wales requirement in that flat front doors within MSFs be checked annually, and internal doors in common parts quarterly.</p>	<ul style="list-style-type: none"> ▪ If we do not obtain access we will organise 2 further appointments. Should we not receive access after the third appointment we propose to force access. ▪ We will offer private owners a free door check, and undertake visual checks on all doors. If any are identified which do not appear to be fire doors, we will inform the owner of this and will offer assistance to allow this to be upgraded. ▪ 3 yearly FRA door checks by the Fire Team including 10% of front doors. ▪ Daily checks by on-site staff of common area fire doors <p>Proposed action:</p> <ul style="list-style-type: none"> ▪ Liaison with SFRS regarding implementation approaches for front door checks ▪ Audit of NETS daily checks of all other internal fire doors
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Phase 2 inquiry findings

- 4.10 The findings of Phase 2 of the inquiry examined the underlying causes of the fire to identify where mistakes were made and how Grenfell Tower came to be in a condition which allowed the fire to spread in the way identified by Phase 1. It also investigated the response of the authorities to the emergency.
- 4.11 Given the inquiry findings were only just released the Scottish Government is considering its findings. We anticipate that it may, in due course, produce further guidance, amend existing guidance or introduce new legislation.
- 4.12 We have however identified a number of themes within the findings relevant to us and have set out our position in respect of these in more detail below:
- Transparency to the Board on fire safety*
- 4.13 As is already set out in detail in section 2 of the report fire safety is embedded within our governance arrangements. The Board has consistently considered the type of information it requires to be provided in relation to fire safety, sets our overall policy framework and scrutinises performance quarterly.
- Business continuity and response planning*
- 4.14 We have a business continuity and response plan specifically relating to a fire event in a MSF within Wheatley Homes Glasgow. We review and test the plan annually, including through a simulation scenario which is jointly led by the Wheatley Homes Glasgow Managing Director and Director of Health and Safety.

- 4.15 The response plan includes engagement with the Glasgow City Council resilience team which would be engaged in the event of a mass evacuation event.
- 4.16 All Wheatley Homes Glasgow senior staff attends the scenario event alongside our Customer First Centre, NETs staff, building compliance staff and the communication team. The outcome and updated action plan are considered and agreed by the Group Executive team.
- 4.17 The scenario event is very detailed, testing staff understanding of roles and responsibilities, customer communications, planning for dealing with displaced tenants including accommodation, food and water and transport and engaging with Glasgow City Council. This covers both any fire event and the days and weeks following any such event.

Competence of staff/contractors handling fire safety matters

- 4.18 We have an in house fire safety team which consists of 6 Fire Safety Officers and 1 SFRS secondee. All of our technical staff have completed certified FRA training, which has been recently verified, and are competent to carry out Fire Risk Assessments.
- 4.19 We will continue to monitor and report on training within our Fire Safety Team to ensure that competence is maintained at all times. We will also require any new member of the team to present their qualifications as part of the recruitment process.
- 4.20 Training and qualification records for our fire risk assessors will be reported to Boards as part of our regular Fire Prevention and Mitigation Reports.

Monitoring of standards and follow up action

- 4.21 The inquiry identified weaknesses in the way that fire safety standards were monitored and the way in which actions identified, as part of any FRA, were followed through and monitored to implementation.
- 4.22 We have a clear process in place for identifying, tracking and monitoring actions identified in FRAs. This has recently been refined to categorise those actions which relate to Health and Safety. High Risk actions are dealt with as an emergency repair and the assessor will call these through to the CFC immediately. Lower risk actions, which are more commonplace, are now categorised as mandatory actions and have an agreed timescale agreed with the Fire Safety Team. Our process relating to this is as follows:
- All mandatory actions are monitored on a weekly basis by a report issued to all subsidiaries and services;
 - Any overdue actions are highlighted separately;
 - 4 weekly meetings chaired by the Group Director of Repairs and Assets to ensure any issues raised are addressed;
 - 4 Weekly update on H&S/ Fire Safety to Executive Team and attendance by Director of Group Health and Fire Safety to discuss ongoing issues;
 - Audits of completed actions are undertaken by the H&S team; and
 - Regular updates are provided to appropriate Boards.

- 4.23 The performance of our FRA programme is part of our standard quarterly performance reports for all RSL Boards.
- 4.24 To ensure our staff have a safe route for reporting concerns our Group Whistleblowing Policy is available to staff on WE Connect. This is supported by videos explaining the content which are also available to staff through WE Connect, and the Group's Business Ethics e-learning module also contains links to the Policy.
- 4.25 The policy sets out routes for raising concerns, which include a whistleblowing hotline, email address and a phone number to which anonymous reports can be made. The Group Assurance team reminds senior managers annually to discuss arrangements for the prevention and detection of fraud with their staff, which includes reporting concerns under the Whistleblowing Policy.

Poor tenant engagement, communication and complaint handling

- 4.26 One of the themes in the findings of the inquiry was poor communication and engagement with tenants. This manifested particularly in a lack of engagement with tenants over issues they raised, work that was being undertaken and complaints not being handled appropriately or resolved. In relation to complaints another failure identified was that multiple and/or recurring complaints about the same issue were not a trigger for escalation or urgent action.
- 4.27 Analysis of our complaints confirms that we have not had a pattern of complaints from multiple tenants, for example in a MSF, in relation to fire safety.
- 4.28 Our complaints handling process has a built-in escalation process where a tenant can escalate a complaint to Stage 2. Our Stage 2 complaints are overseen by our central complaints team which sits out with teams which deliver services or engage with tenants.
- 4.29 Our central team analyses and assures all Stage 2 complaint investigations and responses. This provides us with a mechanism to identify issues such as a pattern of complaints of a specific type, such as fire safety, in a specific locality, such as an MSF, and how many such complaints are upheld.
- 4.30 A further area of focus is also to provide an element of independence within the process. As part of this, our central complaints team will provide the necessary constructive challenge on how we have handled the initial complaint and on the resolution being proposed. All Stage 2 complaints are reviewed by RSL Managing Directors.
- 4.31 If a tenant is unhappy with how we have handled a Stage 2 complaint our process advises them of their right to raise the matter with the Scottish Public Services Ombudsman ("SPSO"). We have not been asked by the SPSO to investigate and report to them on any cases raised with them relating to fire safety.
- 4.32 We have in recent months been reviewing our complaints handling process, including an externally facilitated review of our end-to-end process by Vanguard, multiple Executive team workshops on complaints handling and our complaints categories.

- 4.33 As part of this, we intend to introduce a wider range of markers in relation to complaints to provide us with an enhanced range of data. For example in relation to repairs, which is where we receive the highest volume of complaints, we will introduce a separate sub-category to record if a complainant specifically references anything in relation to health and safety or fire safety.
- 4.34 Whilst we do consider such issues in how we handle any complaint it will support us to automatically generate data which provides us with deeper insight. It should be noted however that it will not always be the case that where a health and safety or fire safety is raised our investigation identifies such an issue exists.
- 4.35 We also, as part of the last independent tenant pulse surveys in Wheatley Homes Glasgow (South) and Wheatley Homes South piloted asking tenants an additional question on whether they agreed that we treat them fairly and with respect. In Wheatley Homes Glasgow over 50% of all tenants strongly agreed and 92% agreed overall that we do. In Wheatley Homes South over 82% of tenants strongly agreed and over 98% agreed overall that we do over This question will be incorporated into all future tenant satisfaction surveys and reported to Boards as part of the results.

Personal Emergency Evacuation Plans - PEEPs

- 4.36 As previously detailed, the Scottish Government, as part of its Building and Fire Safety Working Group, did not support the general use of PEEPs in high rise domestic buildings. However, we are currently in discussion with SFRS nationally regarding the issue of PEEPs together with other potential improvements, including Home Fire Safety Visits, signage and information boxes. We will continue these discussions and have offered to pilot any proposals in partnership with SFRS who are critical to any potential use of PEEPs, since it will be their officers making use of them in the event of a fire evacuation.

Pipeline isolation valves – gas transporter 3 yearly check confirming access/function

- 4.37 We will contact Scottish Gas Networks for confirmation that this has been completed for MSF locations where this is relevant.

5. Customer Engagement

- 5.1 Our long-running “Stay Safe” annual campaign provides information to our customers on how to avoid fires and what to do in the event of a fire. This includes:
- The offer of a home fire safety visit from our Fire Safety Team or SFRS
 - Advice and tips on how to avoid kitchen fires
 - Advice on what to do in the event of a fire
 - Advice on electrical equipment safety
 - Information on the importance of keeping closes, foyers and stairwells safe
 - Specific information on MSF safety with the latest advice from SFRS
 - The importance of fire doors
- 5.2 Our PCFRA identifies those customers at the greatest risk of an accidental dwelling fire and provides a free visit to identify specific risks for individual customers. Additional supports include the offer of free air fryers, fire blankets and stove guards.

- 5.3 Our Concierge Team are also on hand within our MSF blocks to provide support to our customers including any concerns they may have relating to fire safety.

6. Environmental and sustainability implications

- 6.1 There are no environmental and sustainability implications contained in this report.

7. Digital transformation alignment

- 7.1 Technology is used to support the storage of information through our PIMMS asset management system.

- 7.2 E-learning training is also being developed beyond our Health and Safety Awareness and Fire Awareness courses, to reflect our new operating model.

8. Financial and value for money implications

- 8.1 The Board recently approved our Group Asset Management Strategy. Within this, tenant safety and compliance, including fire safety, is stated as our top priority and is therefore always prioritised in our budget allocation process. The measures set out in this report are fully funded in our business plan through our repairs and maintenance programme budget allocations.

9. Legal, regulatory and charitable implications

- 9.1 Our risk appetite relating to laws and regulations is “Averse” i.e., avoidance of risk and uncertainty is a key organisational objective. The risk tolerance of all subsidiaries relating to technical compliance (e.g., Health and safety, gas) is also “Averse.”

- 9.2 Health and safety compliance risks and associated mitigations are included in the group strategic risk register and in the subsidiary risk registers.

- 9.3 Failing to comply with the statutory health and safety legislation and employers’ general duties under the Health and Safety at Work Act and associated Regulations could lead to regulator intervention, enforcement action, prosecution, and adverse reputational risk.

10. Risk Appetite and assessment

- 10.1 The Group risk appetite relating to issues of technical compliance is averse, defined as avoidance of risk and uncertainty is a key organisational objective.

- 10.2 The Group Board approved “Delivering Safer Communities: Our Fire Prevention and Mitigation Framework” in August 2017. It was agreed at this time the Group would undertake Fire Risk Assessments for existing high-rise domestic premises and Livingwell premises, in addition to all relevant premises under fire safety legislation.

- 10.3 Our new build design guide is based on the use of building materials that have been fully tested. Whilst we will evaluate the emergence of new products our risk appetite level (averse) will determine when we would consider it suitable to consider the usage of such products

11. Equalities implications

- 11.1 Our approach to fire safety in high rise properties, and more broadly, has been aligned with Scottish Government legislation and guidance, which takes into account equalities implications. Our strong focus on personalised services includes a proactive approach to carrying out person-centred fire risk assessments (which are not a statutory requirement of social landlords). Our frontline staff are trained to make referrals to our fire safety team in the event that they assess a customer to be at a higher risk of fire, for example due to their personal circumstances or vulnerabilities.

12. Key issues and conclusions

- 12.1 As detailed within this report, we have a strong culture of fire safety and treat the issue as a top priority. Across the Group, fire safety and keeping our customers safe is a priority and a responsibility of all of our staff. Expert advice and support in pursuing this aim is provided by our dedicated Fire Safety Team. As the Board has noted in recent reports, the number of accidental dwelling fires in tenants' homes has significantly reduced since the Group Strategy was agreed in 2021.
- 12.2 We have reviewed the findings and recommendations from the Grenfell Inquiry Phase 2 report and have noted some further strengthening of our approach, as set out in the recommendations section below.

13. Recommendations

- 13.1 The Board is asked to:
- 1) note the contents of the report and our strong culture of fire safety;
 - 2) note that inspections of flat front doors will move from annually to six-monthly from 1 April 2025;
 - 3) note that we continue to apply Scottish Government guidance in respect of PEEPs in multi-storey flats, but that we will explore what further measures might be practicable in conjunction with the Scottish Fire and Rescue Service; and
 - 4) agree that, in the event of three no-access visits for flat door inspections in multi-storey flats, we will move to a forced access process.

Report

To: Wheatley Housing Group Board

By: Frank McCafferty, Group Director of Repairs and Assets

Approved by: Steven Henderson, Group Chief Executive

Subject: Sustainability Update

Date of Meeting: 25 September 2024

1. Purpose

1.1 To update the Board on progress toward our sustainability objectives.

2. Authorising and strategic context

2.1 Under our Group Standing Orders, the Wheatley Solutions Board is responsible for monitoring the delivery of the Group's Sustainability Strategy. This update provides the Group Board with a report on sustainability.

3. Background

3.1 "Setting the benchmark for sustainability and reducing carbon footprint" is a stated key outcome in ***Your Home, Your Community, Your Future***. Our Sustainability Strategy, which we published in early 2023, builds on this through setting key areas of focus, namely:

- **Existing homes:** Achieve EESSH2 target by end 2031/32 and have Net-Zero emissions from all properties where technically and economically feasible by end 2043;
- **New Homes:** All properties at minimum of EPC B and with Net-Zero heating systems in line with planning timescales;
- **Business operations:** Carbon neutral by end 2026 including decarbonised fleet where feasible, and use of green electricity; and
- **Supporting contributors:** Build understanding and support action including among staff and communities to address the climate emergency.

3.2 The Social Housing Net Zero Standard (SHNZS), which the Scottish Government consulted on in early 2024, is intended to replace EESSH2. While conclusions from this consultation are not yet available, the direction set clarifies the energy efficiency-related improvements that will be expected to our existing homes. These improvements will have two parts relating to the:

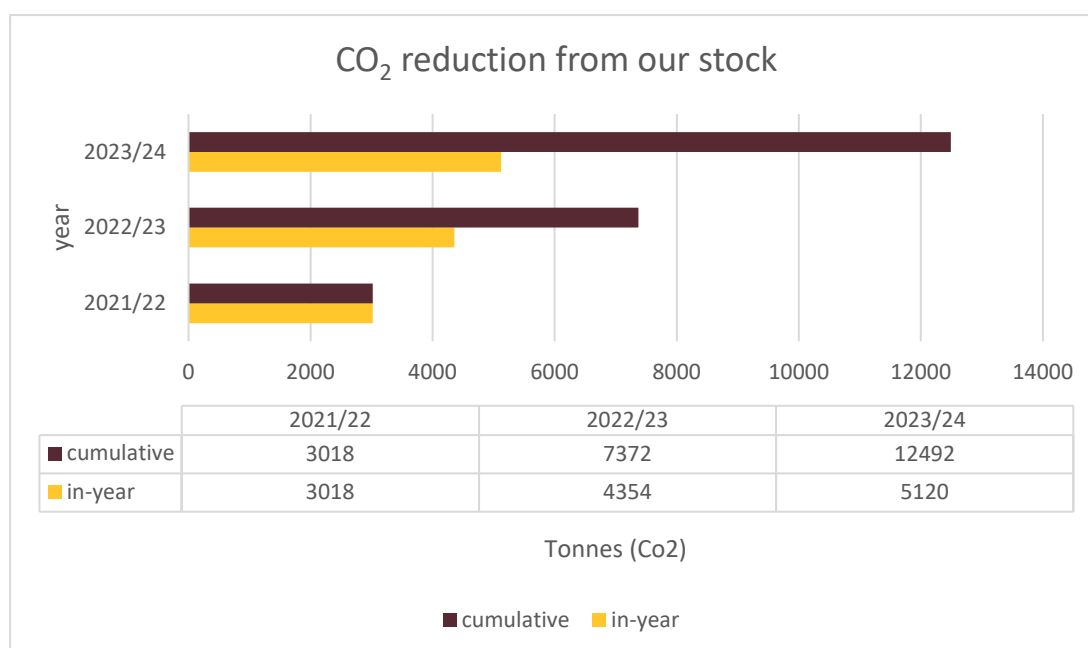
- Fabric efficiency of the property (i.e. the amount of heat required to heat the home); and
- Source of heating for the home which will have to be 'clean' (i.e. not requiring fossil fuel to be used at the home).

- 3.3 For planning purposes, and throughout this report we have used the targets proposed in the SHNZS consultation. We would also intend, as we indicated we would do in our Sustainability Strategy, to refine the objective for improving the energy efficiency of our existing homes to align with SHNZS, so that it reads:
- **Existing homes:** Achieve the fabric efficiency and clean heating elements of SHNZS in line with the timescale set in the standard.

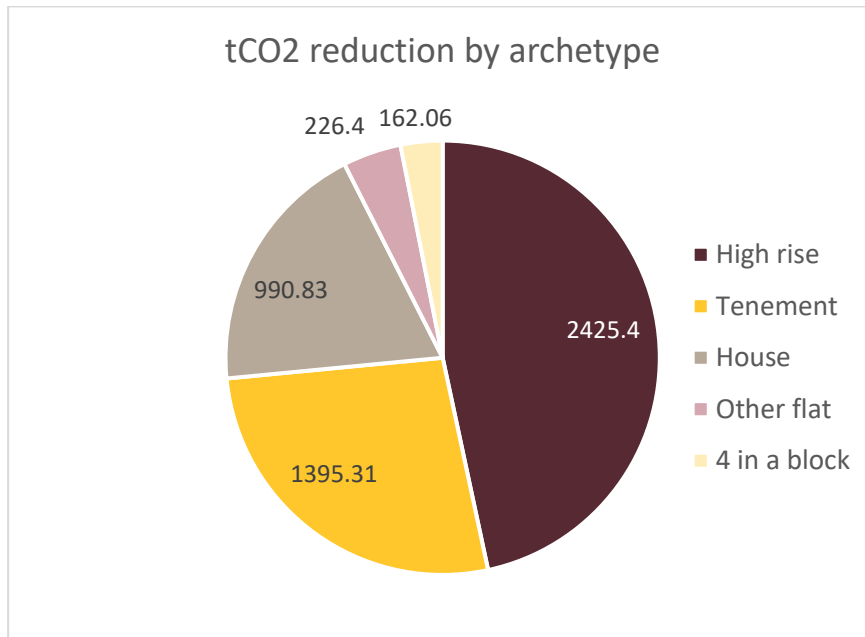
4. Discussion

Existing homes

- 4.1 Through **Your Homes, Your Community, Your Future**, we committed to reducing emissions from our existing homes by 20,000 tCO₂ by 2026. At the time, heating our homes - particularly through gas – was estimated to produce 150,000 tonnes of CO₂ each year, based on typical energy consumption and the heating systems used in our homes. Our 20,000 tCO₂ reduction target is primarily based on reducing demand for heating, rather than switching to heating sources that do not directly emit CO₂ such as heat pumps. The key elements of our approach to meeting this target include installing smart controls, insulation and energy efficient components such as windows and doors. In addition, to reducing CO₂, these measures also benefit tenants through reducing the cost of heating their home.
- 4.2 At the end of March this year, three years into the five-year period covered by Your Homes, Your Community, Your Future, the energy efficiency measures we have installed have reduced CO₂ emissions from our homes by 12,492 tonnes. This is based on assessing impact of our investment in energy efficiency measures in existing homes using UK Government guidance on impact. The chart below shows both reduction by year and cumulative progress towards our 20,000-tonne target.



4.3 This year (2023/24), 5,120 tCO₂ was reduced as a result of our investment with the main contributors being improved heating controls such as Connected Response, solar PV and external wall insulation. The chart below shows the reduction in CO₂ emissions by archetype.



4.4 Our focus is now on preparing for the introduction of the SHNZS, which we expect around the end of this year, and in particular the fabric efficiency element. Results from initial modelling of our stock against the fabric efficiency measure in the consultation are shown below, along with comparable information based on the EESSH 2 requirement.

RSL	EESSH 2					SHNZS (kWh/m ² /yr)		
	EPC/R A	EPC/R B	EPC/R C	EPC/R D	EPC/R E	Better than 71	between 71 and 120	worse than 120
Loretto	0%	43%	49%	8%	0%	70%	22%	8%
Lowther	0%	87%	11%	2%	0%	n/a	n/a	n/a
WH East	0%	44%	53%	3%	0%	60%	33%	7%
WH Gla	0%	14%	82%	4%	0%	40%	43%	17%
WH South	0%	6%	65%	22%	7%	11%	45%	44%
Overall	0%	20%	72%	7%	1%	35%	42%	23%

- 4.5 We are currently developing plans, as part of the direction set in our Asset Management Strategy, for the works needed to achieve the fabric efficiency element of SHNZ by 2033. These works will be archetype-specific and focus initially on the minimum works identified in the consultation, where they are practical and provide a benefit for tenants from the required investment, including:
- 270mm loft insulation;
 - Cavity wall insulation;
 - Draught proofing;
 - Heating controls;
 - 80mm hot water cylinder insulation; and
 - Suspended floor insulation.
- 4.6 We have also successfully bid to the Scottish Government's Social Housing Net Zero heat fund for financial support to improve the energy efficiency of some of our harder to treat properties. Our successful bids, which were confirmed in August 2024, are for:
- £960,000 to retrofit 48 void, sandstone tenement flats in Glasgow and Edinburgh using a mix of internal Wall Insulation, underfloor insulation, double glazing air tightness measures (taping, skirting and draught proofing), Connected Response or High Heat Retention Storage Heaters depending on the condition of the current heating systems; and
 - £3,156,344 to retrofit 108 properties through a combination of air Source Heat Pumps, Solar PV, Battery and External Wall Insulation for properties in Dumfries and Galloway.
- 4.7 These works are being planned currently with the aim of completing them by the end of March 2025.

New Build

- 4.8 All our new homes approved over the last year have achieved an energy performance rating of B. The Heat in Buildings Strategy developed by Scottish Government requires all affordable homes delivered by RSLs to be zero emissions by 2026. Our Performance Specification has been amended to reflect these new requirements.
- 4.9 Our new-build specification allows for enhanced insulation and U-values which are in excess of the current building regulations. This ensures the efficiency of the building fabric is maximised and supports our tenants in the cost of heating their homes. We have also developed a tool which will allow an assessment of what scale of PV installation is possible, the likely benefit to the customer (based on heating system, occupancy and tariff) and what benefit there is in the SAP rating. This will ensure that our PV systems are sized to provide maximum efficiency and benefit to our customers. The tool can be used for new build and existing stock.
- 4.10 In December 2022, the Minister for Zero Carbon Buildings, Active Travel and Tenants' Rights confirmed that the Scottish Government will make legislation by December 2024 to deliver "a Scottish equivalent to the Passivhaus standard".

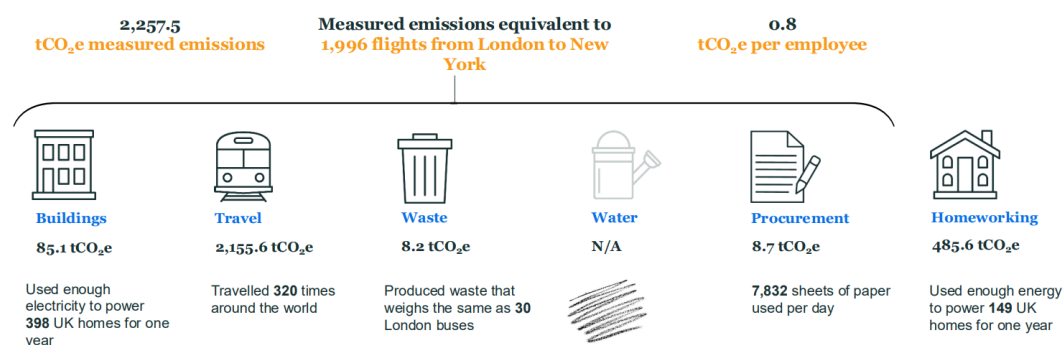
- 4.11 This aligns with the Shared Policy Programme agreement on “explicit support for Passivhaus and equivalent standards” and the recommendation from the Climate Assembly “to ensure that, within the next 5 years, all new housing is built to Passivhaus standards (or an agreed Scottish equivalent)”.
- 4.12 We have engaged directly with the Building Standards Division and wider Scottish Government through membership of the Government’s Energy Review Working Group to input to the design and implementation of the proposed new standard. The new regulation is expected to be laid by the end of 2024 with implementation in late 2027/2028. Our homes will be designed to the new standard as required and we are actively engaged in the delivery of a demonstrator project of the anticipated new standard at our Shandwick Street development in Glasgow.
- 4.13 A new Zero Emissions New-Build Affordable Homes Strategy is expected to be developed by the Scottish Government which will focus on greater use of offsite construction, informed by the findings of the Edinburgh Demonstrator project. Across the Group, we already make use of offsite manufactured open and closed panel systems with projects for modular housing also being progressed. We will continue to explore offsite opportunities and its ability to deliver against our programme ambitions as the market matures. This will include working in partnership with Glasgow City Council (GCC) to pilot modular construction at a site in the city. We have recently received planning consent for a site in WHS programme which includes 6 modular homes as part of the larger site. A site start is anticipated in 2025/25 subject to grant funding.
- 4.14 The concept of 20-minute neighbourhoods and place planning remains a key factor in our development programme. All projects are assessed based on key services available locally that support the delivery of new homes and our tenants, with exemptions in rural areas. The Place Standard tool has supported the development of large regeneration sites at Wyndford and Lochside.
- 4.15 To support biodiversity in relation to our new homes, the use of ‘Green Infrastructure’ (use of natural systems in place of ‘man-made’ or hard engineering alternatives) is adopted in line with the National Planning Framework to reduce pollution, attenuate flood water, minimise overheating, increase wellbeing and support biodiversity. For new projects, Contractors and Design teams will be expected to work with a ‘Building with Nature (BwN) Assessor’. This will help ensure that our new development meet the BwN framework standards at design stage and the highest standards for wellbeing, water quality and wildlife resilience.

Our Business Operations

- 4.16 Our objective is to be carbon neutral in our business operation by 2026. Our measured carbon emissions from our corporate activities (Scope 1 and Scope 2) are shown in the table below. We have also included information from the Planet Mark assessment on Scope 3 emissions from our corporate activities although these are not typically included when organisations aim to be carbon neutral.

Tonnes of CO2 arising from corporate activities	2021/22	2022/23	2023/24*
Scope 1 Emissions from sources owned or controlled directly by us	1,614	1,847	1,859
Scope 2 (market based) Emissions caused indirectly as a result of our activities such as electricity purchased by us	476	320	0
Emissions from corporate activities	2,090	2,167	1,859
Scope 3 Emissions produced by our supply chain (for example, travel for business purposes not procured by us)	274	435	398
Total	2,364	2,603	2,257

4.17 These overall emissions equate to 0.8 tCO₂ per employee which is an improvement of 0.1 tCO₂ since last year. Information on the sources of these emissions, and 'real world' comparators is shown below.



4.18 The table below shows changes in these key sources of emissions (except homeworking which has been included for information this year) since last year.

Source	2023	2024
Buildings	417.8	85.1
Paper	7.7	8.7
Business Travel	391.1	355.0
Fleet Travel	1775.0	1800.6
Waste	11.6	8.2
Total	2,603.2	2,257.5

4.19 The reduction this year is mainly due to a switch to 100% green electricity including in our corporate buildings. Our continued use of fossil fuel in our fleet, in line with our business needs and fleet strategy, means this continues to be our most significant source of emissions. This situation is likely to continue beyond the end of our strategy period reflecting how the EV market, especially for vans is developing. To address this slightly and understand more fully the capabilities electric vans could bring to our business, we are planning to pilot small electric vans this year. Transitioning to these vans is expected to reduce emissions by 66.0 tCO₂ per year.

Our Supporting Activities

- 4.20 We established a Community of Excellence in June 2023 to bring together staff from across our Group and to help ensure that every part of our Group contributes to supporting our sustainability objectives. A priority for the Community of Excellence was to understand and articulate the wider contribution we make beyond the specific steps we are taking to reducing emissions relating to our existing homes, new homes and business operations.
- 4.21 In December 2023, we commissioned Planet Mark (to ensure consistency with our emissions reporting) to capture examples of this wider contribution. Planet Mark facilitated a workshop with staff as part of the Sustainability Community of Excellence. Following this workshop, data analysis was conducted by Planet Mark using measurement methodologies aligned with the Greenhouse Gas Protocol (a globally recognised standard for measuring emissions) to quantify key initiatives and, where possible, attribute a carbon reduction or avoided equivalent.
- 4.22 Planet Mark's analysis was able to quantify the impact from initiatives that led to 312.3 tonnes of avoided carbon emissions. Planet Mark also comments that our effort will have led to significantly more potential avoided emissions, however, it was not possible to quantify the impact due to the lack of an appropriate baseline measurement or referenceable carbon equivalent metric.
- 4.23 The initiatives identified with savings, since they were introduced, are summarised in the table below.

Area	Initiative	Emissions saved (tCO ₂)
Supporting communities with access and infrastructure for electric vehicles.	EV car rental scheme for customers and wider community	23.9
	Installing 73 Electric Vehicle charging points within our communities	185.7
Home Comforts programme – furniture and white goods recycling	Diverting an estimated 132.26 tonnes from landfill	68.8
Active Travel, Cycling Infrastructure and Bike Shelters	installing nearly 1000 free-to-use, secure bike shelter spaces across our communities	12.9
Food vulnerable households and Wheatley Larders	Partnership with Fair Share food charity, using 'surplus for a purpose', redirecting unsold food	21.0
Total		312.3

- 4.24 We have also planted around 3,000 saplings since 2021 giving an estimated 45 tCO₂ of carbon storage to date. This contribution is not counted above because the saplings were not planted in accordance with a verified woodland code, and as such, it is not possible to assign a true carbon savings value in line with the greenhouse gas protocol. It is worth noting that 3,000 trees planted in line with the protocol would achieve total carbon storage of 1,500 tonnes over 100 years.
- 4.25 PNAG (Pathway to Net Zero Advisory Group) is continuing to inform our sustainability activities. Recent support has included considering and reforming our response to the Scottish Government's consultation on SHNZ, reviewing sustainability aspects of our new build development including the Shandwick St pilot and considering our approach to district heating systems including how to optimise, and where these potentially provide advantages for customers.
- 4.26 Going forward, we plan to build on the understanding we are developing on how we impact the environment through external validation of our approach and data. We also plan to explore the availability of a suitable single approach to estimating emission that can also meet various current and future reporting requirements including as part of funding agreements and financial reporting obligations.

5. Customer Engagement

- 5.1 Customers have been engaged as part of the various sustainability initiatives discussed in the report including improvements to existing homes, planned new build developments and wider impact projects such as providing EV charging. We will continue to engage customers as we implement sustainability-related priorities.

6. Environmental and sustainability implications

- 6.1 This report focuses on environmental and sustainability implications.

7. Digital transformation alignment

- 7.1 Where applicable, digital techniques and innovation will be used to support delivery of our sustainability objectives including through reducing travel.

8. Financial and value for money implications

- 8.1 The financial implications of meeting sustainability requirements for existing homes and new build homes are captured as part of considering asset management priorities and the viability of new build developments. We are also continuing to reduce our required spend through accessing grants where available, as demonstrated by our recent further successful bids to the SHNZ fund.

9. Legal, regulatory and charitable implications

- 9.1 Changes in guidance and legislation, such as through the new Social Housing Net Zero Standard and sustainability related building regulations as discussed in this report, will shape future investment approaches and priorities to ensure we meet our legislative and regulatory requirements.

10. Risk Appetite and assessment

10.1 Our risk appetite for setting the benchmark for sustainability and reducing carbon footprint is as follows:

- Financial or VFM: Open - A significant investment in retrofitting will be required to increase the energy efficiency and reduce the carbon footprint of our existing homes. In this context we are prepared to invest for reward, considering both the value and benefits which this investment will bring. However, we must still minimise the possibility of financial loss by managing risks to a tolerable level;
- Reputation and Credibility: Open - We aim to establish Wheatley Group as a role-model for sustainability nationally and beyond, as well as influencing the rest of the sector to raise its standards. We seek to partner with the Scottish Government and other organisations (e.g. Sustainable Glasgow) to achieve our common climate change and sustainable development goals. We are prepared to be innovative to deliver these aims and take decisions that might expose us to additional scrutiny, but only where success is likely and we have taken appropriate steps to minimise any negative exposure;
- Operational Delivery: Hungry - We are eager to be innovative and pioneer new approaches to sustainability through the delivery of innovative energy generation opportunities. We will prioritise solutions that enhance control and cost savings for customers, and work with research partners to solve long standing challenges for improving energy efficiency in non-standard construction types. We are prepared to take greater risks where we believe opportunities will significantly support our aim to 'break the mould' and establish us as a leader in sustainability and reducing carbon footprint; and
- Compliance: Legal / Regulatory: Cautious - this area is gaining more importance for stakeholders, including potential investors, staff and customers. We must be able to demonstrate that we have taken action to comply with all existing and emerging legislative and regulatory requirements in this area and be reasonably sure we would win any challenge.

10.2 The activities discussed in this update are in keeping with this risk appetite.

11. Equalities implications

11.1 Equalities implications will be assessed as part of the actions that are undertaken in implementing our Sustainability Strategy and priorities.

12. Key issues and conclusions

12.1 Our Sustainability Strategy provides direction for our sustainability-related activities. This direction is being taken forward, as planned, across four priority themes, as follows:

- Existing homes – reducing carbon emissions and costs of heating homes by investing in insulation and heating controls;
- New homes meeting regulatory and planning requirements including for zero direct emission heating;
- Business operations – reducing emissions as we work towards being carbon neutral in or corporate activities; and
- Wider contributions – activities across Wheatley with a positive environmental impact including for customers and communities.

12.2 We are also ensuring our approach to reducing emissions evolves in line with emerging government policy including the likely SHNZ requirements and continuing to access grant support where possible.

13. Recommendations

13.1 The Board is asked to note this progress update.

LIST OF APPENDICES: None

Report

To: Wheatley Housing Group Board

By: Laura Pluck, Group Director of Communities

Approved by: Steven Henderson, Group Chief Executive

Subject: Delivering Personalised Services Strategy

Date of Meeting: 25 September 2024

1. Purpose

1.1 To provide the Board with a draft of our Delivering Personalised Services Strategy for consideration and approval.

2. Authorising and strategic context

2.1 Under the Group standing orders, the Group Board is responsible for approving Group-wide strategies.

2.2 The Group Delivering Personalised Services Strategy relates to the following strategic themes and outcomes:

Strategic Theme	Strategic Outcome
Delivering Exceptional Customer Experience	Progressing from excellent to outstanding
	Enabling customers to lead
	Developing a customer-led repairs service
Making the Most of our Homes and Assets	Building community voice, engagement, and resilience
Changing Lives and Communities	Shaping care services for the future
	Developing peaceful and connected neighbourhoods
	Supporting economic resilience in our communities
Developing our Shared Capability	W.E Think – creating our “Thinking Yes Together” culture
	W.E Create – driving innovation
	W.E Work – Strengthening the skills and agility of our staff

- 2.3 We have set strategic targets against many of these themes and outcomes that relate to the delivery of services. Some key targets include:
- Overall customer satisfaction is above 90%;
 - 90% of customers feel they can participate in the landlord's decision-making; and
 - 90% of Care services are graded 5 and above.

3. Background

- 3.1. We recognise that our customers are diverse, and it is important that the services we offer and deliver to our customers are available and accessible for all. Our purpose, vision, and values put the customer at the heart of everything we do and we have strong commitments throughout our Group Strategy to deliver exceptional customer experience.
- 3.2. We have a long history of delivering exceptional services and are recognised and highly regarded for this. We understand that customer needs can be either static or transitory. It is important as an organisation that we consider and respond to changing customer needs and that our services and delivery models are continuously reviewed to reflect this.
- 3.3. The English Housing Ombudsman published a spotlight report on 23rd January 2024 entitled 'Attitudes, respect, and rights: Relationship of Equals', which focussed on the meaning of vulnerability within the housing sector in England. It evidenced failings in the way many landlords were delivering their services to individuals classified as vulnerable who had a need for a more tailored or personalised approach.
- 3.4. The failures related to how more vulnerable tenants accessed services and included failings over processes, siloed working, poor record keeping and communication. The report, although English-focused, highlighted the criticality of social landlords in understanding tenant need and responding to them effectively in how they deliver services.
- 3.5. We know there is no such thing as a universal customer or universal solution to address needs or identified issues, therefore we recognise the services we design and deliver require to be available in a way that best suits the needs and requirements of our diverse range of customers.
- 3.6. To support this, we have embarked upon a strategic project this year, agreed at our April Board meeting, to '**define and agree our approach to vulnerability and personalised services**' of which the first milestone was to develop a strategy setting out identified areas for improvement and key actions we will take to deliver increasingly personalised services.

4. Discussion

- 4.1 Our long history and culture of 'Think Yes' underpins our ambition to collaborate and innovate to achieve better outcomes for customers. Through the creation and implementation of our Delivering Personalised Services Strategy and action plan we will continue to enhance and improve customer experience and outcomes.

- 4.2 The overall aim of the strategy is to ensure that we continue to evolve how we design and deliver our services so that customers are supported to access services in a way which, suits and meets their needs and takes account of their individual circumstances.

Current position

- 4.3 We start from a strong position as we embark upon developing even more personalised service delivery. As an organisation we are well recognised for the work we do to support our diverse range of customers and deliver services that meet individual needs and aspirations. Our operating model and our patch sizes, afford us opportunity to know and understand both individual customers and communities well. This knowledge in turn allows us to deliver a better level of customer service.
- 4.4 Over the last five years we have set out commitments and established ways of working that have supported us to provide more personalised services that take account of individual needs. A specific focus over this period has been on how we support those individuals most vulnerable or at risk of through the following:
- A commitment to provide 11,000 homes to people experiencing homelessness with tailored sign-up processes;
 - A commitment to support the national scaling up of a housing first approach;
 - Creation of a dedicated group protection team focused on safeguarding and public protection;
 - Development of a New Scots action plan which sets out how we support Refugees to settle in our homes and communities;
 - A revised approach to anti-social behaviour with a focus on understanding and managing the root cause;
 - Creation of our first ever Hate Crime Policy and Suicide Prevention Framework; and
 - A focused Equity, Diversity and Inclusion strategy and plan.
- 4.5 In the last 12 – 18 months we have evolved how we carry out our annual tenant visits, broadening the discussion areas to develop a wider picture of specific customer needs.
- 4.6. We have multiple systems, including our Customer Records Management system, that we use across our business areas and have focused efforts in recent years on integrating systems to prevent disjointed and siloed working. We have established business processes in place that aim to support seamless provision of services but there are opportunities to enhance and strengthen how we consider and respond to individual circumstances.
- 4.7. We collect a considerable amount of data across the organisation which allows us to conduct our business but there is an opportunity to streamline how and what we gather in relation to customer needs and to scope how we could better present this data to staff who are interacting with customers whether that be in their home or on the phone.

Factors influencing customer need

4.8. Within the strategy we have outlined factors and circumstances which can influence needs and where there may be a requirement to deliver a more personalised service response. These have been categorised within three broad circumstance types:

- Personal circumstances;
- Situational circumstances; and
- Life circumstances.

4.9. The circumstances are outlined below:

Personal circumstances	Situational circumstances	Life circumstances
Protected characteristic as covered by the Equality Act 2010	Bereavement	Caring responsibilities
Medical health condition (covers both physical and mental health conditions)	Loss of earnings and/or employment	Experiencing homelessness or threatened with homelessness
Neurodivergence	Relationship issues/breakdown	Addictions issues
	Experiencing abuse (including domestic abuse)	History of trauma, abuse, violence and/or neglect
	Debt and/or financial stress (including poverty)	Being involved with the Criminal Justice system
	Major life changes	
	Affected by ASB/crime	

4.10. The factors set out in the strategy are not exhaustive but highlight some of the circumstances that have an impact on the types of services accessed or requested or how services are delivered and adjusted to meet customer needs.

4.11. There is a specific obligation placed on us where a customer with a protected characteristic requires an adjustment to service delivery. The Equality Act 2010 sets out a requirement for us to consider the removal of barriers for people with protected characteristics, through the application of 'reasonable adjustments' where requested by a customer. We currently implement reasonable adjustments where customers request these and we can do so, but as part of this strategy we will formalise our approach through the development of a Reasonable Adjustment Policy and associated complementing processes.

Strategy outcomes

4.12. We have set out in the strategy three priority areas that will focus on enhancing and improving how we deliver personalised services:

- Strengthening our culture and growing our capability;
- Harnessing system functionality and refining relevant business processes; and
- Streamlining the way in which we collect and use our customer data.

- 4.13. A detailed action plan through to 2026 has been drafted to support the strategy delivery. The plan sets out clearly defined actions that we intend to take and outcomes that we expect to achieve through each of the priority areas within the strategy. Progress will be reported to the Board as a minimum, every six months or at relevant points as improvements or changes are introduced. The key actions and outcomes outlined in the strategy are summarised below.

Strengthening our culture and growing our capability

- We will develop an enhanced programme of learning and development that is focused on building a deeper understanding of the circumstances which can affect how people access or receive our services, this will be inclusive of our City Building Glasgow colleagues;
- Our learning programme will support our staff to recognise and respond to diverse customer needs;
- We will facilitate ‘thinking yes together’ sessions with staff to explore what personalised services means across services areas and to set out our strategy ambition; and
- Staff feedback will inform our priority learning and staff will co-design our solutions to delivering more personalised services.

Harnessing system functionality and refining relevant business processes

- We will review the functionality of key systems used by staff to understand customer needs so that we can ensure we are maximising functionality to improve service delivery;
- Our core and relevant business processes will be reviewed to ensure that they support our aims set out within the strategy, for example, our no access process will be reviewed to determine whether we give enough consideration to customer needs in this process or is there room for improvement;
- We will develop a Reasonable Adjustment Policy and complementary business processes to ensure consistency in approach to meet our obligations under the Equality Act 2010; and
- We will continue to review and analyse customer complaints and insight feedback to establish any barriers and learning coming from these routes of customer feedback.

Streamlining the way in which we collect and use our data

- Full analysis of our customer data-gathering methods will be undertaken to determine all of the points that we are collating information in relation to support needs and the range of information we are using;
- We will clarify and agree the nature and type of data required to allow us to deliver increasingly personalised services; and
- We will scope how we can better use our data to present one view of the customer to all customer-facing staff and what changes would need to be implemented across our systems to realise this.

- 4.14. There are many services that we offer our customers. In the next year, we will focus our efforts on the services most used by our customers with a specific focus on the repairs service. Working closely with the relevant teams we will explore key repairs processes such as no access to determine adjustments that we could make to improve the experience for customers with specific needs.

- 4.15. While we will focus on the repairs services, we will also explore quick wins across our other key service areas including letting, anti-social behaviour, rent collection and complaints.
- 4.16. We recognise that there are circumstances that our customers experience that can be short term in nature or longer term and that the impact of these can vary greatly. Not all of the circumstances customers face will require that we adjust our approaches. We will focus our efforts on circumstances and conditions that are experienced by our customer over a longer term in the first instance and those in which a practical change to service can be delivered.
- 4.17. We have established a personalised services community of practice which is comprised of staff from across the business. This community of practice will be integral in driving forward much of the work to strengthen our approaches towards service personalisation. They will be involved throughout the duration of the strategy which runs from 2024 – 2026, bringing their wealth of experience, skills, and knowledge.

5. Customer Engagement

- 5.1 A specific milestone around customer engagement was built into the strategic project to '**define and agree our approach to vulnerability and personalised services**' as it is crucial that our customers influence this.
- 5.2 We held customer focus groups with our 'stronger voices' customers from all of the Group RSLs during August 2024. The purpose of the sessions was to obtain feedback around customers direct experience of accessing our services where they had some form of additional need; and to provide details of how we responded to this. We wanted to gather insight of any areas where they felt we didn't meet their expectations and what they believed could have improved the experience.
- 5.3 A total of 38 customers attended the five in-person sessions spanning all RSLs and some of the key themes originating from the sessions were:
 - Obtaining customer communication preferences and applying these was viewed as key, so that all communication and service provision can take account of these preferences – regardless of the service being delivered;
 - Customers fed back that staff skills and experience in understanding a wide range of circumstances and/or support needs would be helpful to continue to respond to individual needs appropriately;
 - Customers felt that their landlord having access to specific information on their circumstances would be of benefit to service delivery and raised no concerns about disclosure of this information.
 - Customers noted the importance of all customer-facing staff across the business having access to relevant information rather than being held by one area of the business to allow all service areas to respond accordingly (e.g. for visits such as repairs, customers may take longer to answer door due to disability);
 - Additional environmental services should be considered over and above our current service offering as many customers were struggling with environmental tasks owing to their circumstances (e.g. gardens being a challenge linked to disabilities); and

- Not all customers were clear on the wraparound support services available to them, and we needed to do more to raise awareness of services they could access to support them.

5.4 We will work with customers to identify key priorities across the actions we have established and will engage them as we progress work to ensure their views inform the changes we will introduce.

6. Environmental and sustainability implications

6.1 Development and implementation of the Group Delivering Personalised Services Strategy and action plan meets three of the UN Sustainable Development Goals, which include:

Goal 3	Good health and wellbeing	Ensuring we deliver services on an equitable basis and that our customers can access our services will contribute towards the wellbeing of our customers.
Goal 5	Gender equality	We recognise that protected characteristics as included within the Equality Act 2010 can mean that some individuals face additional barriers that require some form of adjustment. Accounting for this within our strategy supports equality of access to our services including gender equality.
Goal 10	Reduced inequalities	Much of our stock is in some of the most deprived communities in Scotland. The work we will carry out to strengthen our approach to personalising services will ensure the services we deliver are done so on an equitable basis.

7. Digital transformation alignment

7.1 A key focus for our Delivering Personalised Services Strategy will be how we harness our data and digital platforms to support our service delivery to achieve our ambition of progressing from excellent to outstanding.

7.2 We will continue to explore our digital capability through systems such as STORM, with the ambition of continually improving customer experience and streamlined access to data for our staff.

8. Financial and value for money implications

8.1 There are no financial implications arising from the matters set out in this report.

9. Legal, regulatory and charitable implications

9.1 The strategy has been written taking cognisance of the relevant legislation, which includes, but is not limited to, the Equality Act 2010 and Data Protection Act 2018.

10. Risk Appetite and assessment

- 10.1 Our Group Delivering Personalised Services Strategy supports four of our five strategic themes including Delivering Exceptional Customer Experience, Making the Most of our Homes and Assets, Changing Lives and Communities and Developing our Shared Capability. Our risk appetite in relation to operational delivery for these themes ranges from open to hungry.
- 10.2 This means that we are keen to pursue opportunities to use digital services and platforms to improve the customer experience and develop the appropriate skills, behaviours and confidence required for staff at all levels to innovate and influence effectively.
- 10.3. Focusing on delivering increasingly personalised services reduces the risk of our customers being disadvantaged because of circumstances that may impact them. It supports us to deliver key services which ensure we meet our obligations and support our customers well.

11. Equalities implications

- 11.1 Our customer base is diverse and continues to change. We recognise that there are certain circumstances that our customers can face that can require a different approach to ensure they are able to access our services without disadvantage. Through this work, our staff will be skilled at understanding these circumstances and the adjustments necessary to ensure parity of service for all.
- 11.2 An Equality Impact Assessment (EIA) has been completed to accompany the strategy and consideration will be given throughout the project as to whether an updated EIA is required at any point to support any changes to service.

12. Key issues and conclusions

- 12.1 We recognise that our customer base is diverse and that it is important the services we deliver are fit for purpose for all customers across Wheatley Group to access without disadvantage.
- 12.2 We have a strong track record of designing and delivering services to support our customers across the Group. We recognise that customer needs are not static and that our customer profile continually changes, therefore we require to be cognisant of this in our service delivery.
- 12.3 In January 2024 the Housing Ombudsman in England published its spotlight report on 'Attitudes, respect, and rights: Relationship of Equals' which focussed on the failings of landlords across England in delivering services to vulnerable residents. We want to ensure we evolve our services and approaches to strengthen how we support individual customer needs.
- 12.4 We have a strategic project this year to '**define and agree our approach to vulnerability and personalised services**'. The first milestone in the project was to develop a strategy outlining our vision and detailing what action we will take to deliver increasingly personalised services. The strategy will run from 2024-2026.

- 12.5 The strategy focuses on certain circumstances that can be present in an individual's life that can create the need for additional support and/or alteration around service delivery. These circumstances have been broken down into three main categories which are personal, situational and life circumstance.
- 12.6 We have set out three areas of priority work which will seek to strengthen our culture and grow our capability, harness system functionality, refine relevant business processes; and streamline the way in which we collect and use our customer data.
- 12.7. We will focus our efforts in the first year on the service areas most used by our customers including the repairs service. We will focus our efforts on circumstances and conditions that are experienced by our customers over a longer term in the first instance and those in which a practical change to service can be delivered.

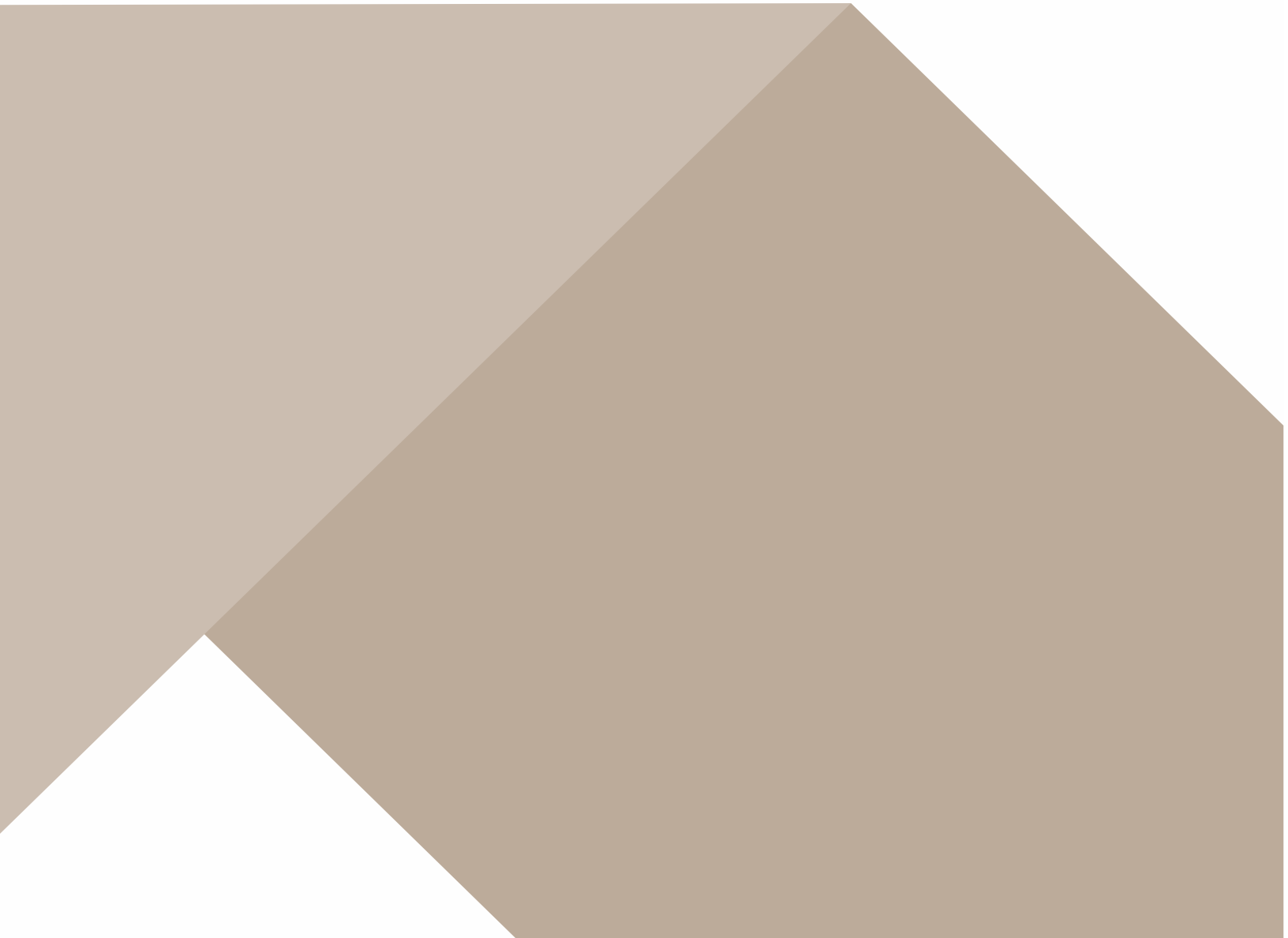
13. Recommendations

- 13.1 The Board is asked to approve the Delivering Personalised Services Strategy.

LIST OF APPENDICES:

Appendix 1: Delivering Personalised Services Strategy

Delivering personalised services strategy



Contents

1. Introduction and background
2. Definition of personalised services
3. Strategy scope, vision, aim and objectives
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1. Introduction and background

As Scotland's leading Housing, Care and Property Management Group we provide services to over 210,000 people in Scotland every year.

We are committed to making homes and lives better through our work and have a strong track record of delivering personalised and tailored services to our diverse customers and communities.

Our housing stock is held within some of the most deprived areas within Scotland, where almost two thirds of our customers live in the lowest ranked Scottish Index of Multiple Deprivation (SIMD) data zones. In terms of an area being considered 'deprived' this can relate to people having a low income; however, it can also mean fewer resources being available within the area or fewer opportunities available for those residing there.

Our customer base is diverse and continues to change. As an organisation we are responsive to this in understanding that with such diversity comes a clear requirement for our services to be designed and delivered in the most inclusive manner. This ensures our customers can access our services on an equal basis without disadvantage.

We are seeing an increase in people experiencing homelessness in Scotland. We are committed to working with our local authority partners and wider stakeholders to respond to this. We have committed to housing 11,000 homeless households over the lifetime of our Group Strategy to 2026. In 2022-2023 there were 32,242 households assessed as homeless or threatened with homelessness in Scotland, made up of 36,848 adults and 16,263 children. Of these households, 51% of them had at least one identified support need. In terms of these support needs, older applicants relate more to physical disability and medical conditions, those in age bracket 35-49 relates more to drug and alcohol dependency and for younger applicants it relates more to basic housing and living skills.

In the 2022 Census, the number of people from a minority ethnic background amounted to 12.9% of the population, which was an increase of 4.7% from 2011. 94.2% of respondents said they speak, read, and write English well or very well, indicating that translation services are required for a proportion of the population.

Scotland's population is ageing. In the 2022 census there were 1,090,600 people recorded as being over 65 years of age. It is essential that the services we provide, and method of provision, are suitable to meet the needs of our ageing population.

People who identified as LGBTQ+ in the 2022 census accounted for 4% of people aged 16 and over within Scotland (183,860) and 0.44% in the same age bracket identified as Trans (19,990).

The Scottish Health Survey estimates that 35% of adults aged 16 or over in Scotland in 2019 had a limiting long term physical or mental health condition, or illness.

A commissioned Scottish Government study into Autism prevalence estimates that 1% of the population is autistic. It is estimated that around 3-4% of the UK population has ADHD, 10% have dyslexia and 6% have dyscalculia. There is strong evidence individuals with physical or mental health conditions, a learning disability and/or a neurodivergent condition can experience significant inequalities and challenges.

Our own data mirrors that of the national picture. We had over 10,000 customers respond to our equality data survey undertaken in Autumn 2022. The survey results demonstrated:

- 44% of the respondents were 65+ years of age;
- 45% of the respondents were disabled, with long-term illness being the largest category of disability;
- 84% of respondents came from a white ethnic background;
- 89% of respondents' main language is English;
- 6% of respondents identify as LGBTQ+; and
- 1.68% of respondents identified as Trans.

Social and economic factors are contributing to a changing customer profile and in turn changes are required to how we work with our customers, support them and deliver our services to them.

In January 2024 the English Housing Ombudsman published a spotlight report entitled 'Attitudes, respect and rights: Relationship of Equals'. The report focused on the role and responsibilities of housing providers to recognise and respond to tenants' specific vulnerabilities or needs. It highlighted extensive failings to the way more vulnerable residents were being treated by social landlords in England. The failure related to the way in which vulnerable residents accessed services and included failings around "*confusion over processes, siloed-working, a lack of curiosity, poor records and communication*". It identified that many landlords were delivering services generically as they failed to understand the specific and unique needs of their residents.

This report, although English focused, highlighted the criticality of social landlords understanding tenant need and responding to that effectively in how they deliver services to tenants.

While we have a long history of delivering responsive and agile services to our customers, the report affirmed the need for a more defined strategy focused on how we work to enhance and further personalise service delivery that reflects both our current and future customers. The ambition and objectives set out in this strategy enable us to strengthen our approaches to delivering personalised services, laying strong foundations for activity that will be captured within our next strategy taking us through to 2031.

There is no such thing as a universal customer and equally there are no universal solutions to identified issues. Through this strategy and beyond, we want to ensure that regardless of where a customer is accessing or receiving some form of service within the business, they should expect to do so in a way that works best for them and their circumstances.

We recognise that there can be occasions where inefficiency is identified within our business processes which could be attributed to a failure to deliver the correct service required for the customer. An example of this could be repeated no access for repairs, which could have underlying reasons such as the customer is deaf or hard of hearing and missing the scheduled repairs appointments because of this. We aim to get things right the first time for our customers and recognising areas for improvement to drive up efficiency is key to achieving this.

This strategy has been developed for all customers and subsidiaries across Wheatley Group, including our Registered Social Landlord (RSL) customers, Lowther residents and owners and Wheatley Care customers. Wheatley Care has distinct regulatory requirements to evidence the delivery of personalised services in line with individual outcome plans and/or service specifications. This strategy will support the delivery of wider Group services to Wheatley Care customers.

2. Definition of personalised services

The Housing Ombudsman's report on Attitudes, respect and rights: Relationship of Equals states that:

“Landlords need to empower themselves with knowledge about their residents and homes to be more proactive and effective, but too often the records on vulnerabilities are incomplete or ignored.....”

“Landlords need a deep and unambiguous understanding of their obligations and a clearer concept of what vulnerable persons means for their organisation. This is particularly relevant when responding to mental health needs or disabilities, making reasonable adjustments or using unreasonable behaviour policies. Otherwise, the risk is a lottery for residents, with recognition of their rights dependent on the service area or whoever responds to the request or complaint”.

We recognise the importance of understanding circumstances and factors that may impact a customer's service need and how we work with and respond to this need. There are varying levels of need affected by personal circumstance, that can impact levels of vulnerability.

We want to continue to deliver personalised services to our customers, whatever their circumstances, and through this strategy will enhance our understanding of how we should best respond to individual customers who have more complex or bespoke needs.

For the purposes of this strategy, we will define delivering personalised services as:

‘The provision of our services in a non-generic manner, where we will tailor services to suit the individual needs and preferences of our customers, or specific customer groups, where possible, to ensure everyone can access services on an equal basis’.

3. Strategy scope, vision, aims and objectives

Scope

This strategy provides a framework for the short to medium term that will guide how we review, refine and deliver our wide range of services across our footprint. It allows for the continued development of fair and reasonable services and processes to ensure equity of access to services for our wide range of customers, regardless of their circumstance or needs. It will outline the activity we will undertake to build the foundation and establish optimum conditions for the delivery of personalised services that will be a central element of our 2026 – 2031 Group Strategy.

Vision

Our vision is for our service delivery to be personalised to the needs of our customers, recognising their individual circumstances and requirements. Our staff will be skilled in understanding the circumstances which can impact our customers’ need. Our business processes and data will be used to support delivery of services in a personalised way.

Aim

This strategy’s overall aim is to ensure that we continue to evolve how we design and deliver services so that our customers are supported to access services in a way which suits and meets their needs and takes account of their individual circumstances.

Objectives

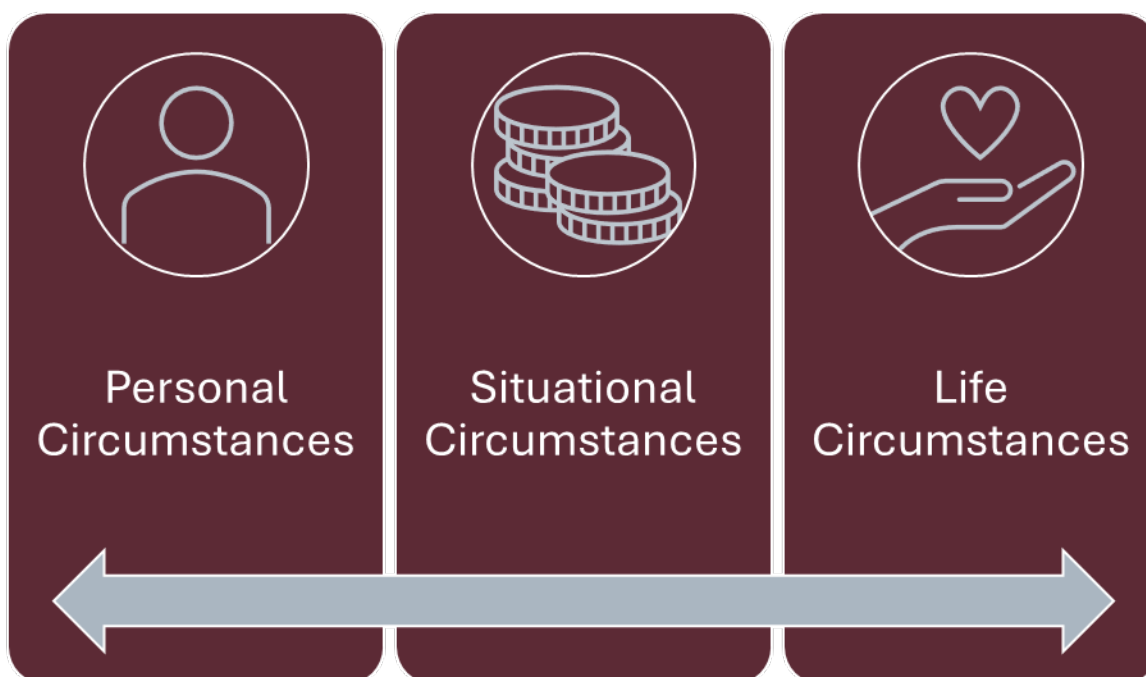
The objectives of this strategy are:

- We will devise and launch an extensive learning and development programme that will assist our staff **to recognise and respond to individual customer needs** and requirements.
- We will **engage with our customers** and staff throughout the life of this strategy to understand the circumstances they feel require a personalised approach and establish adjustments to service provision they feel would best meet any identified needs.
- **Process enhancement will be co-designed** with both staff and customers as standard practice throughout the life of this strategy, to bring expert experience for achieving the best results. We will refine key business processes across letting, repairs, Anti-social Behaviour (ASB), rent collection and complaints, taking cognisance of any identified improvements which enhance opportunity for customers to experience **equity** around access to people and services.
- We will **streamline our approach** to collecting and holding information pertaining to customer needs and build an agreed process that is adopted across our organisation as the standard approach for obtaining information relating to customer support needs.
- We will continue to work in **partnership** with specialist organisations to continually improve our understanding and comprehension of the circumstances our customers can face and ensure that appropriate support and referral pathways are established.

4. Factors influencing customer need

There are a range of factors and circumstances where, for those individuals experiencing these, accessing our services may require some form of personalised approach. These circumstances are wide ranging and can be present in an individual's life from birth or developed over their lives linked to incidents, events, experiences, or situations.

We have identified three types of circumstance which when present or occurring in individuals' lives, can influence and impact customer needs. These are:



Personal circumstances

The personal circumstances of an individual or members of their household can impact how they communicate and/or draw down or access services from an organisation. This can include circumstances such as:

- Having a protected characteristic(s) as outlined within the Equality Act 2010 which includes age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation;
- Medical health conditions – inclusive of both physical and mental health conditions; and
- Neurodivergence – some of the most common conditions included within this overarching term are autism spectrum disorder (ASD), attention deficit hyperactivity disorder (ADHD), dyslexia, dyscalculia, dyspraxia, dysgraphia, tourette syndrome, hyperlexia and synesthesia.

This list is not exhaustive and only sets out a selection of personal circumstances that may impact how a customer may access or have services delivered.

Situational circumstances

Throughout life, individuals can encounter a range of situations that can cause stress and have an impact upon how they are feeling, behaving and communicating. This can include, but is not limited to the following situations:

- Bereavement;
- Loss of earnings and/or employment;
- Relationship issues/breakdown;
- Experiencing abuse (including domestic abuse);
- Debt and/or financial stress (including poverty);
- Major life changes; and
- Affected by ASB.

It is important that when customers tell us they are experiencing certain situations in their life that we understand the potential consequences and/or impact on their communication and ability to access our services. Understanding this allows us to account for it within our interactions and service delivery.

Life circumstances

There are certain circumstances that happen to individuals in their lives that can have a detrimental impact upon the course of their life and path. When these circumstances arise for individuals, they can be particularly challenging. This can include, but is not limited to, the following:

- Caring responsibilities;
- Experiencing homelessness or threatened with homelessness;
- Addictions issues;
- History of trauma, abuse, violence and/or neglect;
- Being involved with the criminal justice system.

Like personal and situational circumstances these can impact how customers engage and interact with staff and how services are accessed and used.

Managing customer data

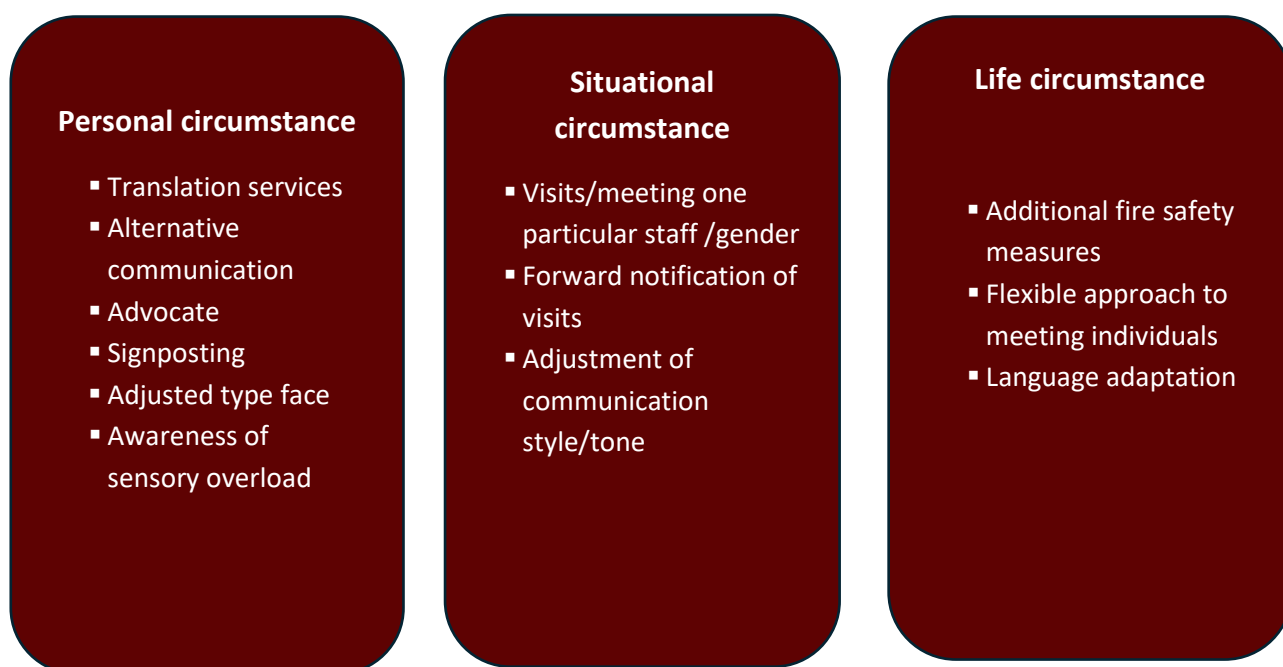
We undertake to deliver our services in an empathetic and caring manner and through this strategy will build upon this to help our staff understand better the circumstances that could impact or affect our customers.

It will not always be obvious that our customers are experiencing these circumstances, and we will often be reliant upon them sharing this information with us. We will take a measured approach towards data collection and recording, which will only be gathered and used for the purpose for which it is intended, in line with Data Protection legislation and regulations.

We do not intend to gather information pertaining to all of the circumstances outlined above. Some circumstances require only that we possess a greater level of understanding to adjust how we communicate and interact with individuals or to help us to signpost individuals to other means of support. We will gather and hold data for circumstances where there is a practical change we can make to deliver the service (e.g., that someone has a physical disability and has requested that people wait for a longer period for the door to be answered to a repair).

Potential resolutions or adjustments

Across all the circumstances outlined, there are a number of resolutions or adjustments we can consider which would support delivery of a more personalised service. Examples of the adjustments are set out below. These are not exhaustive but will be a starting point as we consider how we improve and adjust the services we deliver to our customers.



We will establish practices and business processes that provide customers with opportunities to share information they feel is relevant to the services we deliver and their relationship with us. Customers will have no obligation to share specific personal information with us but will be encouraged through discussion to highlight circumstances which they believe, if we are aware of, will allow us to deliver services in a more inclusive way to them.

5. Reasonable Adjustments

Under the Equality Act 2010, there is a requirement placed on us to remove certain barriers for those who have protected characteristics. As an organisation we consider all requests for reasonable adjustments and we consider these on a case-by-case basis dependent on the adjustment requested.

While we include protected characteristics within the pillar of 'personal circumstance' that may impact customers, there is a different obligation placed upon us for a customer who has a protected characteristic and requests a reasonable adjustment. This is a detailed legislative process, where failure to demonstrate sufficient consideration for making reasonable adjustments could constitute discrimination under the Equality Act 2010. It is important to note that the adjustments must be requested by the customer, and it is not the responsibility of the organisation to suggest adjustments for individuals. For those suggested by our customers they must be reasonable in nature.

Some examples of reasonable adjustments that can be considered include:

- Printed copies of materials;
- Different colours or type of fonts;
- Different method of communication (e.g., written communication only as opposed to any communication methods);
- Designated staff member to engage with (e.g., Housing Officer);
- Location of meetings (e.g., no home visits, hub visits only);
- Arranging for an advocate to represent them;
- Provision of extra equipment or support, known as auxiliary aids (e.g., induction loop for individuals with hearing impairments);
- Translation services; and
- Visits by certain sex of staff (e.g., female only staff to visit home).

Individuals may need more than one reasonable adjustment to remove the barriers faced in relation to their protected characteristic(s).

We have a strong track record of working with our customers to make any reasonable adjustments necessary to support them to live in their homes comfortably and access our support and services more effectively. We use annual tenant visits and customer conversations to identify where reasonable adjustments are required and take the appropriate action to fulfill the requirement and implement the reasonable adjustment. To formalise and strengthen our current approach, we will create a reasonable adjustments policy and associated business processes which will ensure a more consistent approach is taken across the Group.

6. Current Position

We pride ourselves on our long history and culture of 'thinking yes' for our customers and the delivery of award-winning services which are high quality and responsive to individuals. Our Wheatley Group mission statement of 'Making Homes and Lives Better' for our customers and the neighbourhoods in which they live requires us to ensure that everyone can access our services on an equal basis and that we recognise customers as individuals. We are starting from a strong position as we implement this strategy.

Over the last three years we have developed a deeper understanding of trauma and the importance of trauma informed practice and how this can support more meaningful and productive interactions. Through our specialist teams such as care staff and safeguarding teams, we adopt a trauma-informed approach. We will start to develop this further across the wider business areas in the life of this strategy and beyond, as emerging practice informs how we can design and deliver trauma responsive services.

We have a dedicated safeguarding team who are responsible for supporting our customers and staff understand and deal with safeguarding and public protection issues including adult support and protection, child protection, suicide prevention and domestic abuse. The work of this team is underpinned by our Protecting People Framework, which outlines our approach towards safeguarding our customers and neighbourhoods and how we work with individuals experiencing these circumstances.

Our Homelessness Policy sets out how we will work with partners to reduce homelessness and provide more homes for homeless households whilst creating balanced, strong and peaceful communities. This sets out our commitment to not only provide homes but to support individuals who have experienced homelessness to create a home and settle within their community.

We have refined our approach to ASB, which seeks to manage complex cases in a more tailored way. The approach is focused on addressing the root cause of the behaviour through an early intervention approach to change behaviour whilst preventing escalation and repeat incidents.

In recognition of the needs of our New Scots customers, we developed a New Scots action plan acknowledging and responding to the recommendations set out within the Scottish Government Refugee Integration Strategy. As a result of this work, we now have a bespoke New Scots 'welcome to your home' pack which gives information on our role as an RSL, tenant responsibilities, ways in which we can assist and signposting options. We have introduced new e-Learning modules which help our staff understand the experiences of our New Scots.

Our Suicide Prevention Framework provides the structure for our activity around suicide prevention within our neighbourhoods and identifies how best to support those impacted by suicide or suicide ideation. It helps identify those groups most at risk of suicide, how to recognise the signs and deal with disclosure, and to obtain the necessary support for anyone who requires this.

Across our business areas, we have established key strategic partnerships to support our customers' access to services and the support they require to help them thrive. These partnerships support our staff to use established pathways and signpost our customers to the required services and/or support necessary.

Current position - culture and capability

Our staff are the essence of our organisation and are committed to ensuring we deliver exceptional customer experience in our interactions with customers. Our culture is strong around customer voice and engagement and the aspiration for our customers to reach their full potential for a brighter future for themselves and their families.

Our operating model means our staff are present within our neighbourhoods. Our 24/7, 365 days Customer First Centre (CFC) means we are available for customers to provide support and deliver services at a time that best suits them. Our unique patch size for our housing officers of 200-250 units means we are best placed to know our customers well.

Our housing officers are one staff member in amongst a wider team which we have in place to support our customers, which includes CFC staff, ASB officers, care teams, repairs teams, neighbourhood environmental teams (NETs), stronger voices officers, Lowther teams and the Wheatley Foundation. Together they bring a wealth of experience, knowledge and shared capability with distinct skill sets to benefit our customers.

We have invested considerable time in educating our staff in equity, diversity and inclusion and as an organisation celebrate the diversity of our staff and customers. Our staff are empathetic and appreciate the wide range of circumstances faced by our customers and the diverse nature of our customers and neighbourhoods.

Current position - systems and processes

We have multiple systems that we utilise across the organisation and have focused efforts in recent years on integrating our systems to prevent siloed working and a disjointed view of the customer. Further work can be done to harmonise how different teams access and use systems, and the information contained within these.

We have established processes across each of our business areas for our customers to raise service requests, obtain information, make payments and lodge complaints. This cuts across our core areas of business including, but not limited to, repairs, rents, letting, ASB, factoring, environmental services, tenancy management, investment, compliance, and complaints.

Our CFC has established processes in place to ensure that for customers accessing our services, be that either via voice or digital methods, this is as seamless and accessible as possible. Our recent investment in a modern and reliable contact centre platform has paved the way for alternative ways of processing service requests or contact with customers.

In the lifetime of this strategy, we will replace both our factoring system and our web self-service portal, as well as undertaking a significant upgrade to our Customer Record Management system. This affords further opportunity to review how we utilise our systems for the benefit of our customers, specific to delivering personalised services.

Our network of Communities of Excellence (CoEs) affords the opportunity for our staff to come together to analyse processes and ensure that from their unique business or service area perspective, consistent ongoing analysis of process and areas of service improvement are key areas of focus and action.

We have a customer-led scrutiny panel in operation, where process evaluation and customer journey exploration form a substantive aspect of the activity undertaken by the group. This ensures any areas for improvement are identified to enhance the customer experience.

Building community voice, engagement and resilience is outlined as a strategic outcome within our Group Strategy and embedding customer voice throughout our established business processes is key to realising this outcome. Our stronger voices programme is instrumental in achieving this and acts as a mechanism to obtain customer voice and build this into existing and new business processes.

In recent years we have invested in developing our customer insight systems and processes with a shift from retrospective to real time feedback and analysis. This affords an opportunity to understand more easily potential barriers to personalised service delivery from even more of our customers.

When reviewing business processes, we look to strengthen them to ensure they remain customer focused and accessible. We recently strengthened our Equality Impact Assessment, and forced access processes and will next look at our no access process to explore any areas of improvement to identify customer needs and potential service improvement.

Current position - data

As an organisation we collect a considerable amount of data to allow us to conduct our business. The way in which we collect, store, present and use this data is fundamental to the provision of effective services to our customers. Our Group Strategy and Data Strategy outlines our ambition that by 2026, mature data intelligence will support us to deliver personalised, bespoke and seamless services in the right places, to the right people, at the right time.

Our Data Strategy, approved in early 2024, established areas of priority, one of which was how we better understand customers' needs in relation to vulnerability and personalisation of service delivery. Work has commenced to understand the data we currently collect on customer needs and how and where it is stored. Our community of practice for personalised services has undertaken an initial mapping exercise which has helped us understand the current 'as is' process for data collation and use of this, and to identify areas of priority for improvement and enhancement.

We have a defined IT and technology plan in place for our organisation which has supported the move to a more sophisticated contact centre platform and allows greater ability and functionality to use our data in a more effective way. This in turn provides a greater understanding of the customer for staff in real time, allowing for improved service delivery. We will start to explore the additional functionality and capability of this platform in supporting the delivery of personalised services and scope out future development required to realise our ambitions.

We have identified opportunities for improvement in each priority area to align with our aim of ensuring that all customers have equitable access to our services and can do so in a highly personalised manner.

Priorities	Improvement Opportunity
Strengthening our culture and growing our capability	<p>Reinforce 'Think Yes' culture and staff autonomy to make the right decision to deliver for our customers.</p> <p>Development of a wide-ranging training programme to:</p> <ul style="list-style-type: none"> ▪ enhance skills and knowledge of circumstances our customers may experience and the impact this may have on them. ▪ ensure our people can recognise and respond to individual customer need; and ▪ support staff to understand how to tailor services to suit individual requirements.

Harnessing system functionality and refining relevant business process	Gather further information to establish which business systems staff groups currently use to capture support needs and how this is used in service delivery.
	Consider the functionality of current systems and potential new systems and how they could support enhanced service delivery.
	Review key core business processes to identify priority improvements.
Streamlining the way in which we collect and use our customer data	Gather further information from staff to determine the range of ways we can and do collate, store and use data in relation to support needs.
	Identify key data sets that could assist in providing a more tailored service.
	Streamline the approach to collecting support needs data from customers.

7. Delivering Personalised Services

We want to deliver exceptional personalised customer experience in our interactions with customers, therefore it is crucial we have a clear understanding of their needs and requirements, to allow us to consider the best way in which to tailor our services to suit individual needs.

We are currently in a strong position with high levels of customer satisfaction across the organisation. But we have an opportunity to improve and enhance how we deliver responsive personalised services that take account of the changing needs of our customers.

Having a skilled and experienced workforce, ensuring our systems and business processes support our objectives and strengthened data and knowledge management will all be critical aspects of this.

Early intervention is key in ensuring we get it right for our customers from the outset. Having an early understanding and awareness of needs will make a difference in the overall experience for the customer.

Strengthening our culture and growing our capability

Our staff are our greatest strength, where they strive to deliver an excellent level of customer service and exceed expectations in customer interactions and service delivery. Our core values of **Excellence**, **Community**, **Ambition** and **Trust** are embedded in our ways of working and are at the heart of everything we do.

We will continue to invest in our staff to ensure they have the required skills, experience, knowledge and attitude to provide the highest level of customer service that our customers deserve. Building trust and confidence with our customers is a key aspect of this and we will take our shared capability commitment to the next level by ensuring our staff are able to identify the need for the delivery of a personalised service for customers who require this.

Our Think Yes Together philosophy underpins our approach, where our staff work in a collaborative way to deliver excellent levels of customer service and strive to achieve the best possible outcomes for our customers. Thinking Yes Together helps to remove barriers in service delivery and the approach supports the achievement of customer satisfaction.

Key actions, initiatives and outcomes to be achieved by 2026:

- We will develop an **enhanced programme of learning** for our staff which will support their knowledge around:
 - The range of circumstances that have the potential to require additional support and what type of support this would be.
 - Recognising the potential behaviours and communication styles that could be present when individuals are experiencing certain circumstances.
 - Understand and embody the need for traits of tolerance, compassion and understanding to be present when dealing with customers who require additional support linked to personal, life and situational circumstances.
- We will deliver introductory sessions to our staff to present our strategy and outline our vision of **delivering exceptional customer experience** in relation to personalised services. These sessions will set out our vision and priorities throughout the duration of the strategy;
- We will carry out a **self-assessment** to measure how **trauma informed** we are and identify areas for improvement;
- We have mandatory **Equity, Diversity and Inclusion training** for staff to ensure they have an awareness of the requirement to treat everyone fairly and without prejudice. We test learning on training through our established evaluation process and will also gain insight into compliance with this through customer complaints received in this area;
- Our approach towards staff recruitment is underpinned by our strategic commitment that our **workforce's demographic** more closely resembles that of the communities in which we operate. We have in place a performance management framework to track and monitor this commitment;

- Staff will understand the **importance of accurate data reporting** to ensure everyone across Wheatley Group can access the required information to deliver the correct service to customers. This will be reinforced through training sessions and our introductory session on personalised services of the need to work collaboratively to ensure the best service delivery for our customers; and
- We will **work in partnership** with statutory and specialist agencies to further enhance the skills and knowledge of our workforce. We will seek out specialists in the circumstances identified to ensure we have the soundest information available for our staff to support our customers.

Harnessing system functionality and refining relevant business process

Our staff are supported and guided to carry out their duties through the use of multiple business systems and an extensive range of business processes and policies. These have been designed to reflect the wide range of services we offer, and many have been co-created with customers; learning from customer experience where we got it right and where we could have delivered a better service.

Process mapping helps us determine the current process and identify any gaps or areas of weakness that require our additional attention. Our personalised services community of practice will start to review our processes for core business areas. This will ensure we recognise gaps and weaknesses and identify areas where these could be strengthened to accommodate customers with specific requirements.

Customer engagement will feature heavily throughout, where we'll consider the processes from the customer perspective in terms of how this looks and feels to them. We will obtain customer feedback through focus group sessions that we will schedule throughout the duration of this strategy and into the next Group Strategy as our work in this area continues. This activity will help us identify good practice and highlight where we need to develop and improve.

Key actions, initiatives and outcomes to be achieved by 2026:

- We will explore more fully the **functionality of the systems currently in use** to record and present information to staff around support needs and seek to harness these further to improve our response to delivery of personalised services;
- We will commence a **review of existing processes for our core business areas**, to consider their robustness in achieving delivery of services suitable for all customers;

- When reviewing our processes we will do so from the perspective of **route of access for customers**, such as via our Customer First Centre or directly to a staff member, to reflect on whether any improvements to process would be beneficial to consider in terms of this;
- We will design a **reasonable adjustment policy and associated business processes** to ensure continuity in approach across the business when customers approach us and make a request for this to be considered. The policy will contain key information around adjustment agreed and importantly, where to find this information on our systems; and
- We will continue to **review customer complaints and gather customer insight** to establish any learning around barriers or challenges in our processes and work with the identified leads within our community of practice to establish how best to address this and make the necessary service improvements; and
- **Learning journeys** will be carried out to understand what other providers both in and out of the sector are doing well. We will bring this learning back to the business for further consideration around any best practice discovered and consider the benefits of introducing and implementing within our own business.

Streamlining the way in which we collect and use our customer data

It is crucial that the data we hold is fit for purpose to support the delivery of excellent services. Currently the data we hold in relation to allowing our people to deliver personalised services is not always gathered, stored or used in a consistent or effective way to achieve our stated vision, aim and objectives. We know from work done to date that we need to simplify and standardise what we gather, how we gather it and ensure there is clarity across all staff around this.

We need to focus our efforts on the collation and presentation of information that our customers are happy for us to hold, to help support the delivery of personalised services. This must be displayed in a way that is readily available for staff to access and available in real time. It is essential that the data we gather, and hold, is compliant with Data Protection legislation and the General Data Protection Regulations (GDPR) and we only use this for the purpose in which it is intended. We will only gather data required to make any practical changes to service delivery and where we need to do something differently. Not all circumstances our customers face will require data collation and/or recording.

Key actions, initiatives and outcomes to be achieved by 2026:

- Conduct an **analysis of our current customer data gathering methods** across the organisation to determine all of the points we are collecting data in relation to support needs and establish the range of information collated;

- **Scope potential data sets** that will assist with personalised service delivery and consider information which could sit within an ‘ask and forget’ set;
- Design a streamlined process for data collection in relation to personalised services and draft a data management guidance note to support this, covering the **nature and type of the data** we require to obtain, to allow us to offer and deliver personalised services and to support continuity of practice in this area;
- Explore the process and system change requirements which could be implemented to use our data to create **one view of the customer** for all staff. Outline the activity required to achieve this, alongside resource requirement and associated costs;
- Explore how we could use unstructured forms of data (that sit out with systems) so that they could be incorporated **into the view of the customer**; and
- We will review our **no access and repeat repair cancellations data** to explore if any aspect of this relates to service delivery not being personalised to the customer. We will seek to understand the reasons behind the no access and repeat repair demand and map out any areas of improvement that could be implemented to drive this down and improve customer satisfaction levels.

Immediate priorities

Our services and how we deliver these continually evolve in response to feedback from customers, internal learning, periodic review and, in some instances, changes in the regulatory landscape.

This strategy will focus on building on our strong service delivery with a view to strengthening our approaches to understanding customer needs and responding to this in how we deliver services.

Outlined below are our identified immediate priorities that will be undertaken and will allow us to assess the current picture around personalisation and present our vision of how we will build upon this to design and deliver exceptional personalised services into the future.

Strengthening our culture and growing our capability

To support our staff deliver the best possible outcomes for our customers, it is important they are equipped with the appropriate level of knowledge to develop their skills and experience to support conversations and deliver actions around additional need. We will therefore make reviewing our current training offering a priority action to be taken, to provide a baseline of what we currently have available and deliver and identify areas which require to be strengthened. We will engage with staff to obtain feedback regarding desired learning in this area, which will be based on experience in dealing with customers with additional support needs.

'Thinking yes together' sessions will be designed to bring the concept of personalised services to our staff to introduce them to this strategy and all associated activity that will be undertaken to meet the commitments set out within.

Harnessing system functionality and refining relevant business process

We appreciate that there are some services we offer to customers that are accessed more than others, a key one being our repairs service. It is therefore important that we start at a place where we can make an impact on one of our most accessed core services to help support efficiency and ultimately drive-up customer satisfaction.

Specific areas we will explore initially within our repairs service will be our no access process and repeat repair cancellation process, to establish any evidence around failure demand being associated with lack of service personalisation. We will focus initially on consideration of where we are able to make practical changes, such as with long-term conditions, to establish where there are circumstances where specific needs are evident for delivery of our repairs service.

We will develop a reasonable adjustment policy to help ensure a consistent approach is applied to this process, where staff are clear about agreed adjustments and where to access this information on our systems. Standardisation of this process will support compliance with the Equality Act 2010.

Streamlining the way in which we collect and use our customer data

Good clear data that is accessible for staff is a key component in ensuring we are able to deliver the best possible service to our customers when they draw down our services. Our starting point will be understanding the current 'as is' process in relation to data collection and recording in respect of documenting and understanding customer support needs. We will consider the processes for collecting data, alongside the customer engagement processes, to better understand what this looks and feels like for our customers and staff. This will allow us to scope what change and process enhancements are required to achieve our stated vision and aim.

Monitoring strategy implementation

The strategy has a detailed action plan through to 2026 which sets out key actions and outcomes we expect to achieve. Progress with the implementation of the strategy will be overseen by a dedicated Project Board who will meet as a minimum once per month. Progress will be reported to the relevant Boards across Wheatley Group as a minimum every six months or at the appropriate time as changes and/or improvements are introduced.

Associated work

This strategy is complemented by and is linked with work currently being undertaken or planned across thebGroup, specifically;

- Data Strategy implementation;
- Equity, Diversity and Inclusion Strategy implementation;
- Development of our 2nd New Scots action plan;
- Implementation of our Suicide Prevention Framework action plan;
- Implementation of our Hate Crime Policy and supporting action plan; and
- Review of our Group Protecting People Policy Framework.

As work progresses, we will ensure that there is appropriate connection across all work streams that reflect our aims and objectives set out in this strategy.

This strategy and supporting action plan will help us to explore opportunities for further improvement and development of a more integrated view of the customer as we progress with our Data Strategy and develop our next Group Strategy.

Report

To: Wheatley Housing Group Board

By: Frank McCafferty, Group Director of Repairs and Assets

Approved by: Steven Henderson, Group Chief Executive

Subject: New Build performance report

Date of Meeting: 25 September 2024

1. Purpose

1.1 The purpose of this report is to provide an update on the Group's development programme.

2. Authorising and Strategic context

2.1 Under the Group Standing Orders, the Group Board is responsible for key matters relating to the Group's financial and strategic framework including approval of our Group new build programme. The Group Board retains strategic oversight of progress with our asset growth programme.

2.2 Our subsidiary Boards are responsible for approving their rolling five-year development programme each February. The Wheatley Developments Scotland Limited ("WDSL") Board is responsible for scrutinising and approving each individual contract award in line with the agreed development criteria.

2.3 Our development programme links to our 2021 - 2026 strategy and the strategic theme, 'Making the Most of our Homes and Assets'. This also helps us to deliver against the strategic theme of 'Changing Lives and Communities' through increased opportunities for training and employment and through community benefit contributions to the Wheatley Foundation.

2.4 The delivery of our development programme supports our ongoing role as a key partner for the Scottish Government in their *More Homes Scotland* commitments and by the recently published Programme for Government commitment to deliver 110,000 new supply affordable homes.

2.5 The development programme requires ongoing partnership working with the Local Authorities in our operational areas including those with Transfer of Management Development Funding ("TMDF") powers, namely Glasgow and Edinburgh. We additionally continue to be in contact with a broad range of private developers, housebuilders, and land agents to seek to put ourselves into a position to exploit any development opportunities as they may emerge.

3. Background

Reduction of Affordable Housing Grant

- 3.1 On 19 December 2023, the Scottish Government announced a 26% reduction in funding for the Affordable Housing Supply Programme reducing from £752m in 2023/24 to £556m in 2024/25 (£196m reduction).
- 3.2 The Programme for Government announced £100M would be made available for the delivery of 2,800 MMR homes. We are currently seeking details on the accessibility of this funding and how it will be allocated.
- 3.3 The Scottish Government announced in April 2024 that £80m would be made available over the next two years to support acquisitions. The funding allocation has now been announced for 2024/25. The below table confirms the allocation to the key Local Authorities that we work with. We await details as to how this funding will be allocated and to which projects.

Local Authority	Acquisition Allocation Funding
Glasgow City Council	£11.5M
City of Edinburgh Council	£14.8M
West Lothian Council	£2.00M
East Lothian Council	£0.44M
Midlothian Council	£0.47M
Dumfries and Galloway	£0.22M
South Lanarkshire Council	£1.72M
Renfrewshire Council	£0.16M
North Lanarkshire Council	£0.67M

- 3.4 The implications of the wider Affordable Housing Supply Programme reduction is most pronounced in Glasgow. There is a risk that grant may not be available for some projects which have tender approval and are ready for site start (Forfar Avenue, South Annandale Street and King's View). The impact on future projects is also being assessed and we anticipate that planned starts for new projects in 2024/25 are likely to be deferred until at least 2025/26.
- 3.5 City of Edinburgh Council (CEC) has confirmed that grant funding will be made available to support a tender approval for Builyeon Road in 2024/25. West Lothian Council's (WLC) programme is constrained and opportunities to cashflow the key regeneration project at Deans South, Livingston (Phase 2) are currently being explored with WLC. We await further details on opportunities for additional projects, including Winchburgh P3.
- 3.6 Working with Renfrewshire Council, an opportunity has arisen to accelerate the delivery of the former Stewart Milne development at Dargavel for Loretto. In the Loretto programme, all approved projects have been allocated grants to allow them to proceed, other than Forfar Avenue in Glasgow.
- 3.7 In WH South, we have been allocated grant funding to allow a site start at Johnstonebridge. Slippage already exists in the 2024/25 Dumfries and Galloway Council (DGC) funding programme via other RSLs, creating an opportunity to introduce additional tender approvals and site starts during 2024/25 including Corsbie Road and College Mains.

4. Discussion

Group Development Programme Overview

- 4.1 Commentary on the development programme including highlights and exceptions, is provided in Table 1 below. Further details of the current programme as included in Appendix 1. This information is reported to the end of Period 4 (31 July 2024). As of 31 July 2024, 194 units have been completed against a target of 37 units (in addition, 4 acquisitions were completed at Cleddans Grove, Drumchapel).

Table 1: Strategic Performance Indicators (end of P4 2024/25)

Dashboard Indicators	Dashboard: Highlights & Exceptions
On-site	At the end of P4, we have 1,521 units (total development numbers) in the live programme across 22 sites. Our largest project is West Craigs for Wheatley Homes East (300 units).
Due on site	At the end of P4, we had 320 units due on site across 9 projects. This will bring our total development programme to 1,841 units.
2023/24 Budget v Actual spend	At the end of P4, our spend across the Group was £59.0m, £8.5m lower than the budgeted figure of £67.5m. This is primarily due to later than budgeted site starts at a number of developments.
Completions	At the end of P4 we have completed 194 new homes against a target of 37. A further 4 homes were acquired at Cleddans Grove, Drumchapel. Our completions comprise of 139 Social Rent units, and 59 Mid-Market units.
Engagement Status	We have 7 ' High Engagement ' projects on site. These projects relate to scale of the project (over 70 units) or where the project involves complex ground conditions. Updates on High Engagement projects are shown below.

RSL Programme updates

Wheatley Homes Glasgow

- 4.2 The Wheatley Homes Glasgow Board held a strategy workshop on 13 September where it considered the key priorities within its new build programme. It agreed that a key priority is delivering or supporting new build within the Transformational Regeneration Areas ("TRAs") in Gallowgate, Sighthill, North Toryglen, Pollokshaws, Red Road/Barmulloch, East Govan as well as the regeneration of Wyndford, Cranhill and Milton.
- 4.3 As part of this discussion the Board agreed that we should explore options for mixed tenure in areas with vacant or derelict land or gap sites owned by us or the Strategic Housing Authority. It also agreed that proximity to our existing stock footprint should also be a consideration.

- 4.4 The Board discussed the principle of forward funding projects, where we would receive staged grant payments. It was noted that in such projects we would require they be cost neutral overall. The Board indicated that there was limited appetite for forward funding, whilst acknowledging there would be some projects where it should, be considered such as small scale projects or where it is a final phase of a wider regeneration programme.
- 4.5 Shawbridge Arcade commenced on site in May 2024 and works are progressing well. Planning consent has been received for the conversion of the office space to 4 additional residential units.
- 4.6 Site starts at North Toryglen and South Annandale Street are subject to further discussion with Glasgow City Council in relation to grant availability.
- 4.7 [redacted]
- 4.8 [redacted]
- 4.9 The cost forecast to complete Calton Phase 1 is reporting an additional £457k of spend associated with more extensive remediation works on the site. Opportunities to accommodate these costs within the overall budget have been sought but there has been limited scope to reduce costs in other areas. Rental levels and the local housing allowance on mid-market rent (MMR) properties have however increased since the project was approved. [redacted]
- 4.9 Following the appointment of HUB West Scotland for Kelvin Wynd, design team appointments have now been completed and the contractor selection process has commenced. We received confirmation of the Judicial Review on 1 August 2024. The judge determined that although there was an error in law in the wording of the screening opinion issued by GCC; the error would not impact the outcome and as such the Screening Opinion would continue to stand.
- 4.10 This means that there is no impact on the approvals that are in place, and we are able to continue works as planned. The petitioner has now appealed this decision and sought legal aid. We await confirmation as to whether this will be provided to allow the case to be heard. We have obtained an urgent hearing, which will take place on the 22 November 2024.

Wheatley Homes East

- 4.11 Following legal negotiations with Ogilvie Homes Ltd, a Turnkey development was agreed at Blindwells on 25 June 2024. The purchase of all units completed during June and July and practical completion of the development has now been achieved.
- 4.12 The WDSL Board approved the Deans South 2 project in May 2024 for 38 units with Springfield. We have now received confirmation that a tender approval will be accepted by the Scottish Government this financial year for the project, however, the grant will not be available until 2025/26. The Scottish Government has asked that we consider front funding this project. Cashflow and costs for borrowing are being sought to identify the level of front funding that would be required.

Wheatley Homes South

- 4.13 All homes have now been completed at Curries Yard, Locharbriggs (89 homes). 47 new homes at Ewart Place, Springholm are on target to be handed over by the end of September 2024.
- 4.14 We have received both planning consent and grant funding for 33 new homes in Johnstonebridge. A site start with Ashleigh (Scotland) Ltd is expected by October 2024.
- 4.15 Planning consent has been granted for 70 new homes at Corsbie Road, Newton Stewart and 44 at College Mains, Dumfries. The College Mains site will see 6 modular units delivered by Enevate. Grant is expected to be available for acquisition this year, with site starts planned for early 2025/26.
- 4.16 The Scottish Government's Planning and Environmental Appeals Division (DPEA) granted planning permission on 29 May 2024 for 56 homes in Leswalt. Following this successful appeal, we have been working with McTaggart Construction on the delivery strategy for the development. Feasibility work is underway on the delivery of circa 30 homes on the site, with the option that the final 26 may be delivered in a later phase. WH South will engage with the local community around the delivery of the new homes. The period of appeal for the planning decision has now ended (29 August 2024).
- 4.17 Early negotiations have begun with CCG on Catherinefield Farm with the intention that an element of homes for sale will be provided at this site given its scale (circa 300 units). CCG are the only contractor/developer to have engaged with us over mixed tenure delivery at this site. There are a further five projects in the South which will be subject to a mini competition for contractor procurement: Maxwelltown High, Gladstone Road, Summerhill, Newington, and Lochans.

Loretto

- 4.18 Loretto now has four projects on site at East Lane, Paisley (48 units) with the JR Group, Constarry Road, Croy (15 units) with Miller Homes, South Crosshill Road, Bishopbriggs (44 units) with Barratt Homes and Bank Street Coatbridge (17 units) with McTaggart Construction. Works are continuing to progress well on all sites and remain on programme.
- 4.19 Approval was received in November 2023 to proceed with the site at Forfar Avenue, Cardonald (29 units and residents lounge) with McTaggart Construction. We are in discussion with GCC to agree a funding strategy to allow works to progress.
- 4.20 As a result of slippage in Renfrewshire Council's programme, an opportunity has arisen to bring forward Dargavel 3a (46 units), Dargavel 3b (16 units). It is anticipated that approval for the project will be sought in November 2024.

Lowther

- 4.21 [redacted]
- 4.22 [redacted]

5. Customer Engagement

- 5.1 We work closely with our internal customers in the planning and delivery of our Group Development Programme. The respective RSL Housing Management Teams and Lowther Homes letting team are closely aligned with our programme. As part of any new project approval, we will report on the capacity of the new operating model to meet the requirements of new stock in relation to housing management and maintenance.
- 5.2 Local communities are engaged in the planning process at a neighbourhood level in all our developments as part of the statutory consent process. Additionally, as the programme is delivered, we undertake customer satisfaction surveys from our end customers.
- 5.3 Our engagement framework, “Stronger Voices, Stronger Communities” places our customer at the heart of how we plan, design, and specify in our development projects. Our Design Guide will be influenced by Customer Engagement across our geographic areas and through encouraging different customer voices as part of that process. The Design Guide will set the standard for our new homes in terms of design and specification and our customers will play a key part in shaping this.
- 5.4 As part of the new Development Process, new satisfaction surveys have been developed to ensure that our customers can feed back to us on the design of our properties, living in our new neighbourhoods and receiving a defect repair from our contractors. The Design Survey (completed 6 weeks after handover) is now taking place, and the end of Defects survey will be implemented for our 2024/25 programme.
- 5.5 We reviewed our internal processes for defects over the last year, with input from relevant stakeholders. Small but significant changes have been implemented in the Customer First Centre to ensure all contact received from customers within new build properties is tracked through the development team. The findings of a recent internal audit will also be used to further enhance our defect process and service to our customers.
- 5.6 Our new build programme continues to support the work of the Foundation through financial contributions and delivery of community benefits including jobs, training, and apprenticeship opportunities.

6. Environmental and sustainability implications

- 6.1 Our Sustainability Framework sets out our key actions in relation to new build homes. This includes:
- New-build homes will meet the planning requirements in relation to no fossil fuel as required through Building Regulations (March 2024);
 - We will size our solar PV systems to generate sufficient electricity to mitigate the high cost of operating some systems;
 - Our large-scale regeneration proposals will include an assessment of ‘carbon payback;’
 - We will explore the implications of design for deconstruction and look to incorporate requirements for this as part of future new-build standards;
 - We will pilot modern methods of construction; and
 - Our new homes will be at least EPC (Energy Performance Certificates) B.

6.2 Wheatley Development Scotland accepted the handover of 198 new build houses between April 2024 and July 2024. Each new property built is given an energy performance rating through an Energy Performance Certificate (EPC). The EPC rates each property on a primary energy indicator, Energy Efficiency, Environmental Friendliness, and its overall carbon footprint.

6.3 Projects are developed to meet Aspects 1 and 2 of the Silver Sustainability Standards which covers reduction in carbon dioxide emissions and energy use for space heating. Projects feature photovoltaic panels that convert sunlight into electricity. Our new build specification also includes the installation of electric vehicle charging points and gas-free heating options as a standard. Taken as a whole, the specification helps customers reduce their energy bills when the panels are solely for their home and not fitted on a communal block.

7. Digital transformation alignment

7.1 Our Group Strategy sets a clear direction for our new homes being digitally enabled to support home working and modern living. All our new build homes as standard are now enabled by the provision of fibre to the home. This is free of charge to the end customer and included in the total development costs. The customer then has a choice as to the internet provider they wish to use.

7.2 The digital enablement of affordable homes is one of the additional quality measures that the Scottish Government is assessing within the current grant benchmark. Digitally enabled homes will be considered as part of our Specification development.

8. Financial and value for money implications

8.1 Delivering value for money to our funders and stakeholders, including the Scottish Government and local authorities, continues to maintain our position as a key delivery partner.

8.2 Our ability to successfully deliver new build housing helps strengthen the income streams in our business plan and supports our RSLs' charitable objectives to address housing need by providing much needed homes for potential customers on our waiting lists.

8.3 [redacted]

Development Fund

8.4 The 2024/25 business plan included an allocation to the development fund of £373k, available over the year to support projects that cannot meet the target IRR, subject to the Board's approval. As of the end of July 2024, no funds have been allocated to projects.

9. Legal, regulatory, and charitable implications

9.1 The Scottish Housing Regulator seeks regular updates on our new build programme and funding position.

- 9.2 The in-house Property legal team undertakes title due diligence relative to all site acquisitions required to facilitate the development programmes along with the preparation of documentation and due diligence associated with asset securitisation.
- 9.3 The legal team also assist with the preparation of legal documents including Building Contracts and Development Agreements to safeguard our development operations.

10. Risk Appetite and assessment

- 10.1 Our risk appetite for delivering an increase in the supply of new homes is **open**. However, we balance this with a minimal appetite in relation to finance, reputation, and legal compliance.
- 10.2 We have recently undertaken quarterly meetings with our main Framework contractors. All spoke of market conditions having stabilised in relation to both labour and materials. The sub-contractor market remains buoyant with ease of access to labour and prices being held as required for tender periods. Overall, there was no expectation that material prices would fall to any significant extent. Most of the contractors expressed concern over the reduction in the grant available for new affordable homes and the impact on site starts. One contractor noted that they would be reducing their manufacturing capacity as a result of a reduction in their anticipated site starts.
- 10.3 On the 11th September 2024 Hadden Construction went into administration. Hadden are on our Generation 3 Contractor Framework, however we have no live projects with them (at feasibility or on site). As a result of the reduction in the affordable housing supply programme grant availability, coupled with delayed and reduced private housing site starts; market conditions continue to be challenging.
- 10.4 We continue to implement our Development Risk Framework and will review this with WDSL at it's next meeting (November 2024). In addition to this, we engage with developers and contractors on a quarterly basis to review market and business positions; whilst also monitoring progress against programme, labour availability and material deliveries for those projects on site.

10.4 [redacted]

10.5 [redacted]

11. Equalities implications

- 11.1 In March 2024, we completed an Equalities Impact Assessment (EIA) on our Development Programme. The EIA fed into our development programme and several processes that inform the design of projects, the type of properties we build and the specification of these properties.
- 11.2 Within the programmes, all new build units are designed to Housing with Varying Needs (Part 1), as integrated into the Glasgow standard. The inclusion of wheelchair units on several sites is a standard funding requirement.

- 11.3 We continue to work with our local housing and allocations teams to consider equalities in design ensuring that we develop a suitable mix of properties for site. We recently collected equality data on all protected characteristics from customers through an anonymous exercise. We also now collect equality information from people who submit a housing application. We will use this data to inform our new build programme through analysing the allocations data against our customer groups. We will also consider the inclusion of LivingWell projects across the programme which are specifically designed to support those aged 55+.

12. Key issues and conclusions

- 12.1 Good progress continues to be made across our programme, with handovers ahead of target and over 1,800 homes either on or due on site. We were successful in achieving a number of tender approvals last financial year, which has placed us well in terms of agreement with the Local Authorities on the allocation of grant funding in 2024/25.
- 12.2 The 26% grant funding cut to the national Affordable Housing Supply Programme will impact the number of new site starts and approvals over 2024/25 and most likely into 2025/26. We will continue to engage with our key partners on the availability of funding across our programme. Our revised 5-year business plan, which will be brought to the Board in early 2025 will reflect the impact of the grant funding cut on our ability to deliver against our ambitions for new build homes.
- 12.3 We will review our Development Risk Framework to ensure that it remains reactive to the current market conditions and reflective of the recent contractor administration.

13. Recommendations

- 13.1 The Board is asked to note the contents of the report.

LIST OF APPENDICES:

Appendix 1: [redacted]

Report

To: Wheatley Housing Group Board

By: Anthony Allison, Group Director of Governance and Business Solutions

Approved by: Steven Henderson, Group Chief Executive

Subject: Governance update

Date of Meeting: 25 September 2024

1. Purpose

- 1.1 To update the Board, seeking approval where appropriate, on the following governance-related matters:
- Group Board Committee memberships for the year;
 - Subsidiary Board Chairs;
 - Intra-group agreement with our subsidiaries; and
 - Schedule of meetings for 2025.

2. Authorising and strategic context

- 2.1 Under the Group Standing Orders the Group Board is responsible for the appointment of Group Committee members and Committee Chairs based on reports and advice from this Remuneration, Appointments, Appraisals and Governance Committee (“RAAG”).
- 2.2 The RAAG Committee is responsible for approving the appointment of all subsidiary Board member appointments, other than Registered Social Landlord (“RSL”) tenant Board members. Subsidiary RSL Boards are each responsible for appointing their own tenant Board members.
- 2.3 Under the Scottish Housing Regulator’s statutory guidance on group structures, RSLs in a Group are required to have an Intra-Group Agreement in place, defining all aspects of the parent/subsidiary relationship and how the Group is to be operated.
- 2.4 Under our Articles and the Scottish Housing Regulator’s Regulatory Framework we are required to hold a minimum of six Board meetings a year.

3. Background

- 3.1 We currently have three Group Committees: the RAAG Committee; the Group Audit Committee (“GAC”) and the Group Strategic Development Committee (“SDC”). The membership and Chairs of the Committees are subject to annual review and agreement by the Group Board.

3.2 A full review of the IGA we have with our subsidiary RSLs was last undertaken in 2022, as part of the implementation of our governance review.

4. Discussion

4.1 The annual review of Committee membership and Committee Chair appointments allows us to reflect on any changes in the role or focus of the Committees as well as wider changes in Board membership.

4.2 The RAAG Committee considered Committee memberships and Committee Chair appointments at its meeting on 28 August 2024. Based on this, the RAAG Committee has recommended the proposed Committee membership for the year ahead:

Group Audit Committee

4.3 Following Fiona Burden's retirement from the Committee its current membership is as follows:

- Caroline Gardner (Chair);
- Alison McLaughlan;
- Maureen Dowden;
- David Rockliff; and
- Iain Macaulay.

4.4 The RAAG Committee considered the broad range of skills and experience of the members of the Group Audit Committee. Following that consideration, the RAAG Committee agreed that we should consider adding some additional accountancy and finance skills and expertise.

4.5 Based on this we identified Allan Clow, a Board member of Wheatley Homes Glasgow and Wheatley Developments Scotland. Allan is a qualified accountant with experience as a Finance Director and Managing Director experience in the development sector.

4.6 It is recommended that Allan's appointment to the Committee be approved and Caroline Gardner remains as the Chair.

Group Remuneration, Appointments, Appraisal and Governance Committee

4.7 The Group RAAG Committee membership is, as documented in its Terms of Reference, ex-officio, comprising:

- Group Chair (Jo Armstrong);
- Chair of Group Audit Committee (Caroline Gardner);
- Chair of Wheatley Homes Glasgow (Maureen Dowden); and
- Chair of Wheatley Developments Scotland (Bryan Duncan).

4.8 No changes are proposed that would impact the Committee membership or its Chair.

Group Strategic Development Committee

- 4.9 The Group SDC remains in place to consider as necessary either a) any particular strategic issues which require more detailed consideration prior to being considered by the Group Board or b) any matters the Board wishes to delegate not within the purview of an existing partner Board or Group Committee.
- 4.10 The Committee has traditionally been used for major funding transactions, such as the Wheatley Homes South refinancing in late 2019, the legal documents relating to the Lowther Home purchase of units from RSLs, the European Investment Bank (“EIB”) finance contract and amendments to the RSL Borrower Group Security Trust Deed in 2018 and EIB and HSBC loans in 2017.
- 4.11 As considered and agreed by the Board at the meeting on 28 August 2024, the SDC will be tasked with overseeing the implementation of our funding strategy. Given the focus on funding, the RAAG Committee agreed to recommend that membership should be based on the membership of our funding vehicles, WFL1 and WFL2 (Caroline Gardner and Iain Macaulay).
- 4.12 The RAAG Committee also recommend that Jo Armstrong remain on the SDC Committee given her skills and experience in relation to funding along with the Chair of Wheatley Homes Glasgow as the largest subsidiary in the Group and the Chair of Wheatley Developments Scotland given the funding is focused on supporting our new build.
- 4.13 This would see the membership being as follows:
- Jo Armstrong (Chair);
 - Caroline Gardner;
 - Maureen Dowden;
 - Bryan Duncan; and
 - Iain Macaulay.
- 4.14 Given the Committee will oversee a multi-year programme rather than individual transactions, it is proposed that we explore how we could add additional specialist corporate finance skills. This is likely to be through targeting an individual with a corporate finance background for one of our existing subsidiary Board vacancies. It is proposed that the Group RAAG Committee is delegated authority to appoint a new member to the Committee should we identify someone with relevant skills and experience. It is also proposed that the Committee be delegated to remunerate the role at an equivalent rate to Wheatley Developments Scotland Limited.

Subsidiary Board Chairs

- 4.15 Following recent retirements and the enactment of subsidiary Board succession plans we have two new subsidiary Chair appointments which take effect from 25 September:
- Alison McLaughlin – Wheatley Solutions; and
 - Manish Joshi – Lowther Homes

- 4.16 Additionally, Iain Macaulay has formally been appointed as the Chair of Loretto Housing and as such been appointed as a director of this Board.

Intragroup Agreement (“IGA”)

- 4.17 Our IGA sets out the roles and responsibilities of us as the parent in a group structure of our subsidiary RSLs. In summary, the IGA explains:
- We are the parent company and have responsibility for setting the direction of the Group as a collective;
 - Our subsidiary Boards have responsibility for setting our strategy, budget, rents, new build and asset management plans;
 - In order to ensure the success of the Group as a whole, we set the parameters for the matters listed above; and
 - We have the ability to set and designate policies as applying Group wide with the subsidiary Boards having responsibility for ensuring these are fit for their specific purpose.
- 4.18 Following review, including by our RSL subsidiary Boards, no changes are being proposed at this time, subject to any feedback from the Board. This reflects that there have not been any significant changes in the way our Boards operate during the last two years. A copy of the template intra-group agreement is attached for noting in Appendix 1. As highlighted in our annual assurance report in August, the IGAs for Wheatley Homes East and Wheatley Homes South will now be updated to reflect their recent name changes.

Schedule of meetings

- 4.19 We have now prepared the proposed schedule of meetings for 2025. Our scheduled meetings will be held on the following dates at 10.30am:
- 1) 26 February
 - 2) 30 April (Dumfries and Galloway)
 - 3) 19 June and 20 June – Board meeting and annual strategy workshop
 - 4) 27 August
 - 5) 24 September
 - 6) 12 November (Edinburgh)
 - 7) 17 December
- 4.20 Board members are asked to provide any feedback on the dates so that we can finalise these and issue a final schedule in October.

5. Customer Engagement

- 5.1 There has been no customer engagement in relation to this report.

6. Environmental and sustainability implications

- 6.1 There are no environmental or sustainability implications associated with this report.

7. Digital transformation alignment

- 7.1 There are no digital transformation implications associated with this report.

8. Financial and value for money implications

8.1 There are no financial implications associated with this report.

9. Legal, regulatory and charitable implications

9.1 Under the SHR's Standards of Governance Financial Management there is a requirement for "*The governing body... to have the skills and knowledge they need to be effective*".

9.2 The proposals in the report support us to achieve this by ensuring that our Committees have members with the required skills and experience to fulfil the role of each Committee. This in turn allows each Committee to provide support to the Board.

9.3 Our IGA ensures that we can meet the requirements of the SHR in relation to RSLs that operate within a group structure.

10. Risk Appetite and assessment

10.1 There is no single risk appetite covering the matters in this report; however across our related strategic outcomes/risk categories, our risk tolerance for legal/compliance ranges from cautious to averse; reflecting our preference of low inherent risk with limited potential for reward vs avoidance of risk and uncertainty with a priority for tight management controls and oversight. The proposals in this report are consistent with our risk appetites.

11. Equalities implications

11.1 Board diversity continues to be a strong consideration for all Board recruitment and appointments.

12. Key issues and conclusions

12.1 The periodic review of our Committee membership and governance instruments such as our IGA allows the Board to consider how they meet our needs and relevant regulatory requirements.

13. Recommendations

- 13.1 The Board is asked to:
- 1) Approve the Committee memberships and Committee Chair appointments for the year;
 - 2) Delegate authority to the Group RAAG Committee to appoint one additional member of the SDC Committee
 - 3) Approve the Intra-group Agreement we have in place with our subsidiaries; and
 - 4) Note the Board dates for 2025 and that they will be finalised and issued in October based on any Board member feedback.

LIST OF APPENDICES:

Appendix 1: Template Intra-group Agreement

Commercial in confidence

Intragroup Agreement

between

Wheatley Housing Group Limited



and

Wheatley Homes Glasgow Limited



Commercial in confidence

This Agreement is between:

- (1) **Wheatley Housing Group Limited, a company registered in Scotland and limited by guarantee with registered number SC426094 and having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL (the “Parent”);**

and

- (2) **Wheatley Homes Glasgow Limited a registered society registered under the Co-operative and Community Benefit Societies Act 2014 with registered number 317, and being a registered Scottish charity (registered number SC034054) and having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL (the “Subsidiary”),**

Each of the Parent and the Subsidiary a **“Party”** and together hereinafter referred to as the **“Parties”**.

Introduction

- (A) The Parent is a Registered Social Landlord (as hereinafter defined) the head of a group of entities which undertake a range of housing, community, social and commercial activities and seeks to, without limitation, improve the housing, services and opportunities for the Group’s social housing tenants.
- (B) The Subsidiary is a Registered Social Landlord (as hereinafter defined) which undertakes a range of housing, community, and social activities.
- (C) The Parties have agreed to express their common objectives and disciplines on the terms set out in this Agreement.

Agreed terms

1 Interpretation

- 1.1 In this Agreement, where the context so admits, the following words and phrases shall bear the following meanings:

“Agreement” means this agreement including the Schedule;

“Budget” means, at any time, the Subsidiary’s budget for the then current year set and approved in accordance with clause 7;

“Business Plan” means, at any time, the Subsidiary’s then current business and financial plan set and approved in accordance with clause 7;

“Competent Authority” means, insofar as each of these has regulatory authority over either of the Parties: the Regulator; the Financial

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Conduct Authority; the Registrar of Companies; or any other body with a statutory regulatory authority over either Party;

“Group” means the Parties and any other entity which is a subsidiary or associate of either Party, and the Parties and any such other entity are together referred to as **“Group Members”**;

“Group Business Plan” means, at any time, the then current business and financial plan set for the Group by the Parent in accordance with clause 7 and in line with Group Strategy;

“Group Chief Executive” means the most senior executive officer of the Group appointed in accordance with clause 9.3;

“Group Code of Conduct” means, at any time, the then current code of conduct adopted by the Parent and applicable to all board members within the Group including, but not limited to, the Parent Board and the Subsidiary Board;

“Group Policies” means a policy, framework or strategy (other than the Group Strategy) adopted by the Parent following consultation with the Subsidiary and publicised in accordance with clause 6;

“Group Standing Orders” means, at any time, the then current Standing Orders adopted by the Parent and applicable to the Group;

“Group Strategy” means, at any time, the then current strategy co-developed by Group Members and approved by the Parent which applies to all entities within the Group;

“Parent Board” means the board of management of the Parent;

“Parent Constitution” means the constitution of the Parent as amended from time to time;

“Performance Standard” means any standards or requirements published by the Regulator from time to time pursuant to Part 3 of the Housing (Scotland) Act 2010;

“Registered Social Landlord” means a social landlord registered with the Regulator in terms of the Housing (Scotland) Act 2010;

“Regulator” means the Scottish Housing Regulator, having its head office at Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF, or any successor body carrying out the same or similar regulatory functions in respect of Registered Social Landlords;

“Schedule” means the schedule in three parts attached as relative to this Agreement;

“Scheme of Financial Delegation” means the scheme in place from time to time which prescribes the authority to spend money up to a prescribed

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value;

“Service Agreement” means an agreement in the form set out in Part 3 of the Schedule to be entered into by setting out the terms upon which Services are to be provided to one Party by the other;

“Services” means any services to be provided by one Party to another pursuant to this Agreement and the relevant Service Agreement;

“Subsidiary Board” means the board of management of the Subsidiary;

“Subsidiary’s Constitution” means the constitution of the Subsidiary in the form approved by the Parent as amended from time to time in accordance with the terms of this Agreement. Words denoting the singular shall include the plural and vice versa, words denoting the masculine gender shall include the feminine gender and vice versa and words denoting persons shall include corporations;

“Terms of Reference” means the terms of reference for the Subsidiary as approved by the Parent as amended from time to time; and

“Wheatley Solutions Limited” means the company of that name registered under the Companies Acts (registration number SC533419) and having its registered office at 25 Cochrane Street, Glasgow, G1 1HL.

- 1.2 Reference to any statutory provisions or instruments shall be deemed to include reference to any such provisions or instruments as from time to time amended, varied, replaced, extended or re-enacted and to any orders, regulations or other subordinate legislation under such provisions or instruments.
- 1.3 Reference to a clause or a schedule shall be deemed to be references to a clause or a schedule to this Agreement and references to a sub-clause shall be deemed to be references to a sub-clause of the clause in which the reference appears.
- 1.4 In this Agreement, clause headings are included for ease of reference only and shall not affect this Agreement or the interpretation hereof.

2 Group objectives

- 2.1 The Parties hereby recognise they are part of a group and each Party agrees and undertakes to carry on its business in accordance with the Group objectives as agreed from time to time in the Group Strategy.

3 Parent undertakings

- 3.1 The Parent agrees with and undertakes to the Subsidiary in the terms set out in Part 1B of the Schedule. The Parent confirms that the Subsidiary shall manage the day to day affairs of the Subsidiary subject to the provisions of

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this Agreement.

3.2 Notwithstanding that the Parent has the absolute constitutional right to appoint shall only exercise that right where, having had regard to the interests of the Group, which shall include the interests of the Subsidiary, the Parent (acting reasonably) is satisfied that, in the circumstances, the exercise of such right is required. Without prejudice to the foregoing, circumstances in which the Parent would consider exercising such step in rights would include, but are not limited to:

3.2.1 Where the Parent (acting reasonably) considers that any such person (acting alone or together with other persons):

- (a) has failed to comply in any material respect with any Group Policy applicable to the Subsidiary or the terms of this Agreement and such failure has been or would in the opinion of the Parent (acting reasonably) be likely to have a material adverse effect upon the business, assets, reputation and / or operations of the Group;
- (b) has brought any part of the Group into disrepute or has acted in a manner which is materially prejudicial to any part of the Group;
- (c) has failed to comply in any material respect with its constitution, Group Code of Conduct or responsibilities as set out in the Schedule; or
- (d) has caused the Subsidiary to fail in any material respect to be in compliance with its agreed Budget or Business Plan, as applicable, or to be in a position where the Subsidiary either is, or is likely to become, unable to meet its debts as they fall due;

or

3.2.2 where:

- (a) the Subsidiary is insolvent or any enforcement action is being taken against it, or has been threatened, by any third party,
- (b) the Parent has a reasonable concern as to the long term financial viability of the Subsidiary or its ability to meet its contractual obligations as they fall due as a consequence of the actions of the Subsidiary's Board or the actions of any member of such Subsidiary's Board; or
- (c) the Regulator (or any successor regulatory authority) or any other regulatory authority -
 - (i) issues an adverse (in the Parent's opinion, acting reasonably) supervisory or regulatory report, or
 - (ii) takes regulatory action, or exercises statutory powers, against the

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Subsidiary or any member of the Subsidiary's Board.

(d) the Subsidiary's Board is or is likely to fall below the regulatory minimum number of Board members.

- 3.3 Notwithstanding that the Parent has the right in the Subsidiary's Constitution to convene a special general meeting and to pass constitutional changes, the Parent confirms that it will only exercise that power where, having had regard to the interests of the Subsidiary, it considers (acting reasonably) it necessary to do so in order to reflect changes within the overall structure of the Group or to further Group strategic priorities.

4 Subsidiary's undertakings

4.1 The Subsidiary hereby agrees and undertakes that:

- 4.1.1 its policies for the admission of members shall be in accordance with the governance requirements set out in any Group Policies, or as otherwise agreed with the Parent;
- 4.1.2 its constitution is subject to agreement by the Parent;
- 4.1.3 it shall ensure that the composition of the Subsidiary Board shall satisfy the governance requirements set out in any Group Policies, or shall be as otherwise agreed with the Parent;
- 4.1.4 it shall obtain the approval of the Parent Board prior to appointing a chair to the Subsidiary Board; and
- 4.1.5 the Subsidiary Board shall not exercise its own removal and appointment powers (set out in the Subsidiary's Constitution) in respect of the Subsidiary Board members without the prior written consent of the Parent, which shall not be unreasonably withheld.
- 4.1.6 the Subsidiary Board shall not have Committees, save where the Group Board has agreed to their creation.

4.2 The Subsidiary agrees that the Group Chief Executive will be entitled at any time to investigate any acts, omissions or courses of conduct on the part of any member of the Subsidiary's staff, should the Group Chief Executive, acting reasonably, believe that such investigation is required but has not been instigated or has been instigated but is not being properly and diligently undertaken by the Subsidiary and that such acts, omissions or conduct have had, or may have, a material adverse effect upon the business, assets, reputation and/or operations of the Subsidiary or the Parent or the Group. The Group Chief Executive shall undertake, or instruct that there be undertaken by an appropriate person of his or her choosing, an investigation into the relevant matter, and if the conclusion of such investigation (or if the conclusion of any investigation carried out by the Subsidiary) is that any member of the Subsidiary's staff has breached the terms of their contract of employment, the Group Chief Executive may require the Subsidiary to take such disciplinary action as may be reasonable

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and appropriate in the circumstances. The Subsidiary agrees that any such acts, omissions or conduct in relation to the Group Chief Executive shall be considered by the Group Remuneration, Appointments, Appraisals and Governance (RAAG) Committee under its Terms of Reference.

- 4.3 The Subsidiary also agrees with and undertakes to the Parent on the terms set out in Part 1A of the Schedule.

5 Responsibilities of the Parties

- 5.1 It is agreed that each Party shall have responsibility for all aspects of its business referred to as its responsibility in Part 2 of the Schedule.

- 5.2 It is further agreed that the Parent Board and the Subsidiary Board shall have the right to manage their respective businesses in accordance with the objects set out in the Parent Constitution or the Subsidiary's Constitution (as the case may be) and in its best interests, subject only to acting in accordance with Performance Standards, Group Policies, the provisions of this Agreement, the Business Plan and Budget, legal and regulatory requirements and the Group Strategy and Group Business Plan set in accordance with the terms of this Agreement.

6 Group Policies

- 6.1 The Parent shall have the right to designate which policies shall be applied as Group Policies and therefore be applicable to all Subsidiaries.

- 6.2 The Parent shall draft Group Policies in such a way as to ensure that the Subsidiary is able to comply with regulatory standards as they apply from time to time and in drafting Group Policies shall have regard to the need to ensure:

- 6.2.1 compliance with:

6.2.1.1 reasonable standards of financial and business probity; and

6.2.1.2 good practice in governance and risk assessment;

- 6.2.2 that the business of the Subsidiary is carried on in accordance with the Subsidiary's Constitution and with the Group's Business Plan (or the relevant part thereof)

and otherwise shall have regard to such matters as the Parent Board shall from time to time consider appropriate.

- 6.3 Subject to the division of responsibilities set out in clause 5, matters of operational policy relating to the Subsidiary's business shall not be a matter for Group Policies and the Subsidiary shall have the right to set its own operational policies and amend these from time to time. The Subsidiary shall notify the Parent of all amendments to its operational policies from time to time and shall take the necessary steps to ensure that any operational

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policies are consistent with similar policies in operation elsewhere within the Group, including working with other entities within the Group to harmonise operational policies where appropriate.

7 Group business plans

- 7.1 The Subsidiary remains responsible for the development, review and adoption of its Business Plan and Budget on an ongoing basis, but the Subsidiary will do this within the context of, and in a manner which is consistent with, the then current Group Business Plan and Group Strategy which the Parent is responsible for preparing for the Group as a whole. The role of the Parent will be to review and approve Subsidiary's Business Plan and Budget, subject to viability and maximisation of the assets available in the Subsidiary or elsewhere in the Group. The Parent will monitor and support the delivery of the Subsidiary's Business Plan. Reporting mechanisms will be put in place, from time to time, which properly and appropriately reflect this role.
- 7.2 The Subsidiary shall deliver to the Parent its proposed Business Plan and Budget by a date set by the Parent each year and shall confirm to the Parent that such Business Plan and Budget meet any requirements set by the Parent from time to time in relation to Business Plan and Budget matters.
- 7.3 The Parent Board shall, as soon as reasonably practicable after receipt of the updated Business Plan and Budget pursuant to clause 7.1, confirm to the Subsidiary whether it has any issues of concern with such Business Plan and Budget, and the Subsidiary shall make such amendments to its updated Business Plan and Budget as the Parent Board may reasonably require.
- 7.4 The Parent shall notify the Subsidiary of the reasons for raising issues of concern with its draft Business Plan and Budget and the Parent and the Subsidiary will use all reasonable endeavours to work together to agree a revised Business Plan and Budget for approval by the Parent Board as soon as reasonably practicable. Until such issues are resolved, the draft Business Plan and Budget shall not become the Business Plan and Budget for the purposes of this Agreement, and the preceding year's Business Plan and Budget shall continue to have effect unless and only to the extent that the Parties agree otherwise.
- 7.5 The Subsidiary agrees and undertakes to carry on its business, and only enter into commitments, as envisaged by the Business Plan and Budget or, where any matter is outside the Business Plan and Budget, within prescribed financial limits without notifying the Parent.

8 Group services

- 8.1 The Parties shall seek greater efficiency and effectiveness in the provision of services through economies of scale, improved methods of working, and by locating services most appropriately.

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- 8.2 The Parties shall together consider how best to deliver effective and efficient group services with the intention that, over time, each will share services with the other to cover agreed activities and requirements in furtherance of the aims set out in Clause 8.1.
- 8.3 To the extent that the Parent or any other organisation within the Group does provide services to the Subsidiary, or the Subsidiary provides services to the Parent or another Group Member, such services will be provided to a specification to be agreed between the parties and in line with an agreed charging mechanism.
- 8.4 The Subsidiary agrees that, subject to clause 8.5, it shall procure external services through the Parent (and/or other Group Members and/or through any arrangement that is put in place by the Parent for this purpose) in accordance with Part 1A (11) of the Schedule.
- 8.5 Subject to relevant legal and regulatory constraints, it is intended that the primary central service and corporate service provider to the Group shall be Wheatley Solutions Limited. Notwithstanding service provision by Wheatley Solutions Limited the Parent shall have the right to designate, in order to achieve cost efficiency across the Group, that certain services shall be provided by another Group Member or externally. Except as provided for at Part 1A (11) of the Schedule, the Subsidiary shall have no obligation to procure external services (whether from within or outwith the Group) under clause 8.4 or this clause 8.5 unless it is demonstrably in the financial and operational interests of the Subsidiary to do so.
- 8.6 Where Services are to be provided by Wheatley Solutions Limited or any other Group Member, the parties thereto shall enter into a Service Agreement substantially in the form set out in Part 3 of the Schedule to this Agreement recording the agreed services to be provided, the relevant performance service standards, quality considerations, term of the agreement and pricing.
- 8.7 The Parent may enter into any agreements it deems appropriate or desirable with any contractors, consultants, or specialist firms for the provision of the Services.

9 Staffing

- 9.1 Each Party agrees that:
- 9.1.1 staff shall be employed from time to time in accordance with all relevant Group Policies;
- 9.1.2 service provision by the Parent shall be in accordance with any Service Agreement entered into pursuant to this Agreement; and
- 9.1.3 it shall comply with the terms of any intragroup secondment agreement or intragroup employee services agreement to which it is a party from time to time.

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9.1.4 The Group Chief Executive has ultimate responsibility for staffing issues across the Group.

9.2 The Parent shall ensure the provision of such staff as it shall reasonably deem appropriate to provide the Services within budgets and may vary the staffing levels as it shall reasonably deem necessary for the performance of the Services.

9.3 The Group Chief Executive shall be appointed by and be accountable to the Parent Board but shall also be accountable and owe a duty of care to the Subsidiary.

9.4 The Subsidiary shall recruit, manage and remunerate its employees and other staff in accordance with any Group Policies relating to human resources.

10 Variations

10.1 It is anticipated by the Parties that pursuant to their overall aim and intention to co-operate for the benefit of the Group as a whole, the provisions of this Agreement may from time to time require amendment.

10.2 It is accordingly agreed between the Parties that they shall formally review the operation of this Agreement from time to time as deemed appropriate. One Party may thereupon propose to the other Party that a variation be made to this Agreement, and in such event the Parties shall, acting reasonably and in good faith, consider with a view to reaching agreement upon the variation proposed or agreeing variation is not necessary.

10.3 In the event of a failure to agree the matter in dispute, it shall be considered pursuant to the procedure set out in clause 11.

10.4 In the event of a variation being agreed, the same shall be recorded in a supplemental agreement between the Parties.

10.5 The Parent shall not have the right to unilaterally amend the provisions within this Agreement without the consent of the Subsidiary and in the event of any disagreement clause 10.3 shall apply.

11 Resolution of disputes

11.1 It is the declared intention of the Parties that all matters of disagreement should be resolved by negotiation and discussion between the Parties and each agrees to act in good faith and use its reasonable endeavours to apply the terms of this Agreement without the necessity for implementing the dispute resolution procedures of this clause 11.

11.2 In the event that there is any disagreement or dispute between the Parties as to the operation of this Agreement, each Party agrees that its Chair will meet with the other, with a view to resolving any issues of concern and that those persons present at such meeting will resolve the dispute between the Parties. Until the Chairs reach agreement, the previously approved

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Subsidiary Business Plan will remain valid for the purpose of any financial commitments or strategic direction.

12 Notices

12.1 Any notice to be served on the Parent under the terms of this Agreement shall be in writing and addressed to the Company Secretary of the Parent at its registered office address or to such other address as the Parent may from time to time supply in writing to the Subsidiary and shall be deemed to be duly served:

12.1.1 on delivery, if delivered by hand and receipted for by the recipient;

12.1.2 48 hours after dispatch by recorded delivery; or

12.1.3 if faxed or emailed, one hour after transmission provided that no transmission notification of non-delivery or error has been received by the person transmitting the communication and the transmission is to the fax number or email address of the executive officers mentioned in clause 12.1 and last notified by each Party to the other.

12.2 Any notice to be served on the Subsidiary under the terms of this Agreement shall be in writing and addressed to the Company Secretary of the Subsidiary at the address shown on the front of this Agreement or to such other address as the Subsidiary may from time to time supply in writing to the Parent, and shall be deemed to be duly served:

12.2.1 on delivery, if delivered by hand and receipted for by the recipient;

12.2.2 48 hours after dispatch by recorded delivery; or

12.2.3 if faxed or emailed, one hour after transmission provided that no transmission notification of non-delivery or error has been received by the person transmitting the communication and the transmission is to the fax number or email address of the officer mentioned in clause 12.12 and last notified by each Party to the other.

12.3 A change of address under clause 12.1 or 12.2 must be duly notified in writing to the other Party.

13 Jurisdiction

13.1 This Agreement shall be governed by Scottish law and the Parties submit to the exclusive jurisdiction of the Courts of Scotland.

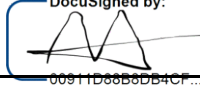
In witness whereof these presents on this and the preceding eight pages together with the Schedules attached as relative hereto are executed as follows:

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Subscribed for and on behalf of Wheatley Housing Group Limited

29 September 2022

on

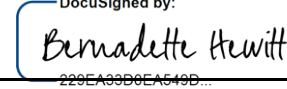
by 
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Anthony Allison

Authorised signatory

Subscribed for and on behalf of Wheatley Homes Glasgow Limited

29 September 2022

on

by 
229EA33D0EA549D...
Bernadette Hewitt

Authorised signatory

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This is Part 1 of the Schedule in three Parts referred to in the foregoing Agreement between Wheatley Housing Group Limited and Wheatley Homes Glasgow Limited

Schedule Part 1A
Subsidiary's undertakings

The Subsidiary shall co-operate with the Parent as follows:

1. by remaining registered with the Scottish Housing Regulator as a Registered Social Landlord and complying with the Performance Standards/law and other regulatory requirements from time to time;
2. by complying with all requests of any Competent Authority;
3. by complying with all reasonable advice from the Parent in relation to probity, standards of competence, management and fidelity, and customer services;
4. by implementing and complying with Group Policies;
5. by carrying on its business and only entering into financial commitments in accordance with and as envisaged by its Business Plan and Budget and otherwise in line with prescribed limits for financial commitments agreed with the Parent; in the event that the Subsidiary wishes to pursue any initiative which is, or may be, beyond the parameters of its Business Plan and Budget, it shall consider such initiative within the context of, and subject to, Group Strategy and the Group Business Plan and the Subsidiary undertakes to seek prior approval to any such initiative from the Subsidiary Board, the Parent Board and the board of any other Group Member directly affected;
6. by attending liaison meetings with the Parent, if reasonably requested, and providing such relevant information as may be requested by the Parent as to the performance of the Subsidiary in relation to strategic policy, performance and financial matters;
7. by reporting to the Parent upon its financial and other operational functions in such form as the Parent shall from time to time reasonably require;
8. by providing the Parent with copy board reports and papers circulated to Subsidiary Board members (at the time of circulation to such board members) and minutes of meetings of the Subsidiary Board promptly following those meetings;
9. by permitting the Group Chief Executive or his or her nominee to attend all Subsidiary Board meetings;
10. by providing all information upon any aspect of its affairs reasonably requested from time to time by the Parent and co-operate fully with any investigations into its affairs initiated by the Parent from time to time;

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11. by (a) appointing the Group's external auditors as its external auditors; the Group's internal auditors as its internal auditors; the Group's treasury management function or provider as its treasury management function or provider; and by using the Group's panel of bankers and / or funders as its panel of bankers and / or funders; (b) subject to the terms of Clause 8.5 of the Agreement, using any other consultants on the Group's panel (other than consultants of a temporary or minor nature employed for day to day work); and (c) by making appropriate recommendations to the Parent of consultants who could join the Group's panel;
12. by appointing the Company Secretary of the Parent from time to time as the Company Secretary of the Subsidiary if so requested
13. by respecting confidentiality of all material and negotiations (otherwise than in respect of those already in the public domain) and only disclosing any confidential information pertaining to the Group with the prior written agreement of the Parent (except where required to do so by any law or regulation or by any court of competent authority);
14. by preparing for and co-operating with any monitoring of its activities by the Regulator and by providing copies to the Parent of all communications with the Regulator relating to the Regulator's role as regulator of the Subsidiary;
15. by operating in accordance with its Terms of Reference, the Group Standing Orders and financial regulations;
16. by only contracting as itself and not attempting to commit the Parent, or any other Group Member, as an agent or otherwise, in any contractual arrangement;
17. in all communications with third parties acknowledging that the Subsidiary is part of the Group in such form as shall be agreed between the Parties from time to time;
18. by complying with the reasonable requests of the Parent to contribute to specific areas of the Group business at particular times.

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Schedule Part 1B

Parent undertakings

The Parent will co-operate with and support the Subsidiary as follows:

1. by providing or procuring the provision of high level professional and other advice and support as required by the Subsidiary relating to significant policy matters generally, including advice on regulatory requirements in relation to performance expectations, monitoring and good professional standards;
2. by implementing and complying with any relevant Group Policies;
3. by undertaking (a) the appointment of bankers and / or funders and undertaking the appointment of, or providing, the treasury management function and (b), subject to the terms of Clause 8.4 and 8.5 of this Agreement and without prejudice to the Parent's obligations in terms of clause 4 of this Part 1B of the Schedule, the appointment of other consultants with the necessary skills and experience to meet the needs of the Subsidiary;
4. by appointing:
 - 4.1 external auditors for the Group; and
 - 4.2 internal auditors for the Subsidiary following consultation with the Subsidiary;
5. by complying with all reasonable requests of the Regulator in a timely manner;
6. by implementing all its adopted strategic policies;
7. by providing in a timely manner such advice and assistance as the Subsidiary may reasonably require in the preparation of its Business Plan, Budget, financial plans, statements, financial reports and cash flows;
8. by complying in a timely manner with its responsibilities in relation to the approval of the Business Plans and Budgets under clause 7;
9. by respecting confidentiality of all material and negotiations and only disclosing any confidential information pertaining to the Subsidiary to external parties outwith the Group with the prior written agreement of the Subsidiary (except where required to do so by any law or regulation or by any court of competent authority or where reasonably required either for regulatory purposes or in connection with the Group's or the Subsidiary's borrowing or other funding arrangements or with the provision of services to the Subsidiary);
10. by operating in accordance with the Group Standing Orders;
11. by attending liaison meetings with the Subsidiary, if reasonably requested, and providing such relevant information as may be reasonably requested by the

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Subsidiary as to the performance of the Group in relation to strategic policy, performance and financial matters; and

12. by acting reasonably and in good faith at all times in relation to the Subsidiary and not in a way that unfairly benefits other Group Members at the cost of the Subsidiary.

This is Part 2 of the Schedule in three Parts referred to in the foregoing Agreement between Wheatley Housing Group Limited and Wheatley Homes Glasgow Limited

Schedule Part 2

Group responsibilities

Parent:

The Parent is responsible for the following functions:

1. Group strategic direction – including overall culture, general principles and values; Group business planning and budget guidelines, setting and monitoring of performance standards;
2. approval of the Group's overall budgets and capital programmes;
3. regular review of Group governance arrangements with input from the Subsidiary;
4. receipt of reports from the Group Audit Committee;
5. approval of the overall development programme;
6. the approval and review of Group Policies;
7. ensuring effective arrangements for the provision of central and corporate services to the Subsidiary;
8. central and corporate functions as defined and designated by the Parent from time to time;
9. setting the borrowing and financial management framework for the Group
10. ensuring effective arrangements are in place for the procurement of all external services provided to the Group, and to the Subsidiary in accordance with this Agreement, including maintenance of lists of approved contractors and consultants – but with local input as appropriate to the service;
11. new strategic initiatives – where these involve significant use of resources, whether existing or new;
12. monitoring the compliance by the Subsidiary with all regulatory and legal standards and taking the action envisaged by this Agreement in the event of non-compliance;
13. taking all such actions as it may consider appropriate to encourage, ensure and promote the financial and business viability of the Subsidiary and that all regulatory requirements affecting the Group are complied with and that the Group's overall reputation and good standing is fully protected at all times; and
14. strategic stakeholder management and relationships for the Group save to the

extent that same are the express responsibility of the Subsidiary in terms of this Agreement.

Subsidiary:

The Subsidiary is responsible for the following functions:

1. carrying out all acts necessary or desirable to ensure its business is carried out in accordance with the Subsidiary's Constitution and any other requirements of the Regulator or any other appropriate Competent Authority, and that its overall business objectives are furthered in the manner the Subsidiary Board considers most appropriate, subject only to the provisions of this Agreement;
2. running all operational, management and day to day aspects of its business, including the setting of the operational framework within the context of the Business Plan and Group Policies;
3. definition of its service standards for service level agreements;
4. reporting to the Parent Board as required by the Agreement;
5. client function in relation to central and corporate services, as defined and designated by the Parent;
6. generation of new operational initiatives and local strategic initiatives within the communities specifically served by the Subsidiary (as opposed to any other Group Member), in line with, and within the parameters of, Group Strategy;
7. ensuring that the Subsidiary's business is operated in accordance with the strategic objectives, of the Group from time to time;
8. taking action on internal and external audit findings;
9. maintaining good relationships with any external parties, including, without limitation, local authorities, health authorities and other statutory agencies;
10. monitoring key performance indicators and reporting to the Parent;
11. the ongoing management of customer relationships with the Subsidiary's service users; and
12. contributing to the formulation of Group Strategy and implementing same at a local level within the communities in which the Subsidiary operates;

This is Part 3 of the Schedule in three Parts referred to in the foregoing Agreement between Wheatley Housing Group Limited and Wheatley Homes Glasgow Limited

Schedule Part 3

Form of service agreement

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Report

To: Wheatley Housing Group Board

By: Anthony Allison, Group Director of Governance and Business Solutions

Approved by: Steven Henderson, Group Chief Executive

Subject: Equality, Diversity and Inclusion Update

Date of Meeting: 25 September 2024

1. Purpose

1.1 The purpose of this report is to provide an update on the implementation of our updated Equality, Diversity and Inclusion (EDI) Action Plan, *One Group Many Voices*, (“Action Plan”) and present the Group Annual Equalities Report for 2023/24.

2. Authorising and strategic context

2.1 Our Group strategy sets out our desire to increasingly tailor services across the Group to suit the needs of our customers, diversify our Customer Voices and consider how our workforce will more closely reflect our communities.

2.2 Under the Group Standing Orders and their Terms of Reference, the Wheatley Solutions Board supports us in implementing our EDI approach including by agreeing and monitoring our Action Plan and monitoring progress quarterly. Our Board receives regular updates on the work undertaken, at least annually.

3. Background

3.1 The Wheatley Solutions Board approved the updated Action Plan on 12 February 2024. We received an update on this at our Board meeting in April 2024.

3.2 This report provides an update on our progress against our Action Plan. In addition to this, we introduced an Annual Equalities Report last year. The Annual Equalities Report captures key elements of our EDI activity over the year and is published on our website.

4. Discussion

4.1 Our Action Plan focuses on three outcomes. A summary of the progress under these outcomes is detailed below.

Outcome 1: Different Together with you

- 4.2 Through this outcome we seek to enhance our *Different Together* approach to have an **increased customer and community focus**. A key action to enable this was to introduce a customer-focused staff network (“network”), feeding into our Different Together Community of Excellence (CoE), to identify opportunities and help drive actions to improve access to our services, particularly cognisant of accessibility and vulnerabilities. The network launched in April and includes over 20 representatives from our customer-facing teams.
- 4.3 Since its launch, the network has informed improvements to enhance access to our services for customers whose first language is not English. This has included:
- Developing a **translated pack** for customers including key information about accessing services. This is available in our top 5 languages on our websites and can be issued upon signup or where language need is identified e.g. by the Customer First Centre;
 - Expanding information designed specifically for this customer group such as launching **translated condensation, dampness and mould leaflets** and our **New Scots welcome pack**;
 - **Refreshing our translation/ interpretation services** DA Languages (“DAL”) now appointed. DAL currently manages the DWP contract and has extensive experience with a diverse range of customers through work with the NHS and Local Authorities;
 - Re-launching **staff guidance, video tutorials and holding online staff training sessions** for accessing DAL translation and interpretation services, and requesting alternative formats, with tips on how to ensure an efficient service for both staff and customer;
 - **Happy to Translate** external review of our translation and interpretation service to highlight our areas of good practice and recommendations for improvement.



- 4.4 Our customer-focused staff network has also fed directly into the **Personalised Services** Group strategic project, with their experiences shaping the draft strategy around what data we will collect, how we will collect it (including security and data protection implications) and how we will use it to deliver a tailored service. As part of this strategic project, we have also undertaken Customer Voice focus groups involving our Registered Social Landlord (RSL) customers with protected characteristics and experience of circumstances that may be a barrier to accessing our services.
- 4.5 In discussing personalised services, the customer-focused network identified the **annual tenant conversation** as a key opportunity to affirm/capture customer needs. We have recently reviewed and improved the information recorded during this visit for example, by adding in a check should it be identified that a customer may require a mandate/if a mandate is due to expire. A field has also been added to ASTRA (our customer relationship management system) to capture if a translation/interpretation service is required, as previously only the preferred language was captured.
- 4.6 Following the approval of our new Anti-Social Behaviour (ASB) and Neighbourhood Management policies in March, an **effective ASB and Hate Crime** approach continues to be a priority across the Group; for example, we analyse Hate Crime reporting quarterly to identify any trends. In embedding the updated policies, ASB and neighbourhood management have been identified as key areas included in the customer journey mapping project which is underway with the support of an external consultant, Vanguard. This is feeding directly into the Customer Insight Driven Priorities strategic project and outcomes from the mapping will be used to refine our approach and underlying processes.
- 4.7 In advancing our **New Scots** approach, our New Scots Welcome Pack and 'journey of a refugee' e-learning have been promoted with staff through an internal communication campaign. The training aims to help staff build an understanding of the challenges refugees face, as well as our role as a housing provider in supporting them settle into our communities. The Welcome Pack, which is provided to New Scot customers on sign-up, is also now embedded on our website meaning it can be translated into any language. We also continue to engage with Shelter's Race Network, which was set up to improve ethnic minority access to the social housing sector – we are due to host the next network meeting in November.
- 4.8 Ensuring our **Different Together approach is threaded through our customer engagement** continues to be a focus. As well as the recent engagement to inform our personalised services approach, our Stronger Voices team works to involve underrepresented groups for example, recognising a lower number of young people are registered in our Customer Voice programme, in quarter one, our Stronger Voices Officers (SVOs) in the South of Glasgow ran 'Art and graffiti' sessions aimed at those aged 16-23. Our SVOs in Dumfries have also been supporting a Young Persons project, whilst in the East, SVOs have worked with our local gardeners to develop a local community garden project in Wester Suttieslea.

- 4.9 In terms of **EDI-friendly communications**, we know that mandates are an important tool for helping customers access our services, particularly those who need extra support to do so. A recommendation from our Group Scrutiny Panel repairs communication thematic review was to refine our mandate process as often customers were not clear on this. We have therefore made the following enhancements:
- **Completed a design review and updated** the mandate templates to ensure that these are accessible, user-friendly and clearly detail what a mandate covers and the process for requesting one;
 - **Improved the process** so that customers can complete a hard copy of the mandate and post/hand this in or complete it electronically and email it;
 - **Added information to our websites** showing what a mandate can be used for, the process for this, and when a Power of Attorney is needed;
 - **Developed staff guidance** so staff are clear on the updated mandate process, including how to generate a report every six months to inform customers if a mandate has expired;
 - **Through internal communications, raised staff awareness** of the improvements and link to our Group EDI approach; added the updated templates, letters and guidance to 'Ways to help your customer' on WE Connect; and
 - **Updated ASTRA** with these templates, added a new service request to help staff process mandates and created a knowledge guide for Customer First Centre advisors.
- 4.10 **Accessibility** is another key focus for us; we have launched video tutorials for staff on how to use Microsoft tools to adapt their digital working environment to their needs; these functionalities are particularly useful for staff with vision conditions, including colour blindness, and neurodiversity with technology and artificial intelligence (AI) that can support focus and productivity.
- 4.11 We have also launched an Accessibility Guide, designed to support staff in making sure any content they are creating, whether for internal use or engagement with customers, is accessible. This has been promoted internally along with our updated employee Reasonable Adjustment Passport. Both of these documents were reviewed by the Employer's Network for Equality and Inclusion (enei); in terms of the Accessibility Guidance, enei commented '*a broad range of experiences and consideration have been included here*'. We have also reviewed and updated our Home Workers Self-Assessment/Guidance and Desk Evaluation form to enhance the link and better signpost staff to support accessibility-related concerns.

Outcome 2 - Different Together in our Group

- 4.12 This outcome focuses on supporting and strengthening the *Different Together* structures we have put in place with **our people and culture**. During quarter one we launched a **staff EDI survey**; this followed the previous staff EDI data collection in 2022 in which 60% of staff provided information.
- 4.13 This year's survey approach was developed based on feedback from our Different Together Community of Excellence; this included two new questions to help us understand the social mobility of our staff and the impact of the Different Together campaign.

4.14 We used blogs on our staff intranet, WE Connect, to remind staff why it was important to complete the survey and what this data informs. To encourage completion, internal communications included email reminders, TalkTogether, managers' briefings and a staff FAQ document. Our survey is still open; analysis of the data will be included in next year's Annual Equalities Report.

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We're excited to announce the launch of our 2024 equity, diversity, and inclusion staff survey.

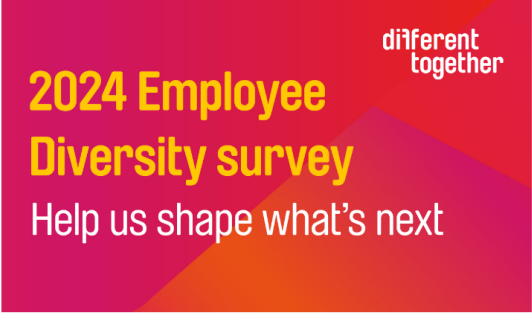
We'll soon be launching our 2024 diversity and inclusion staff survey, part of our Different Together campaign.

This survey is essential in helping everyone feel they belong and have a place at Wheatley. By taking part, you'll help us get a better understanding of the employees who make up our organisation and identify any support needed.

Last year, 60% of staff completed the survey and thanks to your input, we collaborated with our Different Together Community of Excellence (CoE) and six networking groups to enhance engagement and support across the organisation.

Here's how your feedback made a real difference:

- Supporting carers: A total of 41% of colleagues having caring responsibilities, many of whom are parents, as well as colleagues caring for loved ones with disabilities and older adults. We introduced a carers passport and increased paid carers leave to six days. Read more about our carers support [here](#).
- Menopause support: Recognising that many colleagues experience menopausal changes, we launched guidance, regular health workshops, and trained over 136 managers on understanding and supporting menopause at work. Read more about our menopause café [here](#).



This is a vital part of our Different Together campaign, and we need your input to continue making Wheatley a place where everyone feels valued and supported.

'Different Together' helps make sure everyone in our organisation – and in our communities – is represented and has equal access to the resources and services they need.

4.15 Over quarter one, our **Different Together staff networks** have continued to influence improvements in terms of inclusivity for employees with highlights including:

- **Disability and Neurodiversity network** completing a review of the Reasonable Adjustment Passport and developing manager guidance with external experts, Lexxic; this network was also involved in the review of the Accessibility Guide and a Microsoft CoPilot test group, to scope how AI software can support our employees with disabilities including neurodiversity;
- **LGBT+ network** promoted Pride-related events and queer recommendations during June/July, to encourage knowledge raising on LGBTQ+ history and culture. The network led on representing us at this year's Pride marches (see below), which were also an opportunity for us to promote ourselves as an inclusive employer of choice; and
- **Menopause and perimenopause network** continues to hold cafes and their distribution list has grown (now 50+ colleagues); recently the network has focused on nutrition.

4.16 We have also received our **Talent, Inclusion, Diversity and Equality (TIDE) results** following our annual self-assessment submission to enei. Results show **overall improvement to 81%** from 72% last year, with improvements in *Procurement*; *Your Workforce*; and *Recruitment and Attraction* (both now at 'Sustain' level, from 'Embed' in 2023); *Strategy* has retained 'Sustain' level. This again highlights the ongoing improvements we have made in terms of EDI and provides a tangible measure of success. Following a benchmarking exercise, enei has confirmed we have retained our 'Silver' accreditation and ranked 33 out of 185 organisations (and first out of seven in our sector).

Outcome 3 - Evolving our data

- 4.17 Our final outcome focuses on **data**; particularly to develop the EDI data monitoring structures we have set and evolve these further, taking a whole journey approach.
- 4.18 We continue to analyse access to our Wheatley Foundation employability programmes and support services, including welfare benefits and fuel advice, quarterly. We also analyse our prospective customers' demographics for those who apply for a home with us through MyHousing. Our **Annual Equalities Report**, attached at Appendix 1, sets out the EDI data we have collected over 2023/24 and what this has informed. It also provides a comparison against the previous year's report and available Scottish 2022 census data to provide a relevant benchmark.
- 4.19 The Annual Equalities Report has been considered by the Wheatley Solutions Board, following review by our Different Together Community of Excellence and Business in the Community (bitc). Publishing this information publicly not only signals our commitment to EDI, but is now an important tool for us, and other stakeholders, to track our progress.
- 4.20 Although we and our RSL partners have a regulatory requirement to collect, analyse and utilise EDI data, the Group has also progressed with the expansion of **EDI data analysis for Wheatley Care and Lowther**. MyHousing for Lowther will launch at the end of quarter two. Going forward, analysis of their letting customer profile will take place alongside our current MyHousing quarterly EDI data analysis. Wheatley Care is piloting an EDI monitoring approach through their Residata system provider this month.

5. Customer Engagement

- 5.1 'Enhancing our Stronger Voices approach through Different Together' is a section within the Action Plan, under Outcome 1. Customer engagement is a key part of embedding our EDI approach, for example, engaging with groups of different characteristics to inform policy development and Equality Impact Assessments. Recently this has included the development of our Group Personalised Services strategy.
- 5.2 The collection of equality data required extensive customer engagement as we were required to ask all waiting list applicants, new tenants and existing tenants for protected characteristic data. Our Annual Equalities Report details how this data is used. Our next customer EDI survey is scheduled for 2025. As detailed in the Action Plan, we will co-create our approach towards this with customers taking into consideration vulnerabilities and additional support needs.

6. Environmental and sustainability implications

- 6.1 There are no direct environmental or sustainability implications arising from this report. Diversifying our engagement structures will support our Group Sustainability Framework implementation by engaging customers with our sustainability priorities, ensuring different perspectives are involved.

7. Digital transformation alignment

- 7.1 We have developed digital platforms to allow for easier analysis of our customer equality data. Evolving our data and improving access to our services through a digital approach are areas of focus within the updated Action Plan.

8. Financial and value for money implications

- 8.1 There are no financial implications associated with this report.

9. Legal, regulatory and charitable implications

- 9.1 Our Group EDI and Human Rights Policy, and the Action Plan to support us in delivering this, provide us with a clear basis for evidencing our compliance with our legal and regulatory obligations.

10. Risk Appetite and assessment

- 10.1 Our agreed risk appetite for the legal and regulatory compliance of our 'W.E. Think' strategic outcome is "cautious" as although '*Wheatley staff are trusted advisors, it is essential that mitigations are in place to help keep customers safe*' In terms of EDI, our mitigation is to engage independent external advice as part of evolving our approach to demonstrate and evidence how we meet our equalities regulatory obligations
- 10.2 For our reputation linked to W.E Think, our risk appetite is "open" as '*the results of our track record of achievements and strength of our engagement model will enable us to effectively represent the views of our huge customer base.*' Taking EDI into account here is vital and the continued development of our data monitoring will enable us to track progress.

11. Equalities implications

- 11.1 This report details our progress in delivering the Action Plan, *One Group, Many Voices*. These actions support us to assess equalities implications in our decision-making.

12. Key issues and conclusions

- 12.1 As a Group we are strongly committed to EDI. In progressing with the Action Plan, there has been a particular focus on identifying and supporting actions to improve inclusivity and accessibility for customers. This has included the launch of the customer-focussed network and enhancing materials available to staff to support customers, and for customers themselves, whose first language is not English. Our focus on equity and social mobility, and continued EDI data analysis, is detailed in our 2023/24 Annual Equalities Report.

13. Recommendations

- 13.1 The Board is asked to note the progress of the Action Plan as detailed in this report and provide feedback on the Group 2023/24 Annual Equalities Report in Appendix 1.

LIST OF APPENDICES:

Appendix 1: [Group Annual Equalities Report 2023/24](#) available [here](#)