

## Wheatley Homes South

**Board meeting held on:** 26 March 2025

### Action List

Meeting date	Action	Owner	Due	Status
20/11/2024	Ensure the sustainability section in reports is fully addressed	Alex Lamb/Eilidh Mowat	Ongoing	Ongoing review
5/02/2025	Wheatley Care update to be brought to May Board	Alex Lamb	May Board	Complete – on this Agenda.
05/02/2025	Development programme – customer engagement post handover- how do we take account of customer feedback	Lindsay Lauder	Mid-year development update	update to be provided at Board meeting with full update in the development update due to the September Board.
26/03/25	Confirm if there are any of our properties with a private water supply	Stephen Devine	May 2025	Complete - None of our properties have a private water supply
26/03/25	Confirm which of our compliance works which are legislative requirements	Stephen Devine	May 2025	Complete – verbal update to be provided at meeting

The Board acknowledged that we had enhanced our engagement activities with affected customers. Given the progress made by energy companies to date, the Board requested that this situation be kept under scrutiny and asked for a further update at the next meeting.

**Decided: The Board noted the update.**

**12. Group Procurement- annual strategy and policy updates**

The Board were provided with an update on the revised Group Procurement policy and an update on the changes made as part of the annual review of the Group Procurement Strategy 2025.

The Board discussed our risk mitigations in respect of modern slavery within our supply chain and the steps we take to ensure our contractor compliance. The Board noted our right to audit sub-contractors and the contract management system's annual survey and data collection.

**Decided: The Board noted the revised Group Procurement policy.**

**12. AOCB**

No other items of business were raised.

**Signed:.....(Chair)**

## Report

**To:** Wheatley Homes South Board

**Report by:** Alex Lamb, Managing Director

**Approved by:** Pauline Turnock, Group Director of Finance

**Subject:** 2024/25 year-end performance and Annual Return on the Charter

**Date of Meeting:** 21 May 2025

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### 1. Purpose

- 1.1 This report presents year-end performance for 2024/25, including:
- Draft Annual Return on Charter results and seeks approval for submission to the Scottish Housing Regulator (“**SHR**”);
  - Non-Charter strategic results and performance measures; and
  - Delivery Plan strategic projects.

### 2. Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for monitoring performance against agreed targets. We measure progress with the implementation of our five-year strategy via the Group Performance Management Framework (“**PMF**”). The figures reported for the Charter are subject to further validation and checks, including by the SHR.
- 2.2 The Group Board agreed to an updated programme of strategic projects and performance measures and targets at its meeting in April 2024. Our Board subsequently agreed its specific performance measures and targets at its meeting on 29 May 2024.

### 3. Background

- 3.1 We are responsible for meeting the standards and outcomes set out in the Scottish Social Housing Charter and are accountable to our tenants and customers for how well we do so. The Charter is part of the SHR’s assessment of how these outcomes are being met. All Registered Social Landlords (“**RSLs**”) and Local Authority housing services are required to complete the Charter indicators and submit these by 31 May each year. The SHR publishes results for all organisations at the end of August each year.

3.2 The SHR uses the Charter results to focus attention on important risks and key aspects of landlord performance. The outcomes apply to all social landlords, with the exception of those relating to Local Authorities for their homeless duties and to councils and registered social landlords that manage sites for Gypsies / Travellers.

3.3 There are 32 Charter measures, of which 7 have been collected and updated for our 2023/24 submissions through comprehensive customer satisfaction surveys (6 tenant indicators and 1 factored owner indicator).

4. Discussion

4.1 This report outlines our performance against targets and strategic projects for 2024/25. Unless stated, measures are reported for the year. Draft Annual Charter return measures will firstly be discussed, followed by progress against other Board measures shown by strategic theme. Thereafter, an update will be provided on the year end position with strategic projects.

Charter Returns

4.2 This section presents a summary of key draft Charter measures, highlighting where they are also a strategic result. A full set of draft Charter results against targets is provided in Appendix 1.

Tenant Satisfaction

- 4.3 2024/25 we surveyed our customers on their satisfaction with us and they had returned very high satisfaction levels in specific areas including:
- 95% of tenants surveyed said they were satisfied with the overall service from us;
  - 98% we were good at keeping them informed about services and decisions;
  - 100% were satisfied with the opportunities we provide to them to participate in our decision making processes;
  - 93% were satisfied with the quality of their home;
  - 97% were satisfied with repairs or maintenance carried out in the last 2 months;
  - 94% were satisfied with our contribution to the management of neighbourhoods; and
  - 97% feel that the rent for their property represents good value for money.

Gross Rent Arrears

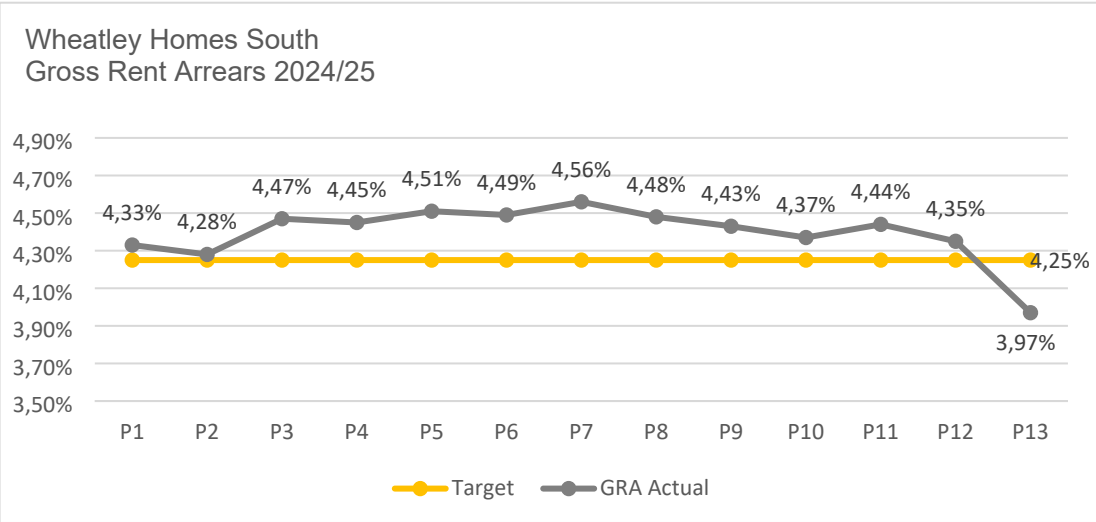
4.4 Our gross rent arrears for 2024/25 at the year-end was 3.97%, better than our 4.25% target and an improvement on 4.33% from last year. We continue to outperform the most recent Scottish average benchmark available of 6.7%, as published by the SHR for 2023/24.

Table 1

Gross Rent Arrears (Charter)	2024/25 Results	2024/25 target	2023/24 Result
WH South	3.97%	4.25%	4.33%

4.5 The following chart shows the trend in our gross rent arrears against target throughout the year, where there has been a strong downward trend since period 7.

Chart 1



Turnover

4.6 Our percentage of lettable homes that became vacant – known as turnover – was 8.51%, an increase from 7.92% in 2023/24, and did not meet the 8% target for 2024/25. The Scottish average published by the SHR in 2023/24 was 7.20%. During the 2024/25 period, a total of 105 new build properties were handed over, which significantly contributed to increased mobility within our existing housing stock. Over 35% of these new build properties were allocated to transferring customers. At Curries Yard, 58 new lets were completed, of which 21 were to transfer customers. The Springholm development saw 47 new lets, with 16 being internal transfers. This level of internal movement, driven by our customers’ evolving housing needs, played a key role in the overall increase in turnover throughout the year.

Average Days to Re-Let

4.7 Our average days to re-let properties for 2024/25 was 8.31 days, well within the 16-day target and an improvement on the 11.01 days average from last year. We were also the best performing in the Group for this indicator. This is set within the context of the SHR publishing a sector average of 56.7 days for 2024/25.

Table 2



Average days to re-let (Charter)	2024/25	Target	2023/24
WH South	8.31	16	11.01

4.8 It should be noted that our performance in 2024/25 takes into account days lost to health and safety related meter issues where we consider the property unsafe/unfit to occupy. Without these days amended, our average days to re-let increases to 9.48 days which still remains well within target.

## Tenancy Sustainment

- 4.9 We ended this year above our 90% target at 90.81% for the Charter measure, this is the first time during the strategy we exceeded the Group target. Our revised tenancy sustainment result (excluding deaths and transfers to another home within the Group) was 93.01%, an improvement on 89.45% from last year.
- 4.10 As defined by the SHR, Charter tenancy sustainment relates to new lets made in the previous year and requires these lets to be sustained for more than one year.



*Table 3*

RSL Tenancy Sustainment	Charter 2024/25	Target	Charter 2023/24	Revised 2024/25	Target	Revised 2023/24
WH South	90.81%	90%	 86.10%	93.01%	91%	 89.45%

## Repairs


- 4.11 The average time taken to complete emergency and non-emergency repairs for the full year is detailed in the table below. The average length of time taken to complete emergency repairs is within the target time of three hours at 2.65 hours, an improvement from 2.70 hours last year. We are the only RSL in the Group to meet this target in 2024/25.

*Table 4*

Average time to complete repairs (Charter)	Emergency (hours)		Non-emergency (days)	
	Target	2024/25	Target	2024/25
WH South	3.00	2.65 	7.5	8.87 


- 4.12 Our average time to complete non-emergency repairs is out-with target, at 8.87 days, and is an increase on last year when 8.58 days. Performance was adversely impacted from December 2024 due to three major storms in the area. We have a plan in place to manage the reduction of the spike in jobs associated with these storms including utilising local sub-contractors to assist with the resolution to many of these external asset works.
- 4.13 Post storms, larger external jobs that require an inspection, hindered our first time fix performance, falling slightly below the 90% target at 89.49%. This, however, is an improvement compared to 87.71% last year. An upcoming planned review of van stocks should also improve our first time fix.

*Table 5*

Percentage of repairs completed right first time (Charter)	2023/24	2024/25	Target	
WH South	87.71%	89.49%	90%	

- 4.14 In terms of satisfaction with repairs, we have exceeded our 90% target at 96.93% satisfaction over the year. This is an improvement from 89.17% last year and is based on 163 completed surveys.

*Table 6*

Satisfaction with repairs (Charter)	2023/24	2024/25	Target
WH South	89.17%	96.93%	90% 

## Gas Safety

- 4.15 We continue to be in a 100% compliant position for gas safety, with 0 expired gas certificates.

## Scottish Housing Quality Standard (“SHQS”)

- 4.16 Our Charter 2024/25 results for SHQS and Energy Efficiency Standard for Social Housing (“EESH”) are shown in the table below, alongside figures for the previous year. They reflect the most recent guidance from the SHR in relation to electrical testing. The compliance levels reflect the number of exemptions and abeyances shown in the subsequent table, Table 8.

*Table 7*

RSL	% of properties meeting the SHQS		% of properties meeting the EESH	
	2023/24	2024/25	2023/24	2024/25
WH South	87.79%	88.47%	91.36%	91.79%

- 4.17 Properties which do not meet SHQS and/or EESH can be either because they fail the criteria or are subject to exemption or abeyance. We have 0 SHQS or EESH failures in 2024/25. Exemptions and Abeyances for SHQS and EESH are detailed in the table below:

*Table 8*


RSL	SHQS Exemption 2024/25	SHQS Abeyance 2024/25	% of total stock with SHQS Exemption or Abeyance 2024/25	EESH Exemption 2024/25	% of total stock with EESH Exemption 2024/25
WH South	860	319	13.03%	840	8.21%

- 4.18 Of the 319 properties in Abeyance, 310 properties are where we have been unable to complete controlled entry works due to non-participation of owners. In addition, we have one property where we have been unable to gain access, following multiple visits, to carry out electrical fixed installation testing and one property with structural issues and non-participation of an owner.

## Medical Adaptations

- 4.19 During 2024/25, we have completed 366 adaptations, less than the 529 that we completed in 2023/24. This is due to a reduction in grant funding for the adaptations. Average days have increased significantly from 24.57 last year to 55.19. The table below shows the number of households waiting, completions and the average time to complete adaptations:

*Table 9*

Medical Adaptations	Households Waiting 2023/24	Households Waiting 2024/25	Number Completed	Average Days to Complete	Target
WH South	0	1	366	55.19	25 

To ensure our target of 25 days in 2025/26 we are adhering to strict turnaround times for decision making of adaptations in homes. This has also been profiled across the reporting periods throughout the year and will be scrutinised at leadership performance meetings that take place on a 4 weekly basis.

## Summary Charter Performance

- 4.20 Within the context of a challenging, ever evolving environment we have achieved 17 of 24 targeted measures (71%), a breakdown is provided in Appendix 1.

### Other Key Performance Measures

- 4.21 The following section presents draft year-end performance against non-Charter strategic and compliance measures by strategic theme. The dashboard for Board level measures is shown at Appendix 2.



## **Delivering Exceptional Customer Experience**

### Customer First Centre (“CFC”)

- 4.22 2024/25 results are presented in the table below and show the CFC met two of its four key targeted measures for 2024/25:

*Table 10*

Measure	2023/24	2024/25		Status
	Value	Value	Target	
WHS - CFC CSAT Score (customer satisfaction)	4.5/5	4.6/5	4.5/5	
Group - % of contacts to CFC resolved within CFC	NEW	89.79%	93%	
WH South - Call abandonment rate	5.89%	5.49%	5%	
WH South - Call abandonment rate - those waited over 30secs and abandoned	NEW	3.29%	4%	

- 4.23 CSAT is a relatively new measure in terms of the strategy and has improved since its introduction in 2023. Customer satisfaction with the CFC (known as “**CFC CSAT**”) remains the CFC’s key measure, ensuring we place our customers’ voices at the heart of performance management. Our overall CFC CSAT score is 4.6 at the end of 2024/25, an improvement on the score of 4.5/5 for 2023/24.
- 4.24 The CFC aim is to provide quality solutions for our customers, negating the need for them to call again or for enquiries to have to be dealt with elsewhere. We are mindful that a balance has to be struck between our ability to provide a first contact resolution through an appropriate length of call and the time customers are waiting for their call to be answered.
- 4.25 Overall, the call abandonment rate for our customers at 5.49% is not meeting the 5% target this year. However, performance has improved since 2023/24 when it was 5.89%. The call abandonment rate after 30 seconds, whereby our customers waited over 30 seconds and then abandoned their call better represents the aspect of the service that may be in the CFC’s control. This improved to 3.29% by the year-end and exceeded the 4% target.







- 4.26 The percentage of contacts to the CFC resolved within the CFC, without the need to be passed to either Housing Teams or MyRepairs Teams was 89.79% at the year-end 2024/25, an improvement from 89.61% YTD in quarter three.

### Complaints Handling

- 4.27 Our complaints handling timescale performance has remained steady over 2024/25 as shown in the table below. Our Stage 1 complaints are responded to in less than 4 days on average while Stage 2 complaints are responded to in just under 13 days on average.

**Table 11**

Charter - average time for a full response to complaints (working days)				
Subsidiary	2023/24		2024/25 – Stage 1 - 5-day target, Stage 2 – 20-day target	
	Stage 1	Stage 2	Stage 1	Stage 2
WH South	3.48 	12.60 	3.47 	12.81 

- 4.28 Our full complaints Charter measures are included in Appendix 3.
- 4.29 In addition to the Charter measures, we also report SPSO measures. The key complaints performance measures to the end of 2024/25 for SPSO are summarised below, with Stage 1 complaints improving since last year and Stage 2 and escalated complaints remaining at 100%. Further detail on SPSO measures is included in Appendix 3, alongside a Charter complaints summary.

**Table 12**

SPSO Indicator 2 - number and % of complaints at each stage that were fully closed within timescales of 5 and 20 working days			
Subsidiary	Stage 1 - responded to within 5 working days	Stage 2 - responded to within 20 working days	Escalated complaints - responded to within 20 working days
WH South	95.92%	100.00%	100.00%

- 4.30 We have seen an improvement in complaint handling over 2024/25 for both Charter and SPSO measures. We have seen a reduction in the number of complaints received this year with strong performance in complaint handling – across both Charter and SPSO measures.
- 4.31 Repairs, as our highest volume service, continues to result in the most complaints (39%). In 2024/25 we carried out well over 39,000 reactive repairs, however complaints amount to only 1.34% of the volume of repairs. We continue to improve our repairs service and our investment planning. Complaints analysis is informing this wider customer insight driven approach to service delivery.

#### Allocations CSAT

- 4.32 Our Allocations MyVoice survey was introduced in August 2023, this measures our customers' satisfaction with the process of getting their new home. Satisfaction remains at 4.6/5 for year-end 2024/25 ahead of the 4.5 target.

Allocations CSAT	2024/25 – Rolling year	2024/25 Target
WHS	4.6	4.5



## Making the Most of Our Homes and Assets

### New Build Programme

- 4.33 We completed 101 social handovers within the financial year against a business plan target of 101. This included the successful handovers at Curries Yard and Ewart Place.

*Table 13*

Sites	Handovers 24/25	Target 24/25	Diff.
<b>WHS</b>	<b>101</b>	<b>101</b>	<b>0</b>
Curries Yard	54	54	0
Ewart Place	47	47	0

- 4.34 Following Board approval in January 2025, the development at College Mains in Dumfries, commenced in March 2025. The land at Leswalt was acquired in March 2025 and the building contract is now being collated with a target site start in May 2025. Site start at Ashwood Drive is anticipated in April 2025 (achieved).

### Investment in Improvement, Modernising and Maintaining Homes

- 4.35 This year we have completed a total of 509 investment projects including 65 new kitchens, 56 new bathrooms, 168 windows and doors, and 101 heating systems, 94 of which were air source heat pumps. In addition, communal painting, environmental works and wall replacements account for the balance of investment projects completed in the year.

### Volume of Emergency Repairs

- 4.36 The table below shows our position against the strategic result to reduce the volume of emergency repairs by 10% by 2026, with a target of 3.34% in 2024/25. We are meeting this target with a reduction of 7.18% less emergency repairs than last year.

*Table 14*

Area	Completed Emergency Repairs		
	2023/24	2024/25	Variance to 2023/24
WH South	13,015	12,080	-7.18%

### Rate It

- 4.37 'Book It, Track It, Rate It' aims to improve visibility and communication during the repair journey. The Rate It element was launched in November providing an opportunity for customer feedback on repair appointments.
- 4.38 Following the launch, the Rate It score is 4.7/5 (from 6,623 responses, representing 16.84% of the feedback links generated to all customers with contact information).

### Responsive repairs: Mould

- 4.39 On the 14 January 2025, the SHR included three new indicators in the Charter for reporting on damp and/or mould, applicable from financial year 2025/26. Work is underway on assessing the data require to compile, calculate and monitor against these new indicators. These results will be included in our ARC submission from May 2026 onwards.
- 4.40 We continue to monitor repairs related to mould, with updates provided to help facilitate greater scrutiny over these types of repairs. The CFC raises every job related to damp, mould, condensation or rot as a mould inspection line.
- 4.41 During 2024/25, to the 31 March 2025 79.39% of mould inspections in our tenants' homes were attended within 2 working days and 97.36% completed within 15 days. In 11.2% of inspections no mould was found. Where mould was present, 80.8% were categorised as mild, 7.9% as moderate (162) and there were no severe cases found.



## **Changing Lives and Communities**

### Peaceful Neighbourhoods

- 4.42 The Group five-year strategic target is that 70% or more of our Group tenancies should be classified as "Peaceful" by 2026. Peaceful communities are defined as communities where customer reported incidents of anti-social behaviour to Police Scotland are reduced.
- 4.43 The proven most effective way to achieve this target is by reducing the incidence of customer reported anti-social behaviour by our customers to Police Scotland.
- 4.44 As the table below shows, the Group achieved the 2023/24 strategic objective of 74.01% of tenancies classified as 'Peaceful', a decrease from 76.16% last year.

*Table 15*

Percentage of Wheatley Group tenancies classified as (year to date average):		2023/24	2024/25	
	Percentage		Number	2024/25 Percentage
<b>Safe</b>		5.98%	3,955	6.46%
<b>Calm</b>		17.83%	11,956	19.53%
<b>Peaceful</b>		76.16%	45,334	74.01%

- 4.45 Overall, the number of Anti-Social Behaviour (“**ASB**”) cases decreased from 927 last year to 796 this year, with 100% resolution.
- 4.46 During 2024/2025 we started the year by embedding the ASB and Neighbourhood Management Policies that were signed off at the end of the previous year. This included activity such as:
- Bespoke training for CFC Advisors to support with differentiation between ASB and Neighbourhood Management, alongside creation of a Neighbourhood Management service request to route the cases to Housing Officers in line with the new approach;
  - Think Yes Together Neighbourhood sessions to bring the policies to staff and discuss our approach towards managing our neighbourhoods. The sessions focussed on application of the policies and the introduction of a triage methodology to help distinguish between what was ASB and what was Neighbourhood Management, to allow effective case routing and improved customer outcomes; and
  - Creation of staff toolkits on both ASB and Neighbourhood Management to help the effectively manage any cases reported.

#### Accidental Dwelling Fires

- 4.50 We have recorded 10 accidental dwelling fires (ADFs) in 2023/24, one less than last year. The profile of the 10 fires during 2024/25 is set out in the table below.

Of the 10 ADFs There were 2 ADFs categorised as significant and 8 minor fires.

*Table 16*

Number of recorded accidental dwelling fires	2024/25			
	Q1	Q2	Q3	Q4
WH South	3	2	4	1

- 4.47 This reduction contributes towards the Group strategic result to reduce RSL accidental dwelling fires by 10% by 2025/26. As of the end of March 2025, 95 accidental dwelling fires have been recorded across the Group RSLs against the upper limit for this year of 195 to be on-track to achieve the strategic result. During the first three years of the strategy period accidental dwelling fires have reduced by 55.8%.

#### Reducing Homelessness

- 4.48 We made 432 lets to homeless applicants in 2024/25. We provided 45.91% of our lets to homeless applicants for the Charter measure, this percentage is the same as relevant lets as no exclusions were applied for us this year.


*Table 17*

RSL	2024/25 Number of lets to homeless applicants (ARC)	% relevant lets made to homeless applicants	2023/24 Number of lets to homeless applicants (ARC)
WHS	432	45.91%	393

### Neighbourhood environmental customer satisfaction (Ad-hoc)

- 4.49 Our NETs MyVoice survey commenced in October 2023 to measure our customers' satisfaction with an ad-hoc service they requested such as bulk uplift, tree work or weeding. Satisfaction for the rolling year is 4.4, ahead of the 4.3 2024/25 target.




**Table 18**

NETs CSAT (Ad-hoc)	2024/25 – Rolling year	2024/25 Target	
WHS	4.4	4.3	

### Jobs and Opportunities

- 4.50 Foundation programmes focus on supporting our customers and those in our communities, accessing jobs, training, and apprenticeship opportunities, support vulnerable children, and alleviate poverty. Overall, we have exceeded the 2024/25 targets for all three foundation measures.
- 4.51 Welfare Benefit Advisors have supported 7,335 customers throughout the year, helping them secure over £20m in Client Financial Gain. Managed migration to Universal Credit has driven higher demand for support, with almost 30% of the CFG secured directly helping to prevent rent arrears.

**Table 19**

Strategic Results	2024/25 Target	Year-end performance 2024/25	
4,000 jobs, training and apprenticeship opportunities delivered for customers and communities	108 – WH South	119 – WH South	
10,000 vulnerable children benefit from targeted Foundation programmes in Wheatley communities	30 – WH South	398 – WH South	
20,000 Wheatley Customers accessing services which help alleviate poverty in Wheatley communities	1200 – WH South	1491 – WH South	





## **Developing our Shared Capability**

### Sickness Absence

- 4.52 We lost 2.94% of working time due to staff sickness absence in the year 2024/25, a reduction on 2023/24 when it was 2.52% but still better than the target of 3%.

**Table 20**

Sickness Rate	Target	2023/24		2024/25	
WH South	3%	2.52%		2.94%	

- 4.53 Minor Illness was the dominant reason for absence accounting for 30.73% of total absence.
- 4.54 Employee Relations introduced daily calls to managers whose staff reported Stress / Anxiety as a reason for sickness absence offering support and guidance, in 2024/2025 there were 405 calls made.
- 4.55 Support for Stress (Non-Work Related) absences cases are provided via our Employee Assistance Provider, PAM Assist, with additional support for more complex cases provided by our pool of specialist counsellors.



## Summary of Strategic Project Delivery

- 4.56 The full list of our strategic projects is attached to this report as Appendix 4. Four projects completed in 2024/25:
- Customer insight driven services;
  - Asset strategy;
  - Develop a data and technology enabled approach to managing and monitoring building compliance; and
  - Improving and evolving our multi-channel customer first centre.
- 4.57 There are two projects which did not conclude within the anticipated milestones.
- **Lochside Regeneration** – This has been carried forward to 2025/26 and new milestones prepared which can be found in the Delivery Plan for 2025/26; and
  - **Defining and agreeing our approach to vulnerability and personalised services** - The first draft of the Reasonable Adjustment Policy concluded and is due to go to the Board in autumn. A number of workstreams are under way and a plan for 25/26 developed.

## 5. Customer Engagement

- 5.1 We have several strategic projects that facilitate opportunity for customer engagement, as do new customer feedback channels such as MyVoice and Book It, Track It, Rate It. This is directly impacting the way we deliver services, the way they can be drawn down by customers and how customers can share their views on these services.

## 6. Environmental and sustainability implications

- 6.1 Our Group sustainability framework includes a refined sustainability performance framework overseen by the Wheatley Solutions Board.

## **7. Digital transformation alignment**

- 7.1 Our strategy is underpinned by digital transformation. The strategic projects for 2025/26 have been developed and prioritised with IT, digital and data interdependencies a key factor.

## **8. Financial and value for money implications**

- 8.1 There are no direct financial implications arising from this report. Any financial requirements related to actions and projects within the report are subject to separate reporting and agreement.

## **9. Legal, regulatory and charitable implications**

- 9.1 The SHR requires an Annual Return on the Charter from each RSL. Key indicators within this return are also included in quarterly performance reporting.
- 9.2 We are also required to involve tenants in the scrutiny of performance, which we do through the Group Scrutiny Panel, and to report to tenants on performance by the end of October each year.

## **10. Risk Appetite and assessment**

- 10.1 This report covers performance across each of our strategic themes and as such there is no single agreed risk appetite. Having a strong performance management culture will in particular support our progression from excellence to outstanding for which we have an open risk appetite in relation to operational delivery with a cautious appetite in relation to compliance with law and regulation.

## **11. Equalities implications**

- 11.1 Project monitoring and evaluations consider equalities information and Equalities Impact Assessments are undertaken at the outset of new programmes to ensure compliance with equality legislation, where applicable.

## **12. Key issues and conclusions**

- 12.1 Despite an ever-evolving landscape, we continue to perform strongly in a wide range of areas, including relative to wider sector benchmarking. This includes areas such as keeping tenants informed, satisfaction with opportunities provided to participate, views that rent represents value for money, emergency repairs timescales, gas safety checks, average days to re-let, time to respond to complaints and gross rent arrears.
- 12.2 Areas we continue to focus on improving include tenancy sustainment, non-emergency repairs timescales, volume of emergency repairs and the percentage of complaints responded to in full at stage 2.

### **13. Recommendations**

13.1 The Board is asked to:

- 1) Approve the draft Annual Return on the Charter results for submission to the Scottish Housing Regulator;
- 2) Delegate authority to the Group Managing Director of RSLs, or in their absence another member of the Group Executive Team, to make any non-material updates to finalise the results before submission; and
- 3) Note the outturn year-end performance against non-Charter measures and strategic projects.

#### **LIST OF APPENDICES:**

Appendix 1: Draft Annual Return on the Charter 2024/25

Appendix 2: Board Measures Dashboard 2024/25

Appendix 3: Complaints, ARC and SPSO measures 2024/25

Appendix 4: Strategic Projects Dashboard 2024/25



	Appendix 1	Wheatley Homes South			SHR Scottish Average
	Charter Indicators	2023/24 Results	Draft 2024/25 Results	2024/25 Target	2023/24
01	Percentage of annual tenants satisfied with the overall service	87,84 %	94,74 %	>90%	86,50 %
02	Percentage of annual tenants who feel their landlord is good at keeping them informed about their services and decisions	96,49 %	98,42 %	90 %	90,50 %
03a	Percentage of complaints responded to in full at Stage 1	96,57 %	96,88 %	95 %	96,70 %
03b	Percentage of complaints responded to in full at Stage 2	96,30 %	89,33 %	100 %	90,70 %
04a	Average time in working days for a full response at Stage 1	3,48	3,47	5	5,10
04b	Average time in working days for a full response at Stage 2	12,60	12,81	20	17,50
05	Percentage of annual tenants satisfied with the opportunities given to them to participate in their landlord's decision making processes	97,30 %	99,74 %	90 %	87,70 %
06	Percentage of stock meeting the Scottish Housing Quality Standard (SHQS)	87,79 %	88,47 %	89,29 %	84,40 %
07	Percentage of annual existing tenants satisfied with the quality of their home	88,65 %	93,16 %	>90%	84,00 %
08	Average time to complete emergency repairs (hours)	2,70	2,65	3	4,00
09	Average time to complete non-emergency repairs (working days)	8,58	8,87	7,5	9,00
10	Percentage of reactive repairs completed right first time	87,71 %	89,49 %	90 %	88,40 %
11	Number of times in the reporting year that you did not meet your statutory obligation to complete a gas safety check within 12 months of a gas appliance being fitted or its last check.	0	0	0	N/A

12	Percentage of tenants satisfied with repairs or maintenance carried out in last 12 months	<b>89,17 %</b>	<b>96,93 %</b>	<b>90 %</b>	<b>87,30 %</b>
13	Percentage of annual tenants satisfied with the landlord's contribution to the management of the neighbourhood they live in	<b>94,86 %</b>	<b>94,47 %</b>	<b>90 %</b>	<b>84,70 %</b>
14	Percentage of tenancy offers refused during the year	<b>16,37 %</b>	<b>30,43 %</b>	<b>Contextual</b>	<b>30,50 %</b>
15	Percentage of anti-social behaviour cases reported in the last year which were resolved	<b>100 %</b>	<b>100 %</b>	<b>100 %</b>	<b>94,30 %</b>
16	Percentage of new tenancies sustained for more than a year - overall	<b>86,10 %</b>	<b>90,81 %</b>	<b>90 %</b>	<b>91,20 %</b>
17	Percentage of lettable houses that became vacant	<b>7,92 %</b>	<b>8,51 %</b>	<b>8 %</b>	<b>7,20 %</b>
18	Percentage of rent due lost through properties being empty	<b>0,20 %</b>	<b>0,25 %</b>	<b>0,6%</b>	<b>1,40 %</b>
19	Number of households currently waiting for adaptations to their home	<b>0</b>	<b>1</b>	<b>Contextual</b>	<b>N/A</b>
20	Total cost of adaptations completed in the year by source of funding (£)	<b>£944 887</b>	<b>£669 000</b>	<b>Contextual</b>	<b>N/A</b>
21	Average time to complete approved applications for medical adaptations (calendar days)	<b>24,57</b>	<b>55,19</b>	<b>25</b>	<b>44,80</b>
22	Percentage of court actions initiated which resulted in eviction - overall	<b>42,86 %</b>	<b>41,98 %</b>	<b>Contextual</b>	<b>26,50 %</b>
23a	Percentage of referrals under Section 5, and other referrals for homeless households made by the local authority, that resulted in an offer	<b>81,44 %</b>	<b>45,78 %</b>	<b>Contextual</b>	<b>37,10 %</b>
23b	Percentage of offers made to LA Section 5 and other referrals for homeless households that result in a let	<b>66,23 %</b>	<b>115,99 %</b>	<b>Contextual</b>	<b>80,50 %</b>
25	Percentage of annual tenants who feel that the rent for their property represents good value for money	<b>95,14 %</b>	<b>97,11 %</b>	<b>85 %</b>	<b>81,60 %</b>
26	Rent collected as % of total rent due	<b>99,53 %</b>	<b>99,82 %</b>	<b>Contextual</b>	<b>99,40 %</b>
27	Gross rent arrears (%)	<b>4,33 %</b>	<b>3,97 %</b>	<b>4,25 %</b>	<b>6,70 %</b>
28	Average annual management fee per factored property.	<b>£116,48</b>	<b>£124,63</b>	<b>Contextual</b>	<b>£115,12</b>
29	Percentage of annual owners satisfied with the factoring service	<b>24,63 %</b>	<b>24,63 %</b>	<b>60 %</b>	<b>59,50 %</b>

30	Average length of time taken to re-let properties (calendar days)	11,01	8,31	16,00	56,70
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Appendix 2 - WHS Board - Delivery Plan 24/25 - Strategic Measures

1. Delivering Exceptional Customer Experience

	2023/24	YTD 2024/25		
Measure	2023	2024		
	Value	Value	Target	Status
% Annual Tenant Visits		81.69%	70%	✔
% new tenancies sustained for more than a year - overall	86.1%	90.81%	90%	✔
% new tenancies sustained for more than a year - homeless	84.35%	89.06%	Contextual	
% new tenancies sustained for more than a year - revised	89.45%	93.01%	91%	✔
Group - % of contacts to CFC resolved within CFC	NEW	89.79%	93%	⚠
CFC CSAT	4.5	4.6	4.5	✔
Allocations CSAT	4.5	4.6	4.5	✔
Abandonment Rate	5.89%	5.49%	5%	⚠
Call abandonment rate after 30 secs	NEW	3.29%	4%	✔

2. Making the Most of Our Homes and Assets

	2023/24	YTD 2024/25		
Measure	2023	2024		
	Value	Value	Target	Status
Average time taken to complete emergency repairs (hours) – make safe	2.7	2.65	3	✔

	2023/24	YTD 2024/25		
Measure	2023	2024		
	Value	Value	Target	Status
Average time taken to complete non-emergency repairs (working days)	8.58	8.87	7.5	
% reactive repairs completed right first time	87.71%	89.49%	90%	
Number of gas safety checks not met	0	0	0	
% of tenants who have had repairs or maintenance carried out in last 12 months satisfied with the R&M service	89.17%	96.93%	90%	
Average time to complete approved applications for medical adaptations (calendar days)	24.57	55.19	25	
Legionella - percentage of applicable properties with a valid risk assessment in place	100%	43.02%	100%	
Number of electrical installation inspections completed and number due to be completed	100%	88.19%	100%	
Percentage of properties with an EICR certificate up to 5 years old	100%	99.43%	100%	
Number of domestic stair and through floor lifts with a completed annual inspection and test against the number due to be completed	100%	100%	100%	
Number of passenger lifts with a completed six-month inspection and test against the number due to be completed	100%	100%	100%	
New build completions - Social Housing	35	101	101	
Number of RIDDOR	2	3	Contextual	
Number of HSE or LA environmental team interventions	0	0	0	
Number of accidental dwelling fires recorded by Scottish Fire and Rescue	12	11	Contextual	
Number of new employee liability claims received	0	0	Contextual	
Group - Number of open employee liability claims	13	10	Contextual	
Number of FRA - Actions - Mandatory Overdue	NEW	0	0	
Number of days lost due to work related accidents	NEW	112	Contextual	

### 3. Changing Lives and Communities

	2023/24	YTD 2024/25		
Measure	2023	2024		
	Value	Value	Target	Status
% ASB resolved	100%	100%	100%	✓
% Lets Homeless Applicants (ARC)	47.52%	45.91%	Contextual	
% Relevant lets to Homeless Applicants	47.57%	45.91%	Contextual	
Group - Percentage of Community Benefit job and training opportunities arising through the spend associated with new home construction and our investment programme that have been secured by Wheatley customers	45.58%	69.77%	30%	✓
Group - % planned jobs, training places or apprenticeships created which are secured by our customers	72.57%	73.19%	60%	✓
Total number of jobs, training places or apprenticeships created for customers and communities	117	119	108	✓
Number of children and young people benefiting from targeted Foundation programmes in Wheatley Communities	270	398	30	✓
Number of people accessing services which help alleviate poverty in Wheatley Communities	1,514	1,491	1,200	✓
Group - Repeat antisocial behaviour cases in period – number of repeat addresses	952	935	921	⚠
NETS Adhoc CSAT	4.6	4.4	4.3	✓
Group - % of our customers live in neighbourhoods categorised as peaceful	76.16%	75.87%	75%	✓
Group - The percentage of HMOs that have a current fire risk assessment in place	100%	100%	100%	✓
Number of accidental fires in workplace	0	0	0	✓
Group RSLs - Number of accidental dwelling fires (reduce by 10% by 2025/26) (Upper limit 195 for 2024/25)	120	95	195	✓

#### 4. Developing Our Shared Capacity

Measure	2023/24	YTD 2024/25		
	2023	2024		
	Value	Value	Target	Status
WHS (Housing) - % Sickness rate	NEW	2.45%	3%	✓
WHS (Repairs) - % Sickness rate	NEW	3.48%	5%	✓
% Sickness rate	2.52%	2.94%	3%	✓

#### 5. Enabling Our Ambitions

Measure	2023/24	YTD 2024/25		
	2023	2024		
	Value	Value	Target	Status
% lettable houses that became vacant	7.92%	8.41%	8%	⚠
Average time to re-let properties	11.01	8.31	16	✓
Gross rent arrears (all tenants) as a % of rent due	4.33%	3.97%	4.25%	✓
% of payments made within the reporting period which were paid in 30 days or fewer (from the date the business receives a valid invoice)	82.83%	93.91%	96%	⚠
% of contracted expenditure compliant with procurement rules	97.31%	97.89%	99%	⚠

## Appendix 3 – Q4 2024/25 - ARC and SPSO measures





- 1.1 This appendix provides ARC and SPSO measures up to Q4 2024/25.
- 1.2 For Group RSLs, ARC measures include complaints received from all customers who receive a service provided by the Group RSL or on their behalf. This includes factoring services delivered by Lowther Homes on behalf of RSLs.
- 1.3 For Group RSLs, SPSO measures include all complaints relating to the RSL, irrespective of the source of the complaint.

### Charter (ARC) Measures

- 1.4 ARC measures are reported to SHR for each RSLs in the Group. Performance is for all RSL customers, including those factored owners who receive a service from Lowther Homes on behalf of RSLs.
- 1.5 The number of complaints received under the Charter definition are as shown in the table below.

Charter RSLs – complaints received						
* excluding complaints carried over						
	*2023/24			2024/25		
	Stage 1	Stage 2	All	Stage 1	Stage 2	All
WHS	486	77	563	478	75	553

- 1.6 The table below outlines the average time for a full response (working days) for Stage One (“S1”) and Stage Two (“S2”) complaints. All targets are being met for this measure. Performance exceeds the 2023/24 SHR Scottish average of 5.1 days for S1 complaints and the Scottish average of 17.5 days for S2 complaints. Performance is for all RSLs, includes Lowther Factored homeowners who receive a factoring service from Lowther on behalf of the respective RSL.





Charter - average time for a full response to complaints (working days)				
Subsidiary	2023/24 Stage 1 - 5-day target, Stage 2 – 20-day target		2024/25 – Stage 1 - 5-day target, Stage 2 – 20-day target	
	Stage 1	Stage 2	Stage 1	Stage 2
WHS	3.48 	12.60 	3.47 	12.81 

- 1.7 The table below outlines the average time for a full response to complaints (working days) overall, for Stage 1 and Stage 2 combined.

Charter - average time for a full response to complaints (working days)		
Subsidiary	2023/24 – not targeted	2024/25 – not Targeted
WHS	4.75	4.64



- 1.8 The table below displays the annual Charter measure for the percentage of complaints that were responded to in full.

Charter – percentage of complaints responded to in full				
Subsidiary	2023/24 Stage 1 – 96% target, Stage 2 – 100% target		2024/25 – YTD Stage 1 – 96% target, Stage 2 – 100% target	
	Stage 1	Stage 2	Stage 1	Stage 2
WHS	96.57% 	96.30% 	96.88% 	89.33% 

- 1.9 The table below displays the annual Charter measure for the percentage of complaints that were responded to in full.

- 1.10 It is worth noting that the percentage of complaints completed in full considers complaints that were received in March 2025, however not yet due for completion with regards to our targeted timescales, as open and this is the reason this did not meet 100%. These complaints have now been handled within our timescales.

**SPSO Measures**

- 1.11 SPSO measures includes all customers who raise a complaint. We are required to record our performance against the SPSO indicators and report these to the board and senior managers. On request the SPSO can ask that we provide them with details of our complaint handling performance in line with their indicators.

- 1.12 Stages of complaints are defined as:

- *Stage 1 complaints* –first time reports of dissatisfaction with services.
- *Stage 2 complaints* – directly received as Stage 2, i.e. not escalated from Stage 1. This can include cases which are considered a risk to reputation or require investigation due to the number of issues raised that could not have been reasonably resolved at Stage 1 as part of a frontline resolution.
- *Escalated complaints* – complaints that were received into the organisation at Stage 1 and later escalated to Stage 2.

- 1.13 A summary of the year-to date figures for each of the indicators are included below.

**Indicator 1 - total number of complaints received.**

- 1.14 For SPSO complaints, Stage 1 and Stage 2 complaints numbers have reduced, compared to 2023/24. At the end of 2023/24 WHS had received 486 Stage 1 and 4 Stage 2 complaints. In 2024/25 WHS has received 478 Stage 1 (1.65% reduction) and 5 Stage 2 complaints (25% increase).

SPSO Indicator 1 - total number of complaints received 2024/25		
Subsidiary	Stage 1 (this includes escalated complaints as they were first received at Stage 1)	Stage 2 (directly received as Stage 2, i.e. not escalated from Stage 1)
WHS	478	5

**Indicator 2 - number and % of complaints at each stage that were fully closed within timescales of 5 and 20 working days. Full response has been given to customer/resolution has been reached, including those with outstanding actions. Extensions of time to a complaint will be included in the total count and will be considered "late".**

1.15 We are achieving target of 95% for stage 1 and 100% for stage 2 for this year.

SPSO Indicator 2 - number and % of complaints at each stage that were fully closed within timescales of 5 and 20 working days						
Subsidiary	Stage 1 - responded to within 5 working days		Stage 2 - responded to within 20 working days		Escalated complaints - responded to within 20 working days	
	2023/24	2024/25	2023/24	2024/25	2023/24	2024/25
<b>WHS</b>	95.62%	95.92%	100.00%	100.00%	100.00%	100.00%

**Indicator 3 - the average time in working days for a full response to the stage.**



1.16 WHS are achieving target of 5 days for stage 1 and 20 days for stage 2 for this year.




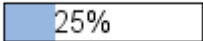
SPSO Indicator 3 - the average time in working days for a full response to the complaints at each stage – 2024/25			
Subsidiary	Stage 1 - responded to within 5 working days	Stage 2 - average time in working days to respond to complaint	Escalated complaints - Average time to respond to complaints after escalation from Stage 1 to Stage 2
WHS	3.47	16.00	12.66





**Indicator 4 - the outcome of complaints as a % of overall complaints.**

SPSO Indicator 4 - the outcome of complaints as a % of overall complaints 2024/25				
Subsidiary	Stage 1 - upheld	Stage 1 - partially upheld	Stage 1 - not upheld	Stage 1 - resolved
WHS	18.88%	12.45%	47.21%	21.46%
	Stage 2 - upheld	Stage 2 - partially upheld	Stage 2 - not upheld	Stage 2 - resolved
WHS	0.00%	66.67%	33.33%	0.00%
	Escalated complaints - upheld	Escalated complaints - partially upheld	Escalated complaints - not upheld	Escalated complaints - resolved
WHS	32.81%	20.31%	46.88%	0.00%

#### Appendix 4 - WHS Board - Delivery Plan 24/25 - Strategic Projects

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
Defining and agreeing our approach to vulnerability and personalised services (b)	31-Mar-2025		<div><div></div></div> 83%	01. Vulnerability strategy and plan developed	30-Jun-2024	Yes	First draft of Reasonable Adjustment Policy concluded and due to go to the Board in autumn. A number of workstreams under way and plan for 25/26 developed.
				02. Customer engagement concluded	31-Aug-2024	Yes	
				03. Board approval of strategy and implementation plan	30-Sep-2024	Yes	
				04. Implementation plan commenced	31-Oct-2024	Yes	
				05. Update to Board on implementation	31-Mar-2025	No	
				06. Review and refine plan phase 2	31-Mar-2025	Yes	
Customer insight driven services (b)	30-Sep-2024		<div><div></div></div> 100%	01. Agree the top 3 priority areas for customer journey mapping based on analysis of customer insight on key satisfaction drivers	31-May-2024	Yes	This project is complete as previously reported
				02. Agree our pulse and thematic survey programme	31-May-2024	Yes	
				03. Undertake customer journey mapping, including through direct engagement with customers	31-Aug-2024	Yes	
				04. Group Executive team agree service, process and technology changes required to improve the customer journey and respond to the pulse survey findings	30-Sep-2024	Yes	

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
Asset strategy (b)	28-Feb-2025			01. Asset strategy featured as a key theme in Group partner Board strategy workshops	31-May-2024	Yes	Our asset strategy that was developed during 2024/25 is now informing investment delivery priorities for the year ahead, as intended.
				02. Customer and staff engagement session	31-May-2024	Yes	
				03. Internal review and sign-off	31-May-2024	Yes	
				04. Group Board approval of Group Asset Management strategy	30-Jun-2024	Yes	
				05. Group partner asset management plans approved	30-Sep-2024	Yes	
				06. Staff launch of group asset management strategy and group partner asset management plans	31-Oct-2024	Yes	
				07. Agreed approach through strategy informs 2025 investment plans	28-Feb-2025	Yes	
Lochside regeneration (b)	31-Mar-2025			01. Masterplan Phasing & Capacities Agreed	31-May-2024	Yes	A customer engagement event is planned for July. The Masterplan has been submitted and is expected to be considered by DGC Committee over the summer. Osbourne Road and Findlater Court have been agreed as the first development progress to progress under the Lochside Masterplan, with preferred contractors having been identified from
				02. PPiP Submission	31-Aug-2024	No	
				03. Contractor Procurement Complete	31-Jan-2025	No	
				04. Land Transfer Max High completion	31-Mar-2025	No	

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
							our Generation 3 Framework. Discussions are ongoing with DGC in relation to the land transfer, however this will also be determined by grant availability.
Develop a data and technology enabled approach to managing and monitoring building compliance (b)	31-Dec-2024			01. Review our existing compliance cycles, data management, integration and management information arrangements	31-Jul-2024	Yes	Work to develop the data and technology enables approach is now complete and agreed by the Executive Team
				02. Build our future building compliance model including desired compliance cycles, key data, data flows, degree of integration, required management information and desired customer touchpoints and functionality	31-Oct-2024	Yes	
				03. Undertake a gap analysis and options appraisal including costs and benefits of the change between current arrangement and desired future model	30-Nov-2024	Yes	
				04. Develop detailed implementation proposal and plan and update Executive Team including on timescales and anticipated benefits	31-Dec-2024	Yes	
Improving and evolving our multi-channel customer first centre (b)	28-Feb-2025			01. Customer Engagement on service improvement opportunities via Stronger Voices team	30-Jun-2024	Yes	All planning in place and POCs (Proof of concepts) have all begun, and will conclude in May 25.

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
				02. Agree approach and workplan for geographical subsidiary service delivery	31-Jul-2024	Yes	Presentation on revised phase II timeline is at ET on Tuesday 25th February.
				03. Pilot customer call transcription and automated quality assurance	31-Dec-2024	Yes	
				04. Scope and develop an approach for automation of identification and verification (IDV)	31-Dec-2024	Yes	
				05. Year 1 update of the Executive Team including customer feedback and Year 2 enhancement plan	28-Feb-2025	Yes	

## Report

**To:** Wheatley Homes South Board

**By:** Alex Lamb, Managing Director

**Approved by:** Pauline Turnock, Group Director of Finance

**Subject:** 2025/26 Delivery Plan

**Date of Meeting:** 21 May 2025

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### 1. Purpose

- 1.1 This report updates the Board on the agreed 2025/26 Group Delivery Plan, comprising:
- Strategic projects to be reported to the Board during 2025/26; and
  - Our specific Board-level performance measures and corresponding targets for approval.

### 2. Authorising and strategic context

- 2.1 The Group Board approved the overarching approach to monitoring the implementation of the Group strategy via our Group Performance Management Framework (“**PMF**”) at its meeting in June 2021. We review the PMF annually, including the targets for the then remaining years of the Group and our strategies. The targets were last reviewed and approved by the Board in May 2024 and the Board subsequently agreed amendments to our strategy as part of our strategy refresh in September 2024.
- 2.2 Under the Group Standing Orders the Group Board has an ongoing role in monitoring the performance of subsidiaries across the Group against the agreed measures. This Board is responsible for approving our Annual Return on the Charter (“**Charter**”) returns and monitoring our performance against agreed targets.

### 3. Background

- 3.1 As part of agreeing on the original PMF in June 2021, the Group Board recognised that the strategic projects, strategic measures and targets would evolve throughout the life of our strategy as we refreshed and renewed it.
- 3.2 As such, strategic projects and our measures and targets are subject to annual review to take into account what has been delivered to date, our business operating context and the external operating environment.
- 3.3 For the same reasons, we also review and update our 5-year strategy each year. As part of this process, each partner Board within the Group considers its 5-year strategy and what refinements are appropriate within this context.

## 4. Discussion

### Strategic context

4.1 2024/25 was the penultimate year of our 2021-26 Group strategy. In considering our key priorities for 2024/25 the Board recognised that we had achieved a number of the key priorities in our five-year strategy, including:

- **Agreed transformational, long-term regeneration plans for** Lochside through engagement and consultation with local communities;
- **A new operating model, agreed in consultation with tenants,** implemented with the Customer First Centre achieving 90%+ satisfaction;
- Implementing a **redefined, reshaped approach to customer engagement** exceeding our target of 1000+ Customer Voices across Group including nearly of our 340 customers;
- the expansion of digital real-time customer feedback methods and the use of customer insight to **resolve issues quicker and drive service changes**;
- **A common repairs platform** across the Group enabling common ways of working and shared practice;
- Developed a **new, integrated Neighbourhood management approach** to allow us to get even closer to our communities;
- Developed a **plan and the financial capacity for the future energy efficiency fabric standard** for social housing;
- **Reshaped our corporate estate** to reflect our new ways of working, whilst reducing our carbon footprint and achieving financial efficiencies;
- Developed a **strategic framework for how we approach sustainability** with defined measures of success; and
- **Created the funding capacity**, whilst maintaining our golden rules and minimal risk exposure, to deliver our development programme.

4.2 Our delivery in 2024/25 and our plans for 2025/26 are set within the context of our operating environment continuing to be dynamic, including:

- In October 2024, the UK budget announced an extra 1.2% on employers' national insurance increasing staff costs by £2.8m;
- A direction of damp and mould becoming codified in law and regulation with the Scottish Housing Regulator introducing reporting requirements and the Scottish Government subsequently announcing that Awaab's Law will be introduced through amendments to the Housing (Scotland) Bill;
- the Scottish Government announced a reinstatement of the funding for the Affordable Housing Supply Programme to £768m for 2025/26; and
- The first red alert storm, Storm Éowyn, in over 13 years significantly impacting the delivery of our repairs service in the final quarter.

In 2024/25 we wanted to maintain progress in well-developed areas such as customer insight shaping how we deliver services and driving improved customer satisfaction. We also wanted to retain a strong focus on key performance measures such as our upgraded target for lets to homeless households, arrears, tenancy sustainment, damp and mould, repairs timescales, building compliance and tenant safety.



- 4.3 We also wanted to start to lay the foundations in strategic areas that would span into the 2026-2031 Group and our strategies such as our long-term approach to asset strategy and investment in homes and environments, regeneration and the role of data, Artificial Intelligence and automation in our future ways of working.
- 4.4 Over the last twelve months we made strong progress in these areas, including:
- We achieved **95% tenant satisfaction** (up from 88%);
  - developed a **Group asset strategy and our Wheatley Homes South Strategic Asset Investment Plans** which incorporate customer priorities including through our neighbourhood plans;
  - improving and evolving our CFC, including **the launch of geographical delivery teams** and developing opportunities for automation such as call transcription and quality assurance;
  - expanded our range of digital customer insight and capacity to respond to it swiftly, with, at the Group level, **over 58,000 pieces of customer feedback** received in 2024/25, including over 6.6K from 'Rate it' from our customers;
  - **outlining our principles to personalised services**, influenced by an enhanced understanding of our customers' needs and staff input;
  - developed a **data and technology-driven approach** to how we manage building compliance, which will further enhance how we protect tenant safety; and
  - improving our **staff experience with us as an employer by introducing self-service offerings**, such as managing annual leave on their mobile.
- 4.5 Over the course of 2024/25 it also became clear that the timing is appropriate to reflect on the operating model and engagement model we introduced in 2022 ahead of the development of our new five-year strategy.
- 4.6 Alongside the development of the 2026-2031 strategy, we will consider what has worked well, how it is working for our customers and what we would wish to refine within the context of what else has evolved over the first five years of our strategy.
- 4.7 A key area of focus in reflecting on our operating model will be communication with customers. We know that when customers feel our communication has not been clear or frequent enough within any of our services it is a driver of dissatisfaction. A key area of focus will be handoffs, how these are managed, how the communication is maintained throughout service delivery and how we can shorten communication chains internally.

#### Delivery Plan 2025/26

- 4.8 As we commence the last year of our current 5-year strategy, our focus is on a few remaining areas where we can further enhance our impact during this strategy term, ending 2025/26 strong, while working to also shape our next strategy. As such and having delivered so much within the first four years of our strategy, the volume of strategic projects is continuing to reduce.

- 4.9 The key Delivery Plan areas of focus for the year ahead will be as follows:
- High quality, safe and secure homes;
  - Transformation through regeneration; and
  - Next step engagement.
- 4.10 The full list of proposed projects and milestones is set out in Appendix 1. For completeness, this includes projects which will be primarily monitored at the partner Board level. For each project, we have also included the specific elements of the strategy that the projects will support or enable the delivery of.
- 4.11 As with previous years we have identified projects where there are external interdependencies that mean the delivery of those projects is not entirely within our control. A more detailed update on each of the three streams is set out below. The projects proposed for inclusion in future performance reports are highlighted in Appendix 1 for Board feedback and agreement.
- High quality, safe and secure homes
- 4.12 The key strategic project for the year ahead within this theme will be our asset compliance data and technology programme. Whilst we have established processes and meet our compliance requirements the strategic project in 2024/25 identified technology, data and process changes which would support us in managing it more efficiently.
- 4.13 It covers not just the six main areas of fire, gas, electrical, asbestos, water management and lifts but the 112 other compliance-related activities we need to manage and the rest of the Group.
- 4.14 The project is of such a scale that it will span multiple years and will deliver the following key outcomes:
- Fully align our approaches, processes and systems with our Group partners in the West and Wheatley Homes East;
  - Changes to our existing technology platform to meet our needs;
  - Mandate contractor use of our systems or (at least) require direct interface to systems so we have direct data entry, real-time insights, quality checks and controls and an efficient operating environment;
  - Establish automated workflows and remove current manual activity; and
  - Enhanced, automated analytics, data governance and reporting.
- 4.15 An area the Group has explored as part of Wheatley Homes East's West Craigs development and proposes a project for the year ahead to extend, is providing a safe and secure home for individuals who have been in long-term care in a hospital. Working with the Edinburgh Health and Social Care Partnership ("HSCP") the Group is building 19 homes to be allocated to individuals who have been in long-term hospital care but are unable to be discharged due to a lack of suitable accommodation and the associated support not being in place and funded.

- 4.16 We plan to showcase this approach when it is completed this summer and learn from our Group partner to engage with Dumfries and Galloway HSCPs about the potential for it to be replicated whilst our partner, Wheatley Homes Glasgow, will similarly engage with Glasgow HSCPs. This would involve joint working at an early stage to ensure that needs are reflected in our development programme. The needs vary depending on why individuals are in long-term hospital care.
- 4.17 This would also involve working with Local Authorities and HSCPs to link funding from new build grant and adaptations as well as the long terms funding for the care packages that would be necessary. There is potential for funding to be allocated more efficiently for care and support in particular by having properties in close proximity.
- 4.18 This will be the first year we are required to report on damp and mould specific measures as part of the Annual Return on the Charter. The measures are:
- Volume of cases of damp and/or mould by causation;
  - Average timescale for the completion of cases of damp and/or mould;
  - Volume of re-opened cases of damp and/or mould by causation; and
  - The percentage of cases of damp and/or mould that have been re-opened.
- Within this context 'causation' is to be separated into one of three categories: condensation; structural; or other.
- 4.19 We undertook a review of our processes, data and staff training in preparation for these measures being introduced. As a result of this we have a number of system changes underway to automate our reporting for each measure, for example which of the causation categories apply and the calculation of timescales under the Charter Technical Guidance.
- 4.20 The requirements relate to absolute numbers and as such no specific targets are proposed and the measures will be reported as contextual. Over the course of this year, once the position on the extension of Awaab's law in Scotland becomes clearer, we will undertake a review of our Group Managing Dampness, Mould and Condensation Policy.
- 4.21 Whilst we are still continuing to deal with the impact of Storm Éowyn the associated backlog relates to certain repairs types such as roofing rather than our higher volume repair types. It is therefore proposed that we retain our target of 7.5 days for the average length of time taken to complete non-emergency repairs.
- 4.22 Repairs satisfaction, which we know is a key driver of overall satisfaction, will continue to be a key measure for 2025/26 with a target of 4.5/5 for Book It, Track It, Rate It and a new My Voice overall repairs satisfaction target of 90%. This gives us a more rounded picture of repairs satisfaction covering both the appointment itself (Book It, Track It, Rate It) and overall satisfaction (My Voice).

#### Transformation through regeneration

- 4.23 Delivering new homes in existing communities as well as wider regeneration of areas continues to be a strong focus. We delivered 432 new homes in 2024/25, contributing to the 844 across Group, the Group's second highest number in a single year whilst also progressing the Lochside regeneration.

- 4.24 We will continue with the major regeneration projects in Dumfries at Lochside, whilst in Glasgow, our Wheatley Homes Glasgow partner will progress projects at Wyndford and with their partners through Transforming Communities: Glasgow. A major focus of both the Wyndford and Lochside projects has been, and will continue to be, the continued engagement with the local community including through the Wyndford Future Focus Group and an ongoing engagement in Lochside. The key focus for Lochside will be a programme of community engagement ahead of the completion and submission of a masterplan.
- 4.24 We will maintain, within the context of the changing nature of funding for the Affordable Housing Supply Programme, an active development programme, with a target of 33 units for 2025/26.
- 4.25 The Group agreed to introduce a new measure this year of customer satisfaction with their new home. The Scottish Government subsequently made the collection and reporting of a similar measure part of the grant conditions for new build. It is therefore intended that in the interest of efficiency we will follow the Scottish Government criteria of a minimum 40% response rate and surveys conducted nine months post move in. A target of 95% customer satisfaction is proposed for this measure.

#### Next step engagement

- 4.26 Our Group engagement framework has been instrumental in reshaping how we engage with tenants and allowed us to significantly diversify the customer voice. It is however important that it is regularly reviewed and refreshed to ensure that it remains fresh, vibrant and appealing to customers.
- 4.27 It is proposed that a key strategic project for the year ahead will be reviewing our approach to customer engagement. It will consider how we can use new digital methods, engage with customers aligned to the development of our next five-year strategy and conclude with a revised framework for Group Board consideration.
- 4.28 We want to improve how our customers can engage with services digitally. Over the course of the year ahead it is proposed we undertake a project to review our current offering and explore options for a new self-service model and digital platform. This will be alongside the review of our wider operating model, which will, for example, consider whether wider range of services or home visits should be bookable online.

#### Non thematic projects

- 4.29 Within the non thematic projects there are two which will impact our factored owners and approach to mixed tenure development and will play important roles in the development of our partner Lowther Homes' 2026-2031 strategy. Firstly, the implementation of a new digital platform, with a focus on how this enables both more efficient working and better factoring customer service in key areas such as billing, consent and self-service.

- 4.30 The Lowther Homes Board have also been engaged on options for growing its letting portfolio, agreeing a wide-ranging approach looking at a range of options for how this would be funded and the corporate structure that may enable it such as through an equity based model or a joint venture, partnership approach.
- 4.31 The Group will also anticipate finalising the Loan note programme over the course of the year, which the Strategic Development Committee and Group Board will have oversight of at key points.

#### Measures and Targets 2025/26

- 4.32 When initially agreeing measures and targets in June 2021, it was recognised these would be subject to ongoing review as well as formal review annually. Despite the continuing business and strategic change during 2024/25, we have once again made significant progress in this period and remain on track to deliver the majority of key outcomes and performance measures in our strategy. Particular highlights include:
- On track to meet our enhanced Group target of 11,000 homes for homeless people or households, exceeding our target in each year with 432 lets in 2024/25 alone, contributing to the Group providing **over 9,600** lets to homeless so far;
  - Reducing our gross rent arrears to less than 4%;
  - Tenancy sustainment maintained at over 90%; and
  - Provided over 1400 instances of direct support to help alleviate financial pressures, adding the 20,000 instances across Group which has benefited more than 11,000 individuals. Over the first four years of the strategy, the cumulative number of people who have received support across the Group **exceeds 48,000**.
- 4.33 The list of proposed measures and targets to be reported to the Board quarterly or bi-annually for Year 5 of the strategy, 2025/26, is set out at Appendix 2.
- 4.34 It should be noted that this Appendix does not include the annual measures e.g. customer satisfaction measures as our ongoing quarterly reports focus on measures which are measured on an ongoing basis. Our annual measures are drawn directly from our strategy.
- 4.35 All other proposed changes are captured in Appendix 2, with the key updates summarised below:
- **CFC abandonment:** Following the introduction of geographical teams, it is proposed that targets are changed to 5% to reflect the longer time this takes to answer calls (which has had no adverse impact on customer satisfaction with the CFC);
  - **New build:** updated to reflect the rolling five-year development programme target of 33 for 2025/26 agreed by the Board in February;
  - **Gross rent arrears:** The strategy renewal approved a change to the strategic target of <5%, it is proposed as 4.95%; and
  - **Annual tenant visits:** To reflect the importance of our contact with customers in their home, the target will be increased to 100%.

## **5. Customer Engagement**

- 5.1 Our Delivery Plan reflects our strong focus on our customers influencing and co-creating with us. Customer engagement is embedded as specific milestones of strategic projects which will directly impact the way we deliver services or the way they can be drawn down by customers.
- 5.2 Newly established real-time customer satisfaction-based measures, and independent customer satisfaction surveys, also reflect the importance of customer feedback in driving how we measure the quality of a service and inform future service improvement.

## **6. Environmental and sustainability implications**

- 6.1 The Group Delivery Plan contains sustainability-related measures previously agreed by the Group Board.

## **7. Digital transformation alignment**

- 7.1 Our strategy is underpinned by digital transformation. The strategic projects for 2025/26 have been fully reviewed to ensure we have the appropriate technical and resource capacity alongside our Digital Programme.

## **8. Financial and value for money implications**

- 8.1 There are no direct financial implications associated with this report, which are covered via the approved 2025/26 business plan.

## **9. Legal, regulatory and charitable implications**

- 9.1 There are no specific legal or regulatory implications however we continue to collect all measures required for the Annual Return on the Charter, including the newly established damp and mould measures reportable from 2025/26 (supplementary to our existing strategic measures).

## **10. Risk Appetite and assessment**

- 10.1 We do not have a single risk appetite in respect of strategy. Our risk appetite seeks to take into account a range of factors which may impact the delivery of our strategy.
- 10.2 In considering our Group Delivery Plan and KPIs for 2025/26 we have considered the continued level of uncertainty associated with the current operating context of the Group.
- 10.3 Our strategy is highly ambitious and contains a high degree of interdependencies. The proposed approach seeks to mitigate the risk that the complexity associated with the level of interdependencies is not managed through a structured approach.

## **11. Equalities implications**

- 11.1 Project monitoring and evaluations consider equalities information and Equalities Impact Assessments are undertaken at the outset of new programmes to ensure compliance with equality legislation, where applicable.

## **12. Key issues and conclusions**

- 12.1 We have made significant progress over the first four years of our strategy and are well placed to deliver all key elements by 2026. In 2024/25 we further progressed areas such as customer insight shaping how we deliver services and driving improved customer satisfaction, while retaining a strong focus on key performance measures such as our upgraded target for lets to homeless households, arrears, tenancy sustainment, damp and mould, repairs timescales and building compliance and tenant safety.
- 12.2 We also started to lay the foundations in strategic areas that would span into the 2026-2031 Group and our strategies such as our long-term approach to asset strategy and investment in homes and environments, regeneration and the role of data, Artificial Intelligence and automation in our future ways of working.
- 12.3 The proposed strategic projects focus on fulfilling a few remaining areas where we can further enhance the impact we have on our during this strategy term, ending 2025/26 strong, while working to also shape our next 5-year strategy, 2026-31.
- 12.4 Our measures and targets for 2025/26 have been informed by our performance in 2024/25 and where appropriate wider sector analysis.

## **13. Recommendations**

- 13.1 The Board is asked to:
- 1) Note the Group 2025/26 Delivery Plan and provide feedback on the proposed strategic projects which will be reported in the quarterly performance paper strategic project dashboards as indicated in Appendix 1; and
  - 2) Approve the proposed measures and corresponding targets for 2025/26.

### **LIST OF APPENDICES:**



Appendix 2: Strategic Results and KPIs with associated targets

Appendix 2

WHS Strategic Results and KPIs 2025 to 2026

Proposed Changes from 2024/25 detailed under ‘Update’ and relevant change shown in red text



1. Delivering Exceptional Customer Experience

Indicators	Year 4 results at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
“Rate it” score from the book it, track it, rate it repairs approach	WEST 4.5/5 EAST 4.4/5 SOUTH 4.7/5	No change from Year 4	4.5/5	4.5/5
Percentage of tenants who sustain their tenancies for more than 12 months (ARC)	WHS – 90.74%	No change	90%	90%
New - Percentage of tenants who sustain their tenancies for more than 12 months - revised	WHS – 93.01%	No change	91%	91%
New - Percentage of tenants who sustain their tenancies for more than 12 months (ARC) - homeless	WHS – 88.83%	No change	Contextual	Contextual
Customer satisfaction with the CFC is 90% - CFC CSAT	4.5/5	No change	4.5/5 (90%)	4.5/5 (90%)
% of contacts to CFC resolved within CFC	89.81%	No change	93%	95%
Revised call abandonment rate - those waited over 30secs and abandoned	5.20%	Change to Year 5 targets	4%	<del>3%</del> 5% RSLs 6.5% Lowther
Average number of working days to respond to stage 1 complaints (ARC)	Q3: WHS – 3.45	No change	5	5
Average number of working days to respond to stage 2 complaints (ARC)	Q3: WHS - 12.80	No change	20	20
Average number of working days to respond to all complaints – Stage 1 and 2 (ARC)	Q3: WHS – 4.61	No change	Contextual	Contextual



Indicators	Year 4 results at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
Percentage of stage 1 complaints responded to within 5 working days (SPSO)	Q3: WHS – 97.47%	No change	95%	95%
Percentage of stage 2 complaints (direct to stage 2) responded to within 20 working days (SPSO)	Q3: WHS – 93.75%	No change	100%	100%
Percentage of escalated complaints (from stage 1 to stage 2) responded to within 20 working days (SPSO)	Q3: WHS – 96.99%	No change	100%	100%
Stage 2 repair complaints as a percentage of Stage 1 repair complaints	WHS – 14.42%	No change	Contextual	Contextual
Satisfaction with the process of getting my new home is improved to 90% - Allocations CSAT	4.4/5 YTD	No change	4.5 (90%)	4.5 (90%)

2. Making the Most of Our Homes and Assets

Existing Indicators	Year 3 results at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
Achieve 95% customer satisfaction with their new build home	Not applicable	No change, although noted that baseline will be in arrears i.e. 9 months post-handover	Baseline established	95%
Develop <del>3,200</del> <b>2,895</b> new homes Group wide across all tenures	2024/25: WHS -101	<b>Targets updated to reflect delivery in Years 1-3 and the revised 5 year development programme agreed by the Board in February 2025.</b>  <b>Based on the business plan, the anticipated total is 2,895 during the 5 year strategy period.</b>	WHS - 101	<b>WHS - 33</b>
Reduce the volume of emergency repairs by 10%	Group - 9.70%	No change	3.5% (cumulative 6.5%)	3.5% (cumulative 10%)
Percentage of reactive repairs carried out in last year completed right first time (ARC)	WHS - 89.49%	No change	90%	90%
<b>Average length of time taken to complete emergency repairs (ARC)</b>	WHS - 2.65 hours	No change	3	3
<b>Average length of time taken to complete non-emergency repairs (ARC)</b>	WHS - 8.87 days	<b>Target to remain at 7.5 days for 25/26</b>	7.5	<b>7.5</b>
<b>% of damp, mould cases attended within 2 working days</b>	Group - 80.86%	This has changed to a contextual measure and will be supported with additional information on the reasons why any are out with 2 working days e.g. customer choice, a no access or no available appointment	Contextual	Contextual
<b>% of damp, mould cases resolved within 15 days</b>	Group - 75.94%	This has changed to a contextual measure and will be supported with additional information on the reasons why any are out with 15 working days e.g. customer choice, a no access, no available appointment, major repair required or investment required e.g. a roof repair/renewal	Contextual	Contextual

Existing Indicators	Year 3 results at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
NEW - Volume of cases of damp and/or mould by causation	NA	Volume of resolved damp and/or mould cases, overall and by causation (condensation, structural or other).	NA	Contextual
NEW - Average timescale for the completion of cases of damp and/or mould	NA	The average timescale of when the case of damp and/or mould is reported to us to the completion of the work to resolve the cause of the damp and/or mould, will be reported by causation (condensation, structural or other)	NA	Contextual
NEW - Volume of re-opened cases of damp and/or mould by causation	NA	Volume of re-opened damp and/or mould cases, overall and by causation (condensation, structural or other).	NA	Contextual
NEW - The percentage of cases of damp and/or mould that have been re-opened	NA	Cases of damp and/or mould within the reporting year where work had previously been concluded and have been re-opened, will be reported by causation (condensation, structural or other)	NA	Contextual
Number of times during the reporting year we did not meet our statutory obligations to complete a gas safety check within 12 months of a gas appliance being	WHS - 0	No change	0	0

Existing Indicators	Year 3 results at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
<b>fitted or its last check (ARC)</b>				
<b>The average time to complete medical adaptations (ARC)</b>	WHS – 55.19 days	To note this is contingent on the availability of funding to undertake the work	25	25
<b>No of households waiting for adaptations to their home (ARC)</b>	WHS - 1	No change	Contextual	Contextual
Number of RIDDOR reported	WHS - 2	No change	Contextual	Contextual
Number of days lost due to work related accidents	WHS - 112	No change	Contextual	Contextual
Number of accidental fires in workplace.	WHS - 0	No change	0	0
Legionella - percentage of applicable properties with a valid risk assessment in place	Q3 2024/25: WHS 100%	No change	100%	100%
% of electrical installation inspections completed and number due to be completed	Q4 2024/25 (interim): WHS 88.19%	No change	100%	100%
% of properties with an EICR certificate up to 5 years old	Q4 2024/25 (interim): WHS 99.43%	No change	100%	100%

Existing Indicators	Year 3 results at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
% of applicable fire safety systems with a valid annual servicing in place (Fire Safety - Sprinkler Systems, Emergency Lighting and Fire Suppression Systems)	Q4 2024/25 (interim):  WHS 100%	No change	100%	100%

3. Changing Lives and Communities

Indicators	Year 3 as at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
Percentage of lets to homeless applicants (ARC)	March 25 (Interim) WHS – 44.95%	No change	Contextual	Contextual
Percentage of relevant lets to homeless applicants	WHS – 46.13%	No change	Contextual	Contextual
House an estimated 10,000 homeless people or households over 5 years	WHS - 405	No change	2,000	2,000 (total >10,000)
Over 70% of our customers live in neighbourhoods categorised as peaceful	Group - 76.23%	No change	75%	80%
Reduce the number of accidental dwelling fires by 10%	RSLs only - 89	No change	8% reduction from baseline figure (Upper limit: 195)	10% reduction from baseline figure (Upper limit: 193)
100% of applicable properties have a fire risk assessment (HMOs)	Group - 100%	No change	100%	100%
>10,000 vulnerable children benefitting from targeted Foundation programmes	WHS - 398 Over 13,000 benefited Group wide since the beginning of the strategy	No change	1,000	1,000
>20,000 Wheatley customers accessing services which help alleviate poverty	WHS - 1491 Over 20,000 instances Group wide of direct support	No change	9,000	9,000
4,000 jobs and training and apprenticeship opportunities delivered	WHS - 119 Over 3,600 Group wide since the beginning of the strategy	No change	800	800

Indicators	Year 3 as at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
75% of jobs, training places or apprenticeships created which are secured by our customers	Group - 67.82% (Jan 25)	No change	75%	75%
Achieve 85% satisfaction with Wheatley Environmental Services	WHS – 4.4/5	MyVoice CSAT for ad-hoc services was launched during 2023/24. In April 2025, MyVoice will also be launched for Planned maintenance. Target proposed as a MyVoice CSAT score of 4.3 / 5	4.3 /5	4.3 / 5 (85%)
% ASB cases resolved (ARC)	WHS 97.12%	No change	100%	100%
Reduce the number of repeat complaints of ASB by 20%	Group - 12.50% reduction (861)	Formalising as part of the Group PMF this existing commitment in the ASB Framework.  Baseline year is 2022/23, when there were 985 repeat addresses.	15% cumulative reduction (Upper limit 766)	20% cumulative reduction (Upper limit 721)
% households with annual tenant visits within a 12-month rolling period	WHS – 82.10%	To increase in 25/26 to 100% for each RSL and Lowther	70% for each RSL	<del>WHG – 99%</del> <del>All other RSLs – 75%</del> <del>Lowther – 75%</del> All RSLs and Lowther – 100%

4. Developing Our Shared Capacity

Indicators	Year 3 at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
Staff absence for all parts of the business, excluding Care, NETs and trade staff, is maintained at 3%	March 25 (interim) 4.39%	No change	3.0%	3.0%



5. Enabling Our Ambitions

Existing Indicators	Year 3 at Feb '25 (unless stated)	Update	Year 4 (2024/25)	Year 5 (2025/26)
Reduce gross rent arrears to 5% (ARC)	WHS – 4.35%	<div>The strategy renewal agreed a target of &lt;5%. This has been set at 4.95%</div> <div>WHS Y4 target was 4.25% and Y5 target of 4.15%</div> <div>Due to the Y4 results of 3.97% - Y5 target has been reset to 3.90%</div>	5.2%	<div>&lt;5% maintained, set at 4.95%</div> <div>WHS – 3.90%</div>
Average days to let a home maintained at 16 days (ARC)	WHS – 9.61	No change	RSLs - 16 Lowther - 10	RSLs - 16 Lowther - 10

## Report

**To:** Wheatley Homes South Board

**By:** Lynne Mitchell, Director of Foundation

**Approved by:** Laura Pluck, Group Director of Communities

**Subject:** Supporting our Customers & Communities –  
Wheatley Foundation Annual Report 2024-25

**Date of Meeting:** 21 May 2025

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### 1. Purpose

- 1.1 To provide an update on the work of the Wheatley Foundation in 2024-25 and outline the impact of the Foundation's programmes on our customers and communities.

### 2. Authorising and strategic context

- 2.1 The work of the Foundation supports the delivery of our strategy and in particular links closely to the strategic theme, *Changing Lives and Communities*. This report updates the Board on the performance of the Wheatley Foundation in the last year.

### 3. Background

- 3.1 The Foundation was created in 2016 to support the commitment to "Making Homes and Lives Better" for customers and communities across Scotland.
- 3.2 In 2024–25, the Foundation delivered a wide-ranging programme of outcome-focused initiatives, positively impacting thousands of households and contributing to improved wellbeing at both individual and community levels.
- 3.3 These programmes continue to serve as a vital lifeline for customers experiencing sustained financial hardship. National statistics underscore the need for this support, with 21% of Scotland's population—around 1.11 million people—living in relative poverty after housing costs. Child poverty remains particularly concerning, affecting 24% of children across the country.
- 3.4 KPIs underpinning the Foundation's key strategic goals and targets through to 2026 focus primarily on:
- Supporting customers by tackling social exclusion and alleviating the impacts of poverty; and
  - Maximising access to employment, training and learning opportunities for customers of all ages

## 4. Discussion

- 4.1 The Foundation remains committed to delivering targeted, practical support that eases financial pressure and enhances wellbeing. Through our presence in local communities and collaboration with frontline staff, we continue to evolve our approach to meet changing needs—offering help with income, employment, digital access, and essentials like food and furniture.
- 4.2 In 2024-25, the Foundation **invested over £8.8m** in Wheatley communities, **supporting more than 12,600 households** and achieving all annual targets including:
- **20,472** instances of direct support to alleviate financial pressures;
  - **1037** Wheatley Works jobs, apprenticeship and training opportunities;
  - **3486** children and young people participating in targeted education/skills programmes;
  - **50** new Bursary awards made to Wheatley customers studying at university or college;
  - **2235** people supported to access free digital and accredited learning opportunities through the John Wheatley Learning Network;
  - **Over £1.7m of external grant/contract funding** secured to support the delivery of Foundation programmes; and
  - **£17m of social value** generated from Wheatley Foundation programmes – Wheatley Works, Welfare Benefits and Fuel Advice, John Wheatley Learning Network and Bursaries.
- 4.3 Ongoing collaboration with Wheatley Homes South has been central to this impact. Staff insights have helped tailor services to be both responsive and meaningful—providing immediate relief while creating pathways to longer-term stability and opportunity.

### Tackling social exclusion and alleviating the impacts of poverty

- 4.4 In 2024-25, **over 2600 instances of direct support** helped reduce financial stress for customers, enabling many to avoid crisis situations, remain in their homes, and better manage their day-to-day expenses. This included tailored income maximisation advice and the provision of free recycled household items to meet basic needs, helping to preserve customer dignity and independence.
- 4.5 Our **Welfare Benefit** advisors provided essential support to **1007 tenants**, resulting in **over £3 million in client financial gain (“CFG”)**—a 35% increase compared to the previous year. Increased demand, driven by the continued roll-out of Universal Credit, has underscored the critical need for this service. The support provided not only alleviated immediate financial hardship for individuals and families but also contributed significantly to tenancy sustainability. Notably, nearly 30% of the total CFG was applied directly to rent payments, helping to prevent arrears and reduce the risk of eviction.
- 4.6 Support led to **20 different benefit or payment types** being secured, with the top three being:

- Universal credit (£1.14m);
- Adult Disability Payment (£761k); and
- Housing Benefit / Local Housing Allowance (£181k)

*“I can’t tell you how relieved I am. I was so anxious, thinking I owed years of repayments. Now, I finally feel at ease. Fiona and the team have been absolutely fantastic, and I’m just so grateful”*

- 4.7 The Foundation has continued to deliver specialist support aimed at maximising our income. This includes escalating issues to the appropriate DWP and Local Authority managers when needed, providing ongoing guidance and support to all frontline staff, and addressing barriers encountered when liaising with the DWP.
- 4.8 This year, our **Fuel Advisor** supported **280 households** with energy-related guidance and assistance. This included issuing **110 emergency fuel vouchers** to customers in crisis – providing immediate financial relief and reducing the risk of disconnection. The number of households supported has decreased by 49% since 2022–23, reflecting a broader shift in customer needs, with more individuals now seeking holistic financial wellbeing support rather than energy-specific advice alone.
- 4.9 In response to these changing needs and ongoing economic pressures, we have established a new **Financial Wellbeing Team**. This team brings together our Welfare Benefit Advisors and newly appointed Financial Wellbeing Officers, replacing the previous Fuel Advisor role. The team provides integrated, wraparound support to help tenants manage their finances, reduce financial strain, and build long-term resilience.
- 4.10 The Financial Wellbeing Team supports tenants to maximise their income, manage household costs, and improve financial security. This includes help accessing benefits such as Universal Credit, Council Tax Reduction, and hardship funds, as well as practical advice on budgeting, reducing everyday spending, and cutting costs on essentials like energy, broadband, and transport.
- 4.11 The **My Great Start** programme helped **191 new tenants** develop the financial knowledge and confidence to sustain their tenancies. Delivered in partnership with Independent Living Support, the service **secured over £188k in financial gains** while offering advice on debt, benefits, budgeting and community support.
- 4.12 Housing Officers can refer any customer whose tenancy is less than six months old to My Great Start. Of all customers supported this year:
  - 35% required budgeting support;
  - 63% are single adults;
  - 20% are lone parents; and
  - 25% are not fit to work

*"If there are people out there struggling with their tenancy and need some support, I'd definitely tell them to speak to their housing officer about My Great Start. It's made a huge difference to me, even just knowing there's someone I can pick up the phone and speak to".*

- 4.13 The **Helping Hands Fund** continued to provide direct financial support to households struggling with rent. In 2024-25, **661 households** received assistance through referrals made by their Housing Officer, preventing further escalation of arrears and supporting housing security.
- 4.14 Our **Home Comforts** and **Starter Packs** programmes continued to play a vital role in supporting tenants to establish and maintain stable home environments. By providing essential household items at no cost, these services not only eased immediate financial pressures but also helped transform properties into comfortable homes. They also delivered environmental benefits by promoting reuse and waste reduction.
- 4.15 Through **Home Comforts**, delivered in partnership with SHAX (Dumfries) and The Community Reuse Shop (Stranraer), **207 tenants** were helped to create a stable home environment – reducing the risk of tenancy breakdown and supporting wellbeing. More than **1170 recycled white goods and furniture items were delivered, diverting 38 tonnes** of household items from landfill.

*"Within a week of my old machine breaking down, Home Comforts delivered a refurbished one. I don't know what I would have done without it.*

- 4.16 Our **Starter Packs** programme enabled vulnerable new tenants to settle in with dignity and confidence by providing essential household items like bedding, crockery, cookware and cleaning supplies. This year, **155 packs** were distributed, with **1 ton of goods redirected from landfill** by reusing these items. For households with children, **17 Food Starter Packs** - containing ingredients for three meals and essential staples like pasta, rice, cereal, tea and UHT milk – were delivered, supporting **25 children**.
- 4.17 In December, the Foundation launched its "Better Christmas" appeal, providing crucial support to customers over the festive period. Thanks to generous contributions from staff, contractors, suppliers, and partners, over **100 families received toys, clothes, and household essentials**. The appeal also supported Galloway Action Team, Summerhill Community Centre, and Lochside Community Centre with their Christmas activities, while 10 families in need were provided with duvets and pillows to help them through the winter period.

#### Maximising access to employment, training and learning opportunities

- 4.18 **Wheatley Works** continued to provide tailored employability support for customers across our communities, enabling people to build the skills, confidence and connections needed to progress into work, training or further education. Through clear referral pathways and personalised one-to-one engagement, customers accessed flexible and responsive support that matched their aspirations and circumstances.

- 4.19 Since April, Wheatley Works has enabled **91 people** to take meaningful steps toward financial independence and improved wellbeing through **119 supported training and employment opportunities**.
- 4.20 Our four-week **Environmental Roots** programme helped **25 people** develop practical skills and work-readiness. Seven progressed directly into further employment or training, including an internal 12 month Changing Lives placement, a 2-year Environmental Apprenticeship and external roles.
- "The programme has really changed my life. I had done the same job for over 20 years and never thought I would work again when I was made redundant. Environmental Roots gave me the chance to build skills and confidence. I'm now working again while making a difference to communities. Roots was the starting point"*
- 4.21 Over the year, **7 trainees and apprentices** transitioned from Wheatley's Changing Lives and Environmental Apprenticeship programmes into employment, with **4 securing jobs in Wheatley subsidiaries** and others moving into roles at Dumfries & Galloway Council and Which Warehouse.
- 4.22 To further support the development of our internal trainees and apprentices, Wheatley Works facilitated accredited "**Money House**" **financial wellbeing training** in partnership with **MyBnk** – a national charity that delivers accredited financial wellbeing programmes for young people aged 16-25. **15 trainees** gained an SCQF level 4 in Personal Money Management, gaining practical financial and digital skills to help manage rent payments, keep up with bills and budget everyday living costs.
- "I didn't get any of this support at school and never really knew how to manage money properly. This is a needed life skill and should be offered to all young people. I now understand budgeting, borrowing and saving better"*
- 4.23 A total of **49 customers** were supported to access **sector-based training programmes** this year, delivered in partnership with two key Wheatley Works partners - CEIS Dumfries & Galloway and Galloway Action Team. These collaborative efforts have been vital in helping customers develop industry-relevant skills and move closer to employment.
- 4.24 Our partnership with CEIS Dumfries & Galloway enabled **24 customers** to engage in tailored training across three priority sectors. Eight customers participated in a Construction Academy, another eight completed a Retail Academy, and the final eight successfully graduated from a Hospitality Academy. These programmes not only equipped participants with technical knowledge but also boosted their confidence and skills. As a result, **8 customers have secured employment** with organisations such as Sodexo, Marks & Spencer, Subway and the Dumfries Arms Hotel, while the remaining participants continue to receive support to find job opportunities that align with their career goals.
- 4.25 A further **25 customers** took part in Repairs, Maintenance and Construction training delivered in partnership with **Galloway Action Team**. This training offered hands-on experience and practical skills aligned with local employment opportunities. **13 of the customers gained employment** through the partnership with employers including Forestry & Land Scotland, Dumfries & Galloway Council and Galloway Action Team.

*“Galloway Action Team has opened up great opportunities for me. I’ve improved nursery gardens, helped to clear older people’s garden’s, been involved in a Christmas Appeal for kids and been part of the team in Galloway Action Team winning the Kings Award for Voluntary Service. I’ve now secured a job helping people and improving communities”*

- 4.26 Community Benefits delivered through our **new-build contracts** have helped create **7 training and apprenticeship opportunities** this year across developments at Johnstone Bridge and Springholm through Ashleigh Construction.
- 4.27 In preparation for new developments at Ashwood Drive and Leswalt, we have worked closely with McTaggart Construction and Dumfries & Galloway College to develop bespoke construction-based training for customers. The first programme, set to launch in June, will include trade taster sessions, accredited certificates, and hands-on work experience. Upon completion, participants will be supported to secure on-site opportunities with McTaggart or their subcontractors, creating a direct pathway to sustainable employment.
- 4.28 Our **Bursary Programme** supported **11 tenants** in further and higher education, including 8 new and 3 returning students, helping them overcome financial barriers to stay in education and succeed.
- 4.29 To strengthen equity of opportunity, a review of the Bursary application process was carried out in response to underrepresentation identified the previous year. This included an Equality Impact Assessment and consultation with internal networks and teams. We also worked with the Scottish Refugee Council to improve accessibility and reach. Updates to website and social media content emphasised our commitment to equity, diversity and inclusion, and clarified that support is available—particularly for those whose first language is not English or who face literacy or neurodiverse challenges.
- 4.30 A total of 23 applications were received from customers – a 44% increase from 2023-24. Among new bursary recipients:
- 50% are aged between 16 and 34 years;
  - 50% reported that they or someone in their household has a disability;
  - Courses being studied include Sports & Fitness Coaching, Nursing, Computer Arts and Psychology; and
  - Study locations include Dumfries & Galloway College, Highlands & Islands University and University of the West of Scotland.
- 4.31 To measure the impact of the Bursary programme, feedback was gathered from recipients throughout the year. Key findings include:
- 100% of respondents rated the application process and communication with the team as good or very good – an increase from 92% last year;
  - 78% said the bursary helped them stay on track with their studies; and
  - 72% reported that the support had improved their overall university or college experience

*"I wasn't sure how we would manage, but the bursary has been a great help. It helped me provide for my family while I was studying, including helping with the cost of household bills".*

- 4.32 This year, **73 people** attended **Digital Skills & Cyber Security workshops** delivered in partnership with Dumfries & Galloway College. The sessions aimed to help people recognise cyber risks, build digital skills, and boost confidence when using the internet. Following the workshops, 100% of attendees reported feeling confident communicating online, accessing services such as DWP, and shopping online.

#### Children & Young People

- 4.33 In 2024-25, the Foundation expanded its reach and impact through a diverse and innovative programme of education and learning opportunities, **supporting almost 400 children and young people** across our communities.
- 4.34 A total of **238 children** received free monthly books this year through our partnership with the **Dolly Parton Imagination Library**, helping promote a love of reading and language development in early years. A new referral system launched in July made it easier for frontline staff to register families, resulting in 58 new sign-ups. In February, we marked a major milestone - over 40,000 books delivered since the programme began in 2016, with **almost 10,000** of those reaching children in our homes.

*"He wants me to read them to him every five minutes. He takes my hand and then points me to a book he wants me to read him. He's really enjoying them. He's very interested in the pictures and can point to different characters and items on the pages"*

- 4.35 In February, the Foundation awarded funding to the Scottish Civic Trust to support the **My Place Photography Project**, a Scotland-wide built environment photography competition for school-age young people. This initiative encourages participants to explore the buildings, architecture, and archaeology of their communities, using photography as both a tool for investigation and a means of creative expression. **Thirty young people** from Dicks Hill Primary in Stranraer are participating in local workshops, marking the first time young people from the region have engaged in this national competition. After completing the workshops, participants will be encouraged to submit their own photographs to the competition, which closes at the end of May, with the awards ceremony scheduled for July.
- 4.36 The Foundation supported the **Fed-Up Cafe** in Stranraer to purchase baby and small-child-specific packs containing food and essentials for families accessing their **community larder**. These items, often unavailable from Fare Share—a service that provides access to surplus supermarket food—are in high demand among local families. Through this initiative, **around 20 families** gained access to affordable nappies, baby wipes, and children's food.

#### Greener Communities

- 4.37 In 2024–25, **9 Greener Communities initiatives** were delivered across our neighbourhoods, focusing on community growing and outdoor activity, food waste, active travel, and recycling and reuse. These projects aimed to raise awareness and build practical, sustainable skills among both customers and staff.



- 4.38 Launched in October in partnership with the Dunedin Canmore Foundation, the **Growing Together Fund** has already supported one customer-led growing project in Dumfries & Galloway and has approved four further projects for 2025/26:
- At Daar Lodge in Kirkcudbright, which supports around 60 sheltered housing residents, the fund helped expand the inclusion garden to create vegetable patches and encourage greater resident participation in growing activities; and
  - Four further projects—including Lochmaben Community Gardens, Heathhall Primary Community Garden, and Nana’s Garden in Dumfries—are set to launch in the coming year, further extending community growing opportunities across the region.
- 4.39 The Foundation’s new **Growing and Planting** stall made its debut at a community event in Kelloholm, where children had the chance to learn how to grow simple herbs and vegetables like mustard cress and mint. The hands-on experience introduced them to the basics of sustainable gardening, fostering early environmental awareness and an appreciation for healthy food production.
- 4.40 **Around 50 families** in Dumfries received **new bikes** for their children thanks to funding secured from Cycling Scotland. The initiative linked with the cycling project at Summerhill Community Centre to identify families in need. High-visibility vests were also provided to improve road safety, enabling children to cycle more confidently and safely within their communities.
- 4.41 Further support for active travel was secured through another round of funding from Cycling Scotland to develop an **e-bike cycling project** for young people at the Springbells site in Annan. This project will train staff and customers as cycle ride leaders and establish an e-bike hire service, encouraging young people to embrace active travel while enhancing their physical and mental well-being.
- 4.42 The **Techshare** initiative provided **8 refurbished digital devices** to customers referred by Wheatley Works and Stronger Voices teams. Additionally, three community partners—Galloway Action Team and two local primary schools in Ecclefechan and Sanquhar—received devices to support local activities. By repurposing technology, **over 20kg of digital waste was diverted from landfill**, contributing to environmental sustainability while improving digital access for families and community groups.
- “Since receiving the laptop I’ve been able to set up an online account with Asda and got my first shop delivered. I have mobility issues, so having the laptop allows me to do my shopping from my room, I am thrilled with the help. I also write poems so having it gives me somewhere to write and save these”.*
- 4.43 As part of **Food Waste Week**, the Fed-Up Café was featured on Wheatley’s staff intranet as a project spotlight. The feature highlighted the café’s role in supporting local customers in Stranraer and shared practical tips for staff on reducing food waste and making the most of what we have.

- 4.44 **Staff Reuse campaigns** run by the Foundation across the year collected school uniforms; warm clothes and Christmas jumpers. This resulted in approximately **80 kilograms of clothing being diverted from landfill** and donated to community organisations, including Apparel Xchange. A Mug Amnesty encouraged staff to donate spare mugs and reduce reliance on disposables, resulting in **over 200 mugs being donated to Starter Packs** for inclusion in our customer packs.
- 4.45 Two **You Choose Challenge** projects took place in Kelloholm and Ecclefechan during 2024–25, allowing customers to vote on how community benefit funding should be used. Residents chose to allocate the funds to local primary schools and the day centre in Ecclefechan, supporting outdoor play activities and planting projects for young people and local residents.

#### Social Value and Impact

- 4.46 **HACT Social Value** (“HACT”) processes continue to be embedded across Foundation project delivery, with before and after surveys now in place. HACT applies a well-established wellbeing valuation approach, aligned with UK Treasury Green Book methodology, to assess impact.
- 4.47 The HACT Social Value Tool calculates the impact of project outcomes on individual wellbeing (life satisfaction) and translates this into a monetary value, representing the amount required to generate the same improvement in wellbeing. For example, the wellbeing value of someone moving from unemployment into a job is estimated at approximately £13k.
- 4.48 Since April, the Foundation has delivered over **£2.7m in social value**. This includes outcomes achieved through Wheatley Works, Welfare Benefits and Fuel Advice support.

### **5. Customer Engagement**

- 5.1 Our customer engagement approach ensures customer involvement and feedback shape and determine the scope and nature of our programmes and activities. Enhancing customer engagement through co-design and development of programmes is a key strategic priority.
- 5.2 Feedback from surveys conducted throughout the year has been overwhelmingly positive, including 100% satisfaction with the new bursary application process, 100% customer satisfaction with items provided through Home Comforts, and 100% of customers supported by Techshare reporting that they had benefitted from receiving a device.
- 5.3 Throughout the year, the Foundation participated in community events including Kelloholm and Leswalt. These events gave customers the chance to learn about the Foundation's work and provide feedback in an informal setting.

### **6. Environmental and sustainability implications**

- 6.1 While the Foundation's work is firmly rooted in supporting people and communities, many of its initiatives – including reuse campaigns, food waste reduction and community growing projects – have positive environmental impacts.

- 6.2 These contributions support the Group's commitment to sustainability and provide valuable evidence for Environmental, Social and Governance ("**ESG**") reporting and accreditation submissions.
- 7. Digital transformation alignment**
- 7.1 The Foundation continue to seek opportunities to digitalise programmes where possible. This includes utilising Microsoft forms to enable customers and staff to self-serve or engage with Foundation programmes more easily.
- 8. Financial and value for money implications**
- 8.1 The Foundation seeks to source, secure and maximise funding opportunities, as well as new partnerships to provide value for money for the business, customers and communities. The activities of the Foundation are supported by gift aid from Lowther, donations from our RSL subsidiaries and external funding from other trusts/foundations/contracts.
- 8.2 **Over £1.7m of external monies** has been secured to support the delivery of 2024-25 Foundation programmes. This includes donations totalling over £380k from a range of sources including Group new build contractors, suppliers, trade unions and staff.
- 8.3 A total of **36 grant fund applications and contracts** have been prepared and submitted since April 2024 - with **a value of over £1.8m** to support the delivery of Foundation programmes across 2024-2026. Of these, 16 have been successful with a value of £477,330. A further 5 bids with a total value of £858,222 are still pending decision and 15 bids worth £465,355 were unsuccessful.
- 9. Legal, regulatory and charitable implications**
- 9.1 The information contained in this report meets the Foundation's reporting requirements and objectives as a registered charity.
- 10. Risk Appetite and assessment**
- 10.1 The matters contained in this report primarily support our Changing Lives and Communities strategic theme and in particular the strategic outcome "Supporting economic resilience within our communities". Our agreed risk appetite for this in relation to finance/reputation and credibility is "open". However, this also recognises the overall benefits of investment whilst ensuring relevant controls to minimise any possibility of financial loss.
- 10.2 The Foundation measures performance against key strategic indicators monthly and undertakes any improvement work where necessary. We report on this quarterly to the Foundation Board to ensure that it remains informed of progress and to mitigate the risk associated with failure to deliver our strategy.
- 11. Equalities implications**
- 11.1 Equalities data for Foundation programmes is collected and analysed quarterly in partnership with the Governance team.

- 11.2 These insights are helping to shape future outreach and ensure continued progress toward inclusive, equitable access across all Foundation programmes.

## **12. Key issues and conclusions**

- 12.1 The Foundation has achieved our targets for the year. For Wheatley Homes South specifically, this has included:
- Supporting more than 1490 households with over 2600 instances of direct support including providing financial, benefits and fuel advice and help to furnish their homes;
  - Providing training and work support for both long term unemployed people and young people with no qualifications/work experience and supporting 119 jobs, training and apprenticeship opportunities; and
  - Working in partnership to create quality education/learning programmes that 398 children and young people from Wheatley Homes South communities have participated in.
- 12.2 For 2025–26, priorities will focus on providing comprehensive support to those most at risk of poverty, including families, young people, and lone parents. Additionally, there will be continued emphasis on creating sustainable pathways into training and employment.
- 12.3 Working in partnership with a wide range of organisations and stakeholders remains central to our delivery. By leveraging external funding, sharing resources, and aligning with local and national priorities, the Foundation maximises the value and impact of its programmes, ensuring positive outcomes for our communities.

## **13. Recommendations**

- 13.1 The Board is asked to note the activity undertaken throughout 2024-25 to support customers and communities.

LIST OF APPENDICES:

None.

## Report

**To:** Wheatley Homes South Board

**By:** Neil Addie, Director of Group Health and Fire Safety

**Approved by:** Frank McCafferty, Group Director of Assets & Development

**Subject:** Health and Safety Annual Performance Report

**Date of Meeting:** 21 May 2025

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### 1. Purpose

- 1.1 The purpose of this report is to provide the Board with an update on health and safety performance during 2024/25.

### 2. Authorising and strategic context

- 2.1 Under the Group Standing Orders the Group Board is responsible for approving Group Policies and their designation as applicable to all of the Group partners. The Group Health and Safety Policy was approved by the Board and designated as a Group Policy.
- 2.2 This report provides an update on the arrangements currently in place to ensure that Group Health and Safety performance meets best practice and legal compliance standards.
- 2.3 Group Health and Safety Management Arrangements contribute to enhancing safety culture and are clearly aligned to our Group strategy of developing and delivering excellent customer service.

### 3. Background

- 3.1 Whilst required by law, the current Group Health and Safety Policy also provides the foundations for our Health and Safety Management System and a positive Health and Safety culture. Our policy is reviewed at least every three years.
- 3.2 Our Group Health & Safety Policy is part of our overall Health and Safety architecture as shown below, along with our Group Health and Safety Management System, Group Health and Safety Management Arrangements and Operational Safety Manuals. This model is based on the Health and Safety Executive's recommended approach to safety management, HS(G)65.



- 3.3 Monitoring arrangements are in place to maintain the validity and accuracy of the documents described, based on feedback from operational activities, changes to the legislative environment and advances in best practice.

#### 4. Discussion

##### Group Health and Safety Policy

- 4.1 In line with planned review schedules, the Group Health & Safety Policy has been reviewed and updated with a number of changes reflecting issues such as:

- New Health and Safety Management Arrangements (“**HSMAs**”) where we have sought to set out our obligations in more detail and with increasing specificity;
- Expanded duties of the Health and Safety Team relating to a new Health and Safety audit programme which ensures compliance with the Health and Safety Work Act and associated regulations; and
- Revised reporting and monitoring arrangements to maintain a high visibility of Health and Safety issues.

##### Group Health and Safety Management Arrangements

- 4.2 We have updated or created new HSMAs in 46 areas relating to the management of Health and Safety to ensure a consistent approach is achieved for legal compliance across all business areas. Group HSMAs are further supported with a legal register listing Health and Safety legislation that is applicable to the related activities.

##### Reporting and Monitoring Arrangements

- 4.3 A new Health and Safety Operational Meeting for Housing was started during the year, to cover activities of all RSLs. This group is now meeting every 3 months to review progress with a Health and Safety Action Plan created for Housing specifically.

##### Operational Safety Manuals (“**OSMs**”)

- 4.4 Our OSMs contains risk assessments, safe systems of work, local procedures and guidance, and are kept under review on a 2-year rolling cycle. Within the current review cycle updated/ improved templates are being created for risk assessment and a safe system of work documents, in order to ensure the highest standards of communication and compliance.

- 4.5 All staff members are required to confirm that they are familiar with OSM content for their job role. We are currently at 92% completion rate for the year, and expect to have this, except for staff who are long term absent, at 100% in the month ahead.

#### Health and Safety Training

- 4.6 In addition to the OSM all staff must also undertake mandatory Health and Safety training. We are currently at a 94% completion rate for the year and expect to have this, except for staff who are long-term absent, at 100% in the month ahead.
- 4.7 This year we will conduct a review of health and safety training across all job roles, with a view to developing health & safety training matrices for these. Additional training requirements identified by this exercise will thereafter be developed and delivered.

#### Homeworking

- 4.8 Homeworking arrangements are well established for our staff. All staff who work from home are required to complete an annual update to confirm their home working arrangements remain safe. We are currently at 66% completion rate for the year and expect to have this, save for staff who are long-term absent, at 100% in the month ahead.

#### Accident and Incident Reporting

- 4.9 We have a legal requirement to investigate and report accidents involving staff, contractors, and customers in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (“**RIDDOR**”).
- 4.10 In 2024/25 we reported 4 RIDDOR ‘Over 7 Day’ incidents to the Health and Safety Executive (“**HSE**”); neither of these incidents resulted in an investigation.
- 4.11 In 2024/25 26 working days were lost due to accidents at work, all of which were attributable to the RIDDOR incidents noted above.

#### Digital Incident Reporting System

- 4.12 During April 2024 the new digital incident reporting system was implemented across all Group functions. This system enables employees to self-report incidents and has been strongly supported by our Trade Union partners. The system is now functioning well and has substantially improved the speed of provision of data versus the previous manual methodology used.

#### Employers Liability (“EL”) Claims Experience

- 4.13 There are currently no open EL claims arising from accidents and incidents at work for our employees.

### **5. Customer Engagement**

- 5.1 There is no direct customer engagement related to this report, however where a health and safety matter could impact customers, we will engage with them on any work we are undertaking.

## **6. Environmental and sustainability implications**

6.1 Our health and safety approach is a key part of ensuring the success of our operating model. This operating model, which includes agile home working as highlighted above, has positive environmental and sustainability implications through:

- Reducing unnecessary travel to an office location;
- Encouraging staff to meet, when necessary, in our new hub locations that include measures to reduce our carbon footprint such as solar PV; and
- Increasingly looking to encourage the use of electric vehicles and power tools, and active travel, where appropriate, to the work being carried out

## **7. Digital transformation alignment**

7.1 Technology is used where appropriate to support safe working arrangements, for example the introduction of the lone working app.

7.2 Further E-Learning training is also being developed beyond our existing Health and Safety Awareness and Fire Awareness courses.

## **8. Financial and value for money implications**

8.1 There are no further financial and value for money implications associated with this report.

## **9. Legal, regulatory and charitable implications**

9.1 The Group's 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 regulatory intervention, enforcement action, prosecution and adverse reputational risk.

9.4 Our reporting and monitoring arrangements support our compliance with the requirements for consultation and more specifically our legal obligation under the Safety Representatives and Safety Committee Regulations and the Health and Safety (Consultation with Employees) Regulations.

## **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.

## **11. Equalities implications**

11.1 There are no equalities implications associated with this report.



## **12. Key issues and conclusions**

- 12.1 The Health and Safety Management System currently in place is recognised as a best practice approach by the HSE for continuous improvement according to their HS(G)65 model.
- 12.2 Over the last year we have further strengthened each element of our Health and Safety Management System, with the proposed policy changes further enhancing this. Engagement with our staff and Trade Union partners remains a key element of ensuring we have a strong Health and Safety culture within the organisation.

## **13. Recommendations**

- 13.1 The Board is asked to note the update on health and safety performance for 2024/25.

LIST OF APPENDICIES:

None.

## Report

**To:** Wheatley Homes South Board

**By:** Jennifer Anderson, Director of Neighbourhoods

**Approved by:** Laura Pluck, Group Director of Communities

**Subject:** Neighbourhood Management and Anti-Social Behaviour Update

**Date of Meeting:** 21 May 2025

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### 1. Purpose

1.1 The purpose of this report is to:

- Provide the Board with an update one year on from implementing our first Neighbourhood Management Policy and revised Antisocial Behaviour (“**ASB**”) Policy; and
- Seek approval of proposed changes to the Neighbourhood Management Policy following our annual review.

### 2. Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for overseeing the implementation of our Neighbourhood Management and ASB Policies.
- 2.2 Within our strategy, we have made a commitment that ‘*Over 70% of our customers live in neighbourhoods categorised as peaceful*’. Successful implementation of our Neighbourhood Management Policy and ASB Policy will support us in achieving this target.

### 3. Background

- 3.1 In 2024 we revised our ASB Policy and created, for the first time, a separate Neighbourhood Management Policy. This was done because many issues customers complain about – for example, dogs barking, noise from children playing or overgrown gardens – do not always constitute ASB on the part of another tenant. Instead, these issues could more effectively be dealt with as part of our regular neighbourhood management activity. One year on, we have reviewed the Neighbourhood Management Policy in light of case data, as well as customer and staff feedback.

## 4. Discussion

### Neighbourhood Management

- 4.1 Between 1 July 2024 and 30 April 2025, there were 543 service requests for neighbourhood management raised at the Customer First Centre (“CFC”). As expected, the largest proportion of these related to domestic noise, which accounted for 38% of all reported requests for service. Analysis of ASB concerns in 23/24 found that over 35% of noise complaints did not constitute ASB. The breakdown of type and volume is noted below:

Neighbourhood Management Category	Number	% breakdown
Animals	79	16%
Children playing	20	3%
DIY	4	<1%
Dog fouling (private place)	38	7%
Domestic noise*	206	38%
Fly tipping	11	2%
Garden maintenance	73	13%
Litter/rubbish	53	10%
Smells	29	5%
Street parking	30	6%
<b>TOTAL</b>	<b>543</b>	<b>100%</b>

*\*domestic noise includes issues such as washing machines, hoovers, floorboards etc, but for the purpose of the figures above also incorporates babies/children crying, lifts, musical instruments and windows and doors.*

- 4.2 The majority of these cases are managed directly by our housing officers who assume responsibility for looking into the issue raised and exploring what, if any, solutions are available to offer resolution for the customer. As noted throughout the Neighbourhood Management Policy, there are times when the issues reported constitute general living noise, and the actions taken for cases such as these therefore differ. There are times when the issues being raised are progressed by the CFC for immediate action such as fly tipping or concerns around litter or rubbish.
- 4.3 To support staff in establishing effective solutions, we developed a supplementary staff toolkit for both neighbourhood management and ASB which is extensive in nature and covers all concerns, case types and potential resolution options to address the issues raised.
- 4.4 Over the last 12 months we have implemented a variety of solutions with the most common detailed below:
- Mediation between neighbours;
  - Working with individuals to explore tolerance levels and how these differ between people;
  - Vibration mats issued for underneath washing machines;
  - Underlay provided for properties;
  - Education around what it means to live in a flatted property to help better manage expectations;
  - Walkabouts with colleagues from the Local Authority to obtain advice on issues such as pest control and environmental health issues;
  - Identifying a support need that requires to be addressed and making the appropriate referrals to access the support; and
  - Signposting using known third sector support agencies.

- 4.5 Neighbourhood Management issues can arise in the wider environment, some of which we have less direct responsibility for, and as such our partnership approach and utilising our strategic agreement with the Local Authority to work together to understand and resolve certain issues is key.
- 4.6 We view this partnership and working in collaboration as vital to supporting our ambitions for our customers and the environments they live in. Ongoing customer insight is indicating increased satisfaction with the management of neighbourhoods. This year we will explore the use of MyVoice for real time feedback in relation to neighbourhood management concerns.

#### Antisocial Behaviour

- 4.7. A key objective of the policy implementation was to more effectively manage neighbourhood management issues by routing through an appropriate process and in turn reducing the number of ASB cases.
- 4.8. When we compare the overall ASB case numbers for the previous year we have decreased from 927 cases reported in 2023/2024 (54 Category A and 873 Category B) to 796 cases reported in 2024/2025 (67 Category A and 729 Category B). This is a reduction of 131 cases of ASB representing an overall decrease of 14%. It is important to note that neighbourhood management cases have only been recorded for nine months of the year. Therefore, we can assume at the rates detailed that we would see a 19% reduction in ASB cases in the next year from the baseline year of 2023/2024.
- 4.9. We can have more confidence that we are managing ASB concerns under the appropriate policy and procedure, providing a better service to our customers and improving customer perception.
- 4.10. Concurrently, with the launch of the policies we have been embedding further our prevention and solutions approach to ASB. The objective of this approach, as previously reported to the Board, has been to work in a more targeted way to understand and tackle the root causes of ASB for the customers causing most disruption through ASB in our communities and in turn reducing overall ASB cases and specifically repeat ASB.
- 4.11. Between April 2024 and October 2024, a total of 48 individuals have been supported through the prevention and solutions approach. In the six months prior to intervention, the 48 individuals have been responsible for 156 separate incidents. In the following six months, post interventions, the number of incidents attributed to these 48 individuals reduced by 60% to 62. For the purposes of reporting, we do not include any customers that have not reached six months post-intervention.
- 4.12. The most significant change in how we manage these cases is in how we are working more assertively and collaboratively with partners across social work, addictions, mental health teams, consultant psychiatrists, criminal justice and third-sector organisations to find the appropriate support for the individuals. In addition, we recognise the need in some cases for having very tailored interventions for individuals with more complex needs. For example, individuals with personality disorders respond more positively to a very consistent approach. Partner agencies have welcomed our joined up and proactive approach and we continue to strengthen our relationships with all relevant partners and agencies.

- 4.13 The significant decrease in incidents highlights the effectiveness of early intervention strategies. By addressing the root causes of ASB and providing tailored support to individuals, the prevention and solutions approach, in addition to our overall approach has demonstrated a measurable impact in reducing repeat incidents and promoting positive behavioural change.
- 4.14 Over the last 12 months the Community Improvement Partnership (“**CIP**”) team have continued to refine our processes and approaches to tackling ASB within our communities. This has included:
- Geographical alignment of Antisocial Behaviour Intervention and Prevention Officers (“**ASBIP**”) and CIP Police Officers with frontline housing teams to strengthen the relationship and improve the response to ASB;
  - Weekly ASBIP led ASB surgeries for housing officers to attend and obtain any feedback, advice and support on ongoing cases;
  - Quarterly meetings between the CIP team and legal team to discuss high profile cases, complex cases and timescales for progressing to enforcement action;
  - Locality based ‘tasking’ meetings with local community police to discuss shared concerns and agree actions;
  - Design and implementation of quality assurance checks to give us confidence in the quality of the actions being taken to support customers and address ASB;
  - Monthly review of complaints in respect of ASB to better understand areas requiring improvement;
  - ASBIP attendance at locality based Visual Measure Board meetings (“**VMBs**”) to discuss and monitor ASB cases and timescales;
  - Workshops led by ASBIPs focussing on key areas of the investigation process for ASB and engaging in discussions around blockages and establishing effective solutions; and
  - Build of a PowerBI dashboard to manage ASB in a more streamlined and efficient manner, which is fully accessible for the Wheatley Homes South Managing Director, Heads of Housing and ASB Housing Officer Leads, with data provided at a street level.

#### Neighbourhood Management Policy Review

- 4.15 Over the past quarter we have been engaging with both staff and customers to obtain feedback on the implementation of and use of the Neighbourhood Management Policy and to determine whether any refinements were required.
- 4.16 The policy and corresponding processes have been well received by staff across the organisation including our CFC Advisors and our housing teams. A staff focus group was held with key staff to establish:
- The effectiveness of having both policies outlining each respective area of concern to be clear on what constitutes neighbourhood management and what ASB;
  - Feedback on how it was received by customers;
  - If there was anything missing from the policy or required to be removed; and
  - Experience of utilising the toolkits and whether there was anything required to strengthen them.
- 4.17 The staff team fed back that they felt the policy and procedures were working well. No substantial changes were suggested. Staff found the policy was clear and supported better communication with tenants.

- 4.18. We engaged with customers to obtain feedback on their experience of utilising the Neighbourhood Management Policy and whether they felt there were any changes required or if anything was missing from the policy.
- 4.19. We spoke with 24 customers and the overwhelming consensus was that the policy was fit for purpose in its current format and required no material changes. Customers were clear on how to report a neighbourhood management concern; understood the service they should expect from us and what solutions were available to deal with the issues raised.
- 4.20. Following staff and customer feedback, we have proposed a series of minor changes to the Neighbourhood Management Policy. These are shown in Appendix 1 in tracked changes, and include:
- Refining some of the language to bring in line with other documents;
  - Adding in one further example of activity under the noise category to include one that was felt by staff to be missing – ‘intimate relations’;
  - Adding in one further example of activity under the environmental category to include one that was felt by staff to be missing – ‘smell of cannabis’;
  - Future proofing the document and removing reference to our current strategy to take it through to our next review period;
  - Inclusion of further information on Wheatley Foundation and how they support the promotion of good neighbourhood management; and
  - Strengthening the section on our Neighbourhood Environmental Team Service and the impact this has on supporting good neighbourhood management.
- 4.21. While the feedback from both staff and customers has been positive, we recognise there are steps we can take to continue to refine and improve our approaches. In the next year we will focus on:-
- Improving our neighbourhood management data and reporting to understand by locality and patch level the extent of neighbourhood management issues and emerging themes;
  - Explore the use of dashboards to present the data to relevant teams;
  - Add neighbourhood management case detail to our Visual Measure Boards for local teams to discuss appropriate actions and solutions;
  - Develop quality checks for neighbourhood management cases to assure that cases are being responded to and resolved in the way we would expect; and
  - Explore the use of real time feedback to test customers satisfaction with the service they receive in respect of neighbourhood management concerns and ASB.

## **5. Customer Engagement**

- 5.1 As noted above.

## **6. Environmental and sustainability implications**

- 6.1 There are two main categories of neighbourhood management within the policy, one of which is environmental concerns and includes areas such as fly tipping, garden maintenance and litter/rubbish. Effective application of the policy and implementation of the suggested solutions to deal with concerns raised will have a positive impact on the environment within our neighbourhoods.

## **7. Digital transformation alignment**

- 7.1 We have enhanced our system to record neighbourhood management cases to help support greater understanding of the types and volume of issues our customers are experiencing within their neighbourhoods. This development is allowing us to observe a richer picture of data around our wider neighbourhoods and the concerns that require to be addressed.
- 7.2 In terms of our ASB service, our new recording system Safer Communities has been built to streamline the process for uploading and managing ASB cases more effectively. This system is more user friendly, and our staff continue to engage with us around continued and future system developments to enhance user experience and continuously improve the process.
- 7.3 We will use our digital channels and products such as WE Connect and Talk Together to provide information around the minor updates to the Neighbourhood Management Policy to staff to ensure they are aware of the change.

## **8. Financial and value for money implications**

- 8.1 The successful introduction of both the ASB and Neighbourhood Management policies has afforded us the benefit of stripping waste from the previous process by redefining the case routing for issues reported to us concerning the management of our neighbourhoods.
- 8.2 We have invested significant time in upskilling our staff on the principles of our new policies, as well as the processes that sit alongside these and the complimentary toolkits. This has the benefit of achieving improved customer experience and journey for those raising concerns around the management of our neighbourhoods.
- 8.3 There are no financial or value for money implications with the minor changes being suggested to the Neighbourhood Management Policy.

## **9. Legal, regulatory and charitable implications**

- 9.1 No further implications.

## **10. Risk Appetite and assessment**

- 10.1 The Neighbourhood Management Policy and ASB Policy both support our ambitions across all five strategic themes. Our risk appetite in relation to operational delivery of these themes ranges from open to hungry.
- 10.2 This means that we seek to build on our existing successes and are eager to be innovative and explore new working practices that offer high reward for both staff and customers. The work we have undertaken to embed the policies, upskill our staff to deliver on these for the benefit of our customers, and the recent review of the neighbourhood management policy is in line with these risk appetites.

### 10.3 The key risks associated with this work could be:

- Failure to design and apply quality checks for neighbourhood management cases to provide assurance around the quality of the output and outcomes for our customers: A priority for this year is to implement quality checks, as we do in ASB, to get further assurance about our responses to neighbourhood management concerns; and
- Failure to build in a mechanism to obtain customer feedback and sentiment in relation to our service delivery across our ASB and Neighbourhood Management services: Our customer satisfaction measures include a specific question on how satisfied customers are with our contribution to the management of neighbourhoods. In 25/26 we will explore the use of MyVoice for capturing customer insight on how we respond to neighbourhood management concerns.

## 11. Equalities implications

- 11.1 There are no adverse equalities implications associated with the review of the Neighbourhood Management Policy and work undertaken to embed this and the ASB Policy into practice over the past 12 months.
- 11.2 Our prevention and solutions approach for ASB has been designed to recognise the impact poverty and disadvantage has on propensity to being either involved in crime or being a victim of crime. Our approach aims to better understand root cause and link our customers to the most appropriate forms of support to help them move from a position of disadvantage to a healthier and safer pathway.

## 12. Key issues and conclusions

- 12.1 Following approval of our first Neighbourhood Management Policy the first year focused on
- Launching and implementing the policy and associated processes;
  - Monitoring the impact; and
  - Seeking feedback to inform revisions to our policy and processes.
- 12.2 We now manage a significant number of issues raised by tenants under our Neighbourhood Management Policy. Resolutions to these have been developed to support a consistent approach to managing concerns. Early evidence indicates customer satisfaction with the management of neighbourhoods is improving. At the same time, ASB cases have reduced by 14% over the same period. We worked more intensively with 48 individuals using our prevention and solutions approach. This resulted in a 60% reduction in incidents associated with these individuals over a six month period.
- 12.3 This has allowed us to focus on true ASB and in progressing our objective to reduce repeat cases of ASB within our neighbourhoods through use of our prevention and solutions approach.
- 12.4 Staff and customers have fed back positively on the policies and the implementation of these with only minor changes being made to the documents and the associated toolkits.
- 12.5 Throughout 25/26 there are a number of areas of improvement we will focus on to ensure we continue to respond effectively and appropriately to both neighbourhood and ASB concerns.



### **13. Recommendations**

13.1 The Board is asked to:

- 1) Note the activity and data in the year since the Neighbourhood Management Policy was approved; and
- 2) Approve the minor changes to the Neighbourhood Management Policy.

LIST OF APPENDICES:

Appendix 1: Neighbourhood Management Policy – tracked changes

# Neighbourhood Management Policy

*We will provide this policy on request at no cost, translated, in large print, in Braille, on tape or in another non-written format.*

We can produce information on request at no cost in large print, in Braille, on tape or in another non-written format. We can also translate this into other languages. If you need information in any of these formats please call us on **0800 011 3447** or email [info@wheatley-group.com](mailto:info@wheatley-group.com)

Możemy, na życzenie, bezpłatnie przygotować informacje dużą czcionką, w alfabecie Braille'a, na taśmie lub w innym niepisanym formacie. Możemy je również przetłumaczyć na inne języki. Jeśli potrzebujesz informacji w którymkolwiek z tych formatów, zadzwoń do nas pod numer **0800 011 3447** lub wyślij e-mail na adres [info@wheatley-group.com](mailto:info@wheatley-group.com)

Podemos produzir informações mediante solicitação e sem custos, em impressão grande, Braille, cassete ou noutro formato não descrito. Também podemos traduzi-las em outros idiomas. Se precisar de informações em qualquer um destes formatos, contacte-nos através do número **0800 011 3447** ou envie um e-mail para: [info@wheatley-group.com](mailto:info@wheatley-group.com)

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Approval body	Wheatley Homes South Board
Date of approval	<del>13<sup>th</sup> March 2024</del> <u>TBC</u>
Review Year	<del>2025</del> <u>2027</u>
Customer engagement required	Yes
Trade union engagement required	Yes – For information
Equality Impact Assessment	Yes

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7. Support for those experiencing neighbourhood management concerns.
8. Partnership working.
9. Support and signposting.
10. Legislative, Regulatory and Strategic Drivers.
11. Policy review and consultation.
12. Policy awareness and training.
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14. Confidentiality and data protection.
15. Complaints.

## 1. Introduction and background

~~Having Developing~~ peaceful and connected neighbourhoods is a key ambition for Wheatley Homes South, where we want our customers to feel proud of their homes and be part of neighbourhoods that are clean, safe and vibrant. ~~strategic outcome within our Group strategy~~ **Your Home, Your Community, Your Future**. ~~To support this ambition, we have outlined a strategic target that over 70% of our customers will live in neighbourhoods categorised as peaceful, meaning reports of antisocial behaviour (ASB) are reducing.~~

Wheatley Homes South has a vital role in ensuring our neighbourhoods are places and spaces where customers are proud to live. Good neighbourhood management is integral to promoting pride in our neighbourhoods, which can only be achieved through a coordinated approach involving customer, Wheatley Homes South and partner engagement.

Wheatley Homes South is Scotland's second largest social landlord with more than 10,000 affordable homes across Dumfries and Galloway, where we are committed to **Better Homes, Better Lives** for all customers residing within our neighbourhoods. We pride ourselves on the provision of award-winning services and recognise the central role our customers play in contributing to this. We encourage customer engagement and consultation, ensuring they are actively involved in shaping services in relation to neighbourhood management.

Our neighbourhood teams are a crucial element in the delivery of safe, well-maintained neighbourhoods, where they deliver a proactive and responsive service across our areas of operation, alongside a planned programme of maintenance. Our neighbourhood teams consist of staff from our including neighbourhood environmental services, antisocial behaviour ~~management~~, customer voice, and housing and care services teams.

Our neighbourhood management approach recognises that each neighbourhood, community, or area is distinct in nature, including stock type and customer base.

We ~~incorporate~~ adopt a placemaking methodology within our approach, where we work collaboratively with customers, partners, and the wide-ranging Wheatley Homes South services, to identify the needs and requirements of the area in realising its full potential. Placemaking is a collaborative process for creating public spaces that people enjoy and feel connected to. There are tools, processes and data available to measure this, that we proactively use within our neighbourhoods.

Customers are at the heart of this approach in helping drive forward the change required and desired within our neighbourhoods, which is based on the observations and opinions of those residing there.

This collaborative and participative approach affords a better understanding of the things that matter most to our customers and where our resources and

service delivery priorities should be targeted, whilst ensuring better outcomes for neighbourhoods with increased opportunities.

It allows us to easily identify where there are areas or issues impacting good neighbourhood management and to consider suitable resolutions available to tackle and improve these.

## 2. What is neighbourhood management?

Neighbourhood management is the term used to describe the proactive and reactive activity and action that is undertaken to maintain the appearance of the neighbourhood environment to a high standard that is considered clean, safe, well maintained and an attractive place for people to live.

It is the collective responsibility of everyone living, visiting, or working within an area to ensure the neighbourhood is maintained to the highest standard. This can include, but is not limited to the following individuals and organisations:

- Wheatley Homes South and housing providers within the area, including Registered Social Landlords, Private Landlords, and the Local Authority.
- Local Authority departments with designated responsibility for neighbourhood management, including, but not limited to environmental health teams.
- Residents living within a neighbourhood from the variety of tenure types present, including social housing, private rented tenancies and owner occupation.
- Organisations, both statutory and non-statutory, working within or operating out of neighbourhoods.
- Business owners.

Neighbourhood management includes the planning, monitoring, management, and delivery of services within the area and is distinct from the management of antisocial behaviour, which is dealt with under the Wheatley Homes South Antisocial Behaviour (ASB) Policy.

## 3. Policy aims and objectives

### 3.1 Our aim

Our aim is to create neighbourhoods that are thriving and well-maintained safe spaces where Wheatley Homes South customers feel proud to live. This policy will set out the structures and approaches in place to achieve this, and measures available to address issues raised that compromise good neighbourhood management, as well as the partner agency approach required by key stakeholders involved across our neighbourhoods.

### 3.2 Our objectives

We will realise our stated aim for creating thriving neighbourhoods by successfully achieving the following objectives:

- Clear identification of the **actions, behaviour and/or activity** that can compromise good neighbourhood management.
- Comprehensive ~~list~~ of **actions and solutions** available to support the resolution of identified neighbourhood management issues.
- Ensure customers are aware of their **responsibilities** under the terms of their Wheatley Homes South tenancy agreement.
- Conduct Routine **engagement activity** focused on keeping our neighbourhoods at a high standard and highlighting any areas of concern requiring proactive action to be taken.
- Regular Neighbourhood Environmental Team (NETs) environmental **weeks of action** with key stakeholders on any thematic areas identified.
- Embedding **Neighbourhood Plans** within Wheatley Homes South localities with clear, detailed improvement action to be taken with agreed timescales attached.
- Empower local communities to drive forward **change and continuous improvement** within their neighbourhoods through involvement in the creation, development and implementation of Neighbourhood Plans.
- Provide **clear guidance** for staff to confidently deal with any reports concerning the management of neighbourhoods.
- Deliver **training to relevant staff** on responding to incidents reported which challenges good neighbourhood management.
- Thoroughly ~~investigate reports where of~~ neighbourhood management concerns ~~issues—exist~~ and ensure customers receive a tailored satisfactory response based on the available resolution actions to deal with these issues.
- **Work in partnership** with key stakeholder agencies to deliver thriving neighbourhoods where our customers are proud to live.

#### 4. Good neighbourhood management

~~In our strategy w~~We outline our ~~are~~ committed edment to making the most of our homes and assets by investing in our existing homes and environments.

We take a proactive approach to managing our neighbourhoods at Wheatley Homes South through the delivery of an extensive range of services, whilst responding to any issues as and when they arise.

Our service provision contributing towards ~~linked to~~ good neighbourhood management includes, but is not limited to the following services:

##### Our Neighbourhood staff teams

Our operating model means more of our staff are based within our communities and available to identify and respond to any concerns raised, at times to suit our customers. This ranges from our Housing Officers, Antisocial Behaviour Intervention and Prevention Officers, Customer Stronger ~~Voices~~ staff Officers, Repairs Operatives, and our Neighbourhood Environmental teams. Having a

wide range of staff making up these wider neighbourhood teams benefits our commitment to supporting our vision of thriving neighbourhoods by providing customers with a range of services and staff on hand to support them with any identified issues should they arise.

### **Neighbourhood Environmental Services (NETs)**

Our NETs teams within Wheatley Homes South play a vital role in delivering thriving neighbourhoods through the provision delivery of services including common close/stair cleaning, grass cutting, uplifting bulk items, gardening, and grounds/neighbourhood maintenance, to ensure local neighbourhoods are clean and tidy. The teams contribute hugely to that sense of pride customers can feel in their communities and are at the heart of our neighbourhood teams for customers to engage with. In 2024/2025 the NETs team in Wheatley Homes South collected 2,100 tonnes of bulk waste and cleaned more than 19,238 closes.

We work in partnership with Scottish charity Keep Scotland Beautiful (KSB), whose mission is to *inspire changes in behaviour to improve our environment, the quality of people's lives, their wellbeing and the places that they care for.* Through this partnership we have supported 16 Wheatley Homes South customers to receive Keep Scotland Beautiful Assessor training, to allow them to evaluate their local area against set criteria to identify areas of strength and improvement and to help evaluate progress on identified improvements.

### **Repairs service**

We provide a planned and reactive repairs service for all customers across Wheatley Homes South, to ensure our stock is maintained to the highest possible standard and delivers on our customer priorities. We have clearly defined timeframes for our repairs to be conducted, and our repairs and maintenance work is always completed in line with our commitment to sustainability.

Our in-house repairs service is customer led and as an organisation we invest significantly in the delivery of the repairs service we provide, to maintain our homes and keep them in excellent condition. This approach ensures we are providing high quality homes that are safe for our customers to live in and contribute towards the delivery of thriving neighbourhoods.

### **Fire Safety**

We work in partnership with Scottish Fire and Rescue to deliver a sector leading approach towards ensuring effective fire safety across our properties. Keeping our customers safe from harm through the risk of fire is a key priority



for Wheatley Homes South and an integral part of good neighbourhood management.

We have an in-house Fire Safety Team who assumes responsibility for the prevention and mitigation of fires across our neighbourhoods and the team works collaboratively with a range of agencies to achieve this. Their work is accomplished through prevention, early intervention, and delivery of a responsive service to build resilience within neighbourhoods in relation to fire safety.

### **Customer Engagement – Neighbourhood Planning**

~~Through our Stronger Voices programme, w~~We take a community led approach towards neighbourhood planning, where the design and delivery of services, systems, processes, and targets are often co-created with our customers. Good neighbourhood management and neighbourhood planning make up an extensive part of ~~this our customer voices~~ programme and work is consistently ongoing in this area to ensure the customer voice is at the heart of our service delivery.

Through this process we work with customers to assess neighbourhoods, identify areas of strength, areas for improvement and co-create action plans to support the delivery of identified activity.

#### Wheatley Foundation

The Wheatley Foundation is our charitable trust and strives in **making lives better** for people within our communities across Scotland. A key focus of the Wheatley Foundation ~~this~~ is establishing opportunities for our customers. ~~The Wheatley Foundation plays an important role in this~~ through their priorities to maximise access to employment, training and learning opportunities and tackling social exclusion and alleviating the impacts of poverty. ~~for our customers.~~

A number of the programmes delivered by the Wheatley Foundation support the creation of vibrant neighbourhoods through training, education, volunteering, work experience and employment opportunities within our neighbourhoods to support with their maintenance and improvement.

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## **5. Neighbourhood management concerns**

### **5.1 Neighbourhood concern types**

Wheatley Homes South is committed to creating thriving spaces where our customers feel safe and are proud to live, however, we recognise that there are times when issues arise that can challenge this.

There are certain actions, activities and behaviours undertaken which can compromise good neighbourhood management and impact how individuals feel about where they live. If not managed appropriately this can have a detrimental impact on the community and the desirability of a neighbourhood.

Based on our experience of the types of neighbourhood management concerns raised by customers, we have categorised these within two main heading types – noise (non-antisocial behaviour) and environmental issues – to demonstrate the types of concerns that can arise between neighbours and within neighbourhoods. These are outlined below with some examples of the type of activity we see reported:

Neighbourhood management issue	Examples of activity
Noise (Non-antisocial behaviour)	<ul style="list-style-type: none"><li>• Children Playing (e.g., within the property, kicking a ball off a wall).</li><li>• Babies/children crying.</li><li>• Animals (e.g., birds chirping, dogs barking – within the property, in the garden or on the veranda).</li><li>• DIY.</li><li>• Domestic Noise (e.g., washing machines, hoovering, walking within the property, flushing toilet, showering, creaky floorboards).</li><li>• Musical Instruments.</li><li>• Lifts.</li><li>• Door/window closing (including common close/stairwell door).</li><li>• <u>Intimate relations.</u></li></ul>
Environmental	<ul style="list-style-type: none"><li>• Fly Tipping (e.g., rubbish or bulk in a public area).</li><li>• Garden Maintenance (e.g., overgrown trees/hedges, rubbish not being put in bins, cutting of grass).</li><li>• Litter/Rubbish (e.g., being thrown from property or left in common close/stairwell area, in gardens, being dropped by people (including children), feeding the birds/keeping in veranda, use of other's bins.</li><li>• Dog fouling (private place) – (e.g., where this takes place within an individual's garden that isn't a shared space).</li><li>• Street Parking (e.g., parking on the street, parking in disabled bays).</li><li>• <u>Smells – (e.g., cooking, cannabis*).</u></li><li>• <u>Fires/bonfires within garden</u></li></ul>

\*Please note that drug possession is a criminal offence and should always be reported to Police Scotland as such. We deal with convictions of drug dealing under our Antisocial Behaviour Policy. The element we are referring to within this policy is in relation to smells attributed with

drug use and includes visible drug taking, drug paraphernalia and smells of drugs. We are recognising here that we receive reports of the smell associated with cannabis which causes concerns from a neighbourhood management perspective and have therefore included this in the list of concerns identified.

**Noise** (non-antisocial behaviour) can often be described as 'living noise' and constitutes activity that ~~can would~~ be considered part of everyday life. We recognise that this activity can still impact customers and are committed to trying to work with all parties, and where appropriate partners, to find appropriate solutions to noise issues which aren't considered ASB noise or managed within the remit of our ASB policy. It is important to note that Similarly, there may be instances where there is no action we can or should take, as the noise activity, action or behaviour is considered general living noise and part of everyday life. We will always seek to engage with all parties involved in the noise (non-antisocial behaviour) concerns raised to attempt to find the most appropriate solution for all.

**The condition of the environment** can impact customers' sense of pride in where they reside, therefore we fully recognise the impact that these types of environmental issues can have on customers, which is why we are fully committed to working with all parties, and where appropriate partners, to find effective solutions to the issues.

Customers' experience of these neighbourhood management concerns can be negative; therefore, it is imperative that these issues are investigated and dealt with, and appropriate solutions sought. There are a variety of solutions that can be utilised to address identified neighbourhood management concerns, which are outlined in more detail in section 6.

It is important to note that the action, activity, and behaviour referred to above as the examples of activity as impacting upon good neighbourhood management ~~does~~ not constitute ASB. antisocial behaviour. ASB This is a separate type of behaviour and activity that is linked to the Antisocial Behaviour etc. (Scotland) Act 2004 and is covered within our Wheatley Homes South ASB Antisocial Behaviour Policy. Within this policy there is clear categorisation of the types of activity and behaviour conduct this refers to and actions to support addressing the conduct.

## 5.2 Customer commitments

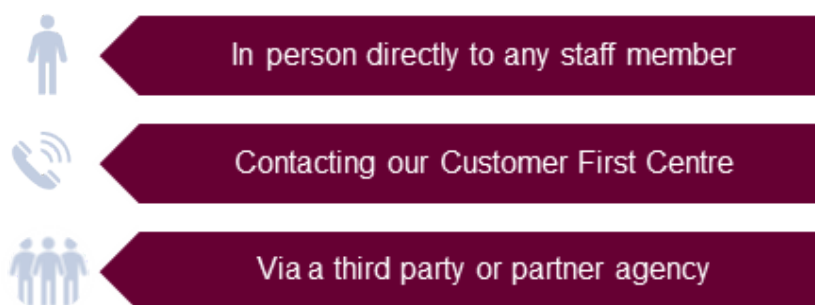
We have set customer commitment levels to ensure our customers are clear around what level of service they can expect from us when they report a concern or issue related to the management of their neighbourhood, which are:

Customer commitment	Timescale
<u>In cases where we are able to provide the information necessary to address your identified issue and/or provide relevant signposting information, without further need for any form of</u>	<u>At point of contact via either direct in person to a staff member or during a call to our Customer First Centre (CFC).</u>

<u>discussion and/or visit, we will do so at the immediate point of contact.</u>	
<u>In cases where further information is required, or an in-person visit is necessary to gather further information to address the concern, we will contact you to discuss and/or arrange this. to gather further information on your neighbourhood management issue or concern</u>	Within 3 working days <u>of receipt of report</u>
<u>In cases where further information and/or an in-person visit is required, we will have communicated with you to provide information, support, and guidance and/or discuss potential solutions to the issue or concern raised</u>	Within 10 working days <u>of receipt of report</u>

### 5.3 Reporting neighbourhood management concerns

Neighbourhood management concerns can be reported ~~by Wheatley Homes South customers~~ via several routes, including:



### 5.4 Triaging methodology

Circumstance and context are ~~is a~~ crucial elements in determining whether something falls into the category of impacting good neighbourhood management or whether it could be considered as something else. To support this process, we have developed a clear triaging methodology with factors for consideration for our staff to determine which category the concern falls within, which will be either:

- Neighbourhood management concern; ~~or~~
- Antisocial behaviour; or
- Neither neighbourhood management concern or ASB.

Staff will establish details around the concern being reported to determine this and will be ~~well~~ trained in the areas of neighbourhood management and ASB to correctly ~~to~~ manage these types of cases and ensure they are being correctly categorised:

Triaging methodology - factors for consideration	
1.	What is the nature of the issue or concern?
2.	When is the activity, action or behaviour taking place – (e.g., time of day)?
3.	How often is the activity, action or behaviour taking place – (e.g., the frequency of this – hourly, daily, weekly, monthly)?
4.	How long does the activity, action, or behaviour last – (e.g., the duration of this - 30 minutes, one hour, all morning/evening, all day)?
5.	What impact is the action, activity or behaviour having on the person affected by this?
6.	Are there any underlying reasons to explain the activity, action, or behaviour?
7.	Is the activity, action, or behaviour unreasonable?

Each case will be dealt with on its merits and characteristics and a determination made following full consideration of all detailed and contextual information. Our staff will communicate clearly with customers which route their concern is being dealt with under – neighbourhood management concern, ASB, or neither. ~~or antisocial behaviour.~~ If it is determined that the concern neither constitutes neighbourhood management concern or ASB, our staff teams will help support customers and signpost or guide them to find some form of resolution to the issue being raised where this is possible.

## 6. Resolving neighbourhood management concerns

There are a number of solutions available to support good neighbourhood management. They are individualised based on circumstance and can involve effective communication, partnership working, negotiation and compromise, to achieve effective resolution to suit all parties involved.

The provision of advice, support and guidance is central to achieving successful outcomes, as is a clear understanding of the differences between action, activity and behaviour that constitutes a challenge of good neighbourhood management and that which doesn't (e.g., antisocial behaviour). It is also important to recognise where resolution measures are required, or where there is no requirement for them, as the action, activity or behaviour constitutes living noise or everyday life.

An example of some key measures that can be used to resolve neighbourhood management concerns include the following list, which is not exhaustive:

### Discussion with the individual(s) **considered to be involved in action, activity, or behaviour**

One of the first steps that should be taken when there is an identified ~~clear~~ individual(s) considered to be identified as partaking in the action, activity or behaviour that is causing distress, frustration or upset to another individual, is

to have a conversation with them around this to raise awareness. This allows for open dialogue to discuss the issue and explain the impact it is having on those affected. The approach allows awareness to be raised and can be sufficient for understanding and compromise to be reached to resolve things. This can involve a visit to the property by a Wheatley Homes South staff member, likely to be the Housing Officer, if necessary.

### **Mediation**

Where parties have failed to reach an agreement or relationships have broken down because of the neighbourhood management concerns raised, sometimes using a third party to mediate can be helpful. This will be a confidential and independent service, where both parties can express their position and feelings to try to sort out their differences, reach a compromise, and help rebuild their relationship. It will often be in a neutral venue to support impartiality and is entered into voluntarily.

### **Referral to specialist teams within the Local Authority**

Local Authorities have a variety of roles within their dedicated teams with the responsibility to deal with neighbourhood management type concerns. The teams are often multi-skilled and range from community wardens, noise teams, home security and mediation services and they will provide advice to anyone who contacts them if they reside within that local authority area.

Local authorities have the statutory responsibility for controlling and dealing with noise concerns.

They also have the responsibility to deal with issues around fly tipping and must have a procedure in place to deal with this.

### **Access to products and services**

If the neighbourhood management concern raised can be resolved through the provision of a specific product or service, then this will be considered as a viable option to address this. Examples of this could be soft door/window closers, adaptations for bin areas or headphones for noise. Another example would be arranging for the customer to access the Noise APP, which is a tool used to submit reports of noise nuisance to landlords for further investigation and corroboration.

### **NETs Support**

Our NETs are an integral part of our approach towards the creation of thriving neighbourhoods and play a major role in ensuring our neighbourhoods are clean, tidy, and safe places for our customers to live.

We can utilise our NETs teams to support addressing concerns within areas identified either through one off pieces of work or programmed activity. This can be a partnership approach with other agencies or organisations involved

in maintaining our neighbourhoods or with wider teams from across Wheatley Homes South.

**Wraparound support**

Wheatley Homes South has access to an extensive **range package** of internal wraparound support for customers which can be utilised at any stage during their tenancy, should their circumstances require this. This ranges from services including financial capability, employability, and safeguarding. If wraparound support services will assist in supporting anyone involved in neighbour disputes or neighbourhood management concerns, the appropriate referrals would be arranged.

**7. Support for those experiencing neighbourhood management concerns**

Where a Wheatley Homes South customer has experienced neighbourhood management concerns and reports this to us, they can always be assured of the following:

Effective Communication	We will keep you updated during the time you have raised a concern with us and ensure to explain the process taken and honour any commitments made to you.
Internal wraparound support	We will provide access to internal wraparound support services to suit the circumstances and needs of our customers.
External support	We will signpost to specialist services based on the individual circumstances and needs of our customers and make any identified referrals as necessary.

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Effective Communication	We will keep you updated throughout the duration a case is ongoing, explaining the process taken at each stage and honour any commitments made to contact you.
Internal wraparound support	We will provide access to internal wraparound support services that suit an individual's needs.
External support	We will signpost to specialist services based on individual circumstance and need and make any referrals identified as necessary.



We will always strive to support good relations between our customers and within our neighbourhoods. However, it is important to recognise that there may be occasions where the conduct or issues being reported to us are considered general living or everyday life and ~~options to address this will be exhausted, and~~ no further action can be taken.

## 8. Partnership working

Our neighbourhoods are diverse areas made up of different housing types with many cultures and communities residing within them.

Ensuring our neighbourhoods remain vibrant and thriving spaces where our customers feel safe, secure, and proud to be part of the community takes a true partnership approach to achieve this. This includes a partnership approach directly with our customers with strong customer engagement embedded throughout, to ensure their voice is at the heart of our service design and delivery.

It also involves strong partnership working with external agencies with a vested interest within our neighbourhoods, which includes, but is not limited to the following partners:

- Local Authorities where we have a geographical stock footprint.
- Police Scotland.
- Scottish Fire and Rescue.
- Voluntary and Third Sector organisations operating within the community.
- Local businesses.

Taking this collaborative approach will deliver better outcomes for customers and neighbourhoods collectively, when there is shared responsibility over the ongoing management of the area.

## 9. Support and signposting

Building customer and community resilience is a key intention set out throughout our Group strategy. We recognise that for some people involved in neighbour disputes and experiencing neighbourhood management concerns, this can have an impact on their health, wellbeing, and resilience levels.

If we become aware of any specific support needs identified throughout the process of dealing with neighbourhood management concerns, we will seek to assist, either directly through the provision of access to our internal wraparound support services, or through making referrals to specialist external agencies.



We will use our knowledge of our neighbourhoods and available services contained within, alongside our strong network of partnerships, to advocate for our customers where necessary to get them the required level of support.

## 10. Legislative, Regulatory and Strategic Drivers

### 10.1 Legislation

This policy has been written taking cognisance of the following legislation:

- Environmental Protection Act 1990.
- Antisocial Behaviour etc. (Scotland) Act 2004.
- Housing (Scotland) Act 2001.
- Housing (Scotland) Act 2010.
- Housing (Scotland) Act 2014.
- Human Rights Act 1998.
- Regulation of Investigatory Powers (Scotland) Act 2000.
- Equality Act 2010.
- Data Protection Act 2018.
- General Data Protection Regulation (Regulation) (~~EU~~—EU) 2016/679).

### 10.2 Regulatory

Neighbourhood management is an established indicator within the Scottish Social Housing Charter. Registered Social Landlords must provide details about satisfaction within neighbourhoods as part of their Annual Return on the Charter (ARC). Full details on the measure reported are found at Appendix 1.

### 10.3 Strategic Drivers

The Scottish Government National Performance Framework (NPF) is Scotland's wellbeing framework and sets out a national purpose and vision for Scotland, with outcomes aligned to measure progress towards achieving this. Neighbourhood management is most closely aligned with the national outcome which states: '***we live in communities that are inclusive, empowered, resilient and safe***'.

This communities outcome outlines that '*Our communities are shaped by the quality and character of the places we live in and the people we live among. In this outcome we recognise that to be healthy and happy as a nation we must nurture and protect our local resources, environments and all who live in them*'.

## 11. Policy review and consultation

~~Neighbourhood management is an area of development nationally at this time, therefore, in the first instance, we will review this policy after 1 year to allow for any ongoing development within the wider housing sector to complete and be~~

~~incorporated into this policy document. Following this review, we will move to a review frequency of every three years. We will review this policy in two years. Following this it will fall into the three yearly review schedule timetable.~~  
Reviews will consider legislative, performance and good practice changes.

More regular reviews may be considered where, for example, there is a need to respond to new legislation / policy guidance or major developments in the area of neighbourhood management. ~~any recommendations from learning reviews.~~

We have developed this policy in consultation with key stakeholders, including customers and staff from Wheatley Homes South.

## 12. Policy awareness and training

~~The policy will be rolled out to staff within Wheatley Homes South as part of wider good neighbourhood management sessions.~~

Relevant staff across the organisation will be aware of the existence of this policy and of the requirement to apply the process contained within when dealing with reports of neighbourhood management issues.

The policy will be located on the Wheatley Homes South website for ease of access for customers and stakeholders alike.

~~A detailed communication programme will accompany the launch of the policy, where~~ internal and external channels will be utilised to raise awareness of the policy to staff, customers and stakeholders, to exhibit and the benefits application of the policy will bring to support our ambition of creating thriving neighbourhoods.

## 13. Performance monitoring and reporting

We will measure and monitor neighbourhood management concerns reported to us to establish the types of issues being raised, as well as identify any trends or thematic areas established. This insight will allow a greater understanding of areas impacting good neighbourhood management and the types of suitable and effective resolution methods available. It also helps identify any areas for improvement.

This information will be considered as part of our wider neighbourhood management approach.

Customer satisfaction with our neighbourhoods and areas for improvement will also be measured and embedded through established structures across the organisation such as our customer ~~stronger~~ voices programme and scrutiny panel.

## **14. Confidentiality and Data Protection**

In certain circumstances and subject strictly to conditions set out in the Data Protection Act 2018, General Data Protection Regulations and any other applicable data protection legislation, personal information may be shared by Wheatley Homes South with other organisations and partners. Before Wheatley Homes South can share personal information, it must consider all legal implications of doing so, not simply the terms of the applicable legislative requirements. Appendix 2 of the Wheatley Group Data Protection Policy must be considered.

Once a decision has been made as to whether or not information should be shared, that decision must be recorded, together with the reasoning behind that decision. Where a decision was taken to share the information, this will be on a “need to know” basis and an audit trail must be kept.

Staff members must consult the Group Data Protection Policy and if in doubt, seek advice from the Group Information Governance Team.

## **15. Complaints**

Our aim is to get it right first time, however, where there is any dissatisfaction with this policy or its operation, customers can make a complaint.

A summary of the Complaints Policy and Procedure is available on the Wheatley Homes South website.

Scottish Social Housing Charter – Annual Return of the Charter Indicators relative to neighbourhood management.

Indicator number	Charter Description
13	<p>Percentage of tenants satisfied with the landlord’s contribution to the management of the neighbourhood they live in.</p> <p>i. (i) Number of tenants who were asked: ‘Overall, how satisfied or dissatisfied are you with your landlord’s contribution to the management of the neighbourhood you live in?’</p> <p>(ii) Number who responded:</p> <p>(a) very satisfied</p> <p>(b) fairly satisfied</p> <p>(c) neither satisfied nor dissatisfied</p> <p>(d) fairly dissatisfied</p> <p>(e) very dissatisfied</p>

## Report

**To:** Wheatley Homes South Board

**By:** Stephen Devine, Director of Assets and Sustainability

**Approved by:** Frank McCafferty, Group Director of Assets and Development

**Subject:** Radio Teleswitch update

**Date of Meeting:** 28 May 2025

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### 1. Purpose

- 1.1. To update the Board on the implications of the planned switch-off of the Radio Teleswitch (“**RTS**”) systems for our customers.

### 2. Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for considering matters of strategic importance.
- 2.2 The planned switch-off of RTS has potential implications for the heating supply to a significant number of our customers and is therefore considered strategically important. An update on this was provided at the Board’s last meeting. It was agreed that a further update would be provided at this meeting and subsequent meetings until the RTS issue is resolved.

### 3. Background

- 3.1 RTS is a legacy electricity metering system that relies on an obsolete long-wave radio signal to communicate with electricity meters so they can switch from peak to off-peak tariffs. These types of meters have two distinct circuits – one for heating and hot water, and one for the other electrical systems in the home – sockets, lights etc. The RTS issue only affects the heating/hot water circuit as this is the one that requires to switch from peak to off-peak to facilitate charging of storage heating and hot water tanks when tariffs are cheaper; typically at night.
- 3.2 The RTS switch off is scheduled for June 2025, although it is likely that the switch-off will be staggered with it occurring in Scotland from the end of August 2025, although this has not been communicated officially. Given this, we believe it remains prudent to plan for the switch-off happening at the end of June 2025.

- 3.3 OFGEM and the energy companies have been working to refine their estimate of the number of meters that are affected and now believe there are 132,000 meters in Scotland (out of 432,000 in the UK). This is a reduction from the 1 million UK meters indicated originally, mainly due to deprioritising properties with alternative heating such as gas. It is also worth noting that in many cases these properties will still have a RTS meter but there will be minimal implications from the switch off because the heating/hot water circuit will no longer be in use.
- 3.4 We have been working closely with Scottish Power, as they are by far the largest RTS meter operator in our stock and are now receiving fortnightly updates on progress in switching meters in our stock. The latest indication from Scottish Power is that **we have 734 RTS meters in our homes**.
- 3.5 Based on the latest data (end-April) we have from Scottish Power, they have 784 appointments booked in for Wheatley customers – group wide, over the next four weeks. Scottish Power is unable to provide a breakdown of appointments by geographic area. This is an average of 196 per week, compared to an average of 26 per week before we, and others, begun our communications and other activities to drive awareness of the switch off and its implications. Also of note is that Scottish Power's 'conversion rate', which is the appointments completed compared to appointments made, has improved from 43% to 68% for our customers.
- 3.6 We are also continuing to hold discussions with Utilita to understand its approach to RTS switch-off. Utilita is planning a direct marketing campaign and is working to identify Wheatley customers in its records of those with RTS meters. So far, Utilita has identified 46 Wheatley Group properties with legacy RTS meters, in homes with electric storage heaters. Market share among other energy providers will be minimal because they do not have a tariff structure that is applicable for storage heating.

#### 4. Discussion

- 4.1 Since the last update we have continued to engage directly with energy companies, OFGEM and Energy UK. We also hosted a SFHA summit with stakeholders including Government and energy companies on void switching where we took the opportunity to raise the RTS issue. Letters have also been sent to all identified customers encouraging them to contact their energy companies to make an appointment for their new meter. Briefings have been provided to staff who routinely engage customers, so they are confident in raising the need to switch when they meet customers. We have also put up posters in common areas to raise awareness of the RTS issue and encourage customers to contact their energy companies to arrange a replacement meter. Furthermore, we have created a dialogue prompt for all incoming calls to our Customer First Centre whereby the property is flagged on our systems as having RTS metering, and our call handler has the opportunity to raise this and the need to change with the customer.
- 4.2 Our on-going efforts have coincided with OFGEM and the energy companies raising awareness of the RTS switch-off through press, radio and television, and Glasgow becoming an identified priority area for switching efforts because of the high prevalence of storage heating.

4.3 Despite these activities, we are still concerned that the pace of switching is insufficient to give us confidence that all RTS meters in our stock will be replaced by switch off. We therefore intend to enhance our customer engagement activities further, while continuing to work with energy companies to help ensure our customers respond positively to their on-going campaigns to encourage switching from RTS meters. Our planned enhanced engagement activities, over and above those discussed already which will continue, include:

- Targeted outbound calling and text messages to our customers encouraging them to contact their energy company to make an appointment to switch;
- Using our social media channels to encourage switching;
- Moving from written and phone-based communications with customers to face-to-face home visits where we will work with the customer to make an appointment to switch; and
- Piloting an approach with Scottish Power where we engage directly with customers who have booked but not kept appointments to provide support and encouragement to make and keep subsequent appointments

4.4 We have also begun contingency planning in the event that our customers are left without heating following the RTS switch off. The focus of this work at present includes:

- investigating and categorising the way electricity is provided in different properties impacted by the RTS switch-off so as to develop alternative heating options;
- examining where we believe customers have access to alternative heating and how water because of previous investment we have made, and confirming there is no reliance on RTS;
- investigating options to use the non-heating electric circuit in an RTS meter to provide heating; and
- assessing the extent to which we can use Connected Response, which is included in many properties with storage heating, as an alternative switching mechanism.

## **5. Customer engagement**

5.1 We are working with our customers, as set out elsewhere in this report, to encourage switching.

## **6. Environmental and sustainability implications**

6.1 There are no environmental and sustainability implication for us as the change from RTS meters to smart meters is for the energy companies to make.

## **7. Digital transformation alignment**

7.1 The move to smart meters is part of a wider agenda towards the use of digital technologies nationally, although there are no direct implications for our digital strategy.

## **8. Financial and value for money implications**

8.1 The cost of replacing RTS meters is for the energy companies.

## **9. Legal, regulatory and charitable implications**

- 9.1 There are no legal, regulatory or charitable implications associated with this paper.

## **10. Risk appetite and assessment**

- 10.1 We are committed to delivering an exceptional customer experience. The RTS switch off presents a risk, which is now reflected in our Group strategic risk register, to this because of the adverse implications for customers, and in particular their supply of electric heating. The approaches discussed in this paper are how we are looking to mitigate this risk.

## **11. Equalities implications**

- 11.1 We are working with the energy companies to encourage affected customers to switch from a RTS meter to a smart meter. Doing this will help ensure that all customers, including those with particular vulnerabilities are protected from the potential harm that could arise from the RTS switch-off.

## **12. Key issues and conclusions**

- 12.1 Energy companies are still planning to switch off the legacy RTS meter system from June 2025. While it is possible an extension to this date may yet be agreed upon, there is a growing risk that the planned switch-off will have adverse implications for our 734 customers identified as having this type of meter. We are continuing to work to address this impact including with OFGEM, energy companies and our customers. Given progress by energy companies to date, we are keeping this situation under scrutiny and enhancing our engagement activities with customers to ensure the impact of this national issue on our customers is mitigated. The Board will be further updated at its next meeting.

## **13. Recommendations**

- 13.1 The Board is asked to note this update.

LIST OF APPENDICES:

None



## Report

**To:** Wheatley Homes South Board

**By:** Louise Dunlop, Managing Director of Care

**Approved by:** Laura Pluck, Group Director of Communities

**Subject:** Care Update

**Date of meeting:** 21 May 2025

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### 1. Purpose

- 1.1 The purpose of this paper is to provide the Board with an update on care activity over the last year and the wider work being undertaken across care.

### 2. Authorising and strategic context

- 2.1 Under the Terms of Reference, it is the responsibility of the Board to monitor ongoing service performance including care services delivered by Wheatley Homes South. Wheatley Care have overall responsibility for care delivery across Wheatley Group and the Board monitor this at each meeting.
- 2.2 This report contributes to delivering upon two strategic themes detailed within Wheatley Group's 2021 - 2026 strategy, '*Your Home, Your Community, Your Future*'. These are:
- 'Changing Lives and Communities; and
  - 'Delivering Exceptional Customer Experience.'

### 3. Background

- 3.1 Wheatley Care assumed full management responsibility of all care activity within WHS from 01 April 2021. The services managed on behalf of WHS include:
- Sheltered Housing Services;
  - Young Persons Project; and
  - Temporary Supported Accommodation.
- 3.2 All care services within Dumfries and Galloway are registered with the Care Inspectorate (CI) under one principal registration. Whilst all services fall under one CI registration each has its' own distinct contract and service specification as detailed below:
- Sheltered Housing receives block funding from Dumfries and Galloway Council ("**DGC**") providing visiting support to up to 248 older people across 15 locations in our homes;

- The Young Persons Project is fully funded by DGC Children and Families Social Work team, offering tenancies for Care Experienced Young People aged 16-24 years. This service is currently contracted annually; and
  - The Temporary Accommodation service receives block funding with a direct award confirmed until 2028 with the option to extend for a further two years. The service operates over two sites for young people and adults 16+ who are experiencing homelessness.
- 3.3 The Area Care Manager is the Registered Manager for all services, working closely with the Head of Care, the team deliver on both operational and strategic priorities. The Area Care Manager is supported by Team Leaders based across the services. The leadership teams are part of the wider Care Leaders Forum.
- 3.4 The services have been operating for more than 20 years and have a strong reputation across the Local Authority and Health and Social Care Partnership (“HSCP”) for delivering high quality care and support services and excellent outcomes for individuals with a range of care and support needs.

#### 4. Discussion

##### *Sheltered Housing Service*

- 4.1 Service delivery within our Sheltered Service has continued to focus on promoting physical and mental wellbeing, advice, sign posting and making links to other agencies. The aim of the service is to work with people long term to reduce social isolation, increase meaningful activity which supports customers to remain as independent and resilient as possible within their own homes and communities for as long as possible.
- 4.2 The outcomes achieved by customers differ to more transitional services where maintaining stability, health, independence, and quality of life are often the primary goals, rather than significant change or progression. For many customers, maintaining existing levels of wellbeing is a key and positive outcome given the natural challenges associated with aging and/or long-term health conditions. The care and support delivered, and the approaches adopted have contributed to 85% of our customers in Sheltered Services reporting, via their Outcomes Star assessment tool, that they have maintained their health to a good level and that 80% have maintained their distance travelled in meaningful activity which support the reduction of social isolation.
- 4.3 Following the success of the Inclusion Garden in 2023, previously reported to the Board, a second round of HSCP/Lens funding in 2024 was awarded to facilitate the refurbishment of the communal lounges at Catherinefield Court and Daar Lodge and focus on creating Psychologically Informed Environments (“PIE”) that promote safety and wellbeing. The refurbishment plans were developed in conjunction with the customers who use the space, and the feedback has been very positive. The space within Catherinefield Court is also used regularly for local community events and groups. The Asset and Investment Plan has identified £150,000 for the Sheltered Services over the next five years. This investment will see the timber windows at Daar Lodge being replaced. Daar Lodge is in a conservation area and discussion with Dumfries and Galloway Council are ongoing to progress the planning permissions required for the works to be carried out.

- 4.4 A key focus over the past year has been the continued digitalisation of the Telecare Services which are a critical part of the service delivery model. A dedicated working group was established and has been taking forward the work associated with this change which has been driven by PSTN (Public Switched Telephone Network) changes originally anticipated this year. While the PSTN switch off has been delayed until 2027 we have continued to progress our plan. To date, five sites have been upgraded to a digital solution with close partnership working ensuring that disruption for customers has been minimal. We anticipate all relevant sites will have updated systems by the end of September 2025.
- 4.5 Customer satisfaction remains high across the Sheltered Service with the most recent customer sentiment survey, carried out across all care services in 24/25, evidencing overall satisfaction within the service at 99%. Feedback was received from 73% of customers.

#### *Young Persons Project*

- 4.6 The Young Persons Project continues to offer support to care experienced young people who often present with complex support needs linked to previous Adverse Childhood Experiences and continuing trauma. Overall customer satisfaction has also remained high in this service at 100%.
- 4.7 DGC continue to be complimentary in respect of the outcomes that the young people are achieving and are currently undertaking a review of young person's services across DGC with a view to bringing all provision into their procured main business. Currently this service is contracted annually based on funding that DGC receive from the Scottish Government. We are hopeful that this approach will bring longevity to this contract going forward.
- 4.8 Five young people have moved on from the service within the year, all of whom are sustaining their tenancies. This includes three unaccompanied young people seeking asylum who were referred to the service and have thrived as a result of their own determination and resilience and the interventions, care and support offered to them.
- 4.9 As a result of our work with unaccompanied asylum-seeking young people the staff team were nominated as a finalist for the 2024 CIH Marion Gibb award for Equality in Housing held last Autumn. The service was also recognised as best practice in the Care Inspectorate Thematic Review of young people's services in Scotland. A great accolade for the staff and leadership team.
- 4.10 There is a continued focus on individuals continuing within further education or employment and the team have worked closely with Wheatley Foundation and this is evidenced in some of the achievements noted below: -
- Two young people have been supported to gain work experience with Dumfries and Galloway Council;
  - One young person is awaiting the outcome of their Wheatley Works application;
  - Two young people were accepted onto a mechanics course of their choice at Dumfries College;

- One young person has been accepted to go on to the next year of his computing course;
- One young person is awaiting the outcome of their interview to become an apprentice butcher and;
- Eight young people have received laptops through Wheatley Foundation's Tech Share Project which has supported their continued studies.

#### *Temporary Accommodation*

- 4.11 Support over the past year within the service has focused on supporting individuals to secure longer term settled and sustained accommodation which meets their needs. Over the past year, 42 individuals have moved on from the service to a positive destination to their own home or returning to live with family.
- 4.12 The service is achieving significant outcomes with the individuals across many areas of their lives, in particular, improved tenancy management skills, routes into education and employment, managing finances and improving physical and mental health outcomes. Recognition of the excellent work being done is regularly recognised by colleagues across statutory services and this is further evidenced by the Outcomes Star assessment tool which demonstrates that over 70% on individuals are making progress or maintaining their identified outcome areas.
- 4.13 This year the service has also recruited a volunteer with lived experience who is offering peer support to people we support. This individual was accommodated within the service and wished to return in a volunteer role. Their main focus is on meaningful activity and whilst this does not replace paid support, the individual's input enhances the support on offer and recognises the importance of empathy and understanding through lived experience.
- 4.14 Learning and development opportunities have enabled six individuals to attend Cyb safe classes in partnership with Dumfries College.
- 4.15 Through the close partnership working with Wheatley Foundation, the service secured funding for four e-bikes to promote the independence, health, and wellbeing of young people at Springbells accommodation.
- 4.16 Overall customer satisfaction within Temporary Accommodation has remained high at 95%. This is significant given the transient nature of the service.

#### *Harm Reduction - impact of Recovery Worker*

- 4.17 Last year we reported to the Board that we had secured funding through 'The Lens' to trial a Recovery Worker post across our services for a period of six months. The trial has concluded. Feedback from staff and customers has been very positive.
- 4.18 Throughout the time of the trial, we have observed a reduction in hospital admissions due to overdose or acute mental ill health with only one admission to hospital compared to five admissions due to overdose in the previous six month period. We revised our harm reduction approach across the services as a result to reduce risks of overdose or health complications from substance withdrawals.

- 4.19 Throughout the trial we have focused on a number of areas to enhance the work we do. Some of the outcomes are detailed below: -
- Staff reporting improved knowledge and confidence in respect of harm reduction approaches;
  - Closer partnership working with key agencies, building on relationships within the wider community for the benefit of our customers;
  - Joint working with specialist agencies including With You, NHS Specialist Drug and Alcohol Service and the Hub Community Action Centre;
  - Increasing meaningful activity within the services to combat the loneliness and isolation that is often associated with mental health issues and addiction and;
  - A focus on peer support in service through awareness days, activities, and workshops.
- 4.20 As a result of our reviewed harm reduction protocol, we have worked with DGC and altered our occupancy management approach to those using substances within the service. We approach this with a harm reduction and human rights mindset and support the individual to work with the staff team on reducing the harm and engage with specialist services to promote recovery and prevent exclusion.
- 4.21 We have extended our training on harm reduction and the use of Naloxone to contractors we work with who provide nightshift services in our accommodation. As a direct result of this nightshift staff were able to preserve the life of a customer in a near fatal overdose by administering Naloxone and CPR for 20 minutes until paramedics arrived, saving the individuals life.
- 4.22 We are aware of the financial challenges being experienced by local authorities and therefore are exploring other funding opportunities which could support the continuation of this specialist role. However, our refreshed harm reduction strategy is embedded into daily practice across services and supporting positive outcomes.

#### *Wider care activity*

- 4.23 Our wider care activity has continued to support excellent service delivery. We have worked closely with our Care Business Manager to increase contract stability and look at new opportunities for growth. The direct award for the Temporary Accommodation Service for three years with the option of a further two extension years was a significant outcome after years of annual extensions. We are fully involved in the wider review of care experienced young people and are hopeful that our expertise and reputation will offer future longevity in this contract and opportunities for growth across Dumfries and Galloway.
- 4.24 Over the past year, a number of discussions have taken place with partners within DGC with regard to how we can work together to respond to unmet care and support need in Dumfries and Galloway. In partnership with housing and development colleagues, we have attended and contributed to ongoing meetings associated to regeneration within localities and the role of care and support services.

- 4.25 Internally we have recognised success through a Care staff celebratory event held in the summer of last year. This allowed the work of services and individual care staff to be highlighted and celebrated. This was further complemented with an event celebrating those staff with over 20 years' service and an event that was focussed on staff with under two years' service. Both events were focused on celebrating and thanking people for their contribution while also garnering staff insight into why they were attracted to care as a career in the first instance and why they have remained in the care sector. The feedback from these sessions helped influence our approach to recruitment and retention in care.
- 4.26 As part of a renewed structure within the care central support team, a dedicated Quality, Compliance, and Improvement team has been established. This team are responsible for driving continuous improvement in organisational performance and will be responsible for leading, managing and overseeing the organisation's quality management system (Care Quality Framework), as well as ensuring compliance with relevant organisational, regulatory, and contractual requirements across care services.
- 4.27 A trauma-informed audit has also been undertaken for the purposes of strengthening our approach to the delivery of personalised services specific to individuals who have experienced and live with the effects of trauma. This work also delivers on the Scottish Governments ambitions to develop a trauma-informed workforce nationally.
- 4.28 Our priorities for the year ahead will be focussed on continuing the embed quality excellence across service delivery and sustainable growth that will support unmet need in local authority areas.

## **5. Customer Engagement**

- 5.1 As noted, customer satisfaction has remained high across all care provision within Wheatley Homes South. The customer sentiment survey undertaken in 2024 demonstrated that across all three services:
- 99% of customers felt that the service supported their wellbeing and scored this as excellent or very good;
  - 96% of customers agreed that staff displayed the knowledge and skills to provide support in the best possible way; and
  - 99% of customers agreed that they were satisfied with the overall support within the service across all service provision.

## **6. Environmental and sustainability implications**

- 6.1 There are no environmental and sustainability implications associated with this paper.

## **7. Digital transformation alignment**

- 7.1 We have noted the work being taken forward to upgrade the Telecare System within the Sheltered Service in the main body of the report. There are no other digital transformation implications associated with this report.

## **8. Financial and value for money implications**

- 8.1 All care services within WHS broke even in the financial year 2024/25 with Sheltered and Temporary Accommodation services receiving the Scottish Government mandated uplifts for adult social care equivalent to the Real Living Wage uplift.

## **9. Legal, regulatory, and charitable implications**

- 9.1 The care services within Wheatley Homes South have one Care Inspectorate registration for all the services it operates. The service was last inspected in 2019. During this inspection, the services received grades of 5 – Very Good and 6 – Excellent.
- 9.2 Due to the length of time that has passed since their last inspection, we are linking in with the local inspector to ascertain if there is a timeline for our next inspection.

## **10. Risk Appetite and assessment**

- 10.1 This programme of work is aligned with our strategic themes of Changing Lives and Communities, Delivering Exceptional Customer Experience and Making the Most of Our Homes and Assets. Our risk appetite statement in relation to our reputation and credibility is described as “minimal.” This report demonstrates our commitment to continuing our reputation for quality service provision for within Dumfries and Galloway.

## **11. Equalities implications**

- 11.1 There are no equalities implications arising from this report.

## **12. Key issues and conclusions**

- 12.1 Our care services continue to achieve excellent outcomes for our customers across a breadth of care and support needs. Our integrated approach to housing and care means that we are uniquely placed to make a significant difference to people's lives.
- 12.2 Feedback from customers has been very positive with very high levels of satisfaction reported.
- 12.3 We continue to strengthen our approach through the progression of our strategic and operational priorities. The work being undertaken more widely across care will promote opportunity for growth and development of new or extended services across Dumfries and Galloway.

## **13. Recommendations**

- 13.1 The Board is asked to note and comment on the report.

LIST OF APPENDICES:

None.

## Report

**To:** Wheatley Homes South Board

**By:** Lyndsay Brown, Director of Financial Reporting

**Approved by:** Pauline Turnock, Group Director of Finance

**Subject:** Finance Report to 31 March 2025

**Date of Meeting:** 21 May 2025

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### 1. Purpose

The purpose of this paper is to:

- Provide an overview of the Finance Report for the year to 31 March 2025; and
- To seek the Board's approval to submit the Loan Portfolio and Five Year Financial Projections returns to the Scottish Housing Regulator.

### 2. Authorising and strategic context

- 2.1 Under the terms of the Intra-Group Agreement between Wheatley Homes South ("WHS") and the Wheatley Group and this Board's Terms of Reference, we are responsible for the ongoing monitoring of performance against agreed targets. This includes the ongoing performance of its finances.

### 3 Background - Financial performance

- 3.1 The results for the year to 31 March are summarised below:

	Actual £'000	Budget £'000	Variance £'000
Turnover	73,832	74,508	(677)
Operating expenditure	(42,352)	(44,093)	(1,741)
<b>Operating surplus</b>	<b>31,480</b>	<b>30,415</b>	<b>1,065</b>
<i>Operating margin</i>	43%	41%	
Donation to Wheatley Foundation	(333)	0	(333)
Net interest payable	(7,055)	(7,387)	332
<b>Surplus</b>	<b>24,092</b>	<b>23,028</b>	1,064
<b>Net Capital Expenditure</b>	<b>22,646</b>	<b>25,472</b>	2,826



## 4. Discussion

- 4.1 The Statutory Surplus to 31 March is £24,092k, which is £1,064k favourable to budget with expenditure being well managed and reporting spend favourable to budget across the majority of expenditure categories. Repairs spend overall remains favourable to budget with savings in compliance and gas servicing, partly offset by higher reactive repairs following Storm Eowyn in January. Within income a continuation of our strong letting performance and quick turnaround of properties when they become vacant has driven favourable variances in rental income.
- 4.2 The favourable budgetary performance has allowed an additional donation of £333k to be made to the Wheatley Foundation in the final quarter of this year to provide further support to our customers.
- 4.3 Key points to note:
- Net rental income is £402k higher than budget, with Curries Yard development completing earlier than budgeted and a void loss rate of 0.6% vs 1.0% in budget. Grant income is in line with budget following the completion of 54 units at Curries Yard and 47 units at Springholm, all for social rent;
  - Other grant income is £592k adverse to budget due to lower than budgeted social housing net zero and aids & adaptations grant funding (with lower corresponding costs in investment spend), partly offset by higher renewable heat incentive (RHI) grant income and higher Supporting People grant income from Dumfries and Galloway Council ("**DGC**");
  - Other income is £487k adverse to budget due to lower than budgeted intra group gift aid from Wheatley Developments Scotland ("**WDS**") of £541k;
  - Operating expenditure is £1,741k favourable to budget:
    - Total employee costs (direct and group services) are £178k favourable to budget due to the timing of changes to the budgeted structure partly offset by additional spend from Wheatley Solutions for Group employee costs;
    - Total running costs (direct and group services) are £183k favourable to budget due to savings across various expenditure lines in direct running costs and Wheatley Solutions; and
    - Repair costs are £319k favourable to budget. Responsive repairs are unfavourable to budget with additional costs in February & March following Storm Eowyn. Cyclical and compliance spend is £688k favourable to budget due to timing and reprofiling of spend compared to budget.
  - Additional donations of £333k have been provided to the Foundation and given the discretionary nature of this spend is reported after operating surplus. These donations will increase the financial capacity in the Foundation and be available to provide support for our customers;
  - Capital Investment income is £6,638k lower than budget mainly due to the delay in the site start for Ashwood Drive, Corsbie Road and College Mains. Grant income received relates to Johnstonebridge, College Mains and Leswalt, and grants in relation to social housing net zero ("**SHNZ**") and adaptation claims;

- Total capital investment spend of £16,159k is £727k higher than budget reflecting additional investment capacity released following the covenant change (£1,300k) partly offset by lower SHNZ and adaptation spend (lower corresponding grant income); and
- New Build expenditure is £9,519k lower than budget due to the later than budgeted site start dates at Ashwood Drive, Corsbie Road and College Mains. Curries Yard is also under budget due to additional spend occurring in 2023/24. This is partially offset by additional spend in Johnstonebridge which is ahead of schedule.

### Five Year Financial Projections

- 4.4 The Five Year Financial Projections is a web based return designed by the Scottish Housing Regulator to collect the financial projections and related information of all RSLs in Scotland in a standard format. The information provided is used to calculate a number of financial ratios and is used by the SHR as part of its annual review of the financial viability of RSLs and in making decisions on the level of engagement. It is also used to allow developing trends, patterns and emerging issues to be identified and considered across the sector.
- 4.5 The return incorporates the draft results for 2024/25 and the financial projections for the next five years approved by the Board in February 2025. At other points in the year we submit our long term financial projections i.e. our 30 year business plan which was presented to the February Board and the annual accounts which will be presented to the August Board meeting.
- 4.6 The return includes outturn and forecast Statements of Comprehensive Income, Financial Position and Cashflow together with other key assumptions such as movements in stock numbers and pension costs.
- 4.7 The five year forward projections also include estimates for non-cash year-end accounting adjustments not included in the management accounts. The reconciling items between the P12 management accounts in appendix 1 and the SHR return are shown below:

	£k	
<b>WHS P12 Draft Statutory Surplus</b>	<b>24,092</b>	
Social housing property valuation movement	(2,837)	Business plan estimated pending final JLL valuations
Investment property valuation movement	332	
<b>Surplus before tax per SHR return</b>	<b>21,587</b>	

- 4.8 The summary sheet and accompanying financial data and five year projections to be submitted to the regulator are attached at Appendix 2. The Board are requested to consider and approve these financial projections. Once approved, these will be submitted to the Scottish Housing Regulator.

### Scottish Housing Regulator ("SHR") Loan Portfolio Submission

- 4.9 We are required to submit its loan facilities and borrowing position, as at 31 March 2025, to the Scottish Housing Regulator via the regulators' online portal. The submission report appended contains the details which will be transferred to the portal, showing both the information and the layout.
- 4.10 The submission report contains the information relating to the intragroup funding from Wheatley Funding No. 1 Limited and on the debt position of the RSL as at the financial year end.
- 4.11 The key information contained within the report is that, as at 31 March 2025:
- We had total borrowings of £167.5m (£92.5m intragroup and £75.0m direct funding (Allia £35.0m and THFC £40.0m));
  - The intragroup loan was on a fixed rate, with an average rate for the year of 4.84%;
  - Direct funding with THFC is subject to a fixed rate of 5.20% and the Allia facilities have a weighted average rate of 2.643%;
  - The value of the 4,732 units secured against the loans is £270.3m (£195.2m in respect of the intragroup loan and £75.1m for THFC) (31 March 2024 valuation for intragroup loans and 28 March 2024 valuation for direct funding); and
  - 5,602 units remain unencumbered and available to support further debt, with c.£53.71m of assets having to remain unencumbered to meet Allia covenants.
- 4.12 As part of the submission to the Scottish Housing Regulator, the Chair of the Board and Director/Chief Executive are required to confirm the following:
- "I hereby certify for and on behalf of the RSL that the information provided in this return is, to the best of my knowledge and belief, an accurate and fair representation of the affairs of the RSL."

## **5. Customer Engagement**

- 5.1 This report relates to our financial reporting and therefore there are no direct customer implications arising from the Finance Report.

## **6. Environmental and sustainability implications**

- 6.1 We have delivered £3.0m of energy efficiency improvements through the SHNZ fund this year. This includes deep retro-fit of our least energy efficiency homes in Dumfries and Galloway. This project sees a range of measures applied to improve the energy efficiency including EWI, air source heat pumps, new windows, solar PV and batteries. This will benefit 108 homes, with EPC's improving from EPC 'E' to EPC 'B', bringing the total number of deep retro-fit SHNZ supported homes to 358.

## **7. Digital transformation alignment**

- 7.1 There are no digital transformation alignment implications arising from the Finance Report.

## **8. Financial and value for money implications**

- 8.1 The statutory surplus for the year to 31 March 2025 is £24,092k, £1,064k favourable to budget. Our cost efficiency targets are built into the budget and delivery of these is a key element of continuing to demonstrate value for money.
- 8.2 After adjusting the net operating surplus for new build grant income, depreciation, gift aid and including capital expenditure in our properties an underlying surplus of £6,415k has been generated which is £819k favourable to budget. The favourable interest position, favourable letting performance and lower than budgeted expenditure is offset in part by additional investment spend approved by the Board earlier in the year, over and above the budgeted investment programme and the additional donation of £333k provided to the Foundation.
- 8.3 We remain compliant with all covenants and financial Golden Rules which are monitored on a consolidated basis against the financial performance of all Wheatley Group RSLs together.

## **9. Legal, regulatory and charitable implications**

- 9.1 There are no direct legal, regulatory and charitable implications arising from the Finance Report.

## **10. Risk Appetite and assessment**

- 10.1 The Board's agreed risk appetite for business planning and budgeting assumptions is "open". This level of risk tolerance is defined as "prepared to invest for reward and minimise the possibility of financial loss by managing the risks to a tolerable level".

## **11. Equalities implications**

- 11.1 There are no equalities implications arising from the Finance Report.

## **12. Key issues and conclusions**

- 12.1 This paper presents the financial performance for the year to 31 March 2025.

### **13. Recommendations**

13.1 The Board is requested to:

- 1) Note the Finance Report for the year to 31 March 2025 at Appendix 1;
- 2) Approve the summary sheet and accompanying financial data and projections at Appendix 2 and authorise these to be submitted to the Scottish Housing Regulator and delegate authority to the Group Director of Finance to undertake any factual data updates required to the data in advance of the submission; and
- 3) Approve the SHR Portfolio Submission as at 31 March 2025.

#### **LIST OF APPENDICES:**

Appendix 1: Period 12 – 31 March 2025 Finance Report  
Appendix 2: Five Year Financial Projections Submission  
Appendix 3: Loan Portfolio Submission



# Year to 31 March 2025

## Finance Report



# 1) Operating statement – Year to 31 March 2025

OPERATING STATEMENT	Year to March 2025		
	Actual £ks	Budget £ks	Variance £ks
<b>INCOME</b>			
Rental Income	51,359	51,163	196
Void Losses	(315)	(521)	206
<b>Net Rental Income</b>	<b>51,044</b>	<b>50,642</b>	<b>402</b>
Grant Income	16,418	16,418	0
Other Grant Income	4,705	5,297	(592)
Other Income	1,665	2,152	(487)
<b>TOTAL INCOME</b>	<b>73,832</b>	<b>74,508</b>	<b>(677)</b>
<b>EXPENDITURE</b>			
Employee Costs - Direct	5,084	5,277	193
Employee Costs - Group Services	3,523	3,508	(15)
ER/VR	0	210	210
Direct Running Costs	2,567	2,651	84
Running Costs - Group Services	2,206	2,305	99
Revenue Repairs and Maintenance	12,803	13,122	319
Bad debts	241	1,056	815
Depreciation	15,441	15,441	0
Demolition and compensation	487	523	36
<b>TOTAL EXPENDITURE</b>	<b>42,352</b>	<b>44,093</b>	<b>1,741</b>
<b>NET OPERATING SURPLUS</b>	<b>31,480</b>	<b>30,415</b>	<b>1,065</b>
<i>Net operating margin</i>	43%	41%	2%
Donation to Wheatley Foundation	(333)	-	(333)
Interest receivable	128	30	98
Interest payable & similar charges	(7,183)	(7,417)	234
<b>STATUTORY SURPLUS</b>	<b>24,092</b>	<b>23,028</b>	<b>1,064</b>
<b>INVESTMENT</b>	<b>Actual £ks</b>	<b>Budget £ks</b>	<b>Variance £ks</b>
<b>TOTAL CAPITAL INVESTMENT INCOME</b>	<b>9,666</b>	<b>16,304</b>	<b>(6,638)</b>
Capital Investment spend	16,159	15,432	(727)
New Build Programme	14,688	24,207	9,519
Other Fixed Assets	1,465	2,137	672
<b>TOTAL INVESTMENT EXPENDITURE</b>	<b>32,312</b>	<b>41,776</b>	<b>9,464</b>
<b>NET CAPITAL EXPENDITURE</b>	<b>22,646</b>	<b>25,472</b>	<b>2,826</b>

## Key highlights:

Net operating surplus of £31,480k, £1,065k favourable to budget and a statutory surplus of £24,092k, £1,064k favourable is reported. Lower spend across expenditure budgets and favourable net income position due to a strong letting performance are contributing to the favourable performance.

- Net rental income is £402k higher than budget. Void losses are £206k favourable to budget, with a void loss rate of 0.6% vs 1.0% in budget. Rental income is £196k higher due to unbudgeted rental income from earlier handover of Curries Yard and the Lochside clearance no longer taking place.
- Grant income is in line with budget following the completion of 54 units at Curries Yard and 47 units at Springholm, all for social rent.
- Other grant income is £592k adverse to budget due to lower than budgeted aids & adaptations and net zero grant funding (with lower corresponding costs in investment spend), partly offset by higher renewable heat incentive (RHI) grant income and higher Supporting People grant income from DGC.
- Other income is £487k adverse to budget due to lower than budgeted intra group gift aid from WDS of £541k.
- Total employee costs (direct and group services) are £178k favourable to budget due to the timing of changes to the budgeted structure partly offset by additional costs from Wheatley Solutions.
- Total running costs (direct & group services) are £183k favourable to budget with savings in both direct costs and across several departments within Wheatley Solutions.
- Repairs costs are £319k favourable to budget. Responsive repairs are £369k adverse to budget driven by higher cost per job and the impact of Storm Eowyn in February & March. Cyclical & gas maintenance and compliance are favourable due to repainting of the programmes.
- Demolition costs includes three buy backs at Summerhill, the final one at Newington and the demolition costs at Ecclefechan with all 13 units at Ecclefechan now demolished.
- Donations to Wheatley Foundation of £333k were made to provide additional support for our customers.

Interest payable represents interest due on the loans due to Wheatley Funding No.1 Ltd and external funders. The £234k favourable variance is due to lower drawdowns and a lower base rate charged on the variable loans.

Net capital expenditure of £22,646k is £2,826k lower than budget.

- Capital investment income is £6,638k lower than budget with new build grant income reflecting the delayed start at Corsbie Road, Ashwood Drive and College Mains. New build grant received relates to Johnstonebridge, Leswalt and College Mains. Aids & adaption funding of £669k and SHNZ grant funding of £2,974k has been received.
- Total capital investment spend is £727k higher than budget reflecting additional capacity created from the covenant change partly offset by lower SHNZ and adaptation spend (lower corresponding grant income).
- New Build expenditure is £9,519k lower due to later than budgeted start dates at Corsbie Road, Ashwood Drive, College Mains and High Street. Curries Yard has less than budgeted spend in 2024/25 due to accelerated costs in 2023/24. This is partially offset by additional spend at Johnstonebridge which is ahead of schedule.
- Other capital expenditure is £672k lower than budget mainly due to the deferral of the Stranraer office to 2025/26.

## 1b) Underlying surplus – Year to 31 March 2025

### Key highlights :

- The Operating Statement (Income and Expenditure Account) on page 2 is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2014).
- However, the inclusion of grant income on new build developments creates volatility in the results and does not reflect the underlying cash surplus/deficit on our letting activity.
- The chart below therefore shows a measure of underlying surplus which adjusts our net operating surplus by excluding the accounting adjustments for the recognition of grant income and depreciation but including capital expenditure on our existing properties.
- For the year to March 2025, an underlying surplus of £6,415k has been generated which is £819k favourable to budget. The favourable interest position, favourable letting performance and lower than budgeted expenditure is offset in part by additional investment spend approved by the Board earlier in the year, over and above the budgeted investment programme in recognition of our objective to provide high quality housing and investing to improve the energy efficiency of our homes.

Underlying Surplus - Year to 31 March 2025			
	YTD Actual £ks	YTD Budget £ks	YTD Variance £ks
Net Operating surplus	31,480	30,415	1,065
add back: Depreciation	15,441	15,441	0
less:			
Grant income	(16,418)	(16,418)	0
WDS Gift aid	(541)	(1,023)	482
Net interest payable	(7,055)	(7,387)	332
Total expenditure on Core Programme	(16,159)	(15,432)	(727)
Donation to Wheatley Foundation	(333)	-	(333)
<b>Underlying Surplus</b>	<b>6,415</b>	<b>5,596</b>	<b>819</b>



## 2) In House Repairs Service – Year to 31 March 2025

In House Repairs	YTD		
	Actual £ks	Budget £ks	Variance £ks
<b>INCOME</b>			
Internal	11,968	12,675	(707)
External Customers	512	447	65
<b>TOTAL INCOME</b>	<b>12,480</b>	<b>13,122</b>	<b>(642)</b>
<b>COST OF SALES</b>			
Staff Costs	5,513	5,465	(50)
Materials	2,685	3,080	394
Subcontractor & Other Costs	2,451	2,577	126
<b>TOTAL COST OF SALES</b>	<b>10,651</b>	<b>11,122</b>	<b>469</b>
<b>GROSS PROFIT</b>	<b>1,829</b>	<b>2,000</b>	<b>(171)</b>
Margin %	15%	15%	-1%
<b>Overheads</b>	<b>1,886</b>	<b>2,000</b>	<b>114</b>
<b>NET (LOSS) / PROFIT</b>	<b>(57)</b>	<b>-</b>	<b>(57)</b>

### Key Comments:

- Income is £642k lower than budget. External customers income represents Home Group income generated in the year to 31 March 2025.
- Employee costs are £50k unfavourable to budget driven by additional overtime to meet the demands following Storm Eowyn) and a one-off payment to all employees in March 2025.
- The favourable variance in materials and subcontractors is driven by lower gas servicing and cyclical job numbers.
- Overheads are £114k favourable to budget driven by savings across various expenditure lines including lower vehicle lease charges, fuel and waste costs.

### 3) Repairs and Investment – Year to 31 March 2025

Revenue Repairs and Maintenance	YTD		
	Actual £ks	Budget £ks	Variance £ks
Reactive	9,837	9,468	(369)
Gas planned maintenance	813	1,174	361
Landscaping and cyclical maintenace	747	900	153
Compliance	1,406	1,580	174
<b>TOTAL</b>	<b>12,803</b>	<b>13,122</b>	<b>319</b>

Core Investment Programme	To 31 Mar 2025		
	Actual £ks	Budget £ks	Variance £ks
<b>Investment programme grant income</b>			
Aids and Adaptations	669	1,000	(331)
Social Housing Net Zero	2,974	3,364	(390)
<b>Total</b>	<b>3,643</b>	<b>4,364</b>	<b>(721)</b>
<b>Investment programme spend</b>			
Core Programme	6,709	5,414	(1,295)
Capitalised repairs	976	921	(55)
Social Housing Net Zero	2,974	3,364	390
Capitalised Voids	3,691	3,459	(232)
Adaptations	669	1,000	331
Capitalised Staff	1,140	1,274	134
<b>Total</b>	<b>16,159</b>	<b>15,432</b>	<b>(727)</b>

<b>Net Investment Spend</b>	<b>12,516</b>	<b>11,068</b>	<b>(1,448)</b>
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#### Repairs

Repairs and maintenance costs are £319k favourable to budget.

- Reactive repairs are £369k above budget driven by a higher average cost per job partly offset by lower job numbers.
- Gas planned maintenance, landscaping and cyclical maintenance and compliance expenditure were all favourable to budget due to the timing of spend against budget and reprofiling the gas servicing and cyclical programme. All compliance work is delivered within the required legislative timeframe.

#### Investment

Net investment in our existing homes was £12,516k, which is £1,448k higher than budget.

- Core programme is £1,295k over budget due to higher spend on lowrise, air source heat pumps (ASHP) and windows. An additional £1.3m was approved as part of the covenant change and included in the Q3 forecast. This was spent on windows, lowrise and ASHP.
- Voids are £232k adverse to budget driven by higher average cost per void. In recent months, we have seen higher value voids requiring significant investment, with spend closely monitored.
- YTD adaptations spend is in line with agreed grant funding (£669k).
- Capitalised staff is £134k lower than budget with the reallocation of the Head of Asset Investment post to Group Repairs & Investment in Wheatley Solutions.

## 4) New Build – Year to 31 March 2025

Development Name	Status	Contractor	YTD P12		
			Actual	Budget	Variance
Curries Yard	Completed	CCG	1,851	2,700	849
Springholm	Completed	Ashleigh	3,051	2,673	(378)
Glenluce	Feasibility	Ashleigh	12	2	(10)
Johnstonebridge	On Site	Ashleigh	3,443	2,603	(840)
Corsbie Road	Feasibility	McTaggart	92	3,320	3,229
Ashwood Drive	Feasibility	Ogilvie	48	1,482	1,434
Thornhill	Feasibility	CCG	290	232	(59)
Lochans	Feasibility	TBC	61	151	90
Troqueer	In Development	TBC	76	579	503
Summerhill	In Development	TBC	417	428	11
Newington	In Development	TBC	331	430	99
Lochside	In Development	TBC	90	267	177
College Mains	Approved/ on site	Ashleigh	1,322	4,312	2,990
Spring Bank Road	Feasibility	TBC	139	162	23
Leswalt	Approved/ on site	McTaggart	900	648	(252)
Catherinefield	Feasibility	TBC	721	1,146	425
Dumfries High Street	Feasibility	TBC	47	1,416	1,369
Maxwelltown High	Feasibility	TBC	141	-	(141)
Completed PY	Completed		10	-	(10)
<b>Total Social Rent</b>			<b>13,040</b>	<b>22,549</b>	<b>9,509</b>
Capitalised Staff			1,164	1,173	9
Capitalised Interest			484	484	0
<b>Total New Build Investment</b>			<b>14,688</b>	<b>24,207</b>	<b>9,519</b>

<b>Grant Income</b>			<b>6,023</b>	<b>11,940</b>	<b>(5,917)</b>
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<b>Net New Build Cost</b>			<b>8,665</b>	<b>12,266</b>	<b>3,601</b>
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<b>Grant Income Completions (recognised in OPS)</b>			<b>16,418</b>	<b>16,418</b>	<b>-</b>
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### On Site/ Due on Site:

- **Curries Yard (SR/89):** All 89 properties are now handed over. External communal works are being finalised. End of Year Defects have been completed on Phase 1 and 2.; phase 3 to commence in April.
- **Springholm/ Ewart Place (SR/47):** Full site completion in Sept 2024 with all properties handed over.
- **Johnstonebridge/ MacLean Drive (SR/33):** Site start October 2024 and works progressing well, due for completion early 2026.
- **College Mains (44):** Site acquired March 2025, works started 25/03/2025. Site completion expected late Summer 2026.
- **Ashwood Drive (SR/9):** Tender approved by WDSL Board in February 2025, grant funding from DGC and SG awarded. Site start April 2025 and site completion May 2026.
- **Leswalt (SR/56):** Tender and acquisition approved by WDSL Board in January 2025, grant funding in place, acquisition completed end of March and site start anticipated mid-May 2025.

### Regeneration:

- **Lochside –** Masterplan for Transformational Regeneration to be submitted to DGC. Phased approach for delivery of sites agreed by WHS Board in February. Osborne will be first phase and will see c.82 new homes delivered. Community Launch event 02/07/25
- **Newington:** Demolition works are now completed, with the exception of Fernlea and Springbells. Remaining owner at Fernlea has now moved, following acceptance of our offer. Demolition of these Fernlea to take place in May 2025, subject to gas/electricity disconnections. Planning applications with DGC for determination, awaiting outcome – anticipated May 2025.
- **Summerhill:** Demolition works are now completed. Planning application has been submitted following on from engagement event held in January 2025. Preferred contractor now appointed.
- **Troqueer:** Demolition completed; community engagement event held in November 2024 and planning application submitted in December 2024 – awaiting determination. Preferred contractor now appointed.

# 5) Balance Sheet – Year to 31 March 2025

	31 March 25	31 March 24
<b>Fixed Assets</b>		
Social Housing Properties	480,834	465,426
Other Fixed Assets	3,343	1,878
Investment Properties	11,583	11,582
<b>Fixed Assets</b>	<b>495,760</b>	<b>478,886</b>
<b>Current Assets</b>		
Stock	896	897
Trade debtors	309	102
Rent and service charge arrears	2,828	3,014
less: provision for rent arrears	(1,236)	(1,285)
Prepayments and accrued income	2,559	2,138
Other debtors	3,781	3,849
Due from other group companies	129	252
<b>Total debtors</b>	<b>9,266</b>	<b>8,966</b>
Bank and cash	2,846	5,150
<b>Current assets</b>	<b>12,112</b>	<b>14,116</b>
<b>Creditors: within 1 year</b>		
Trade Creditors	(2,336)	(2,354)
Accruals	(1,568)	(2,173)
Deferred income (Grant)	(4,181)	(16,417)
Prepayments of Rent and Service Charge	(1,277)	(990)
Other Creditors	(768)	(707)
Amounts due to Group Undertakings	(6,818)	(6,501)
<b>Current liabilities</b>	<b>(16,948)</b>	<b>(29,141)</b>
<b>Net Current Liability</b>	<b>(4,836)</b>	<b>(15,026)</b>
<b>Long Term Creditors</b>		
Long term loans	(167,266)	(167,214)
Loan interest	(6,250)	(5,171)
Deferred Income	(5,808)	(3,967)
Other provisions	(171)	(171)
<b>Net Assets</b>	<b>311,429</b>	<b>287,337</b>
<b>Capital and Reserves</b>		
Revenue Reserve	154,481	130,389
Revaluation Reserve	156,948	156,948
<b>Shareholders' funds</b>	<b>311,429</b>	<b>287,337</b>

## Key Comments:

The balance sheet as at 31 March reflects the audited position.

- **Fixed assets** of £496m – representing new build works less depreciation of existing assets.
- **Stock** relates to the in-house repairs team stock and materials on site relating to the investment program.
- **Prepayments and accrued income** – Accrued income includes new build grant income (Johnstonebridge), aids & adaptations grant and Social Housing Net Zero (SHNZ) grant funding.
- **Other debtors** includes capital asset recharge £3.5m.
- **Creditors: within 1 year:**
  - Accruals includes £0.3m of investment works (CBG), £0.4m materials & sub-contractors costs and £0.1m of PSTN works. The reduction from March 2024 is due to timing.
  - The reduction in deferred income relates to the release of grant for the completion of 54 units at Curries Yard and 47 units at Springholm. The £4.2m balance relates to Johnstonebridge which is expected to complete Q4 2025/26.
- **Long-Term Creditors:**
  - Capital loans of £167m, include WFL1, Allia and THFC loans.
  - The roll up of accrued interest on Allia loans is not payable until the end repayment date of the loan. £6.3m has been accrued since the drawdown of the loans.
  - Grant income received is deferred until the completion of new build properties. The balance relates to College Mains, Leswalt, Ashwood Drive and Thornhill which are all expected to complete 2026/27 onwards.
  - Provision of £171k relates to the remaining balance made for dilapidation liabilities for offices and hubs.



Landlord Name:	Wheatley Homes South Limited
RSL Reg No.:	315
Report generated date:	07/05/2025 09:48:48

Approval

A1.1	Date approved	
A1.2	Approver	
A1.3	Approver job title	
A1.9	General Comment	

STATEMENT OF COMPREHENSIVE INCOME						
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
	£'000	£'000	£'000	£'000	£'000	£'000
Gross rents	50,967.0	54,431.0	57,410.0	61,200.0	64,300.0	68,046.0
Service charges	392.0	348.0	145.0	152.0	158.0	164.0
<b>Gross rents &amp; service charges</b>	<b>51,359.0</b>	<b>54,779.0</b>	<b>57,555.0</b>	<b>61,352.0</b>	<b>64,458.0</b>	<b>68,210.0</b>
Rent loss from voids	315.0	600.0	556.0	589.0	615.0	646.0
<b>Net rent &amp; service charges</b>	<b>51,044.0</b>	<b>54,179.0</b>	<b>56,999.0</b>	<b>60,763.0</b>	<b>63,843.0</b>	<b>67,564.0</b>
Developments for sale income	0.0	0.0	0.0	0.0	0.0	0.0
Grants released from deferred income	16,418.0	6,244.0	19,698.0	12,413.0	31,072.0	9,823.0
Grants from Scottish Ministers	4,705.0	1,542.0	567.0	550.0	548.0	540.0
Other grants	0.0	0.0	0.0	0.0	0.0	0.0
Other income	1,665.0	1,162.0	1,202.0	1,336.0	1,371.0	1,406.0
<b>TURNOVER</b>	<b>73,832.0</b>	<b>63,127.0</b>	<b>78,466.0</b>	<b>75,062.0</b>	<b>96,834.0</b>	<b>79,333.0</b>
Less:						
Housing depreciation	14,275.0	14,577.0	15,479.0	16,734.0	18,206.0	20,108.0
Impairment written off / (back)	0.0	0.0	0.0	0.0	0.0	0.0
Management costs	12,860.0	13,711.0	14,359.0	14,579.0	14,848.0	15,098.0
Service costs	0.0	0.0	0.0	0.0	0.0	0.0
Planned maintenance - direct costs	2,966.0	2,967.0	3,041.0	3,117.0	3,195.0	3,275.0
Re-active & voids maintenance - direct costs	9,837.0	9,529.0	9,706.0	10,087.0	10,483.0	10,891.0
Maintenance overhead costs	0.0	0.0	0.0	0.0	0.0	0.0
Bad debts written off / (back)	241.0	1,119.0	1,173.0	1,239.0	1,289.0	1,347.0
Developments for sale costs	0.0	0.0	0.0	0.0	0.0	0.0
Other activity costs	1,340.0	560.0	124.0	68.0	70.0	475.0
Other costs	1,166.0	1,118.0	1,614.0	2,070.0	1,909.0	1,757.0
	28,410.0	29,004.0	30,017.0	31,160.0	31,794.0	32,843.0
<b>Operating Costs</b>	<b>42,685.0</b>	<b>43,581.0</b>	<b>45,496.0</b>	<b>47,894.0</b>	<b>50,000.0</b>	<b>52,951.0</b>
Gain/(Loss) on disposal of PPE	0.0	0.0	0.0	0.0	0.0	0.0
Exceptional Items - (Income) / Expense	0.0	0.0	0.0	0.0	0.0	0.0
<b>OPERATING SURPLUS/(DEFICIT)</b>	<b>31,147.0</b>	<b>19,546.0</b>	<b>32,970.0</b>	<b>27,168.0</b>	<b>46,834.0</b>	<b>26,382.0</b>
Interest receivable and other income	128.0	90.0	60.0	60.0	60.0	60.0
Interest payable and similar charges	7,183.0	7,311.0	7,439.0	7,808.0	8,533.0	9,757.0
Increase / (Decrease) in Negative Goodwill	0.0	0.0	0.0	0.0	0.0	0.0
Other Gains / (Losses)	(2,505.0)	7,122.0	(13,783.0)	(7,532.0)	(34,433.0)	(7,593.0)
<b>SURPLUS/(DEFICIT) ON ORDINARY ACTIVITIES BEFORE TAX</b>	<b>21,587.0</b>	<b>19,447.0</b>	<b>11,808.0</b>	<b>11,888.0</b>	<b>3,928.0</b>	<b>9,092.0</b>
Tax on surplus on ordinary activities	0.0	0.0	0.0	0.0	0.0	0.0
<b>SURPLUS/(DEFICIT) FOR THE YEAR AFTER TAX</b>	<b>21,587.0</b>	<b>19,447.0</b>	<b>11,808.0</b>	<b>11,888.0</b>	<b>3,928.0</b>	<b>9,092.0</b>
Actuarial (loss) / gain in respect of pension schemes	0.0	0.0	0.0	0.0	0.0	0.0
Change in Fair Value of hedged financial instruments.	0.0	0.0	0.0	0.0	0.0	0.0
<b>TOTAL COMPREHENSIVE INCOME FOR THE YEAR</b>	<b>21,587.0</b>	<b>19,447.0</b>	<b>11,808.0</b>	<b>11,888.0</b>	<b>3,928.0</b>	<b>9,092.0</b>

STATEMENT OF FINANCIAL POSITION						
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
Non-Current Assets	£'000	£'000	£'000	£'000	£'000	£'000
Intangible Assets & Goodwill	0.0	0.0	0.0	0.0	0.0	0.0
Housing properties - Gross cost or valuation	478,329.0	509,144.0	525,523.0	565,306.0	567,049.0	592,036.0
Less:						
Housing Depreciation	0.0	0.0	0.0	0.0	0.0	0.0
Negative Goodwill	0.0	0.0	0.0	0.0	0.0	0.0
<b>NET HOUSING ASSETS</b>	<b>478,329.0</b>	<b>509,144.0</b>	<b>525,523.0</b>	<b>565,306.0</b>	<b>567,049.0</b>	<b>592,036.0</b>
Non-Current Investments	11,583.0	12,142.0	12,258.0	12,376.0	12,494.0	12,614.0
Other Non Current Assets	3,343.0	5,180.0	6,311.0	6,548.0	6,859.0	7,102.0
<b>TOTAL NON-CURRENT ASSETS</b>	<b>493,255.0</b>	<b>526,466.0</b>	<b>544,092.0</b>	<b>584,230.0</b>	<b>586,402.0</b>	<b>611,752.0</b>
<b>Current Assets</b>						
Net rental receivables	1,592.0	1,896.6	1,896.6	1,896.6	1,896.6	1,896.6
Other receivables, stock & WIP	7,674.0	7,197.7	7,229.9	7,262.8	7,296.3	7,330.6
Investments (non-cash)	0.0	0.0	0.0	0.0	0.0	0.0
Cash at bank and in hand	2,846.0	3,000.0	3,000.0	3,000.0	3,000.0	3,000.0
<b>TOTAL CURRENT ASSETS</b>	<b>12,112.0</b>	<b>12,094.3</b>	<b>12,126.5</b>	<b>12,159.4</b>	<b>12,192.9</b>	<b>12,227.2</b>
<b>Payables : Amounts falling due within One Year</b>						
Loans due within one year	0.0	6,926.0	7,193.0	6,589.0	0.0	0.0
Overdrafts due within one year	0.0	0.0	0.0	0.0	0.0	0.0
Other short-term payables	16,948.0	32,148.3	26,373.5	45,492.4	23,408.9	36,898.2
<b>TOTAL CURRENT LIABILITIES</b>	<b>16,948.0</b>	<b>39,074.3</b>	<b>33,566.5</b>	<b>52,081.4</b>	<b>23,408.9</b>	<b>36,898.2</b>
<b>NET CURRENT ASSETS/(LIABILITIES)</b>	<b>(4,836.0)</b>	<b>(26,980.0)</b>	<b>(21,440.0)</b>	<b>(39,922.0)</b>	<b>(11,216.0)</b>	<b>(24,671.0)</b>
<b>TOTAL ASSETS LESS CURRENT LIABILITIES</b>	<b>488,419.0</b>	<b>499,486.0</b>	<b>522,652.0</b>	<b>544,308.0</b>	<b>575,186.0</b>	<b>587,081.0</b>
<b>Payables : Amounts falling due After One Year</b>						
Loans due after one year	173,516.0	167,390.0	177,219.0	190,257.0	206,642.0	219,826.0
Other long-term payables	0.0	0.0	0.0	0.0	0.0	0.0
Grants to be released	5,808.0	3,553.0	5,082.0	1,812.0	12,376.0	1,995.0
<b>TOTAL LONG TERM LIABILITIES</b>	<b>179,324.0</b>	<b>170,943.0</b>	<b>182,301.0</b>	<b>192,069.0</b>	<b>219,018.0</b>	<b>221,821.0</b>
Provisions for liabilities & charges	171.0	171.0	171.0	171.0	171.0	171.0
Pension asset / (liability)	0.0	0.0	0.0	0.0	0.0	0.0
<b>NET ASSETS</b>	<b>308,924.0</b>	<b>328,372.0</b>	<b>340,180.0</b>	<b>352,068.0</b>	<b>355,997.0</b>	<b>365,089.0</b>
<b>Capital &amp; Reserves</b>						
Share capital	0.0	0.0	0.0	0.0	0.0	0.0
Revaluation reserve	156,948.0	156,948.0	156,948.0	156,948.0	156,948.0	156,948.0
Restricted reserves	0.0	0.0	0.0	0.0	0.0	0.0
Revenue reserves	151,976.0	171,424.0	183,232.0	195,120.0	199,049.0	208,141.0
<b>TOTAL CAPITAL &amp; RESERVES</b>	<b>308,924.0</b>	<b>328,372.0</b>	<b>340,180.0</b>	<b>352,068.0</b>	<b>355,997.0</b>	<b>365,089.0</b>
Intra Group Receivables - as included above	129.0	252.0	252.0	252.0	252.0	252.0
Intra Group Payables - as included above	6,818.0	6,501.0	6,501.0	6,501.0	6,501.0	6,501.0



STATEMENT OF CASHFLOWS						
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
	£'000	£'000	£'000	£'000	£'000	£'000
<b>Net Cash from Operating Activities</b>						
Operating Surplus/(Deficit)	31,147.0	19,546.0	32,970.0	27,168.0	46,834.0	26,382.0
Depreciation & Amortisation	15,441.0	15,693.0	17,091.0	18,587.0	20,002.0	21,635.0
Impairments / (Revaluation Enhancements)	0.0	0.0	0.0	0.0	0.0	0.0
Increase / (Decrease) in Payables	(222.0)	167.2	170.5	173.9	177.4	180.9
(Increase) / Decrease in Receivables	(23.0)	(45.0)	(32.0)	(33.0)	(34.0)	(34.0)
(Increase) / Decrease in Stock & WIP	0.0	0.0	0.0	0.0	0.0	0.0
Gain / (Loss) on sale of non-current assets	0.0	0.0	0.0	0.0	0.0	0.0
Other non-cash adjustments	(16,486.0)	(6,089.6)	(19,697.0)	(12,411.6)	(31,067.7)	(9,820.4)
<b>NET CASH FROM OPERATING ACTIVITIES</b>	<b>29,857.0</b>	<b>29,271.6</b>	<b>30,502.5</b>	<b>33,484.3</b>	<b>35,911.7</b>	<b>38,343.5</b>
Tax (Paid) / Refunded	0.0	0.0	0.0	0.0	0.0	0.0
<b>Return on Investment and Servicing of Finance</b>						
Interest Received	128.0	90.0	60.0	60.0	60.0	60.0
Interest (Paid)	(6,484.0)	(6,293.0)	(6,677.0)	(7,278.0)	(8,501.0)	(9,351.0)
<b>RETURNS ON INVESTMENT AND SERVICING OF FINANCE</b>	<b>(6,356.0)</b>	<b>(6,203.0)</b>	<b>(6,617.0)</b>	<b>(7,218.0)</b>	<b>(8,441.0)</b>	<b>(9,291.0)</b>
<b>Capital Expenditure &amp; Financial Investment</b>						
Construction or acquisition of Housing properties	(14,204.0)	(25,617.9)	(33,045.8)	(46,769.7)	(33,743.3)	(28,152.9)
Improvement of Housing	(16,159.0)	(13,221.7)	(12,087.6)	(16,660.7)	(19,730.4)	(24,131.6)
Construction or acquisition of other Land & Buildings	0.0	0.0	0.0	0.0	0.0	0.0
Construction or acquisition of other Non-Current Assets	(1,465.0)	(2,669.0)	(2,743.0)	(2,089.0)	(2,109.0)	(1,769.0)
Sale of Social Housing Properties	0.0	0.0	0.0	0.0	0.0	0.0
Sale of Other Land & Buildings	0.0	0.0	0.0	0.0	0.0	0.0
Sale of Other Non-Current Assets	0.0	0.0	0.0	0.0	0.0	0.0
Grants (Repaid) / Received	6,023.0	19,390.0	15,026.0	27,802.0	19,039.0	12,373.0
<b>CAPITAL EXPENDITURE AND FINANCIAL INVESTMENT</b>	<b>(25,805.0)</b>	<b>(22,118.6)</b>	<b>(32,850.4)</b>	<b>(37,717.4)</b>	<b>(36,543.7)</b>	<b>(41,680.5)</b>
<b>NET CASH BEFORE FINANCING</b>	<b>(2,304.0)</b>	<b>950.0</b>	<b>(8,964.9)</b>	<b>(11,451.1)</b>	<b>(9,073.0)</b>	<b>(12,628.0)</b>
<b>Financing</b>						
Equity drawdown	0.0	0.0	0.0	0.0	0.0	0.0
Debt drawdown	0.0	2,177.0	15,934.0	18,766.0	15,711.0	12,628.0
Debt repayment	0.0	0.0	(6,926.0)	(7,193.0)	(6,589.0)	0.0
Working Capital (Cash) - Drawn / (Repaid)	0.0	(2,973.0)	(43.1)	(121.9)	(49.0)	0.0
<b>NET CASH FROM FINANCING</b>	<b>0.0</b>	<b>(796.0)</b>	<b>8,964.9</b>	<b>11,451.1</b>	<b>9,073.0</b>	<b>12,628.0</b>
<b>INCREASE / (DECREASE) IN NET CASH</b>	<b>(2,304.0)</b>	<b>154.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<b>Cash Balance</b>						
Balance Brought Forward	5,150.0	2,846.0	3,000.0	3,000.0	3,000.0	3,000.0
Increase / (Decrease) in Net Cash	(2,304.0)	154.0	0.0	0.0	0.0	0.0
<b>CLOSING BALANCE</b>	<b>2,846.0</b>	<b>3,000.0</b>	<b>3,000.0</b>	<b>3,000.0</b>	<b>3,000.0</b>	<b>3,000.0</b>

ADDITIONAL INFORMATION						
	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
	£'000	£'000	£'000	£'000	£'000	£'000
<b>Number of units added during year to:</b>						
New Social Rent Properties added	101	33	121	93	219	60
New MMR Properties added	0	0	6	0	0	0
New Low Costs Home Ownership Properties added	0	0	0	0	0	0
New Properties - Other Tenures added	0	0	0	0	0	0
Transfers in	0	0	0	0	0	0
<b>Total number of new affordable housing units added during year</b>	<b>101</b>	<b>33</b>	<b>127</b>	<b>93</b>	<b>219</b>	<b>60</b>
<b>Units developed for sale:</b>						
Number of units developed for sale to RSLs	0	0	0	0	0	0
Number of units developed for sale to non-RSLs	0	0	0	0	0	0
Development Assumption Indicator	Yes					
<b>Number of units lost during year from:</b>						
Sales including right to buy	0	0	0	0	0	0
Demolition	138	0	25	0	0	0
Transfers out	0	0	0	0	0	0
Other	0	0	0	0	0	0
Number of units managed at end of period (exclude factored units)	10,235	10,369	10,471	10,564	10,783	10,843
<b>Units owned:</b>						
Social Rent Properties	10,235	10,268	10,364	10,457	10,676	10,736
MMR Properties	101	101	107	107	107	107
Low Costs Home Ownership Properties	0	0	0	0	0	0
Properties - Other Tenures	0	0	0	0	0	0
<b>Number of units owned at end of period</b>	<b>10,336</b>	<b>10,369</b>	<b>10,471</b>	<b>10,564</b>	<b>10,783</b>	<b>10,843</b>
<b>Financed by:</b>						
Scottish Housing Grants	16,418.0	6,244.0	19,698.0	12,413.0	31,072.0	9,823.0
Other public subsidy	0.0	0.0	0.0	0.0	0.0	0.0
Private finance	7,822.0	2,842.0	14,286.0	10,362.0	28,033.0	7,238.0
Sales	0.0	0.0	0.0	0.0	0.0	0.0
Cash reserves	0.0	0.0	0.0	0.0	0.0	0.0
Other	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total cost of new units</b>	<b>24,240.0</b>	<b>9,086.0</b>	<b>33,984.0</b>	<b>22,775.0</b>	<b>59,105.0</b>	<b>17,061.0</b>
<b>Development cost per unit</b>	<b>240.0</b>	<b>275.3</b>	<b>267.6</b>	<b>244.9</b>	<b>269.9</b>	<b>284.4</b>
<b>Assumptions:</b>						
General Inflation (%)	5.0	2.5	2.5	2.5	2.5	2.5
Rent increase - Margin above/below General Inflation (%)	2.5	4.4	2.5	2.5	1.5	1.5
Operating cost increase - Margin above/below General Inflation (%)	0.0	0.0	0.0	0.0	0.0	0.0
Direct maint cost increase-Margin above/below General Inflation (%)	0.0	0.0	0.0	0.0	0.0	0.0
Actual / Assumed average salary increase (%)	4.5	3.5	2.5	2.0	2.0	2.0
Average cost of borrowing (%)	4.2	4.3	4.2	4.3	4.7	4.7
Employers Contributions for pensions (%)	9.1	9.1	9.1	9.1	9.1	9.1
Employers Contributions for pensions (£'000)	1,143.4	1,175.4	1,204.6	1,220.3	1,244.7	1,269.6
SHAPS Pensions deficit contributions (£'000)	0.0	0.0	0.0	0.0	0.0	0.0

Min. headroom cover on tightest interest cover covenant (£'000)	0.0	0.0	0.0	0.0	0.0	0.0
Minimum headroom cover on tightest gearing covenant (£'000)	0.0	0.0	0.0	0.0	0.0	0.0
Minimum headroom cover on tightest asset cover covenant (£'000)	0.0	0.0	0.0	0.0	0.0	0.0
Total staff costs (including NI & pension costs) (£'000)	14,959.0	15,633.5	16,021.3	16,230.1	16,554.8	16,885.8
Full time equivalent staff	295.0	293.0	292.9	290.9	290.9	290.9
EESH Revenue Expenditure included above (£'000)	0.0	0.0	0.0	0.0	0.0	0.0
EESH Capital Expenditure included above (£'000)	1,306.0	1,801.0	1,400.0	2,431.0	3,790.0	5,914.0
Total capital & revenue expend on maint pre-1919 properties	434.4	385.8	385.8	385.8	385.8	385.8
Total capital & revenue expend on maint all other properties (£'000)	28,962.6	25,718.1	24,835.4	29,865.2	33,408.5	38,297.7
Estimated decarbonisation cost indicator	Yes					
Estimated decarbonisation cost (£'000)	1,194.0					

TRENDS & COMPARATORS

RATIOS	Year -2	Year -1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	National Median
Financial capacity	Actual	Actual	Outturn	Forecast	Forecast	Forecast	Forecast	Forecast	
Interest cover	360.7%	439.4%	462.446%	466.576%	457.728%	460.900%	423.147%	410.689%	307.9%
Gearing	61.2%	58.2%	55.247%	52.171%	53.328%	55.059%	57.203%	59.390%	43.1%
Efficiency									
Voids	1.3%	1.1%	0.613%	1.095%	0.966%	0.960%	0.954%	0.947%	0.7%
Arrears	4.5%	3.8%	3.119%	3.501%	3.327%	3.121%	2.971%	2.807%	1.9%
Bad debts	0.3%	1.0%	0.472%	2.065%	2.058%	2.039%	2.019%	1.994%	0.5%
Staff costs / turnover	22.5%	21.5%	20.261%	24.765%	20.418%	21.622%	17.096%	21.285%	20.4%
Turnover per unit	£5,554	£6,116	£7,143	£6,088	£7,494	£7,105	£8,980	£7,317	£5,846
Responsive repairs to planned maintenance	2.0	1.7	1.9	1.7	1.6	2.0	2.2	2.5	1.6
Liquidity									
Current ratio	0.6	0.5	0.7	0.3	0.4	0.2	0.5	0.3	1.7
Profitability									
Gross surplus / (deficit)	25.4%	33.9%	42.186%	30.963%	42.018%	36.194%	48.365%	33.255%	15.6%
Net surplus / (deficit)	3.3%	44.0%	29.238%	30.806%	15.049%	15.838%	4.056%	11.461%	9.0%
EBITDA / revenue	12.7%	27.1%	39.635%	33.110%	46.340%	36.292%	46.791%	28.183%	24.9%
Financing									
Debt Burden	2.9	2.7	2.4	2.8	2.4	2.6	2.1	2.8	1.6
Net debt per unit	£15,789	£16,281	£16,512	£16,522	£17,325	£18,350	£18,885	£19,997	£6,680
Debt per unit	£16,127	£16,782	£16,788	£16,811	£17,612	£18,634	£19,164	£20,274	£9,524
Diversification									
Income from non-rental activities	17.6%	24.2%	30.865%	14.175%	27.358%	19.050%	34.070%	14.835%	17.6%
INDICATORS									
Turnover	55,881.0	62,825.0	73,832.0	63,127.0	78,466.0	75,062.0	96,834.0	79,333.0	
Operating costs	28,760.0	28,301.0	28,410.0	29,004.0	30,017.0	31,160.0	31,794.0	32,843.0	
Net housing assets	423,556.0	465,426.0	478,329.0	509,144.0	525,523.0	565,306.0	567,049.0	592,036.0	
Cash & current investments	3,405.3	5,150.0	2,846.0	3,000.0	3,000.0	3,000.0	3,000.0	3,000.0	
Debt	78,771.9	79,885.0	173,516.0	174,316.0	184,412.0	196,846.0	206,642.0	219,826.0	
Net assets / capital & reserves	259,704.0	287,337.0	308,924.0	328,372.0	340,180.0	352,068.0	355,997.0	365,089.0	

## Comments

Page	Field	Comment
SOCI	Gross rents	Additional units added in year 2 causing higher rental income in year 3
SOCI	Service charges	Drop in year 2 driven by Care services only contracted for 1 year
SOCI	Grants from Scottish Ministers	Drop in year 2 driven by Care services only contracted for 1 year
SOCI	Other activity costs	Care costs in year 1 & demo costs thereafter. High in year 5 as Lochside clearance starts
SOCI	Other costs	Other fixed asset depreciation & ERVR
SOCI	Interest receivable and other income	Bank interest & interest on THFC deposits
SOCI	Other Gains / (Losses)	Social Housing and Investment movement
SOFP	Housing depreciation	Properties are held at revaluation rather than cost less depreciation.
SOFP	Loans due within one year	Allia loans
SOFP	Loans due after one year	WFL1, Allia and THFC
SOFP	Grants to be released	HAG long term grant
SOFP	Provisions for liabilities & charges	Dilapidations provision
SOCF	Increase / (Decrease) in Payables	Lower payables in year 0 and then increases in year 1 causing the fluctuations.
SOCF	(Increase) / Decrease in Receivables	Timing of debt received
SOCF	(Increase) / Decrease in Stock & WIP	No movement
SOCF	Other non-cash adjustments	HAG recognised in ops statement
SOCF	Debt drawdown	Drawdown to fund new build programme
SOCF	Debt repayment	Allia loan repayment
SOCF	Working Capital (Cash) - Drawn / (Repaid)	WFL1 working capital
Additional Information	'Total cost of new units' / 'Total number of new affordable	Total number lower than prior year submission driven by grant funding available from Scottish Government.

Page	Field	Comment
	housing units added during year'	
Additional Information	Private finance	Timing of new build completions
Additional Information	Minimum headroom cover on tightest interest cover covenant (£'000)	Covenants calc at Group level
Additional Information	Minimum headroom cover on tightest gearing covenant (£'000)	Covenants calc at Group level
Additional Information	Minimum headroom cover on tightest asset cover covenant (£'000)	Covenants calc at Group level
Additional Information	Full time Equivalent Staff Curr Year	Reduced headcount expected in year 1 to align with business plan savings
Additional Information	Estimated decarbonisation cost	Part of our net zero programme to decarbonise our properties

RSL: 315 – Wheatley Homes South (formerly Dumfries and Galloway Housing Partnership (DGHP))
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Return	Annual Return 2025	31/03/2025
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Further Return Details

Accounting Year End	Do you have any ISDA's	Does Lender have a floating charge over the company Assets	Intragroup Lending / Borrowing
March	No	No	No

Social Housing Units

Owned by RSL	Used for Security	Unencumbered	% of Unencumbered with positive value
10,334	4,732	5,602	100.00

Total Facility (£'000s)	Facility Outstanding (£'000s)	Facility Undrawn (£'000s)
75,000.0	75,000.0	0.0

FACILITIES													
Facility Number	Lender	Status	Facility Total £'000s	Start Date	End Date	Amount Undrawn	Amount Outstanding	Undrawn Facility For	Funds Committed	Next 5 Yrs?	Multi Lender	Charge Holder	Security Trustee
DGHALL2373	Allia	Live	5,000.0	08/12/2016	08/12/2026	0.0	5,000.0	N/A	N/A	N/A	No	No	No
DGHALL2902	Allia	Live	30,000.0	28/02/2018	12/03/2035	0.0	30,000.0	New Build - Social Housing	Yes	Yes	No	No	No
DGHHFC002	THFC	Live	40,000.0	25/01/2012	11/10/2043	0.0	40,000.0	N/A	N/A	N/A	No	No	No

LOANS														
Status	Loan Type	Purpose of Loan	Total Loan Amount	Balance O/S	Repayment Terms	Ref Int Rate	Margin over Int Rate or All In fixed rate	First Cap Repayment Date	Final Capital repayment Date	First Int Payment date	Interest is being	Value	Basis	Date of Valuation
LIVE	FIXED RATE LOAN	Affordable Housing Development	40,000.0	40,000.0	Interest only - Bullet Repayment at and of term from cashflow	FIXED PERCENTAGE	5.200%	11/10/2043	11/10/2043	11/09/2019	PAID	75,142.5	MV-T	28/03/2024
LIVE	FIXED RATE LOAN	Affordable Housing Development	5,000.0	5,000.0	Payment start date deferred - bullet repayment of interest and capital at maturity	FIXED PERCENTAGE	3.320%	08/12/2026	08/12/2026	08/12/2026	Rolled up	N/A	N/A	N/A
LIVE	FIXED RATE LOAN	Affordable Housing Development	5,000.0	5,000.0	Payment start date deferred - bullet repayment of interest and capital at maturity	FIXED PERCENTAGE	3.660%	01/03/2028	01/03/2028	01/03/2028	Rolled up	N/A	N/A	N/A
LIVE	FIXED RATE LOAN	Affordable Housing Development	5,000.0	5,000.0	Payment start date deferred - bullet repayment of interest and capital at maturity	FIXED PERCENTAGE	2.800%	28/02/2029	28/02/2029	28/02/2029	Rolled up	N/A	N/A	N/A
LIVE	FIXED RATE LOAN	Affordable Housing Development	20,000.0	20,000.0	Payment start date deferred - bullet repayment of interest and capital at maturity	FIXED PERCENTAGE	2.180%	12/03/2035	12/03/2035	12/03/2035	Rolled up	N/A	N/A	N/A



Intragroup Borrowing

Seq No	Status	Lender	Relationship	Amount Rec'd £'000	Balance Outstanding £'000	Purpose of Loan	Loan Purpose Details	Duration (months)	First Repayment Date	
	Live	Wheatley Funding No.1 Limited	Other group company	92,500.0	92,500.0	Working Capital		360	01/08/2023	
Security	Type of Security	Security Details	Security value £'000	Loan Agreement	Repayment Period (months)	Repayment Terms	Ref Rate	Margin / All-in-rate	Start Date	End Date
Yes	Standard Security	WHS is guarantor to Lender	195,158.5	Yes	344	Interest only then capital & interest	Rate paid by onlender	4.84%	01/04/2022	01/04/2052

COVENANTS						
Loan ref No	Type of Covenant	Reporting frequency	Required Level	Calculated	Level Achieved	Date of last report
THFC	Asset Cover	Annually	>=150%	MV-ST as % Loan	186%	31/03/2024
THFC	Interest Cover	Annually	>=100%	Gross Rent less notional mgt & mtce as % of interest	172%	31/03/2024
Allia	Asset Cover	Annually	>=130%	Unencumbered assets outside any fixed charge must be at least 130% of loan value, as valued in the financial statements	670%	31/03/2024

## Report

**To:** Wheatley Homes South Board

**By:** Anne-Marie Hallett, Head of Governance

**Approved by:** Anthony Allison, Group Director of Governance and Business Solutions

**Subject:** Governance update

**Date of Meeting:** 21 May 2025

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### 1. Purpose

This report provides an update to the Board on:

- Board recruitment;
- the impact of the Economic Crime and Corporate Transparency Act; and
- Annual governance reporting: Expenses and Allowances, Register of Interests and Gifts and Hospitality.

### 2. Authorising and strategic context

- 2.1 We are required to operate under our Articles of Association as well as the Group Standing Orders, our Terms of Reference, intra-group agreement with Wheatley Group and the group-wide governance policies.
- 2.2 Under its Terms of Reference, the Board is responsible for overseeing Board recruitment. The Board is also able to appoint tenant Board members.

### 3. Background

- 3.1 We are required to yearly confirm any gifts or hospitality that has been received or given as detailed in our Group Policy (Payments, Benefits, Gifts and Hospitality Policy).
- 3.2 It is important that the Board stays up to date with legislation to ensure compliance and mitigate risks

### 4. Discussion

#### *Board Recruitment*

- 4.1 At the last meeting it was agreed to delegate authority to the Chair to approve the appointment of the new independent Board member. The Chair conducted an interview with Joan Pollard and concluded she would be a good addition to the Board. A copy of Joan's CV is attached at Appendix 1.

- 4.2 Her appointment will take effect from this meeting and concludes the recruitment for the final vacancy as part of the agreed Board composition. Joan will attend the August Board meeting.
- 4.3 As indicated to the Board last month we wrote to Hugh Martin seeking a response to whether he would be attending any future Board meetings. As no response was received either written or verbal we are required to resign him from the Board as is necessary under our Articles. Hugh has not been in attendance at a Board meeting since August 2024.
- 4.4 Following the successful tenant pathway programme Donald Carruthers is ready to join the Board as a tenant board member. Donald is on the Scrutiny Panel and was identified as a suitable candidate. He is currently going through his induction and is expected to join the Board in August. The Board is requested to approve the appointment of Donald Carruthers.
- 4.5 At which time John McCraw, who is on a 6 month leave of absence, will leave the Board by mutual agreement.

*Economic Crime and Corporate Transparency Act (“ECCTA”) 2023*

- 4.6 The EECTA is a new legislative measure aimed at enhancing the UK's ability to combat economic crime and improve corporate transparency. It primarily targets UK organisations constituted as companies, Companies House and those who submit forms to Companies House.
- 4.7 It also strengthens anti-money laundering powers with UK law enforcement agencies. It builds on previous legislation and introduces several new provisions to strengthen the UK's response to economic crime. Our initial assessment indicates that the impact should be minimal.
- 4.8 ECCTA is introducing a number of changes including:
- ID verification of directors, Persons of Significant Control and those filing documents at Companies House;
  - increased ability by Companies House to investigate and enforce compliance with the Companies Act 2006 and EECTA;
  - improved data sharing capabilities with other Government and external agencies; and
  - a new corporate offence of failing to prevent fraud.
- 4.9 Most of the key provisions are expected to be fully operational by mid-2025. We have initiated a review of the provisions of the ECCTA and will update procedures and risks, where necessary, and obtain further information to allow us to achieve compliance.
- 4.10 This is in part due to our already robust policies including Group Anti-Money Laundering and Counter-Terrorism Financing Policy; Group Fraud, Corruption and Bribery Policy and Group Whistleblowing Policy. Policies are reviewed and presented to the Group Audit Committee (“**GAC**”) every three years to ensure they remain effective and up to date. The last update to the GAC was August 2024, which confirmed our policy was updated to reflect the ECCTA.

4.11 We have already taken further steps to comply including:

- Ensuring our Registered Office is appropriate and complies with the ECCTA requirements;
- Provided and registered an appropriate email address; and
- Confirming with each annual confirmation statement the company's activities and future activities are for a lawful purpose

#### *Expenses and Allowances*

4.12 The Group Policy on Governance Body Expenses and Allowances was approved by the Group Board in November 2023. The policy helps to ensure we have a clear framework for reimbursing Board members.

4.13 As per section 11.1 of the policy, Board Members are asked to note that Claims should normally be made within one month of incurring the expense and should ideally be made within the tax year in which they are incurred, to allow individuals to make appropriate returns to HM Revenue and Customs. Board Members' expenses are also reported within our annual report and consolidated financial statements. All Board Members have been invited to submit any expenses for the period covering 1 April 2024 to 31 March 2025.

#### *Register of Interests*

4.14 Our Group policy on Board member conflicts of interest was approved by the Group Board in June 2022. The policy sets out our Group position and must be read in conjunction with the constitution of each entity in the Group, and our Group Code of Conduct.

4.15 Under our Group Code of Conduct, Board members are required to ensure they register any interests and update their entry whenever a new interest arises. Information on Board member interests is also published on our website, along with Board member profiles. In addition, we are required to provide information to our auditors concerning related parties.

4.16 A Register of Interests is maintained for Board Members and is available in our Reading Room in AdminControl.

4.17 Declaration of Interests form a standing agenda item at each Board meeting, where members are requested to declare any further interests, any amendments to the register of interests, or any conflicts related to specific agenda items.

4.18 As part of our year-end procedures we have also sought confirmation from Board members that they have no new declarations that require to be made. Any updates will be recorded in the register and notified to the Chair and the Board as required.

#### *Gifts and hospitality*

4.19 Our Group Policy (Payments, Benefits, Gifts and Hospitality Policy) was approved in June 2022. Under the policy, Board Members are required to declare any offers of gifts and hospitality they make or receive on behalf of us.

A register of the offer or receipt of any gifts or hospitality is maintained by the Governance team.

- 4.20 During the period 1 April 2024 to 31 March 2025, no declarations have been received from any of our Board members.

## **5. Customer engagement**

- 5.1 There are no customer engagement matters in relation to this report.

## **6. Environmental and sustainability implications**

- 6.1 There are no environmental or sustainability implications arising from 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 Board expenses and remuneration are included within our overall annual budget.

## **9. Legal, regulatory and charitable implications**

- 9.1 This report helps us to ensure that we maintain oversight of our compliance with Gifts and Hospitality policy.
- 9.2 The Scottish Housing Regulator's Regulatory Framework sets out that, where payment is to be offered to Board members, this must be within a clear policy framework and the RSL must make sure it acts with transparency, honesty and propriety, and avoids any public perception of improper conduct. The remuneration policy addresses all of these points and accordingly, is compliant with regulatory requirements.

## **10. Risk appetite and assessment**

- 10.1 Our risk appetite in relation to governance is cautious, which is defined as "Preference for safe delivery options that have a low degree of inherent risk and may only have limited potential for reward".

## **11. Equalities implications**

- 11.1 There are no equalities implications arising from this report.

## **12. Key issues and conclusions**

- 12.1 We have undertaken a review of our Group-wide frameworks and policies. Through this process, we have identified that there are arrangements in place that help us to meet the commitments made under those frameworks and policies.

- 12.2 From 1 April 2024 - 31 March 2025 we recorded no declarations of gifts or hospitality from Board members.
- 12.3 Following an extended period of non-attendance a tenant board member will be resigned.
- 12.4 A new tenant board member has been identified and following a period of support and training is ready to join the Board.

### **13. Recommendations**

- 13.1 The Board is asked to:
- 1) Note the contents of the report; and
  - 2) Approve the appointment of Donald Carruthers as tenant board member.

LIST OF APPENDICES:



## Report

**To:** Wheatley Homes South Board

**By:** Alex Lamb, Managing Director

**Approved By:** Alan Glasgow, Group Director of Housing

**Subject:** Risk Register

**Date of Meeting:** 21 May 2025

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### 1. Purpose

1.1. This report asks the Board to consider and approve:

- the Board's Risk Appetite Statements; and
- the proposed changes to the Risk Register.

### 2. Authorising and strategic context

2.1. In accordance with the Group Standing Orders, the Board is responsible for managing and monitoring its Risk Register and Risk Appetite. The Group Board is responsible for managing and monitoring the Wheatley Group Risk Management Framework.

### 3. Background

3.1. The Group's risk management approach requires that the Board review its Risk Appetite Statements annually, to consider whether these remain an accurate reflection of the Board's willingness to accept risk associated with the achievement of its Strategic Aims.

3.2. This paper summarises the results of management's review of the risk appetite statements, for consideration and approval by the Board.

3.3. The paper also gives an overview of the current risk position for consideration by the Board. As set out in the Group Risk Management approach, this update focuses on risks management wishes to bring to the attention of the Board. This includes risks in the following categories:

- A. Risks outwith risk appetite;
- B. Risks with a residual risk score of 12 or more or an inherent risk score of 20 or more, for which the Board has not received an update on the operation of the controls in the last 6 months; and

- C. Risks highlighted by management for consideration. This will include new risks, risks to be removed from the Risk Register, or risks with a significant change in scoring. It also includes brief details of any significant changes to the external environment that may impact on the Board's risk profile ("horizon-scanning").

#### 4. Discussion

##### Risk Appetite Statements

- 4.1. The Group uses the risk appetite definitions set out below to define a risk appetite statement for each type of risk (e.g. financial/VfM or operational delivery) that might occur when delivering each Strategic Aim. The colours in each row represent the risk appetite levels, ranging from Averse to Hungry.

	Financial or VfM	Reputation / Credibility	Operational Delivery	Regulatory/ Legal Compliance
<b>Averse -</b> Avoidance of risk and uncertainty is a key organisational objective.	Avoidance of financial loss is a key objective. Only willing to accept the low-cost option. Resources withdrawn from non-essential activities.	Minimal tolerance for any decisions that could lead to external scrutiny.	Defensive approach to objectives – aim to maintain or protect, rather than to create or innovate. Priority for tight management controls and oversight with limited devolved decision-making authority. General avoidance of systems / technology developments.	Avoid anything which could be challenged, even unsuccessfully. Play safe.
<b>Minimal -</b> Preference for ultra-safe business delivery options that have a low degree of inherent risk and only have a potential for limited reward.	Only prepared to accept the possibility of very limited financial loss if essential. VfM is primary concern.	Tolerance for risk taking limited to those events where there is no chance of significant repercussion.	Innovations always avoided unless essential. Decision making authority held by senior management. Only essential systems /technology developments to protect current operations.	Want to be very sure we would win any challenge.
<b>Cautious -</b> Preference for safe delivery options that have a low degree of inherent risk and may only have limited potential for reward.	Prepared to accept the possibility of some limited financial loss. VfM still the primary concern but willing to also consider the benefits. Resources generally restricted to core operational targets.	Tolerance for risk taking limited those events where there is little chance of any significant repercussion should there be a failure.	Tendency to stick to the status quo, innovations generally avoided unless necessary. Decision making authority generally held by senior management. Systems / technology developments limited to improvements to protection of current operations.	Limited tolerance for "sticking our neck out". Want to be reasonably sure we would win any challenge.
<b>Open -</b> Willing to choose the one that is most likely to result in successful delivery while	Prepared to invest for reward and minimise the possibility of financial loss by managing the risks	Appetite to take decisions with potential to expose us to additional	Innovation supported, with demonstration of commensurate improvements in management control. Systems / technology	Challenge will be problematic, but we are likely to win it, and the gain will outweigh the



	Financial or VFM	Reputation / Credibility	Operational Delivery	Regulatory/ Legal Compliance
also providing an acceptable level of risk / reward (and VFM etc.).	to a tolerable level. Value and benefits considered (not just cheapest price). Resources allocated in order to capitalise on potential opportunities.	scrutiny but only when appropriate steps have been taken to minimise any exposure.	developments considered to enable operational delivery. Responsibility for non-critical decisions may be devolved.	adverse consequences.
<b>Hungry</b> - Eager to be innovative and to choose options offering potentially higher business rewards (despite greater inherent risk).	Prepared to invest for the best possible reward and accept the possibility of financial loss (although controls may be in place). Resources allocated without firm guarantee of return – 'investment capital' type approach.	Appetite to take decisions that are likely to bring external scrutiny but where potential benefits outweigh the risks.	Innovation pursued – desire to 'break the mould' and challenge current working practices. New technologies viewed as a key enabler of operational activity.	Chances or losing are high and consequences serious. But a win would be seen as a great coup.

- 4.2. In May 2024 the Board used these Group Risk Appetite definitions to set its risk appetite for each of its Strategic aims, resulting in a summary Risk Appetite Statement, as set out below. The full Risk Appetite Statements are available for review in Appendix 1.

Strategic Theme 1: Delivering exceptional customer experience	Financial	Reputational	Operational	Compliance
1. Progressing from excellent to outstanding	Cautious	Minimal	Open	Cautious
2. Enabling customers to lead	Open	Open	Open	Minimal
3. Developing a customer-led repairs service	Open	Open	Open	Minimal
Strategic Theme 2: Making the most of our homes and our assets	Financial	Reputational	Operational	Compliance
5. Increasing the supply of new homes	Averse	Minimal	Open	Minimal
6. Investing in existing homes and environments	Cautious	Open	Open	Minimal
7. Setting the benchmark for sustainability and reducing carbon footprint	Open	Open	Hungry	Cautious
8. Building community voice, engagement and resilience	Open	Open	Open	Cautious
Strategic Theme 3: Changing Lives and Communities	Financial	Reputational	Operational	Compliance
10. Developing peaceful and connected neighbourhoods	Minimal	Open	Open	Minimal
11. Supporting economic resilience in our communities	Open	Open	Open	Minimal

<b>Strategic Theme 4: Developing our shared capacity</b>	<b>Financial</b>	<b>Reputational</b>	<b>Operational</b>	<b>Compliance</b>
12.W.E.Think – creating our “Thinking Yes Together” culture	<i>Open</i>	<i>Open</i>	<i>Hungry</i>	<i>Cautious</i>
13.W.E.Create – driving innovation	<i>Open</i>	<i>Open</i>	<i>Hungry</i>	<i>Cautious</i>
14.W.E.Work – strengthening the skills and agility of our staff	<i>Open</i>	<i>Hungry</i>	<i>Hungry</i>	<i>Cautious</i>
<b>Strategic Theme 5: Enabling our Ambitions</b>	<b>Financial</b>	<b>Reputational</b>	<b>Operational</b>	<b>Compliance</b>
15.Raising the funding to support our ambitions	<i>Open</i>	<i>Minimal</i>	<i>Cautious</i>	<i>Minimal</i>
16.Maintaining a strong credit rating and managing financial risk	<i>Minimal</i>	<i>Averse</i>	<i>Cautious</i>	<i>Averse</i>
17. Evolving digital platforms to support our activities	<i>Open</i>	<i>Open</i>	<i>Open</i>	<i>Averse</i>
18.Influencing locally and nationally to benefit our communities	<i>Cautious</i>	<i>Open</i>	<i>Hungry</i>	<i>Minimal</i>

- 4.3. Management has reviewed the risk appetite statements, considering factors such as strategic priorities for 2025/26; external factors which may impact on achievement of the Strategic Aims and Subsidiary specific factors that may impact on the Board’s willingness to take risk in different areas. There are no proposed changes arising from this review.
- 4.4. The Board is asked to consider whether the Risk Appetite Statements can be approved for 2025/26.

### *Risk Register*

- 4.5. The Group’s risk management approach requires that the full Risk Register should be reviewed annually. Accordingly, the full risk register is available for review at Appendix 2.
- 4.6. The chart below shows all risks within the Risk Register. These are colour-coded as follows:
- Red font – risks highlighted for Member consideration (as set out in paragraph 3.1) and discussed further below;
  - Purple font – risks with a high residual risk or inherent risk score where Boards have received an update on the operation of the controls in the last 6 months;
  - Black font – lower scoring risks that have remained stable within the current period.

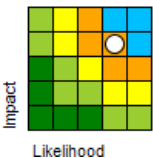
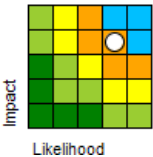
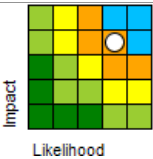
A full description of each of these risks, and associated controls, is set out in Appendix 2.

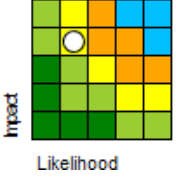
Impact	5					
	4		<ul style="list-style-type: none"><li>Ability to meet Scottish Government legislative requirements for energy efficiency (C)</li><li>Supplier's Financial Position, Contingency and BCP (C)</li><li>Fire Event (A)</li></ul>	<ul style="list-style-type: none"><li>Reduced availability of financial support from SGov't/Local Govt</li></ul>	<ul style="list-style-type: none"><li>Delayed recovery in the event of a cyber-attack (A)</li><li>Disruption following a cyber-attack on a key system provider (A)</li><li>Radio Teleswitch switch off (A)</li></ul>	
	3	<ul style="list-style-type: none"><li>Insufficient Group Development Programme pipeline</li></ul>	<ul style="list-style-type: none"><li>Care and Support Services</li><li>Business Continuity</li><li>Senior staff recruitment</li><li>Staff development and succession planning</li><li>Damp and Mould</li><li>Fire Safety</li><li>Group Credit Rating</li><li>Customer Satisfaction (tenants)</li><li>Rent arrears management</li><li>Governance Structure</li><li>WHS Property Services (C)</li><li>Inhouse Repairs Service (C)</li></ul>	<ul style="list-style-type: none"><li>Impact on our customers of reduced public funding</li><li>Laws and Regulations</li><li>Staff behaviour enables a cyber-attack</li><li>Compliance with funders' requirements</li><li>Repairs supply chain disruption</li><li>Securing new funding and adverse market changes</li><li>Political and Policy changes impact on strategic key partnerships</li><li>Non- achievement of sustainability targets</li></ul>	<ul style="list-style-type: none"><li>Climate change impact on Group assets and services</li></ul>	
	2				<ul style="list-style-type: none"><li>Monitoring H&amp;S arrangements (C)</li></ul>	
	1					
		1	2	3	4	5
		Likelihood				

4.7. The remainder of this section provides additional commentary on those risks highlighted in red font.

## Section A - Risks outwith risk appetite

- 4.8. There are four risks with a residual risk score that is greater than the approved risk appetite. This is set out in the table below.

Risk	Residual Risk Score	Risk Appetite Level	Commentary
RISK 019.2: Delayed recovery in the event of a cyber attack		Cautious	This risk covers our ability and the time taken to return to normal business operations in the period following a cyber-attack. To mitigate this, the Group regularly reviews business continuity arrangements including scenario planning exercises to test the effectiveness of these plans and to identify any additional refinements. We back up data from all core IT systems daily, hold in a secure location and have conducted integrity testing with planned downtime and restart of IT systems.
RISK 019.3: Disruption following a cyber-attack on a key system provider		Cautious	This risk reflects the risk that a key supplier is affected by a cyber-attack. The extent to which we can influence supplier controls to prevent an attack is limited, however we are enhancing the controls and checks within the contract lifecycle through scheduled supplier engagement by contract owners, additional questions focused on the supplier's resilience and DR plans, data breach processes and notifications within the annual Vendor Security Assessments and Data Privacy Assessments being reviewed on an annual basis.
<b>NEW RISK:</b> RISK020- Radio Teleswitch switch off		Minimal	This new risk is in response to the Radio Teleswitch (RTS) switch off and the impact this may have if c.5000 customers with RTS electricity meters do not engage with their energy suppliers to have these meters updated in advance of the switch off. The Group is unable to directly resolve this issue on behalf of its customers, but is engaging with third parties,

Risk	Residual Risk Score	Risk Appetite Level	Commentary
			contacting affected customers and raising awareness through communications for customers and staff.
RISK 089 – Fire Event		Minimal	This is focused on the risk of a fire within a customer's property. It is outwith risk appetite due to the limited control the Group has over the actions of third parties to minimise fire risk. Despite best efforts, we cannot eliminate all risk of accidental dwelling fires. We have reduced these year-on-year, through proactive engagement with our customers and rigorous fire safety inspections of our assets on a rolling programme basis and mitigating measures, but we will continue to experience accidental dwelling fires.

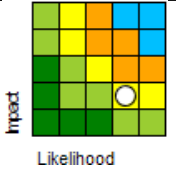
- 4.9. The implementation of any identified actions will be monitored by management and residual risk scores will be reviewed as part of the scheduled quarterly review of all risks.

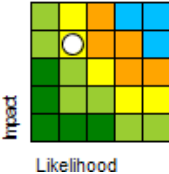
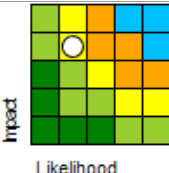
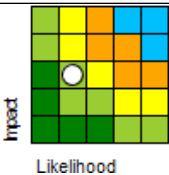
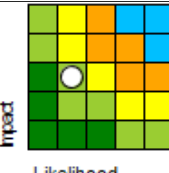
**Section B – High scoring risks with controls due for review.**

- 4.10. There are no risks with a residual risk score that is greater than the 12, or an inherent risk score of 20 or more, for which the Board has not received an update on the operation of the controls in the last 6 months.

**Section C- Horizon Scanning**

- 4.11. The table below summarises five risks highlighted for the Board's attention, including any key changes to the risks in the Risk Register.

Risk	Residual Risk Score	Risk Appetite Level	Commentary
<b>NEW RISK:</b> RISK090- Monitoring H&S Arrangements		Cautious	This new risk has been added to capture the risk that the H&S monitoring function does not work effectively to detect non-compliance with H&S policy and procedures or drive improvement across the Group due to poor team coordination, insufficient support, or lack of awareness of relevant issues by that function. The risk is currently

Risk	Residual Risk Score	Risk Appetite Level	Commentary
			being managed within risk appetite.
<b>NEW RISK:</b> RISK039- Supplier's Financial Position, Contingency and Business Continuity Planning		Cautious	This risk has been added to reflect the risk that suppliers ceasing to trade, or supply chain disruption, could cause significant disruption to service delivery or delay to projects, resulting in additional cost and reputational damage.
<b>AMENDED RISK:</b> RISK004- Ability to meet Scottish Government legislative requirements for energy efficiency		Cautious	Risk has reduced because the Scottish Government has indicated it will no longer implement heat and building regulations that would have required us to remove gas from our properties for existing homes. Likelihood has reduced to 2 as legislative requirements are less onerous. This brings the risk within risk appetite.
<b>DELETED RISK:</b> RISK183- WHS Property Services		Open	This risk was added to reflect risk surrounding the implementation of Servitor in the South. Changes are now embedded and therefore a new risk has been proposed to cover the risk that the Group's Inhouse Repairs service does not meet expected targets.
<b>NEW RISK:</b> RISK183- Inhouse Repairs Service		Open	As above, new risk to replace RISK183. This covers the risk of a failure within the supply chain, repairs service and/or by contractors, which interrupts the inhouse repairs service to customers.

4.12. The Board is asked to consider whether any matters discussed elsewhere during the Board meeting result in additional risks to be captured in the Risk Register.

## 5. Customer Engagement

5.1. No customer engagement implications arise directly from this report.

## 6. Environmental and sustainability implications

6.1. No environmental or sustainability implications arise directly from this report.

## **7. Digital transformation alignment**

7.1. No digital transformation alignment implications arise directly from this report.

## **8. Financial and value for money implications**

8.1. No financial or value for money implications arise directly from this report.

## **9. Legal, regulatory and charitable implications**

9.1. No legal, regulatory or charitable implications arise directly from this report.

## **10. Risk Appetite and assessment**

10.1. There is no single risk appetite associated with this paper. Instead, the review of risks within the Risk Register, as outlined in this paper is designed to provide assurance on the controls in place to manage risks such that the residual risk score is within risk appetite and to identify additional actions we plan to reduce residual risk further, where required.

## **11. Equalities implications**

11.1. This report does not require an equalities impact assessment.

## **12. Key issues and conclusions**

12.1. Management's review of the Risk Appetite Statements has not identified any required changes to the Statements for 2025/26.

12.2. Management's review of the Risk Register has identified four risks that are outwith risk appetite, no risks with high inherent or residual risk scores that have not been reviewed by management; and a further five risks highlighted for Board consideration.

## **13. Recommendations**

13.1. The Board is asked to:

- 1) Approve the Risk Appetite Statements for 2025/26;
- 2) Approve the proposed changes to the Risk Register; and
- 3) Identify any further changes required to the Risk Register.

## **LIST OF APPENDICES:**

Appendix 1 –WH-South Risk Appetite Statements 2025/26

Appendix 2 – WH-South Risk Register

## Appendix 1 – WH-South Risk Appetite Statements

### Theme 1 – Delivering exceptional customer experience

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
<i>Progressing from Excellent to Outstanding</i>	<b>Cautious:</b> We aim to deliver the highest levels of customer service whilst optimising VfM for the services provided. We must be able to transparently demonstrate how our services and products provide VfM.	<b>Minimal:</b> We will continue to seek to influence at a national level and be externally validated as global leaders in customer service and benchmarked results. It is vital that we deliver strong performance against key business measures. We must be very sure that there is little chance of any significant reputational repercussion should there be a failure.	<b>Open:</b> We are keen to pursue opportunities to use digital services and platforms to improve the customer experience. We should be able to demonstrate the benefits that these new digital approaches will make, including improvements to the control environment.	<b>Cautious:</b> We will increasingly use integrated online and digital engagement platforms and spaces to support engagement with customers and should be satisfied that they protect the online safety and personal information of users. We must be reasonably sure we could win any legislative challenge related to the use of these customer engagement tools.
<i>Enabling customers to lead</i>	<b>Open:</b> Increasingly, more customer control of expenditure will ensure resources are targeted at the things which matter to our customers. By 2026 25% of all tenant-facing expenditure across Group will be controlled by tenants. We will allocate financial resource to support increased customer control of expenditure where the value and benefits can be demonstrated. We accept that there is a possibility of some financial loss as this new	<b>Open:</b> We aim to create a cultural shift for customers and staff, shifting the balance of power and control to the customer and ensuring the service they experience is aligned to their personal priorities. Equality and diversity will be at the heart of our service re-design, and we will choose options that are the most likely to successfully deliver these ambitions and elevate our reputation in these areas. We are willing to take decisions which	<b>Open:</b> We aim to be a digitally led business which delivers innovative and transformative digital solutions. We will pursue opportunities to use digital services and platforms to improve the customer experience, without leaving anyone behind. Our operating model must reflect the needs of all customers.	<b>Minimal:</b> Staff will increasingly be trusted advisors, but it is essential that mitigations are in place to help keep customers safe and prevent any misuse of trust. Digital platforms and the use of artificial Intelligence and predictive analytics will be essential tools in our digitally led services; however, we must be able to demonstrate that we comply with legislation regarding the security and use of data.



Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
	customer-led approach is embedded, but mitigating actions should be taken to manage this to a tolerable level.	might expose us to additional scrutiny, as long as steps have been taken to minimise any negative impact.		
<i>Developing a customer led repairs service</i>	<b>Open:</b> We are prepared to invest in improvements to the repairs service, particularly where investment will result in optimised efficiency, consistency in approach and customer led services. Our spending decisions must be transparent and withstand scrutiny.	<b>Open:</b> The repairs service is a core driver of customer value, and we aim to deliver repairs efficiently and effectively, achieving a high level of customer satisfaction. We seek to improve the repairs service and be innovative in how we meet the repair needs of customers. We accept that change may bring additional scrutiny, but we will only act where we are satisfied that the results will lead to overall improvement and increased customer satisfaction.	<b>Open:</b> Our ambition is to continue to improve the repairs service, and the new systems infrastructure will support our aim to introduce more dynamic ways for repairs to be delivered. We will choose options that are most likely to result in success and seek opportunities to use developments in systems and technology to improve our operational repairs activity. Decisions about arrangements for repairs delivery in the West will be informed by the option appraisal of the first five years of the JV.	<b>Minimal:</b> Keeping customers and staff safe is a key priority and we must be able to demonstrate that we comply with Health and Safety legislation in relation to our repairs activity.

## Theme 2 – Making the most of our homes and assets

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
<i>Increasing the supply of new homes</i>	<b>Averse:</b> Achieving our target return on investment will be an important factor in decisions about what and where we build. Avoiding financial loss is a key objective.	<b>Minimal:</b> We aim to use the strength of the Group and the national significance of our new build programme to influence the Scottish Government to sustain the current budget allocation and grant conditions for affordable housing supply through to 2026. We also seek to extend our influence with grant funders, Glasgow and Edinburgh councils and the Scottish Government, to increase the share of Affordable Housing Supply Programme (AHSP) budget allocation to the Group. Therefore, our tolerance for risk taking in relation to the safe delivery of the new build programme is limited to events where there is no chance of significant repercussion.	<b>Open:</b> Operationally, we are keen to grow new partnerships beyond our current footprint and explore options to facilitate development opportunities in other geographic areas. We will choose options that are most likely to result in successful delivery, while also providing an acceptable level of reward for the Group. The Wheatley 24 house range will meet customers' needs and exceed their expectations by delivering the best in the principles of Modern Methods of Construction (MMC), helping to mitigate against industry skills shortages and move towards achieving zero defect housing, faster onsite construction times and ever greater customer satisfaction results. Innovation in these areas is supported; however, we must be able to demonstrate the improvements and benefits that investment in these areas will deliver.	<b>Minimal:</b> We must be able to demonstrate that we comply with legislation in relation to our new build activity, including procurement, construction and Health and Safety legislation.

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
<i>Investing in existing homes and environments</i>	<b>Cautious:</b> Ongoing financial strength is crucial to enable us to continue to improve, modernise and maintain homes across the Group. We will revise our well-established investment processes to include more focus on what creates most value for our customers. Value for money will still be the key factor in our decision making, but wider benefits, such as reducing levels of emergency and reactive repairs and customer satisfaction, will also be considered.	<b>Open:</b> Improvements to Locality Planning and engagement approaches will allow us to better understand what investment activity creates the most value for our customers. However, this increased customer engagement may also raise expectations and invite scrutiny. We must ensure that the outcomes of Locality Planning and customer engagement are fully considered in our decision making and that we can explain the reasons for actions taken.	<b>Open:</b> We are eager to exploit technological innovations to enhance the efficiency and convenience of our investment and maintenance services. We will deliver 'innovation at the point of investment' in our existing homes and explore the use of cutting-edge predictive analytics to inform a more intelligence-led repairs and maintenance service. We are prepared to choose options that are most likely to result in successful delivery, while also providing an acceptable level of reward.	<b>Minimal:</b> Keeping customers and staff safe is a key priority and we must be able to demonstrate that we comply with Health and Safety legislation in relation to our investment activity.
<i>Setting the benchmark for sustainability and reducing carbon footprint</i>	<b>Open:</b> 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.	<b>Open:</b> We aim to establish Wheatley Group as 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	<b>Hungry:</b> 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	<b>Cautious:</b> 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.

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
		where success is likely, and we have taken appropriate steps to minimise any negative exposure.	establish us as a leader in sustainability and reducing carbon footprint.	
<i>Building community voice, engagement and resilience</i>	<b>Open:</b> Our new engagement approaches will give tenants a far greater say over Group investment. We will continue to use our Group-wide procurement frameworks to drive wider community benefits with our suppliers and will harness our size and buying power to get the best deals possible for our customers. Financial decisions will consider both value and benefits, as well as cost.	<b>Open:</b> Customers and wider communities will increasingly be more involved in our decision making. We will also work with communities to co-create a 'Wheatley Place Measure' that reflects the criteria our customers identify as the hallmarks of a successful and resilient community. This increased involvement should encourage customers to expect improvements and challenge us more. We must ensure that we can demonstrate how the outcomes of this engagement have been used in our decision making.	<b>Open:</b> Our aim is to establish a greater sense of customer and community ownership, through planning and designing new homes and communities together. We will pursue developments in technology, such as 4D applications, which will encourage customers to get more involved in decision making by making it relevant, fresh and fun. We are committed to creating opportunities which help break down barriers of disadvantage for customers and their families. The overarching purpose of the Foundation will be to raise customer aspirations and build lasting customer and community resilience rather than meet short-term need. Innovation in this area is supported, but we must take reasonable steps to mitigate uncertainty and be able to demonstrate the value and benefits of actions taken.	<b>Cautious:</b> We will increasingly use integrated online and digital engagement platforms and spaces to support engagement with customers and should be satisfied that they protect the online safety and personal information of users. We must be reasonably sure we could win any legislative challenge related to the use of these customer engagement tools.

### Theme 3- Changing Lives and Communities

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
<i>Developing peaceful and connected neighbourhoods</i>	<b>Minimal:</b> We will work with partners at national and local level to secure funding for our customers to have increased access to devices, low or no costs mobile data and support customers to secure the most affordable broadband connections. We have a preference for safe delivery options that have a low degree of inherent risk. Value for money is a primary concern, but we are also willing to consider all benefits in our financial decisions.	<b>Open:</b> We will take a lead role in influencing other organisations and agencies in the interests of our customers. We will help our customers and communities to have their voice heard and will seek to harness collaborative action to achieve a greater collective impact on improving the wellbeing of our communities. This will involve establishing common objectives, agreed and co-ordinated approaches, shared data and common indicators of success, all of which may bring additional scrutiny. Therefore, we must ensure that appropriate steps are taken to mitigate any negative impact on our reputation or credibility.	<b>Open:</b> We seek to build on our existing successes and maximise opportunities to use new systems and technology to further improve our current operations. Innovation is supported but we must be able to demonstrate commensurate improvements in management control.	<b>Minimal:</b> Ensuring the best Fire Safety precautions throughout our housing will continue to be a priority. We also plan to maximise the use of the facilities we own in our areas and develop digital platforms to support customer engagement, both with us and within their communities. Keeping customers and staff safe is a key priority and we must be able to demonstrate that we comply with our legislative responsibilities in relation to all this activity.

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
<i>Supporting economic resilience in our communities</i>	<b>Open:</b> We are committed to supporting our customers and communities, including those impacted by the pandemic. We are prepared to invest in Group initiatives including the Wheatley bursary programme and the delivery of jobs, training and apprenticeship places, in order to help improve the economic resilience of our customers and communities. We will also seek funding to support the delivery of targeted Foundation Programmes to support children in our communities. Appropriate controls will be established to minimise the possibility of financial loss, but we recognise the overall benefits of investment in these areas. We will ensure that the terms and conditions of any funding received are met.	<b>Open:</b> We aim to expand the level of support available to our customers through the provision of wrap-around services and Foundation programmes and bursaries. While we are willing to choose options that will deliver the most successful outcomes for our customers, we must ensure that we take appropriate steps to minimise any negative exposure which could impact on the level of future funding available to us.	<b>Open:</b> We will reshape our services to provide additional support to our customers who have or are at risk of losing their job or entering the benefit system for the first time. We will seek options that will most likely result in successful outcomes for our customers, while also providing an acceptable level of value for money.	<b>Minimal:</b> We will proactively engage with those at risk to provide them with the support of our wraparound services. Staff will increasingly be trusted advisors, but it is essential that mitigations are in place to help keep customers safe and prevent any misuse of trust.

## Theme 4- Developing our shared capacity

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
W.E. Think – creating our “Thinking Yes Together” culture	<b>Open:</b> We will build on our award-winning Think Yes culture and evolve it to deliver our vision for 2026. Resources will be allocated to capitalise on potential opportunities. We will invest in options that are most likely to result in success but must have appropriate controls in place to minimise the possibility of financial loss.	<b>Open:</b> We aim to ensure external influencers, including politicians, regulators and funders, understand Wheatley’s unique offering and capacity, and seek to work with us. We will firmly establish Wheatley’s authority and credibility, both as a result of our track record of achievements and because of the strength of our new engagement model, which will enable us to effectively represent the views of our huge customer base. In order to transform our culture and thinking we accept that we may need to take decisions with potential to expose us to additional scrutiny, but appropriate steps must be taken to minimise any negative exposure.	<b>Hungry:</b> The transformational redesign of our services and operating models to make the most of our investment in technology and digital platforms is already underway. Innovation is pursued as we challenge current working practices and inspire our staff to think and act differently. Developing the appropriate skills, behaviours and confidence required for staff at all levels to innovate and influence effectively will be a key feature of our learning and development programme over the next five years. We will monitor success by ensuring our performance measures are aligned to the behaviours and outcomes we want to drive.	<b>Cautious:</b> Wheatley staff are trusted advisors, but it is essential that mitigations are in place to help keep customers safe and prevent any misuse of trust. We will increasingly use integrated online and digital platforms and spaces to interact with customers and should be satisfied that they protect the online safety and personal information of users. We must be reasonably sure we could win any legislative challenge related to the use of these online tools.



Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
W.E. Create – driving innovation	<b>Open:</b> Resources will be allocated to capitalise on potential opportunities. We will invest in options that are most likely to result in success but must have appropriate controls in place to minimise the possibility of financial loss.	<b>Open:</b> Wheatley will seek to benchmark with world-class organisations. We will pursue appropriate prestigious external recognition that serves to raise our profile as a role-model and exemplar for people practice and creating customer value. We will also seek to forge innovative new partnerships with both academia and businesses to design and deliver accredited learning experiences and pathways. In order to maximise partnering opportunities we accept that we will likely be exposed to additional scrutiny, therefore appropriate steps must be taken to minimise any negative impact on our credibility or reputation.	<b>Hungry:</b> We are eager to 'break the mould' and stimulate innovation and learning in our communities as well as our workforce. New technology will be viewed as a key enabler of change as we create a virtual space for innovation and learning and transform how we engage with technology and innovation possibilities in a collaborative way.	<b>Cautious:</b> We will increasingly use integrated online and digital platforms and spaces to interact with customers and partner organisations and should be satisfied that these protect the online safety and personal information of users. We must be reasonably sure we could win any legislative challenge related to the use of these online tools.
W.E. Work – strengthening the skills and agility of our staff	<b>Open:</b> Resources will be allocated to capitalise on potential opportunities. We will invest in options that are most likely to result in success but must have appropriate controls in place to minimise the possibility of financial loss.	<b>Hungry:</b> Wheatley will be an increasingly sought-after employer in people's career journeys; our reputation for developing high quality people with agile and transferable skills will give Wheatley Alumni kudos as prized and respected prospective employees. The Executive Team will lead the way in influencing and positioning Wheatley with external partners and strategic decision makers, building relationships that offer strong potential to create fresh opportunities for the benefit of the Group. We are eager to be innovative and pursue opportunities that offer high business rewards; however, the benefits must outweigh any reputational risks.	<b>Hungry:</b> New technology will be viewed as a key enabler of operational activity, with staff across the business being increasingly digitally active. We are also eager to be innovative and explore new working practices that offer high business reward for both staff and customers. How we work will continue to change as we reshape our roles and operating model.	<b>Cautious:</b> Staff will increasingly be trusted advisors, but it is essential that mitigations are in place to help keep customers safe and prevent any misuse of trust. We will explore opportunities to co-design modern employment terms and conditions and working practices that appeal to our evolving workforce and ensure maximum flexibility to meet changing needs. However, we are unwilling to take unnecessary risks regarding the delivery of employer responsibilities and must be reasonably sure we would win any challenge regarding employment legislation.



## Theme 5- Enabling our Ambitions

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
<i>Raising the funding to support our ambitions</i>	<b>Open:</b> We will explore all potential sources of funding available to us to seek the most advantageous options but must be able to clearly demonstrate the value and benefits of the facilities chosen. Commercially, we must identify new sources of equity for Lowther Homes. We are open to looking at new sources although the T&C of any equity must still meet the requirements of the Group Golden Rules.	<b>Minimal:</b> Access to Scottish Government grant remains vital to delivering our ambitions and we will work closely with Scottish Government and local authorities with devolved funding powers to achieve this. We are unwilling to take any action which could prevent us from securing this grant funding.	<b>Cautious:</b> The funding platforms we put in place have provided a strong basis in terms of available funding facilities to support our RSLs' development aspirations. However, new facilities will be required in the latter years of the strategy period, and we will look to bond, bank and other potential sources to identify the most advantageous options. We prefer safe delivery options that have a low degree of inherent risk and decision-making authority will be held by senior management.	<b>Minimal:</b> We must be able to demonstrate that we comply with legislation and regulation in order to meet the expectation of existing and potential funders and stakeholders. We must be very sure we would win any legal or regulatory challenge.
<i>Maintaining a strong credit rating and managing financial risks</i>	<b>Minimal:</b> We will test our business plan against a set of financial golden rules and ensure we have mitigating actions ready to address a wide range of adverse scenarios and stresses. We prefer ultra-safe business delivery options and are unwilling to tolerate a breach of the golden rules.	<b>Averse:</b> We will maintain a strong investment grade credit rating, with our stand-alone credit profile remaining close to the sovereign rating. We will not expose our Group to risks from build-for-sale housing, and our private housing rental and factoring subsidiary, Lowther Homes, will continue to be ring fenced in financial terms from our regulated charitable subsidiaries. We want to avoid risk and uncertainty in this area and will not tolerate decisions	<b>Cautious:</b> We want to maintain our strong credit rating and manage our financial risk. Therefore, we prefer to take safe delivery options which will protect our current position	<b>Averse:</b> We must be able to demonstrate that we comply with legislation and regulation in order to meet the expectation of stakeholders and maintain our strong credit rating. Avoidance of risk in this area is a key objective.

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
		which could lead to the Group being downgraded.		
<i>Evolving digital platforms to support our activities</i>	<b>Open:</b> As our delivery approach becomes increasingly digitally led, investment in new technology should be focused on business activities which can be re-shaped by technology. We must be able to demonstrate how this investment in technology will create enhanced value for customers and contribute to the delivery of the Group's Strategic themes. We will assess digital investment in terms of strategic fit, complexity, risk, people and quality measures as well as financial considerations.	<b>Open:</b> The transition that our customers and staff make to self-managed services must be both successful and sustainable as well as being based on offerings that fundamentally improve services beyond that which is possible in an off-line environment. We accept that change may expose us to additional scrutiny, but appropriate steps must be taken to minimise any exposure.	<b>Open:</b> We want Wheatley to become synonymous across the sector as the home of technology innovation that shapes the future of housing and property management. Technological innovation will be supported, but we must be able to demonstrate commensurate improvements in management control.	<b>Averse:</b> <i>Data and information will play an increasingly important role in enabling the delivery of all aspects of our services with data standards and interoperability key. We must be able to demonstrate that we have robust processes in place to comply with legislation regarding the security and use of data</i>
<i>Influencing locally and nationally to benefit our communities</i>	<b>Cautious:</b> Continuing to raise our profile beyond our national borders and outside our sector will support our ambitions to raise future finance. Our preference will continue to be for safe funding options that have a low degree of inherent risk, however we are keen to explore all options and seek the best possible value in all funding available to us. Keeping funders	<b>Open:</b> Cementing our position as a leading influencer is a key theme for this strategy period. We aim to confidently and deliberately raise our profile further and take a leading role on the UK and international stage, which will also support our ambitions to raise future finance. We must ensure that the Group's existing reputation and credibility is protected, while	<b>Hungry:</b> <i>Identifying and exploring different ways of working and solutions developed across a broader range of contexts will stimulate and inform our thinking as we re-configure our business to create increased value for our customers. Innovation is supported and we are willing to choose options that are most likely to result in successful delivery while also providing an acceptable level of reward.</i>	<b>Minimal:</b> In order to successfully influence on both a UK and international stage, we must be able to demonstrate that we take appropriate steps to comply with our legislative and regulatory responsibilities.

Strategic Outcome	Financial or VFM	Reputation and Credibility	Operational Delivery	Compliance: Legal / Regulatory
	and potential funders aware of our excellence in product and service provision is significant in building their confidence to invest.	maximising the impact of future exposure. In this context, we are prepared take decisions which have the potential to expose us to additional scrutiny if appropriate steps have been taken to minimise any negative exposure, and the overall benefit to the Group's profile will outweigh it.		

## Appendix 2 – WH-South Risk Register

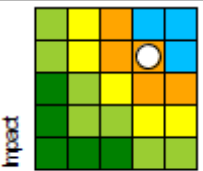
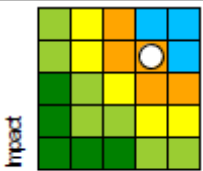
**RISK 019.2 F Delayed recovery in the event of a cyber-attack (Outwith Risk Appetite)**

<b>Strategic Outcome</b>	<b>Maintaining a strong credit rating and managing financial risk</b>	<b>Risk type</b>	<b>Operational Delivery</b>	<b>Risk owner</b>	<b>Group Director of Governance and Business Solutions</b>
<b>Description</b>		<b>Controls</b>			
There is a risk that the Group is unable to restore business as usual systems within a 2-week window following a cyber-attack such as ransomware or data theft due to ineffective or inadequate disaster recovery procedures, resulting in an inability to deliver services and financial loss.					
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
		<p>Risk Appetite is <b>CAUTIOUS</b> (Yellow)</p>			

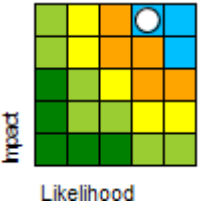
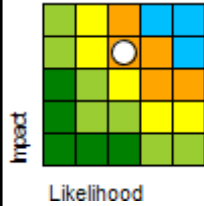
**RISK 019.3 F Disruption following a cyber-attack on a key system provider (Outwith Risk Appetite)**

<b>Strategic Outcome</b>	<b>Maintaining a strong credit rating and managing financial risk</b>	<b>Risk type</b>	<b>Operational Delivery</b>	<b>Risk owner</b>	<b>Group Director of Governance and Business Solutions</b>
<b>Description</b>		<b>Controls</b>			
There is a risk that the Group is impacted by a cyber-attack on a third-party provider of a critical Software as a Service (SAAS) provider due to inadequate contract management, resulting in an inability to deliver services, and financial loss.					
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
<p>Likelihood</p>	<p>Likelihood</p>	Risk Appetite is <b>CAUTIOUS</b> (Yellow)			

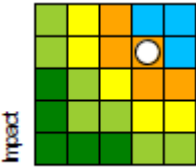
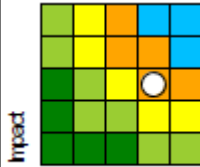
**RISK 020 Radio Teleswitch switch off (Outwith Risk Appetite and New Risk)**

Strategic Outcome	Progressing from Excellence to Outstanding	Risk type	Reputation and Credibility	Risk owner	Group Director of Assets and Development
<b>Description</b>		<b>Controls</b>			
<p>There is a risk that customers with Radio Teleswitch (RTS) electricity meters (c.5000 customers) do not engage with their energy suppliers to have these meters updated in advance of the RTS switch off, resulting in these customers' storage heaters being left permanently switched on or off, depending on the last signal received. Either outcome could have a negative impact on customer experience and satisfaction, particularly as the Group is unable to directly resolve this issue on the behalf of its customers.</p>		<p>Engagement with SFHA, OFGEM, Scottish and UK Government and energy companies to raise awareness of the issue from an RSL perspective, including participation in the OFGEN and Energy UK (the energy industry trade body) events.</p> <p>Participation in the RTS Consumer Engagement Group monthly meetings (scheduled to Dec 2025).</p> <p>Data Sharing agreement in place with Scottish Power, enabling us to contact affected RTS customers and encourage them arrange to switch via our Connected Response programme.</p> <p>Communications campaign including letters to customers, at various times, to encourage them to respond to Scottish Power communications; posters in MSF blocks; and prompts for CFC call handlers to reinforce the need for customers with RTS meters to contact their energy company.</p> <p>Staff awareness campaign.</p> <p>Internal project team formed to monitor progress with switching and coordinate the listed control activities.</p> <p><b>Planned Controls:</b></p> <p>Working with Scottish Power to develop a targeted campaign.</p> <p>Also going to proactively contact affected customers.</p> <p>Flags being built into CRM system to pick up engagement if affected customers call in to CFC.</p> <p>Business Continuity/Crisis Management planning in the event the switch off occurs.</p>			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <u>MINIMAL</u> (Light Green)</p>	<p>RSL Board updates at every meeting until not required.</p>		

**RISK 021 Reduced availability of financial support from Scottish Government and / or local government**


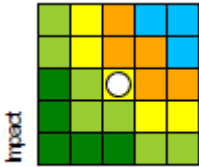
Strategic Outcome	Raising the funding to support our ambitions	Risk type	Financial or VFM	Risk owner	Group Director of Finance
<b>Description</b>		<b>Controls</b>			
<p>There is a risk that without sufficient Scottish Government financial support we may be unable to deliver Scottish Government targets in relation to the development of new homes and energy efficiency. Inflation will also impact on the Scottish Government and / or local authority financial support available for new build targets resulting in an inability to deliver strategic outcomes.</p>		<ul style="list-style-type: none"> <li>• Regular engagement with Scottish Government representatives to proactively present the case for housing investment directly and through our representative bodies.</li> <li>• Participate in the Scottish Government reviews of grant availability.</li> <li>• Pathway to Net Zero Group draws on independent expertise to support evolution of plans in this area.</li> <li>• Provision in the Business plan tested against the Asset Management Strategy to ensure sufficient provision within the Plan.</li> <li>• Financial planning sensitivities undertaken to understand the potential impact under a variety of grant scenarios.</li> <li>• Actively pursue external funding opportunities including those with the Scottish Government to support our investment in energy efficiency works.</li> </ul>			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
		<p>Risk Appetite is <b>OPEN</b> (Orange)</p>	<p>Group Board (Group Business Plan Financial Projections) (Annually in February)</p> <p>Group Board (5-Year Development Plan) (Annually)</p> <p>Group Board (Asset Management Strategy)</p> <p>Group Board (5-Year Investment Plan)</p>		

**RISK 023 Climate change impact on Group customers, assets and services**


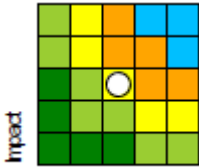
Strategic Outcome	Setting the benchmark for sustainability and reducing carbon footprint	Risk type	Financial or VFM	Risk owner	Group Director of Assets and Development
Description		Controls			
There is a risk that the impact of climate change consequences on Group customers, assets and services are not anticipated resulting in damage to the value of our assets and our ability to deliver services to our customers.		Business continuity plans (both at Group and local level) provide for operational responses to extreme weather events such as flooding and severe winter snow (e.g. "Beast from the East" type events). Group works in line with National Planning requirements, including the use of SEPA flood risk maps to assess New Build locations. Asset Management Strategy will ensure future investment maintains and improves condition of our asset including to mitigate any climate change related risks.			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 Likelihood	 Likelihood	Risk Appetite is <b>OPEN</b> (Orange)		Group Boards - Asset strategy in June 24, and subsequent strategic asset investment planning. Wheatley Solutions Board updated on sustainability related matters at its meetings. Sustainability update planned for Group Board in June 25, in advance of updating strategy later in 2025.	



# RISK 001 Impact on our customers of reduced public funding

Strategic Outcome	Supporting economic resilience in our communities	Risk type	Operational	Risk owner	Group Director of Communities
Description		Controls			
There is a risk that the impact of reductions in Local Authority services leaves the Group unable to meet increased levels of demand for wrap-around and / or Wheatley Foundation services, and therefore unable to deliver its strategic outcome to support economic resilience for all customers in need.		Monthly performance meetings, reviewing project activity/demand against available budget. Monitoring of business information from across Group to identify emerging customer/community issues. Regular liaison meetings with stakeholders and funders. Monthly “External Funding Opportunities” meeting – Foundation staff. Development of ALISS to signpost customer to additional support. Performance/Budget updates provided quarterly to Foundation Board. Monthly “Helping Hands” rent support updates provided to MDs.			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 Likelihood	 Likelihood	Risk Appetite is <b>OPEN</b> (Orange)		Group Board paper on 2023/24 rent setting (February 2024) Group Board paper on Group Business Plans Financial Projections (February 2024) Strategy session/ annual report to Foundation Board to review priorities and ensure responding to customer priorities (Annually) Performance/Budget updates provided quarterly to Foundation Board.	

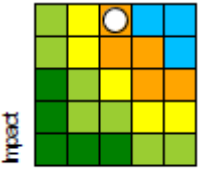
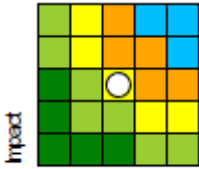
## RISK 016 Laws and Regulations

Strategic Outcome	Progressing from Excellent to Outstanding	Risk type	Compliance: Legal/Regulatory	Risk owner	Group Director of Governance and Business Solutions
<b>Description</b>		<b>Controls</b>			
<p>Non-compliance with statutory laws and regulations, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Scottish Housing Regulator and Care Inspectorate regulations,</li> <li>• Financial Conduct Authority (FCA) regulations,</li> <li>• compliance with Health and Safety Building Regulations</li> <li>• Freedom of Information (Scotland) Act, and</li> <li>• General Data Protection Regulations, and</li> <li>• OSCR, the Scottish Charities Regulator,</li> </ul> <p>resulting in adverse feedback and loss in confidence from regulators, funders, customers and potential partners, as well as potential fines and penalties.</p>		<p>A Group-wide annual assurance review is carried out against the SHR's regulatory framework, as well as the Care and Lowther regulatory frameworks. These help to ensure we meet the requirements of the SHR, OSCR, Care Inspectorate and other regulatory entities. Standing Orders/Scheme of delegation set out roles and responsibilities in relation to key legislative and regulatory requirements.</p> <p>The Group has on-going relationship management with the Scottish Housing Regulator. Changes to existing legislation are identified and implemented by identified responsible officers across the Group.</p> <p>Group wide approach to how the Group manages information. Privacy Impact Statements implemented across the Group.</p> <p>Legislative compliance maps are in place for all teams, documenting key legislative requirements and the detective controls that have been put in place to confirm ongoing compliance.</p>			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <b>CAUTIOUS</b> (Yellow)</p>	<p>Annual reporting to RSLs, Care and Lowther (Aug-Oct) each year.</p>		


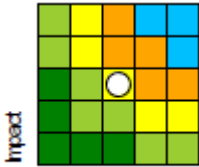
### RISK 019.1 F Staff behaviour enables a cyber-attack

Strategic Outcome		Risk type		Operational Delivery		Risk owner		Group Director of Governance and Business Solutions	
<b>Description</b>				<b>Controls</b>					
<p>There is a risk that the Group is subject to a cyber-attack such as ransomware or data theft caused by risky or malicious staff behaviour, resulting in an inability to deliver services, regulatory censure and financial loss.</p>				<p>[Redacted]</p>					
								above:	
<p>Likelihood</p>		<p>Likelihood</p>		<p>Risk Appetite is <b>CAUTIOUS</b> (Yellow)</p>		<p>[Redacted]</p>			



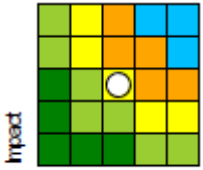
**RISK 008 Compliance with funders' requirements**

Strategic Outcome	Raising the funding to support our ambitions	Risk type	Financial or VFM	Risk owner	Group Director of Finance
<b>Description</b>		<b>Controls</b>			
<p>There is a risk of defaulting on loan agreements as a result of failing to meet or maintain compliance with loan agreements. This would result in withdrawal of the funding, potential for cross-default on other facilities, difficulty in obtaining future funding from other funders, and would likely result in higher cost of funding.</p>		<p>Regular meetings with funders and investor representatives to update on financial status of the Group. Financial performance monitored monthly and covenant compliance reviewed quarterly by the Group Board, before being submitted externally to funders. Covenant compliance monitoring tool introduced by Finance. Funder legal agreements set out the key dates and requirements. Subsidiary and Group Business Plans are subject to annual updates and review by respective Boards. Additional protection via 'Golden Rules' to produce forward-looking monitoring with headroom against loan covenants. Golden Rules subject to annual board approval, with performance monitored quarterly and any anticipated breaches, requiring board approval.</p>			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	<p>Risk Appetite is <b>OPEN</b> (Orange)</p>	<p>Business plan projections in Feb and Aug. Finance reports, including covenant compliance and Golden Rules, are a standing item for all Boards. (Ongoing) Treasury update reports are presented quarterly to Group and WFL1 Boards. (Quarterly)</p>		

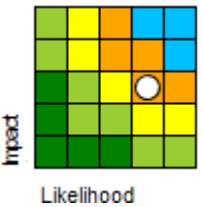
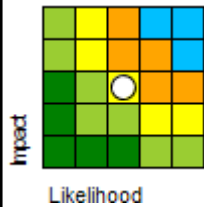
# RISK 018 Repairs supply chain disruption

Strategic Outcome	Investing in existing homes and environments	Risk type	Operational Delivery	Risk owner	Group Director of Governance and Business Solutions
Description		Controls			
<p>There is a risk that the Group faces disruption to its Repairs supply chain (including delays to supply deliveries, increased costs of supplies, or supplier business failure) due to global events such as the war in Ukraine / Mid East, and manufacturing challenges such as shipping, the UK cost of living crisis and rising inflation, resulting in delays or an inability to deliver operational targets and potential financial loss or reputational damage.</p>		<p>Utilisation of Group and 3rd party frameworks to minimise price increase risk. Procurement procedures include assessment of suppliers' financial health. Active use of Contract Management System which contains system generated alerts to flag risk. Integrated Repairs Management software (Civica Servitor) in WHS /WHE to manage van stock levels including and where possible, advance purchase of components and materials. Engagement with key suppliers on stock levels. Specific contingency plans for key services e.g. lifts. Local staff directly employed by CBG, WHE or WHS PS. Identified lead for Repairs monitors supply chain materials contract. In the event of supplier insolvency, procurement frameworks / approved supplier listings would be used to identify alternative suppliers.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <b>OPEN</b> (Orange)</p>		<p>Group DevCo - tenders/ programme performance/ Contractor financial exposure. These are standing items at each meeting. (Ongoing) Annual Procurement strategy and policy updates presented to Boards for approval (10 February 2025) All Boards receive procurement performance, finance and development updates (Ongoing standing items)</p>	

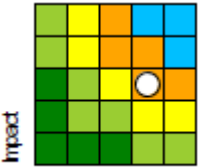
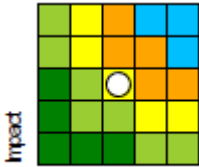
**RISK 011 Securing new funding and adverse market changes**

Strategic Outcome	Raising the funding to support our ambitions	Risk type	Financial or VFM	Risk owner	Group Director of Finance
Description		Controls			
<p>There is a risk that the Group's ability to raise borrowing at cost-effective rates or raise the funds required to meet our liquidity Golden Rules is limited by wider economic or political conditions such as another banking crisis, rising interest rates, prolonged high inflation, default in the sector, increasing focus on ESG credentials or constitutional changes; resulting in an inability to hold enough cash to meet our commitments or achieve our business objectives.</p>					
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <b>OPEN</b> (Orange)</p>		<p>Treasury management update to WFL1/Board every quarter, which includes update on market conditions. (Ongoing)            Business Plan Financial Projections reported to Group Board (Annually, February)            Annual Sustainability Report (Annually, August)            Funding Strategy discussed at Group Board (Annually, June residential)</p>	

**RISK 014 Political and Policy changes impact on strategic key partnerships**



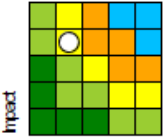
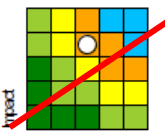
Strategic Outcome	Influencing locally and nationally to benefit our communities	Risk type	Reputation and Credibility	Risk owner	Group Director of Governance and Business Solutions; Group CEO
Description		Controls			
<p>The risk that political and policy changes (within Scotland and the UK) lead to less effective working relationships with key strategic partners, including elected members, and affect the ability of the Group to deliver its strategic objectives resulting in significant adverse reputational impact.</p>		<p>The Group has an established national approach to stakeholder management led by the Executive Team and Communications Team.</p> <p>We have ongoing engagement with senior officials and policy leads within the Scottish Government and key local Authority partners. We are also part of national policy working groups and actively look for opportunities to engage with key politicians.</p> <p>Annual MSP survey carried out to track progress, with plan put in place to address negative comments.</p> <p>Strategic Agreements in place with GCC and DGC.</p> <p>Partnership agreements in place with WLC (in respect of a shared understanding amongst WLC and other RSLs in relation to new build housing development) and work closely with CEC.</p> <p>We hold Board workshops on key policy areas, including annual strategy workshops and standalone Board/CPD events where required. The Group's policy of not building homes for sale also mitigates potential property market risk.</p> <p>At a community level, good stakeholder and partnership relations, including with elected members, are carried out by Executive Team, Managing Directors, Locality Housing Directors and the Director of Communications and Marketing. We actively look for opportunities to engage with key politicians to promote partnership working and projects highlighting the work of the Group and subsidiaries in 'Making Homes and Lives Better'.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
		<p>Risk Appetite is <b>OPEN</b> (Orange)</p>		<p>Group CEO update to group Board as standing item includes update on political engagements. (Ongoing)</p> <p>Senior political presence at all WH-G Board meetings through GCC drawn appointments. (Ongoing)</p>	

**RISK 137 Non-achievement of sustainability targets**

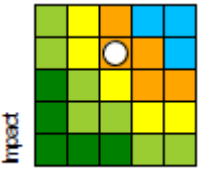
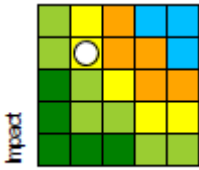
Strategic Outcome	Setting the benchmark for sustainability and reducing carbon footprint	Risk type	Reputation and Credibility	Risk owner	Group Director of Assets and Development
Description		Controls			
<p>There is a risk that the Group is not able to demonstrate how it is contributing to climate-change mitigation activities, due to non-achievement of targets within its Sustainability Framework, resulting in reputational damage with key stakeholders, including investors, government and customers.</p>		<p>We have detailed asset information and baseline data, and our asset strategy includes an assessment of the likely requirements of the new Social Housing Net Zero Standard which is currently being consulted on by Scottish Government. We have secured some funding from the Scottish Government to invest in properties through bids to the SHNZ (Social Housing Net Zero Fund). Targets to reduce emissions from our homes are monitored and reported each year to Wheatley Solutions. Progress towards our aim of being carbon neutral is assessed independently and reported each year.</p> <p>The Group's ethos is that demolition is not a preferred option, although we will explore this if following assessment this is found to be the best option including in terms of sustainability impact.</p> <p>We produce an annual ESG report for investors setting out our progress on the environmental agenda and have produced a sustainability framework for investors to support the raising of sustainability-linked finance.</p> <p>In addition to ESG reporting, increased public messaging around our work in relation to climate change is ongoing and we have developed and are implementing a group sustainability strategy.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <b>OPEN</b> (Orange)</p>		<p>All Boards – business plan including detailed 5-year capital investment plan Wheatley Solutions/Group Board projected Co2 reduction (Annually in February) Sustainability update report to all Boards (Annually Group (June) others in September) Sustainability as a key driver in our asset strategy</p>	



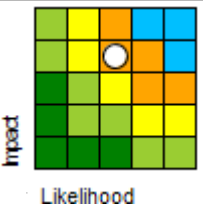
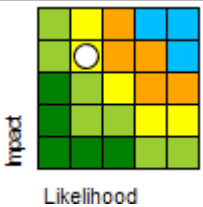
**RISK 004 Ability to meet Scottish Government legislative requirements for energy efficiency (Amended Risk)**

Strategic Outcome	Investing in existing homes and environments	Risk type	Financial/VFM	Risk owner	Group Director of Assets and Development
Description		Controls			
There is a risk that the combined cost impact of several years of high inflation and increasing regulatory / statutory compliance requirements results in assets which require significant investment in order to meet required standards and expectations.		<p>Five-year business plan is reviewed annually 6 months in advance. Plan is developed through consultation with Locality Housing Directors and after consideration of external regulations and environment.</p> <p>Group Asset strategy has been developed, and subsidiary strategic asset investment plans have been developed to clearly articulate investment need and priorities and ensure that our available investment is focused where it has greatest impact.</p> <p>Funding considerations are also re-assessed annually and inform the rent proposals. The Finance team has reviewed financial plans against a variety of assumptions and undertaken stress testing of these assumptions. Financial projections are regularly reviewed and updated as additional information becomes available. Group Board approves the financial projections including key assumptions including those around funding and investment in existing homes and environments.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Likelihood</p>  <p>Likelihood</p>	 <p>Likelihood</p>  <p>Likelihood</p>	<p>Risk Appetite is <b>CAUTIOUS</b> (Yellow)</p>		<p>Group Board asset strategy approved (June 2024). RSL Boards strategic asset investment plans (Autumn 2024). These will be reviewed and refreshed as needed each year.</p> <p>5-year investment plans refreshed each year and considered by Boards annually in February. All Boards receive an update on financial performance at each meeting.</p>	

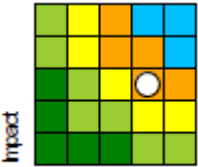
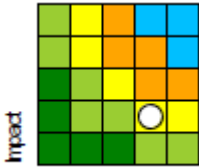
**RISK 039 Supplier's Financial Position, Contingency and Business Continuity Planning (New Risk)**

Strategic Outcome	Maintaining a strong credit rating and managing financial risks	Risk type	Operational Delivery	Risk owner	Group Director of Governance and Business Solutions
Description		Controls			
Supplier ceases trading mid contract or supply chain is disrupted due to political or legislative change, supplier failure or a force majeure, resulting in significant disruption to service delivery and/or delays to projects which incur additional costs and reputational damage.		Review the supplier's financial position before appointment and escalate concerns (Equifax credit ratings agencies etc.). Business and Continuity planning/alternative required. Due Diligence checks completed. References on suppliers before appointment. Relationship with suppliers during contract to discuss any financial issues /difficulties. Obtain supplier references. Review any irregularities with invoicing. Request upfront information on sub-contractors before appointment. Collaborate with other bodies on political updates. Work with legal partners (i.e. Shepherd and Wedderburn) on legislative changes. CMS portal requires suppliers to submit annual insurance documents. Active use of Contract Management System which contains system-generated alerts to flag risk. Standing items at the quarterly Leadership Business Meeting – to cover Risk Management and contract management Bi-annual PCIP external audit undertaken to ensure high performance is achieved. Regular Internal and External audits undertaken.			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 Likelihood	 Likelihood	Risk Appetite is <b>CAUTIOUS</b> (Yellow)		Procurement performance monitored by ET and Wheatley Solutions Board Annual procurement updates to all RSLs and Solutions board submitted 10 Feb 25 Annual Procurement Scottish Gov. returns were submitted in March 25	

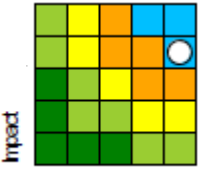
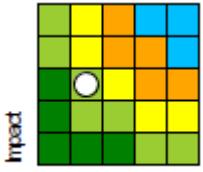
**RISK 089 Fire Event (Outwith Risk Appetite)**

Strategic Outcome	Developing peaceful and connected neighbourhoods	Risk type	Compliance: Legal/Regulatory	Risk owner	Group Director of Assets and Development
Description		Controls			
<p>Actions and behaviours of customers or third parties which are outwith the Group's control lead to a fire within our buildings, resulting in the injury or fatality of individuals, damage to Group property, and reputational damage.</p>		<p>Fire Prevention and Mitigation Framework, including our approach to high rise block inspections and Livingwell. Fire Risk Assessments are completed on a rolling cycle and include assessment of Wilful Fire Raising. Person Centred Risk Assessments (Home Fire Safety Visits) undertaken by Fire Safety Officers where vulnerable customers identified. Daily, weekly and monthly inspections of high-rise domestic premises maintained by Environmental Teams in between Fire Risk Assessments being completed. Statutory maintenance of Domestic Properties undertaken to include Gas Safety Installations, Electrical Installations and the provision of Heat and Smoke Detection. New Build properties are built with Water Suppression Systems as per new Building Standards requirements. Flats are designed to prevent the spread of fire through compartmentalisation. Extensive compliance and investment regime to achieve compliance with building safety regulations (as required) and best practice guidance. Fire Working Group attended by Snr Mgt Teams every 2 months that feeds into a Group Executive Fire Liaison Meeting chaired by Executive Lead and attended by Leadership Directors to review performance, emerging issues and escalate matters as required.</p> <p>Compliance Steering Group established to monitor and review compliance events that could contribute to risk of fire e.g. Gas Safety, Electrical Safety etc.</p> <p>Weekly report of PCRA Outstanding Actions issued to Managing Directors, Locality Housing Directors and Heads of Housing for Action.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
		<p>Risk Appetite is MINIMAL (Light Green)</p>		<p>Annual report to RSL Boards on Fire Prevention and Mitigation Framework. Group, RSL and Lowther Boards - Fire safety performance related KPIs (ADFs and FRAs) as part of standing performance updates. (Ongoing)</p> <p>Board updates (Annually - Nov)</p>	

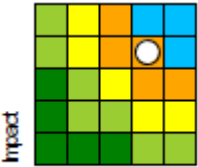
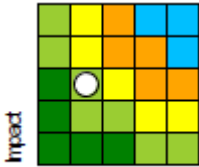
**RISK 090 Monitoring H&S arrangements (New Risk)**

Strategic Outcome	W.E. Work – Strengthening the skills and agility of our staff	Risk type	Compliance: Legal/ Regulatory	Risk owner	Group Director of Assets and Development
Description		Controls			
<p>There is a risk that the H&amp;S monitoring function does not work effectively to detect non-compliance with H&amp;S policy and procedures or drive improvement across the Group due to poor team coordination, insufficient support, or lack of awareness of relevant issues by that function. Undetected non-compliance with Group H&amp;S policy and procedures could lead to an event which results in statutory action by the Health and Safety Executive or civil action, with potential HSE improvement actions, prosecution, financial penalties and reputational damage.</p>		<p>A programme of H&amp;S audits and inspections will be undertaken by the Wheatley Group H&amp;S Team, covering all work locations.                      Audit/ inspection reports and actions are issued to responsible managers, and completion of these actions within allocated timescales is monitored by H&amp;S.                      Progress and outcomes arising from this programme are reported to operational and strategic H&amp;S meetings, as well as being reported to the Executive Team.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <b>CAUTIOUS</b> (Yellow)</p>		<p>Annual reporting on H&amp;S (May) and Fire Safety matters (Nov)</p>	

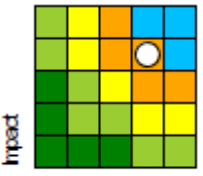
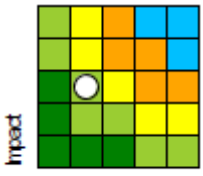
## RISK 005 Care and support services

Strategic Outcome	Shaping Care Services for the future	Risk type	Compliance: Legal/Regulatory	Risk owner	Group Director of Communities
Description		Controls			
<p>A failure in the care of an individual could result in serious personal harm, leading to risk to life and limb, financial liability and loss of future work due to reputational damage.</p>		<p>These include:</p> <ul style="list-style-type: none"> <li>• 3 yearly cyclical reviews of care operational policy and procedure (or more frequently where error requires further mitigatory instruction).</li> <li>• Annual Self-Assurance demonstrating, through evidence gathering, compliance with legislation, regulation and operational policy. Self-assurance undertaken for 2023/24, and again in 2024/25 and reported to the Care Board demonstrating material compliance.</li> <li>• Monthly performance monitoring cycles demonstrate that incidents are being recorded in-line with the Care OSM and escalated as directed within policy and protocol, this includes, health, wellbeing concerns and adult protection cause for concern. These cycles also allow us to examine complaints, investigations and outcomes. This will be replicated in 25/26.</li> <li>• As per process, financial errors are reported to the Assurance Team to demonstrate that necessary enquiries/investigations have taken place with mitigating controls put in place.</li> <li>• Care and support services governance arrangements, including the authorising environment, are clear and have been approved, including the Care Business Framework.</li> <li>• Customer sentiment surveys are deployed annually to seek formal feedback on customer satisfaction with the service they receive.</li> <li>• The Care Inspectorate, in the main, conduct inspections either annually or ever 2 years producing reports that evidence outcomes from inspection (which includes monitoring the results from Care Inspectorate service visits and Group Assurance inspections) in place which assesses the quality of care and adherence to Care policies and procedures across Group.</li> <li>• The Protecting People Policy Framework sets out arrangement for protecting the people we work for, including those considered to be vulnerable. Work to deliver against the Framework is reported to the Wheatley Care Board.</li> <li>• Mandatory and service specific training is in place to give staff the knowledge to identify additional support needs in relation to the people we work for. A training needs analysis is completed for each service annually to identify any additional training requirements in relation to the specific needs of people using that service. Dynamic risk assessments are completed for service users where risk has been identified and revisited on an ongoing basis to ensure the care and support arrangements in place continue to meet their needs.</li> <li>• The BCP and local Service Contingency Plans are invoked where necessary and remain updated to ensure that priority frameworks inform the scheduling of care to the most vulnerable customers.</li> <li>• Care Strategic Review Project proposes improvements to data gathering that enhances reputation and credibility, with a sound evidence base.</li> </ul>			
Inherent risk	Residual risk	Risk Appetite level:	Previous / Next detailed Board update on operation of controls listed above:		
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <b>MINIMAL</b> (Light Green)</p>	<p>Care business plan and ongoing care performance reporting to Group and Wheatley Care Board (minimum quarterly); Care Self-Assurance to Care Board (October 2024); Strategic Care Review Update paper to Care Board (June 2024 / October 2024); Strategic Care Review Update paper to Group Board (November 2024); Strategic Care Review Update paper taken to Group Board (April 2025); Strategic Review update presented to each Care Board. Project concludes March 2025; Annual Self Assurance audit by external consultant taken to Care Board (February 2025); Customer Sentiment 24/25 update report at Care Board (February 2025)</p>		

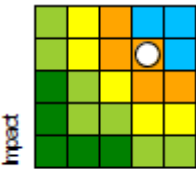
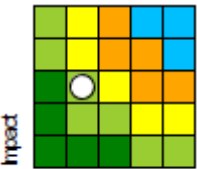
**RISK 012 Business Continuity**

Strategic Outcome	Progressing from Excellent to Outstanding	Risk type	Operational Delivery	Risk owner	Group Director of Assets and Development
<b>Description</b>		<b>Controls</b>			
<p>The Wheatley Housing Group does not have adequate or tested Business Continuity / Disaster Recovery Plans in place for key business activities and may rely on the provision of technology provided by third parties (for example: repairs service, care provision/staff cover, customer payment systems/technology, CFC telephony), resulting in significant disruption to service and avoidable reputational damage.</p>		<p>Business Continuity Plans are in place across all business areas. A business continuity steering group oversees the collating, reviewing and designing the Group's Business Continuity Plans.</p> <p>The business continuity framework and Business Continuity Policy are now embedded across the Group and in all business areas, in line with the Group's new business operating model and in light of experience through the COVID-19 pandemic.</p> <p>Regular testing and exercising of the Business Continuity Plans will continue to be implemented across all business areas.</p> <p>Winter Readiness Plans have been developed to ensure there is a collaborative approach to business interruption across this period where we may experience more adverse weather.</p> <p>Crisis Management Plan remains in place and is reviewed prior to the festive period every year in line with our Winter Readiness Plans.</p>			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	<p>Risk Appetite is OPEN (Orange)</p>	<p>Disaster Recovery arrangements included in paper to Wheatley Solutions Board – Digital Transformation Programme Update (Feb 23)</p>		

**RISK 031 Senior staff recruitment**

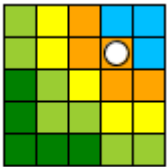
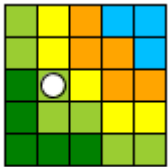
<b>Strategic Outcome</b>	<b>W.E. Work – strengthening the skills and agility of our staff</b>	<b>Risk type</b>	<b>Operational Delivery</b>	<b>Risk owner</b>	<b>Group Director of Finance; Group Director of Governance and Business Solutions</b>
<b>Description</b>		<b>Controls</b>			
The Group cannot attract candidates for senior roles with the desired qualities, skills or experience due to competing demand for staff in the sector, resulting in reduced levels of service provision.		HR policies on recruitment and selection. Leadership Development Programme to bring in new talent across Group RSLs and Wheatley Solutions. Use of specialist recruitment agencies for senior posts. Targeted advertising via CIH/ Inside Housing/ similar publications used to attract professionally trained staff. Benchmarking of starting salaries/benefits offered to ensure these remain sector leading/competitive.			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
		Risk Appetite is <b>HUNGRY</b> (Blue)	RAAG is kept informed of senior recruitment activity.		

### RISK 032 Staff development and succession planning

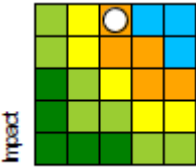
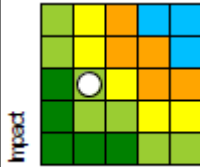
<b>Strategic Outcome</b>	<b>W.E. Work – strengthening the skills and agility of our staff</b>	<b>Risk type</b>	<b>Operational Delivery</b>	<b>Risk owner</b>	<b>Group Director of Finance; Group Director of Governance and Business Solutions</b>
<b>Description</b>		<b>Controls</b>			
Failure to succession plan and develop staff leads to there being a lack of internal talent available with the relevant skills, knowledge and experience to fill business critical roles as required, resulting in a loss of expertise, disruption to operating activity while posts are vacant and additional costs for temporary or new staff joining the Group.		Career Pathways provide opportunities to develop and expand on knowledge and experience The Workforce Plan MyAppraisal process for all staff and integrated with MyAcademy. Training records for all staff and training courses at the Academy and Leadership Development Programme, succession planning and talent management programme. Aspiring Leaders/Leading with Impact to support the succession of Executive and senior leadership roles IGNITE graduate training programme Bursary Programme			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
		Risk Appetite is <b>HUNGRY</b> (Blue)	People Services Annual report to RAAG (April each year)		



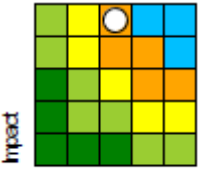
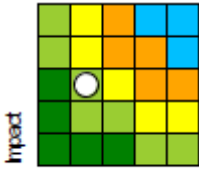
### RISK 053 Damp and Mould

Strategic Outcome	Investing in existing homes and environments	Risk type	Compliance - Legal / Regulatory	Risk owner	Group Director of Assets and Development
Description		Controls			
<p>There is a risk that housing stock is in a poor-quality condition as a result of damp and mould, resulting in harm to tenants' health.</p>		<p>The Group has a Damp and Mould Policy, which is supported by detailed procedures. Mould and damp are recorded as specific work order descriptions, with agreed timescales for completion of the works. Target timescales for completion of mould works have been reduced from 30 to 15 days and all jobs include a full inspection within target of 2 working days.</p> <p>Additional staff, to specialise in mould and damp, have been recruited to provide additional resource to the existing team. Over 70 staff have done City &amp; Guild accredited courses. Arrangements are also in place for specialist external support to this Service. A process is in place to contact tenants with completed mould and damp jobs to determine whether the reported issue has been resolved. Trades staff are made aware of condensation and its causes, as well as being trained in application of products used to manage it.</p> <p>There are annual visits to properties as part of technical compliance programme, with those in attendance advised to report any issues noted while in a property, including damp and mould. Housing Officers also access properties at least once per annum (usually more frequently) and have been supported with training and guidance on the identification and reporting of damp and mould. Housing Officers have access to information about current mould and damp jobs, factsheets to provide to tenants and are able to direct tenants to videos on how to manage issues. These are also available on Group websites. Training has been developed for all frontline staff who work with tenants including housing, wraparound services, CFC and care staff. CFC staff have specific script for probing when someone raises concern about damp or mould, so we understand clearly the extent of concern at the outset.</p> <p>A No Access Policy to cover the Group's approach to forced access, including in instances where repeated issues of damp and mould are raised but access is refused, has been rolled out.</p> <p>All staff with reason to visit customer homes have been provided with training to help recognise signs of damp and mould. This also includes CBG trades operatives. The effect of this should be that the likelihood of any unreported cases of damp and mould should be reduced and also the likelihood of any severe cases should also reduce given the time these would take to develop to that stage.</p> <p>Employ technological solutions to treat mould where appropriate e.g. misting machines.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	<p>Risk appetite is <b>MINIMAL</b> (Light Green)</p>		<p>Damp and Mould measures included in regular performance reporting to RSL and Group Boards</p>	

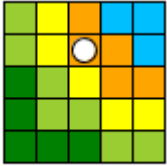
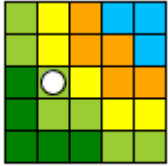
### RISK 003 Fire Safety

Strategic Outcome	Investing in existing homes and environments	Risk type	Compliance: Legal/Regulatory	Risk owner	Group Director of Assets and Development
Description		Controls			
There is a risk that a failure to comply with relevant fire safety standards for our buildings results in harm to the health or safety of our customers and/or staff, leading to injuries or fatalities, enforcement action and reputational damage		<p>Group Fire Safety Team focuses on identification of fire preventions actions for implementation by MDs.</p> <p>Fire Working Group attended by Snr Mgt teams every 2 months feeds into a Group Executive Fire Liaison Meeting chaired by Executive Lead and attended by Directors to review performance, emerging issues and escalate matters as required.</p> <p>Quarterly Bi-annual reporting of implementation of actions to Group Audit Committee.</p> <p>Outwith relevant premises, Fire Prevention and Mitigation Framework, including our approach to high rise block inspections and Livingwell, and Fire Risk Assessments are completed on a rolling cycle.</p> <p>Daily, weekly and monthly inspections of high-rise domestic premises maintained by Environmental Teams in between Fire Risk Assessments being completed.</p> <p>Extensive compliance and investment regime to achieve compliance with building safety regulations (as required) and best practice guidance.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	Risk Appetite is <b>MINIMAL</b> (Light Green)		<p>Standing biannual item at Group Audit Committee meetings. (May / November)</p> <p>Annual Report to RSL and Lowther Boards on Fire Prevention and Mitigation Framework Group, RSL and Lowther Boards - Fire safety performance related KPIs (ADFs and FRAs) as part of standing performance updates. (Ongoing)</p>	

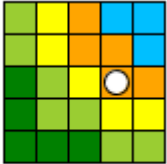
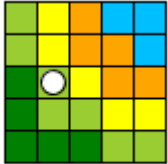
## RISK 010 Group Credit Rating

Strategic Outcome	Maintaining a strong credit rating and managing financial risks	Risk type	Financial or VFM	Risk owner	Group Director of Finance
Description		Controls			
<p>There is a risk that external factors such as a downgrade of the UK's credit rating or a default by another organisation within the social housing sector results in a downgrading of the Group's credit rating to BBB+ or below, resulting in a potential requirement to repay our European Investment Bank loans, a reduction in the availability of future borrowing, and/ or an increase in the cost of current debt.</p>		<p>The Group's business plan is designed to maintain a strong standalone credit rating, for example excluding build for sale. Our financial Golden Rules include maintaining strong levels of liquidity to mitigate refinance risks. We have reduced the specific risk related to the EIB rating requirement with mitigation language in the funding documentation; the legal clauses specifically exclude a downgrade to BBB+ as an Event of Default (thereby avoiding cross-default). Additionally, the legal clauses provide for a period to negotiate with EIB on mitigating measures, such as revisions to covenants or posting of increased security/collateral. We maintain strong relationships with other investors/lender relationships in case of unanticipated funding need. Our strong relationship with S&amp;P Global is managed proactively with quarterly meetings and an annual review each April, enabling pre-emptive actions to be taken where required.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	<p>Risk Appetite is <b>MINIMAL</b> (Light Green)</p>		<p>Business plan projections for all Boards set out how we will maintain financial position (Annually, each February)</p> <p>The Group and WFL1 Boards receive quarterly treasury reports on the current credit market conditions and any credit rating updates. (Quarterly)</p>	

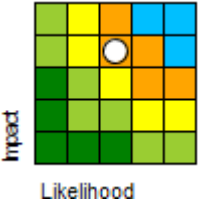
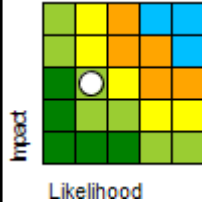
**RISK 006 Customer Satisfaction (tenants)**

Strategic Outcome	Enabling customers to lead	Risk type	Reputation and Credibility	Risk owner	Group Director of Housing
Description		Controls			
<p>Group service failures or Local Authority service cuts cause our customers to feel that our homes and services do not meet their needs and/or the standards they expect, leading to declining customer satisfaction.</p>		<p>Customer service excellence is a key element of 2021-26 strategy. We use a variety of methods to continuously monitor customer feedback and satisfaction including:</p> <ul style="list-style-type: none"> <li>• My Voice</li> <li>• Book it track it rate it</li> <li>• Customer Voice panels</li> <li>• Group Scrutiny panel</li> <li>• Customer focus groups</li> <li>• Annual Customer satisfaction survey</li> <li>• Postal surveys</li> <li>• Learning from complaints</li> <li>• Annual tenancy visits, strategic targets in place for 24/25 and 25/26.</li> <li>• Complaints performance monitored as an indicator of satisfaction</li> </ul> <p>This information helps us understand customer views and informs our delivery and investment plans every year. This will be augmented by a range of new approaches to improve satisfaction among particular target groups such as young families. The new performance management framework will also include a stronger focus on measuring drivers of customer value in our key services. Housing officer patch sizes of 1:250 (1:200 in WH-S) allow housing staff to deliver personalised services. 1-2-1 meetings with Housing Officers to identify and address any operational issues or staff performance issues. DMTs and Leadership Business Meetings allow MDs to discuss engagement with customers and support required from other business areas. Senior Leadership Forums keep oversight of operational management and weekly VMBs. Communications plans used to keep customers informed of key service information and manage expectations.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is <b>OPEN</b> (Orange)</p>		<p>Quarterly performance reports include details on complaints received from tenants. (Ongoing) Bi-annual customer insight report to RSL Boards.</p>	

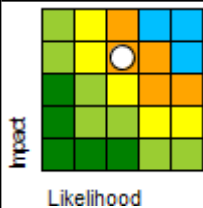
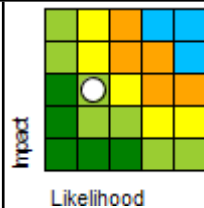
# RISK 007 Rent Arrears management

Strategic Outcome	Enabling Customers to Lead	Risk type	Financial or VFM	Risk owner	Group Director of Housing
Description		Controls			
There is a risk that the Group does not collect expected levels of income, caused by arrears management processes not being implemented effectively, resulting in financial loss for the Group and negative impacts for customers, with increasing financial hardship. This includes processes put in place to support tenants during the continued migration to universal credit.		<p>Our small housing patch sizes provide a key mitigation, allowing staff to work proactively with customers before their debts become unmanageable.</p> <p>Joint working with Wheatley Foundation colleagues to deliver our full range of wrap around services to help customers sustain their tenancy and address issues of debt and financial exclusion. The Here For You fund is also available to support customers who are struggling, and this has been extended into 2025/2026.</p> <p>Performance against key indicators is monitored closely at Local, SLT, DMT and ET performance meetings including close scrutiny of overall performance in relation to gross debit and top quartile benchmarks.</p> <p>The Rents Matters Toolkit is regularly updated, with training delivered for all staff. The toolkit is available for staff on W.E.Connect and supported by Business Improvement Teams.</p> <p>Our annual rent campaign mitigates against Christmas spike in arrears.</p> <p>Universal Credit managed migration approach has been developed, including a comprehensive staff and customer communication plan and staff training.</p> <p>Comprehensive UC action plan in place and implemented with RSL presence on UC Subgroup of Rents COE.</p> <p>Group Rents COE monitors performance and action plan includes delivery of Group Rent and Income Framework.</p> <p>The Group business plan also contains a significant buffer within its assumptions for risk in relation to bad debts and rent arrears. In addition, arrears performance is reviewed by Boards.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	<p>Risk Appetite is <b>OPEN</b> (Orange)</p>		<p>The Group, RSL and Lowther Boards consider this on a quarterly basis through performance report. (Ongoing)</p> <p>RSL/Lowther Five-year financial projections and management accounts. (Ongoing)</p>	

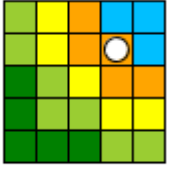
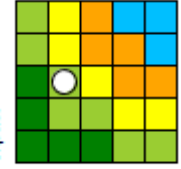
# RISK 009 Governance Structure

<b>Strategic Outcome</b>	<b>W.E. Work- strengthening the skills and agility of our staff</b>	<b>Risk type</b>	<b>Compliance: Legal/Regulatory</b>	<b>Risk owner</b>	<b>Group Director of Governance and Business Solutions; Group CEO</b>
<b>Description</b>		<b>Controls</b>			
<p>The governance arrangements are not clearly defined, are overly complex and lack appropriate skills at Board and Committee levels to govern the Group effectively. Failure of corporate governance arrangements could lead to serious service and financial failures.</p>		<p>We carry out an annual assurance review and complete an Annual Assurance Statement each year. This is reviewed by the Assurance Team and by external consultants every three-years. Formal succession planning for Board members is in place. Governance arrangements regularly reviewed by the Scottish Housing Regulator, external consultants, internal and external audit functions.</p> <p>A Board induction and CPD programme helps us to ensure that Board members are equipped with the skills to govern our business.</p> <p>There is horizon-scanning of changes to corporate governance aspects of the Group's regulatory world and the potential impact on the Group's structure.</p>			
<b>Inherent risk</b>	<b>Residual risk</b>	<b>Risk Appetite level:</b>	<b>Previous / Next detailed Board update on operation of controls listed above:</b>		
		<p>Risk Appetite is <b>CAUTIOUS</b> (Yellow)</p>	<p>Our Boards receive regular reports that cover succession planning, skills and Board appraisal. RAAG receives regular updates on succession planning. (Ongoing)</p>		

# RISK 183 Inhouse Repairs Service (New Risk)

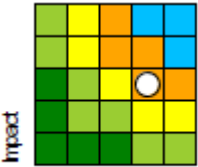
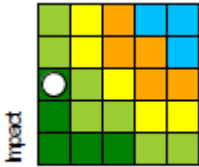
Strategic Outcome	Developing a Customer Led Repairs Service	Risk type	Operational	Risk owner	Group Director of Housing
Description		Controls			
<p>Failure within the supply chain, repairs service and/or by contractors results in interruption of services to customers with potential consequences as follows:</p> <ul style="list-style-type: none"> <li>- Loss of key personnel;</li> <li>- Financial objectives are not achieved;</li> <li>- Reduced customer satisfaction;</li> <li>- Reputational damage;</li> <li>- Lack of ability to attract and retain skilled workforce;</li> <li>- Lack of opportunity to plan for succession;</li> <li>- Inability to maintain stock.</li> </ul>		<p>WHS and WHE repairs services are delivered in house. Using Book it, Track it Rate it., My Voice scores, and customer voice panels to obtain feedback on service delivery.</p> <p>Maintain good employee relationships with unions.</p> <p>Annual business planning</p> <p>Monitoring performance internally with partners</p> <p>Focussed activity for materials supply chain with detailed action plans in place.</p> <p>Procurement strategy</p> <p>Third party contractor framework</p> <p>Support from Group Health and Safety</p> <p>Management support from Wheatley Director of Investment, Repairs and Compliance</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
		<p>Risk appetite is <b>OPEN</b> (Orange)</p>		<p>Repairs Performance update to Board (Quarterly)</p>	

**RISK 183 WHS Property Services (Propose to delete and replace with new RISK 183 'Inhouse Repairs Service' – see page 49)**

Strategic Outcome	Developing a Customer Led Repairs Service	Risk type	Operational	Risk owner	Group Director of Housing
Description		Controls			
<p>Failure to effectively manage supply chain, repairs service and contractors results in interruption of services to customers with potential consequences as follows:</p> <ul style="list-style-type: none"> <li>- Loss of key personnel;</li> <li>- Financial objectives are not achieved;</li> <li>- Reduced customer satisfaction;</li> <li>- Reputational damage;</li> <li>- Lack of ability to attract and retain skilled workforce;</li> <li>- Lack of opportunity to plan for succession;</li> <li>- Inability to maintain stock.</li> </ul>		<p>WHS repairs service now delivered in house. Using Book it, Track it Rate it., My Voice scores, and customer voice panels to obtain feedback on service delivery.</p> <p>Heating servicing and maintenance now delivered in house Apprenticeship programme being developed</p> <p>Annual business planning</p> <p>Monitoring performance internally with partners</p> <p>Focussed activity for materials supply chain with detailed action plans in place.</p> <p>Procurement strategy</p> <p>Third party contractor framework</p> <p>Support from Group Health and Safety</p> <p>Management support from Wheatley Director of Investment, Repairs and Compliance</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	<p>Risk appetite is <b>OPEN</b> (Orange)</p>		<p>Repairs Performance update to Board (Quarterly)</p>	



# RISK 172 Insufficient Group Development Programme pipeline

Strategic Outcome	Increasing the supply of new homes	Risk type	Reputation and Credibility	Risk owner	Group Director of Assets and Development
Description		Controls			
<p>Appropriate development sites fail to be identified and acquired resulting in non-delivery of commitment made in Business Plan to build new homes and results in reduced income flow and loss of reputation, with potential consequences as follows:</p> <ul style="list-style-type: none"> <li>- Inability to attract new customers</li> <li>- Loss of confidence by stakeholders</li> <li>- Reduced income stream.</li> </ul>		<p>Stakeholder management, including consultation with Scottish Government, Local Authorities and TMDF.</p> <p>Expanding number delivery partners, including development of close relationships with private sector partners, securing section 75 opportunities.</p> <p>Subsidiary strategies and Location Plans consider the impact of new build and adjust services accordingly.</p> <p>For WH-S:</p> <p>Development of WH-S new build strategy which considers different routes to delivery.</p> <p>Analysis of demand by Indigo House to inform programme.</p> <p>Increasing Contractor base in Dumfries and Galloway.</p> <p>Strategic Agreement with GCC approved in April 2023 to identify future regeneration areas.</p> <p>Quarterly meetings with GCC and DGC regarding Strategic Agreements.</p>			
Inherent risk	Residual risk	Risk Appetite level:		Previous / Next detailed Board update on operation of controls listed above:	
 <p>Impact</p> <p>Likelihood</p>	 <p>Impact</p> <p>Likelihood</p>	<p>Risk Appetite is <u>MINIMAL</u> (Light Green)</p>		<p>Business Plan approved annually (Jan/Feb)</p> <p>Mid-year review to each RSL Board.</p>	