WHEATLEY HOMES SOUTH LIMITED
BOARD MEETING & STOCK TOUR

Wednesday 25 March 2025 at 10.30am
Brasswell Office (Dumfries)

The Board meeting will be followed by the stock tour (1 pm – 3 pm)

AGENDA

1. Apologies for absence

2. Declarations of interest

3. a) Minute of meeting held on 11 February 2026 and matters arising
   b) Action list

4. Chair and Managing Director update

Main business and approvals

5. Addressing depopulation in Dumfries and Galloway (presentation)

6. Home Safety building compliance update

7. Income, Arrears and Debtors Policy

8. Customer engagement framework

9. Protecting people policies

10. 2026/27 Budget and Finance Report

11. Wheatley Care Strategic Partnership – Service Agreement

Other business

[redacted]

13. Procurement strategy and policy

14. AOCB

Wheatley Homes South

Board meeting held on: 11 February 2026

Action List

Meeting date	Action	Owner	Due	Status
26/11/2025	Provide an analysis of complaint trends, learning and stage 2 figures	Alex Lamb	May Board meeting	Annual Complaints Handling report May Board alongside ARC results
11/02/2026	Bring back regional comparators of rent increases - ie. Loreburn Housing	Alex Lamb	March Board meeting	Verbal update to be provided at Board meeting
11/02/2026	Affordability - in the November rent setting paper we said we had funding available for those not in receipt of benefits (para 4.7) - provide data on the number of customers we have helped and the value of this to next meeting.	Alex Lamb	March Board meeting	Verbal update to be provided at Board meeting
11/02/2026	Provide photographs to demonstrate the categories of damp and mould	Alex Lamb	March Board meeting	Photographs will be provided at Board meeting

Report

To: **Wheatley Homes South Board**

By: **Brian Stewart, Director of Investment and Compliance**

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

Subject: **Building Compliance Update**

Date of Meeting: **25 March 2026**

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1. Purpose

1.1 This report provides an update on our home safety building compliance work during 2025/26.

2. Authorising and strategic context

2.1 Under our Terms of Reference, the Board is responsible for monitoring our performance. This report provides the Board with an update on our compliance work programmes and our performance against the programme targets.

2.2 Keeping our tenants safe and secure in their homes is a key priority in our strategy. Compliance is also one of the five drivers, and a priority for investment, within our strategic asset investment and management plan which the Board approved in September 2024.

3. Background

3.1 Our compliance work programmes include gas servicing, lift servicing, thermostatic mixing valves ("**TMVs**"), asbestos surveying, water management including legionella prevention and electrical works such as electrical inspections and smoke and heat detector renewals/replacements.

3.2 Landlords have a legal duty to repair and maintain gas pipework, flues and appliances in a safe condition, to ensure an annual gas safety check on each appliance and flue, and to keep a record of each safety check.

3.3 Landlords also have other obligations under legislation or approved codes of practice ("**ACOPs**") for a variety of building maintenance and inspection activities for example firefighting equipment (dry risers/sprinklers), lifting equipment, and alarm systems. As well as a mandatory responsibility for electrical safety including carrying out electrical inspections, commonly referred to as Electrical Installation Condition Reports ("**EICR**") or Fixed Installation Testing ("**FIT**").

3.4 The arrangements for how we meet our obligations through our compliance work programmes are illustrated in the table below.

Work Stream	Cycle	Status
Gas Servicing	Annual (10-month cycle)	Rolling programme ongoing
Electrical (EICR)	Maximum Every 5 years	Rolling annual programme ongoing
TMV maintenance and Installation	Annual	Rolling programme ongoing
Smoke and Heat Detector re-life programme	Every 10 years but is dictated *annually* by build date / LD2 install date	Rolling annual programme ongoing
Lift Insurance Inspections	Six monthly/Annual	Rolling programme ongoing
Mechanical and Electrical Works	Subject to asset requirements: examples include CCTV, pumps, aerials, and alarms	Ongoing programme
Water Management	Site-by-site basis requirement, works include tank inspections, bacterial testing, legionella testing	Ongoing Programme
Asbestos surveying	Annual	Ongoing programme

<u>One and done approach</u>

3.5 Where practical, we take a “one-and-done” approach, tailored to the compliance activities within our tenanted properties. This means that, for related compliance activities within our stock, we try to package works together taking account of asset compliance cycles, property attributes and individual customer requirements. The table below shows the three “one-and-done bundles” we apply.

Type of Package	Stock Targeted	Type of works
Home Safety Bundle 1: **Gas and Water Management works**	Gas properties	▪ Annual gas servicing ▪ Temperature checks at water outlets ▪ TMV works ▪ Test/servicing of smoke/heat/carbon monoxide detectors ▪ Complete all certification
Home Safety Bundle 2: **Electrical installs and servicing**	All properties	▪ Installation of S + H detectors (re-life programme) ▪ Carry out EICR inspections
Home Safety Bundle 3: **Joinery and electrical**	Electric properties	▪ Test/servicing of smoke and heat detectors

3.6 We also use the opportunity, when one of our properties is void, to carry out any required compliance activities. This provides additional assurance that every new customer is moving into a home that is safe and secure, while also maximising the access we need to undertake cyclical or capital compliance works.

4. Discussion

4.1 We continually monitor and report progress against our various compliance workstreams to ensure our obligations are met and to provide an early indication if progress is not as planned. The remainder of this report provides the Board with details on progress against core compliance programmes during the year to date.

Gas Safety

4.2 All our gas safety inspection records ("**CP12s**") are up to date and fully compliant. Achieving this requires an annual inspection of every property with gas. We have **8,225** homes that require a gas service.

4.3 In quarter three, all properties have valid gas certificates in place. Earlier in the reporting year, the Board was notified that we had identified five gas properties where the gas safety certificate had gone beyond its date for renewal. These were rectified within days, and no issues were identified at any of the properties. However, these will be recorded for the rest of the reporting year.

4.4 While we now have valid gas certificates in place, we are required to report to our governing bodies and the Scottish Housing Regulator the number of times in the reporting year we did not meet our statutory obligations to complete a gas safety certificate within 12 months.

Classified as Public

4.5 To support **100%** compliance, we send appointment letters, text messages and emails to all customers. Tenants can change appointments to suit their needs by contacting our 24Hr Customer First Centre. We also manage individual cases where there are complex issues or housing management challenges that impact access.

4.6 As a last resort - after we have exhausted all reasonable efforts to obtain access through communication and liaison - we move to a "forced appointment". Our forced appointment process involves:

- Hand-delivery of a forced access appointment letter a minimum of 24 hours before the appointment;
- Doorstep discussion if the tenant is present at the delivery of the letter to negotiate access;
- Completion of officer pre-appointment checklist & Health & Safety checklist;
- Liaison with the Housing Officer for any additional knowledge of the customer;
- Wheatley representative joint attendance with WHS Gas Engineer and Housing Officer; and
- Liaison at forced access appointment as required to reach successful completion of gas service and achieve compliance.

<u>Water Management</u>

4.7 Our water management regime varies on a site-by-site basis taking into consideration the water system installed, the type of property and the customer demographic.

4.8 Works can include visual inspections of the communal tanks, risk assessments, temperature checks of both the water inlet and of resting water within the tank, bacterial testing which checks the water supply for various bacteria including e-coli and legionella and chemical testing for metal and mineral contents to ensure that water meets the relevant water quality standards as set by the Water Supply (Water Quality) (Scotland) Regulations 2001.

4.9 We have **100%** completions for all specialised housing such as Sheltered blocks and all Relevant Premises, which include non-domestic property, such as offices.

4.10 In our general needs stock, some blocks across Dumfries and Galloway do not always have a common loft hatch and require access into individual tenants' homes to access the tank for inspection. Multiple attempts have been made at these properties throughout the year including appointment letters and outbound calling. Currently, 20 properties require surveys where we continue to liaise with customers about allowing us access to carry out the inspection. In connection with blocks that have communal loft hatches, we have 6 that require to be accessed. As a result, we have a total of 26 outstanding blocks that require access / preparation works for the surveys to be completed, with 21 currently re-booked for access visits during March 2026.

4.11 Any properties that remain on this list will be prioritised for further access attempts during Quarter 1 of the 2026/27 rolling programme.

4.12 The table below provides details of progress with the overall rolling annual programme.

Inspections/tasks completed so far	Total Inspections/tasks Required	Percentage completion
173	**147**	**85%**

TMV Servicing for qualifying households

4.13 Our TMV programme is a best practice approach that involves a rolling annual programme focused on homes containing under 5s or over 75s, and care sites / specialist housing locations.

4.14 Of the 2,065 properties in the programme, we have completed 1,761 inspections so far. This is a completion rate of **85%.** Of the 304 properties still to be completed, 194 properties will be appointed and completed as part of the annual Gas Servicing before 31st March 2026. The 110 remaining properties will be managed through our Electrical Heating Service contract.

4.15 The programme is reliant on customers permitting access. To encourage this, we include TMV servicing alongside gas / electrical heating servicing appointments, where possible. We also offer flexibility to amend appointments, proactively contact customers and make up to three access attempts.

4.16 Where access is not achieved, we send letters to customers informing them of our attempts and inviting them to contact us to make a follow-up appointment. Forced appointments are not undertaken in keeping with the non-mandatory nature of the programme.

Smoke and Heat Detectors

4.17 All our **10,486** properties have compliant LD2 smoke and heat detectors. These were installed at the time the home was constructed (for newly built homes) or as an upgrade as part of our rolling programme of re-life works (10-year cycle). All customers are offered a minimum of two appointments to enable the work to be completed at a convenient time for them. As a last resort, we move to a forced appointment, to ensure we maintain 100% compliance in this area.

Periodic Electrical Testing ("**EICR**")

4.18 Periodic electrical inspections are required in all properties on a cycle of no more than 5 years. Landlords must make "reasonable efforts" to ensure that homes are accessed to carry out the inspection.

4.19 The outstanding 7 addresses are currently being managed by our Housing Team to find solutions to the current housing management issues preventing the EICR from being carried out. Once resolved these addresses can be quickly programmed for completion.

Qualifying Addresses*	EICRs: current number that is out with 5 years	Percentage complete to date
10,486	**8**	**99.92%**

Lift Inspections and Maintenance

4.20 Proactive servicing of our lifts is carried out monthly via our approved maintenance contractor with supplementary six-monthly inspections by our insurance company.

4.21 Lift performance, such as time to complete any minor defects or major repairs, is routinely monitored and managed within set Service Level Agreement ("**SLA**") timescales. Examples of these SLAs include 1 hour for trapped passengers and all other emergencies within four hours.

No. of passenger lifts	Total Inspections complete	Percentage complete to date
2	**2**	**100%**

No. of stair lifts	Total Inspections complete	Percentage complete to date
180	**180**	**100%**

4.22 Our lifts are part of our wider digital switchover project preparing for the Public Switched Telephone Network ("**PSTN**") switch off. Transitioning to digital provides several benefits, beyond ensuring continued operation after switch-off, including cost savings, increased management information, better reliability and the ability to integrate with other digital services. Our 2 passenger lifts are now migrated to digital.

4.23 Alongside digitising our lift alarms, we have also transitioned fire and intruder alarms from the PSTN. Doing this means that our alarm systems are *future-proofed*, more resilient and that we are better able to meet the needs of vulnerable customers and protect our assets.

Mechanical and Electrical Works ("**M&E**")

4.22 Equans Services Ltd is our appointed M&E contractor responsible for the delivery of a comprehensive programme of planned maintenance across **105** residential blocks. The programme is designed to ensure continued statutory compliance and the safety of residents across approximately **1,017** homes.

4.23 The Group Board has approved the awarding of the Mechanical and Electrical compliance and reactive repairs contract to Equans Services Ltd for a new term of three (3) years, commencing 1 April 2026. This agreement includes an option to extend the contract for up to an additional twenty-four (24) months, contingent upon satisfactory performance, continued value for money, and ongoing compliance with both contractual and statutory obligations.

4.24 The scope of services delivered includes, but is not limited to, water hygiene and management, dry riser systems, sprinkler installations, fire detection and alarm systems, automatic opening vent ("**AOV**") systems, and mechanical ventilation services. These works are critical to maintaining the safe operation of building systems and ensuring compliance with all relevant legislative and regulatory requirements.

4.25 The table below provides some examples of the scale involved across the M&E asset programme.

WHS - Task	Example Numbers
Sprinklers	**13**
Fire alarm systems	**10**
Automatic Opening Vent (AOVs)	**3**
Intruder Alarms	**7**
Fire Extinguishers	**15**
Emergency Lighting	**113**
PAT Testing	**18**
CCTV	**7**
Fall Arrest Systems	**3**
Lightning Protection	**1**

4.26 We monitor contractor performance to ensure any emergency callouts are dealt with within timescales and that routine preventative maintenance and compliance tasks are being managed and delivered as required.

Asbestos Surveying

4.27 Asbestos management survey inspections of communal areas are undertaken through a rolling programme. Following inspections, the report for each block is uploaded to our asset management system PIMSS.

4.28 WHS have a total of 416 blocks, of which 327 had previously identified asbestos, which has informed our Reinspection Programme. To date we have completed all 327 reinspection surveys for these identified blocks. Further to this we carried out Full Management Surveys to the other 89 blocks during 25/26 to ensure any areas that were not accessed via previous surveys were re-checked to ensure best practice.

4.29 All relevant staff have access to asbestos information relating to our properties through PIMSS. These staff also provide asbestos information to contractors when they are required to work in our properties and this work is monitored.

4.30 Where asbestos is identified that requires a minor repair, a process is followed that ensures this is managed and that correct working procedures are carried out. If there is ever uncertainty on the presence of asbestos, sampling is undertaken before work begins using a licenced asbestos contractor, with remedial works carried out as necessary.

4.31 During our 2025/26 inspection programme, 11 blocks to date have been identified where we intend to carry out asbestos removal works, and this is currently in the planning process to be completed.

Classified as Public

Radon Gas Monitoring

4.32 We are continually looking to enhance our approach to home safety and this year we plan to pilot a testing programme for radon gas. Our approach to Radon Gas Monitoring for existing stock will be focused on properties with the highest probability of being in an area above the 'radon action level' (above 5% probability). This equates to 216 properties. Kit Delivery commenced in February 2026 (75 delivered to date) and will be complete by 31 March 2026. Kits will be collected in Quarter 1 (April-June 2026) with full analytical results expected during Quarter 2 (July-September 2026).

4.33 Radon is a naturally occurring radioactive gas that can be found in high concentrations in indoor environments, such as homes and workplaces. It is created when uranium decays in the ground seeps to the surface and can get indoors through floors.

4.34 Radon levels in the ground are usually low, but some parts of Scotland may have higher levels depending on the ground type/conditions.

4.35 As there are no warning signs for the presence of radon, testing for radon is the only way to get evidence of levels and ensure there is no danger from exposure to residents.

5. Customer Engagement

5.1 Engaging with our customers and ensuring they understand the importance and benefits of compliance works to keep them safe in their homes is crucial in successfully delivering our home safety compliance programmes.

5.2 We emphasise the importance of allowing access for compliance activities during routine interactions with our customers including through our Customer First Centre, at the annual tenant visit and in programme specific letters, texts, calls and visits.

5.3 Achieving compliance across our wide range of home safety programmes involves significant planning and liaison between customers and our teams, particularly if we are required to escalate to a forced access appointment.

5.4 We also advocate for our customers with other third parties such as utility companies and external support providers to resolve issues so that we can complete our compliance obligations in our homes and keep our customers and properties safe.

6. Environmental and sustainability implications

6.1 There are no direct environmental and sustainability implications associated with this report.

6.2 Our approach to carrying out associated compliance works in one visit wherever practical will lead to fewer travel visits by engineers and trade staff across our assets.

7. Digital transformation alignment

7.1 We are developing a multi-year programme to enhance our compliance system, management, monitoring and reporting that will see data from multiple sources brought together and closer integration with our various suppliers. This will ensure we continue to develop our existing systems and approaches, as we have been doing, to ensure consistency of management and reporting. This system development will involve a scoping exercise during 2026/27 with implementation planned for 2027/28.

8. Financial and value for money implications

8.1 Funding for our compliance workstreams is included as part of our agreed 5-year Revenue and Capital Investment business plan approved by the Board in February and is sufficient to meet our compliance obligations.

9. Legal, regulatory and charitable implications

9.1 Our compliance activities support us in meeting our legal obligations as a landlord. At this time, we do not expect any additional compliance requirements to be introduced, although we will maintain a forward look including through our relationships with the Scottish Government and the SHR.

10. Risk Appetite and assessment

10.1 Our risk appetite relating to building compliance work streams is minimal" i.e. preference for ultra-safe business delivery options that have a low degree of inherent risk and only have a potential for limited reward.

10.2 The compliance activities and the progress against them discussed in this report ensure that the risk is managed in line with our agreed risk appetite.

10.3 Some compliance activities, for example, gas servicing and electrical safety are embedded in the Scottish Housing Regulator's reporting return requirements.

11. Equalities implications

11.1 Specific work programmes have been developed and put in place to address potential vulnerabilities due to age i.e. the TMV Servicing programme. When undertaking works, we will carry these out in ways that minimise inconvenience to all of our customers such as by offering a range of appointments that suit their needs and offering a one-stop shop service through compliance trades teams for compliance events required within a customer's home.

12. Key issues and conclusions

12.1 We are continuing to deliver our agreed compliance programmes. These programmes ensure we meet our statutory and regulatory obligations as a landlord relating to gas, electricity, water management, lifts, asbestos and fire. We also undertake other programmes as part of our compliance activities that, while not legally required, are necessary to ensure we help to keep our customers safe. These programmes include TMV servicing and annual smoke alarm servicing outwith our mandatory 5 yearly EICR and 10-year LD2 rolling programmes.

12.2 Our “one and done” approach continues to be offered where possible for similar related compliance activities subject to asset cycles, property attributes and customer requirements. Ensuring we remain agile and alert to any changing legislation or best practice is key to maintaining our commitment to provide a robust level of landlord assurance across the various compliance activities.

12.3 We also continue to robustly monitor and manage the performance of our in-house team and our M&E contractor to ensure tasks are delivered on time and to the required standards.

12.4 As in previous years, the delivery of our compliance programmes is making sure that we meet our obligations and responsibilities as a landlord.

13. Recommendations

13.1 The Board is asked to note the content of this report and the ongoing approach to managing and delivering our compliance related works.

LIST OF APPENDICES:

None

Report

To: **Wheatley Homes South**

By: **Alex Lamb, Managing Director**

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

Subject: **Income Arrears and Debtors Policy**

Date of Meeting: **25 March 2026**

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1. Purpose

1.1 This report provides the Board with an overview of the review undertaken on the Income, Arrears and Debtors Policy ("**the Policy"**). It seeks approval of the updated Policy, subject to the refreshed Group Arrears and Debtors Framework ("**the Framework**") being approved by the Group Board.

2. Authorising and strategic context

2.1 Under the Board's Terms of Reference, the Board is responsible for approval of the Income, Arrears and Debtors Policy. The Policy is brought to the Board for approval now, as part of the regular three-year review cycle.

2.2 The Policy has undergone review and revision in alignment with the Group Income, Arrears and Debtor Framework, which it reflects. This Policy will be subject to review on the same three-year cycle as the aforementioned Framework.

3. Background

3.1 The Policy has been reviewed in line with our standard three-yearly review cycle. This allows us to reflect on how the policy has operated and reflect any changes in our operating context that should be incorporated into the policy.

4. Discussion

4.1 The updated Policy reflects changes to the suite of advisory services available to customers by placing more focus on the need for financial wellbeing through the introduction of Financial Wellbeing Officers to complement the services provided by Welfare Benefit Advisors. Our Annual Tenant Visits ("**ATVs**") enhance our ability to provide early intervention supports.

4.2 We have also strengthened operational support for staff dealing with income related operations via our Rent Matters Toolkit, considering the ever-changing landscape of welfare reform including the 'at scale' managed migration of customers on legacy benefits to universal credit which began in 2024.

4.3 The revised Policy was reviewed by our external legal advisors, with the following updates:

- Updates to the legal context section to reflect all key laws relating to rights;
- Revisions to the aims, to clarify that the document has been developed in accordance with recognised good practice and relevant statutory requirements;
- Additional language throughout the document to ensure appropriate consideration of:
  - Vulnerabilities, disabilities, and family circumstances;
  - The views of customers and, where applicable, their families; and
  - Changed the reference to "families" or "children", to inclusive language like "those who live with customers".

4.4 The aim of the Policy is to prevent debt accruing where possible and to reduce it quickly and effectively where it does occur. We achieve this by quickly identifying customers who are having challenges with payment and ensuring that they have access to the appropriate personalised wraparound and support services. We will continue to support our customers throughout their journey to help them move back to a positive payment status as quickly as possible.

4.5 It is therefore essential that we demonstrate how we will secure income and clearly set out our expectations from the outset around payment of rent in advance and from day one of an agreement, using our preferred method of Direct Debit where possible.

4.6 The amended Policy is more reflective of our current operating model. We want our customers and our business to be financially resilient and able to withstand any challenges that come up in terms of rent and income collection/payment. We also want customers to feel supported and able to benefit from the lived experiences of other customers we have worked with, showing them there is a positive way forward and out of debt should this occur.

4.7 The language has been updated throughout and sections have been reorganised and amended to ensure clarity and emphasise our commitment to ensuring that customer experience is central to how we approach income and debts.

4.8 Some sections have had minimal changes such as contemporised language and links to other policies, while other sections have been amended to reflect legislative changes and rights-based principles, in particular the incorporation of references to the UNCRC (Incorporation) (Scotland) Act 2024. These changes are summarised in the table below:

Policy Area	Key Change
Key Principles	Updated to underline our commitment to customer experience and our duty to consider customer wellbeing. Staff thinking differently to find solutions embodies our ethos of 'Think Yes'.
Starting the Customer Relationship	Whilst the key statements in both these sections remain relevant, we have updated this to include 'those who live with customers' as an important inclusion in our approach to customer engagement. This has been expanded upon in the Customer Engagement section of this paper
Building the Relationship	
Our Approach to Debt Recovery	This section details how we will approach the recovery of debt and deliver wraparound support services. The offer of 'fuel advice' has been removed as it is no longer relevant and aligns with the changes of the newer financial wellbeing offering. It also details our approach to making reasonable adjustments for customers with some examples provided.
Legal Framework	This section is now "Legal and Regulatory Considerations" and has been expanded to include reference to: ▪ The Equality Act 2010 ▪ The Housing (Scotland) Act 2025 ▪ The Human Rights Act 1998, ▪ United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 And This will ensure that the wellbeing and rights of customers and their households are considered when providing services. This includes taking into consideration an individual's personal circumstances, such as being a victim of domestic abuse.

5. Customer Engagement

5.1 To inform this policy review, we engaged 670 customers across all Registered Social Landlords to give their views on their experience as a customer and their own journey in relation to rent, income and making payments. Through an MS Forms survey, topics covered included 'clarity/understanding of the 'responsibilities to pay rent'. We also asked customers if they observed anything missing and any suggested improvements.

5.2 Getting help earlier and partnership working were highlighted to get the customer the right support. Customers also highlighted the importance of clear and accessible communication, adding that an 'easy read' version provided to customers at the start of their new tenancy would be beneficial. 81% of the 102 respondents found it was clear and easy to follow with 99% of the respondents reporting that they were clear in their responsibilities to pay rent.

5.3 We will continue to engage with our customers, taking account of their views and experiences to shape and co-create our services, helping us to build on and sustain positive relationships with customers.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

7.1 The Policy supports the Group's digital transformation strategy by embedding data-driven, customer-centric approaches into income and arrears management whilst supporting ongoing digital service enhancements for staff and customers. They promote the use of digital payment methods and opportunities to interact and provide feedback through digital methods.

8. Financial and value for money implications

8.1 There are no financial implications associated with this Policy. However, failure to effectively implement debt management could pose a risk both financially and in terms of value for money given that it relates to the collection of income and arrears recovery.

9. Legal, regulatory and charitable implications

9.1 We will comply with legislation and good practice in relation to dealing with tenants in the recovery of rent arrears. The relevant legislation is as follows:

- UK General Data Protection Regulations;
- The Data Protection Act 2018;
- Housing (Scotland) Act 2001;
- Homelessness etc (Scotland) Act 2003;
- Housing (Scotland) Act 2010;
- Housing (Scotland) Act 2025;
- Equality Act 2010;
- The Property Factors (Scotland) Act 2011;
- Debt Arrangement (Scotland) Act 2002;
- The Housing (Scotland) Act 2001;
- The Social Housing Charter;
- The Human Rights Act 1998; and
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024.

9.2 In cases where we require to raise court action for repossession, appropriate legal advice and support resource is in place to handle each case and ensure that all legal requirements are complied with.

10. Risk Appetite and assessment

10.1 Our risk appetite in this area is **cautious**, defined as wanting 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.

10.2 Regular review of the Policy mitigates the risk of outdated practice, reduced compliance or any negative impact on income collection.

11. Equalities implications

11.1 The Policy sets out a fair and supportive approach for all customers. It ensures that individual needs are recognised and that customers are treated with dignity and respect. The incorporation of the UNCRC strengthens our commitment to recognising the rights of children within affected households.

12. Key issues and conclusions

12.1 This review confirms that the Policy remains appropriate and effective, with only minor updates required. The revisions enhance clarity, reinforce our approach to income management and ensure compliance with current legislation.

12.2 The Group Framework mirrors our own individual policy and any proposed changes to our policy would be incorporated into the Group Framework ahead of it being presented to the Group Board for approval.

13. Recommendations

13.1 The Board is asked to:

1) Note the content of the report and updates to the Policy; and
2) Approve the Wheatley Homes South Arrears and Debtors Policy subject to approval by the Group Board of the Group Income, Arrears and Debtors Framework.

LIST OF APPENDICES:

Appendix 1 – Updated Draft Wheatley Homes South Income, Arrears and Debtors Policy

Wheatley Homes South

Wheatley Group

Income, Arrears & Debtors Policy

March 2026

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

Better homes, better lives

We can produce information on request in large print, Braille and audio formats. It is also available in other languages. Call us on 0800 011 3447 or email mailto:talk@wheatleyhomes-south.com.

Approval body	Wheatley Homes South Board
Date of approval	
Review Year	*2028*
Customer engagement required	*Engaged customers via survey August 2025*
Trade union engagement required	No – Circulated for information
Equality Impact Assessment	Yes

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1. Introduction

Wheatley Homes South is part of Wheatley Group, Scotland's leading housing and property-management group. This policy sets out our approach to managing the collection of rent and other charges which are payable to us (our income), as well as our approach to arrears and debt.

This policy makes clear the support we will provide around income maximisation, and the role of staff in supporting our customers.

We are committed to supporting our customers from the earliest opportunity, and in doing so seek to ensure there is a culture of positive payment throughout the duration of the contractual agreement. Where a customer finds themselves unable to pay rent or charges due, we will endeavour to ensure they have access to appropriate personalised services at a time and place that suits them to help them move back into a positive payment status as quickly as possible.

Wheatley Homes South complies with all applicable legislation and follows good practice principles in managing income and any associated debts.

- We provide services to our customers that are in line with the Social Housing Charter and our supporting strategies
- We will make sure our customers and, where applicable, those who live with customers are treated with respect and dignity at all times
- We recognise that housing decisions impact the customer's whole household, and we consider the needs, views, and wellbeing those affected by our decisions in our decision-making where appropriate.
- We will work with our customers to understand their needs and take particular account of any vulnerability that they may have. For instance, this may include changes to the welfare system which affect them, disabilities or support requirements
- Our staff will provide advice, information and support and where it is in the best interests of the customer, refer people to other agencies that can provide additional support

2. Policy Aims and Objectives

Rent payments and service charges are our main source of income. Managing collection of these payments and charges is crucial to us and our customers. If we do not receive rent and charges that are owed to us, then it could impact our ability to provide services to our customers.

The aims of this policy are to:

- Demonstrate how we will secure income

- Ensure customers are clear about their responsibility to pay rent and other charges from the beginning of their relationship with us to prevent debts accruing
- Promote a positive payment culture that supports customers to pay their rent and charges in full and on time in line with their agreement
- Work with customers who find themselves in arrears to repay these debts as quickly as possible, using a tailored and personalised approach
- Ensure that our approach to preventing debt and collecting arrears is carried out legally and fairly
- Assist and support customers to maximise their income
- Help customers to build financial resilience, encourage good money management and provide support for those who need it including through our financial wellbeing services.
- Demonstrate our commitment to meeting our legal duties and responsibilities and aligning with best practices.

3. Key Principles

This policy is based on our Group-wide framework and is adapted to suit our unique customer base and circumstances.

At the heart of how we collect income and debts is the customer experience. The following key principles underpin this policy:

- Prevention
- Early intervention
- Personalised support
- Respect of rights
- Consideration of wellbeing of customers and those affected by our decisions
- Positive payment culture
- Building financial resilience
- Harnessing technology.
- Consistency of approach.
- Staff thinking differently to find solutions.
- Easy access to good advisory services including our wrap around support from welfare benefits advisors and financial wellbeing officers.

4. Starting the Customer Relationship

Our customers will be clear on what they have to pay, when they have to pay, how they will be charged and available payment methods.

We want customers to understand the importance of starting their tenancy positively and continuing in this manner during their relationship with us. We will make sure customers know they have a responsibility to pay their rent and

charges to us, in full and on time as per the terms of their agreement. We will clearly set out our expectations around payment of charges or rent in advance and from day one of their tenancy, using our preferred method of Direct Debit where possible.

We will clearly explain any obligations and responsibilities and specifically:

- The relevant terms and conditions of the tenancy agreement
- The total cost of any rent or charges
- When rent or charges should be paid
- Any expected deposits or charges that have to be paid
- That Direct Debit is our preferred payment method; and
- The alternative methods of payment available if they are unable to set up a Direct Debit

Where we confirm with the customer that there is a charge to be paid from the outset and/or in advance, we will work with the customer to ensure this charge is paid. In all cases, we will consider the individual circumstances of the customer and negotiate each case individually where required.

If we decide that a charge must be increased, we will give appropriate written notice of the change

Our customers will be clear on what services are provided for the charge they pay. We aim to always provide Value for Money.

We will confirm with the customer any services that will be provided under the agreement; how these services will be delivered and the charges that will apply.

Our customers will be made aware of the consequences of not keeping to their agreement to pay the charge due.

All customers will be informed about the consequences of non-payment. Where a customer falls into debt we will make sure they are aware of all the support that is available to them, both internally from us and Wheatley Group wrap around services, and externally to help them manage their account to clear any monies owed and prevent further debt accruing. This includes taking into consideration an individual's personal circumstances, such as being a victim of domestic abuse.

We will follow all appropriate Pre-Action Requirements as outlined in relevant legislation, working with customers who are experiencing financial difficulties to access support and assistance.

We want our customers and our business to be financially resilient, able to withstand any challenges that come up in terms of rent, service charges and income collection/payment and beyond.

Our customers will be given access to advice and information to help them ensure they can afford the services we offer.

Staff will refer and signpost any customer for appropriate support and advice where there may be a concern about vulnerability or ability to pay. We will encourage customers who may experience difficulties to contact us at the earliest opportunity, so that we can help to prevent debts from accruing, increasing or becoming difficult to manage.

We will support our customers throughout their journey with us.

Our customers will have access to a variety of wraparound support services, working with our partners to create opportunities for our customers that will include help to:

- Maximise their income through our welfare benefits service.
- Minimise issues of fuel insecurity, fuel poverty and energy efficiency where possible through our financial wellbeing officers.
- Access employment and training opportunities through our employability services; and
- Receive the best possible support, advice and information where required from our own teams and through work with partner agencies

5. Building on the Relationship

We are committed to building and sustaining positive relationships with all our customers.

We aim to do this by:

- Staying in touch regularly with all of our customers
- Making sure we have accurate profile information about our customers
- Working to understand each customer and their needs
- Helping our customers through any changes in their circumstances
- Engaging with our customers, taking account of their views and lived experiences to help shape and co-create our service (including those who live with customers as appropriate)

Our discussions will capture essential customer data, to help us to provide the most appropriate services, options and support where required. This data will be used to help us develop tailored approaches and any subsequent collection, prevention, management and recovery of debts and charges. We will comply with the UK General Data Protection Regulations (UK GDPR) and Data Protection Act 2018.

6. Our approach to Debt Recovery

Our staff focus on delivering outstanding customer service to each individual customer. They are empowered to make decisions on a case by case basis, for example, where a significant life event has taken place which has impacted on the customer's ability to pay.

There will be occasions when a customer either cannot or will not maintain payments to their account. If that happens, we will:

- Aim to make contact at the earliest opportunity after the payment due date to establish the reason for non-payment and to avoid the debt becoming unmanageable
- Discuss payment of the debt in full and/or agree an appropriate and affordable repayment arrangement
- Provide/signpost customers to support services tailored to suit individual requirements e.g. money advice, employability support, where required, in order to help them meet the charges they are due to pay
- Making clear the consequences of non-payment and providing advice at all stages to customers
- Meeting our legal obligations to provide appropriate advice and guidance as part of our Pre-Action Requirements
- Make any decision on a case by case basis, informed by our knowledge of our customer's circumstances
- Enforce sanctions where appropriate – this includes but is not restricted to: withdrawal or limitation of service, court action, interest charges or deduction of payments from compensation

Where collection from a customer is required, we aim to:

- Make sure every officer has a clear set of procedures to follow when dealing with the collection and recovery of monies
- Contact customers quickly where a debt occurs
- Apply all payments timeously to relevant accounts (within 48 hours unless technical difficulties arise)
- Adhere to any time limits set in recovery procedures

Where a customer accrues a debt, we will aim to:

- Engage with the customer to help them identify any debt and payment issues early
- Agree an appropriate and affordable repayment arrangement which takes account of the customer's personal circumstances where payment in full cannot be made
- Negotiate arrangements for a single payment to cover all indebtedness to Wheatley Group where a customer may owe multiple debts. Examples may include but are not restricted to: current charges, former account charges, sundry debts, court costs, repair charges.
- Confirm any arrangement in writing
- Honour any reasonable agreement made to discharge a debt before escalating any recovery action
- Use any credit in an account within the Group, to offset any debt owed to the Group

If a customer fails to engage with us or no agreement is reached, we will escalate action as necessary to recover the outstanding sum owed.

We have a Debt Recovery Team, who will attempt to contact customers referred to them and who assist officers in the collection or pursual of any debts owed.

We may use various methods to attempt collection of a debt. This may include (but is not limited to):

- Court Action
- Wage Arrestment
- Levying of charges or inhibitions
- Enforcing decree for eviction and payment

7. Ending the Relationship

When either party gives notice to end the agreement, we aim to:

- Conduct an exit interview and/or inspection of the property (where appropriate)
- Conduct a full debt check and if a debt is identified, agree a final payment plan
- Provide any documentation where appropriate
- Provide references upon request
- Refund credits (after deductions for any Group debts)
- Notify third parties for the return of deposit balances subject to any claims that we may have

In circumstances where there is current court action and where we have contact information, we will endeavour to remain in close contact with the customer until proceedings have concluded. We will review the case throughout the duration and may alter our planned actions in agreement with the customer.

We will consider all options available to us for managing and recovering the debt, up to and including eviction and inhibitions.

Each case will be managed individually, considering the circumstances of the case and the reason for ending the agreement.

Where a customer leaves a debt at the end of their agreement, we will issue a final bill and continue to pursue this debt using various contact methods, including passing the case to our Debt Recovery Team.

We may use the services of third-party tracing agents:

- Where there are outstanding debts, and an address is not known for the customer
- Where full payment has not been made
- Where no arrangement has been made

Customers with outstanding debts will be made aware of the consequences for any future contract with us and Wheatley Group, should they fail to make or keep to a repayment plan. This could include future requests for services being refused or restricted by us, Wheatley Group and/or its subsidiaries.

8. Writing Off Debt

A debt may be considered for write off where it has been deemed to be irrecoverable. Defined criteria have been set out to assist officers in deciding whether a debt is deemed recoverable or not. Cases will be assessed on an individual basis and debts/arrears may be written off where all options for recovery have been exhausted.

If a debt is to be written off, this will take the form of an adjustment to the associated account at the end of the relevant balancing period.

Where a debt has been written off this will not prevent future pursual, for example, where a customer wishes to rent another property and has an outstanding debt for a former tenancy.

9. General Matters

We reserve the right to apply charges for additional costs associated with the management of the agreement. For example, this may include storage costs or court costs.

10. Legal and regulatory considerations

This policy has been developed considering the various legislation and regulations governing us, for example,

- The Property Factors (Scotland) Act 2011
- Debt Arrangement (Scotland) Act 2002
- The Housing (Scotland) Act 2001
- The Social Housing Charter.
- The Equality Act 2010
  The Human Rights Act 1998, and
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024

This policy has been informed by relevant legislation and rights-based principles. We keep rights in mind in relation to the development of relevant policies and practices including when exercising functions under this, and accompanying policies. We recognise that our decisions can affect not just individual customers but entire households, and we will aim to consider the impact and wellbeing of those impacted by our services, where appropriate and applicable.

11. Performance Monitoring

Regular monitoring of key indicators, for example, satisfaction levels, income collected, and arrears accrued or debt written off will take place through a variety of means. Regular reports, statistics and trend analysis will be made available to the Wheatley Homes South Board.

12. Policy Reviews

We will review this policy every 3 years. More regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance.

13. Links With Other Policies

This policy links with our Group Housing Information, Advice and Letting policy. The policy has also been written to align with the principles of our Equity, Diversity and Inclusion and Human Rights Policy.

14. Confidentiality

We are committed to protecting the privacy of our customers. We process personal information in accordance with the requirements of the UK GDPR, the Data Protection Act 2018, our privacy notices and the Wheatley Group Data Protection Policy.

You can find more information about how we look after personal information by reading our privacy notices at **www.wheatleyhomes-south.co.uk**

Report

To: **Wheatley Homes South Board**

By: **Alex Lamb, Managing Director**

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

Subject: **Group Engagement Framework**

Date of meeting: **25 March 2026**

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1. Purpose

1.1 The Board is asked to provide feedback on the revised Customer Engagement Framework ("**the Framework**") and agree that it progresses to the Group Board for approval.

2. Authorising and strategic context

2.1 Under our Group Standing Orders, the Group Board is responsible for approving Group Wide Frameworks. As part of the Strategic Governance Review it was agreed that subsidiary Boards would be asked to review any updated or new Group Frameworks (or policies) and provide their agreement that they progress to the Group Board.

2.2 A key element of our 2026-31 strategy is a continued focus on customers having the opportunity to engage with us and influence how we make decisions. As part of this we recognised that customers wish to engage in different ways and that our approach to engagement needs to respond to those needs.

3. Background

3.1 Since the introduction of the current Engagement Framework, we have significantly strengthened the reach and impact of customer engagement through enhanced scrutiny activity, real-time feedback and increased digital engagement.

3.2 These approaches have influenced service improvement and investment decisions and have been externally recognised for good practice. Customer expectations and organisational capability have continued to evolve, and the periodic review of the Framework provides an opportunity to refine our approach to ensure it remains effective, proportionate and aligned to how customers wish to engage.

4. Discussion

4.1 The key elements of our approach to customer engagement are operating effectively, with 99.7% of tenants satisfied with their opportunities to participate (vs 86% Scottish average). The Group Scrutiny Panel, which includes five of our tenants, has been externally recognised with awards at the Tenant Participation and Advisory Service ("**TPAS**") National Good Practice Awards in June 2025 and the Chartered Institute of Housing Awards in November 2025.

4.2 We have however seen a trend of customers increasingly wishing to engage with us digitally. We have seen evidence in recent years of the impact of increasing the use of digital and tailoring our approach to preferences. Customer behaviour has shown a clear appetite for digital interaction, with strong evidence of increased reach, participation and satisfaction, including through:

- **Rent Consultation – text/email reminders:** Using customer preference-based text and email reminders led to a significant uplift in consultation responses, shown with 2,130 responses this year compared to 1,846 in 2025. This demonstrates customers' willingness to engage digitally and the value of personalised, well-timed prompts;
- **Digital surveys to inform policy:** We have increased the use of digital surveys to support and shape policy development, for example, our Group Arrears and Debtors Framework. This has delivered broader participation across demographics, faster turnaround times for insight, and richer data to support decisions;
- **Video content**: Short videos were used on our social media to promote strategy engagement and improve understanding of the purpose and impact of customer involvement. This helped us receive over 850 responses to our strategy development digital survey; and
- **Targeted email campaigns:** Data-led campaigns have supported higher engagement by targeting specific groups with tailored messaging.

4.3 Together, this provides strong evidence that customers are willing and motivated to engage digitally and that this will be an area of focus for our engagement in future.

4.4 The revised Framework, attached at Appendix 1, retains the key elements of the existing Framework, however the structure of the document and how we express those elements have been updated.

4.5 This marks the next step in our approach, evolving from our previous proposals and commitments around engagement. The key changes from the existing Framework were as follows:

- Clearer articulation of our legal and regulatory obligations and tenant rights;
- Removing elements that we have not deployed regularly;
- Clearer distinction between our principles of engagement and engagement model; and
- A stronger focus on digital engagement to reach all tenants, with reduced reliance on Customer Voices as the primary mechanism.

4.6 A key purpose of the Framework is to set a clear, consistent set of principles and model of engagement that applies across the Group and act as our "tenant participation strategy" as required in law. As such we will require to formally consult tenants on the Framework before it comes into effect.

4.7 The proposed principles and model for engagement under the Framework are as follows:



4.8 A specific requirement of the Framework is that this Board agrees a specific Engagement Plan for Wheatley Homes South. This intentionally strengthens the level of oversight the Board will have on our engagement activity. Our own Engagement Plan will translate the principles and model into a plan which reflects:

- Local priorities e.g. around investment and regeneration;
- Neighbourhood Plans and Wheatley Standards;
- Customer safety e.g. Community Improvement Partnership approach; and
- Key local service developments.

4.9 Taking into account feedback from our other partner Boards, it is intended that the Group Board will be asked to agree the Framework for consultation with tenants at its April meeting. We will then provide the Board with the outcome of the consultation alongside a draft Engagement Plan for approval at its August meeting.

5. Customer engagement

5.1 Customer engagement continues to be at the heart of our 2026-2031 strategy. The level of engagement in developing the strategy has exceeded our expectations and provided us with important insight for the refreshed customer engagement framework. We will now consult with our customers on our proposals before agreeing on the final Framework and WHS-specific engagement plan.

6. Environmental and sustainability implications

6.1 We understand that investment in homes, particularly to ensure energy-efficiency, is a priority for customers. Our refreshed Framework will support us to engage customers around this, including setting standards as we shape our Wheatley Standard and a refreshed Sustainability Framework.

7. Digital transformation alignment

7.1 Our refreshed Framework aligns with our digital ambitions. We understand an increased digital appetite from customers, albeit balancing this with other engagement channels. Our evolving data maturity will support us in garnering insight from all forms of engagement to support us making informed decisions and improving services.

8. Financial and value for money implications

8.1 We understand that keeping rents fair and transparent is a priority for customers; our annual rent consultation is a key element of our engagement approach under 'Consult'.

9. Legal, regulatory, and charitable implications

9.1 Our key legal duties around engagement are to:

- Publish and review a tenant participation strategy (the Framework);
- Consult tenants on changes to housing services;
- Maintain and publish a register of Registered Tenant Organisations;
- Provide accessible information; and
- Support tenant participation.

9.2 This Framework supports our compliance with participation duties as set out in the Housing (Scotland) Act 2001, supported by the Housing (Scotland) Act 2010, and in particular meet Scottish Social Housing Charter Outcome 3, as well as the requirements of the SHR Regulatory Framework.

10. Risk appetite and assessment

10.1 Effective customer engagement is critical to delivering our strategy and meeting regulatory expectations. Key risks include uneven participation across customer groups, over-reliance on single engagement channels, and failure to clearly evidence customer influence on decisions. The revised Framework mitigates these risks through diversified engagement methods, strengthened scrutiny arrangements and clearer governance and reporting.

11. Equalities implications

11.1 A draft Equality Impact Assessment has been undertaken to inform the draft Framework and will be further refined post customer consultation. A key principle is to be inclusive and accessible.

12. Key issues and conclusions

12.1 The revised Customer Engagement Framework seeks to form the basis to strengthen and modernises our existing approach, responding to changing customer expectations for increased digital engagement. It provides a consistent, outcome-focused framework across the Group and strengthens our ability to evidence customer influence on decisions, service improvement and investment priorities.

12.2 The Framework will strengthen transparency, scrutiny and reporting, and introduces clearer Board oversight through our own Engagement Plan. Subject to Board feedback, progression to customer consultation will enable tenants to shape the final Framework prior to adoption.

13. Recommendations

13.1 The Board is asked to provide feedback on the revised Customer Engagement Framework and agree it that it progresses to the Group Board for approval.

LIST OF APPENDICES:

Appendix 1: Customer Engagement Framework

Wheatley Group

Making homes and lives better
wheatley-group.com

Making homes and lives better, together

Customer Engagement Framework 2026

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 479 7979 or email 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 479 7979 lub wyślij e-mail na adres 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 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجانًا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضًا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Group Board*
Date of approval	
Review Year	*2029*
Customer engagement required	*Yes*
Trade union engagement required	*Yes – For info*
Equality Impact Assessment	*Yes*

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1. Introduction

2. Policy aims

3. Legal and regulatory context

4. Engagement principles

5. Engagement model

6. Engagement channels

7. Key roles and responsibilities

8. Measuring success and reporting

9. Equalities

1. Introduction

We are committed to our strategic purpose of 'making homes and lives better' and ensuring that our customers' priorities, experience and opinions shape how we design and deliver services, prioritise improvements and make decisions.

2. Aims

The key aims of our Engagement Framework are:

- Customers influence how we design, deliver and improve services;
- Engagement is embedded across our organisation — locally, strategically and at Board level;
- Customers are kept informed about services and decisions and satisfied with the opportunities to participate;
- We are transparent and accountable with customers in how we have listened, learned and acted on their feedback; and
- To comply with our legal and regulatory duties.

3. Legal and regulatory context

As a Registered Social Landlord ("RSL") in Scotland, we are regulated by the Scottish Housing Regulator. An RSL must comply with the participation duties set out in the **Housing (Scotland) Act 2001**, supported by the **Housing (Scotland) Act 2010**, and must meet **Scottish Social Housing Charter Outcome 3**. As part of the Annual Return on the Charter, each RSL must measure and report on two tenant perception related indicators: being kept informed about services and decisions, and opportunities to participate in decision-making. It must also comply with the requirements of the SHR Regulatory Framework.

Our key legal duties are to:

- publish and review a tenant participation strategy [this document];
- consult tenants on changes to housing services;
- maintain and publish a register of Registered Tenant Organisations;
- provide accessible information; and
- support tenant participation.

This requires us to inform, involve and consult tenants about housing services, support tenants to participate in engagement activities, and evidence tenant influence in decision-making, including improvement activity.

4. Engagement principles

Our approach to customer engagement will be underpinned by the following key principles:

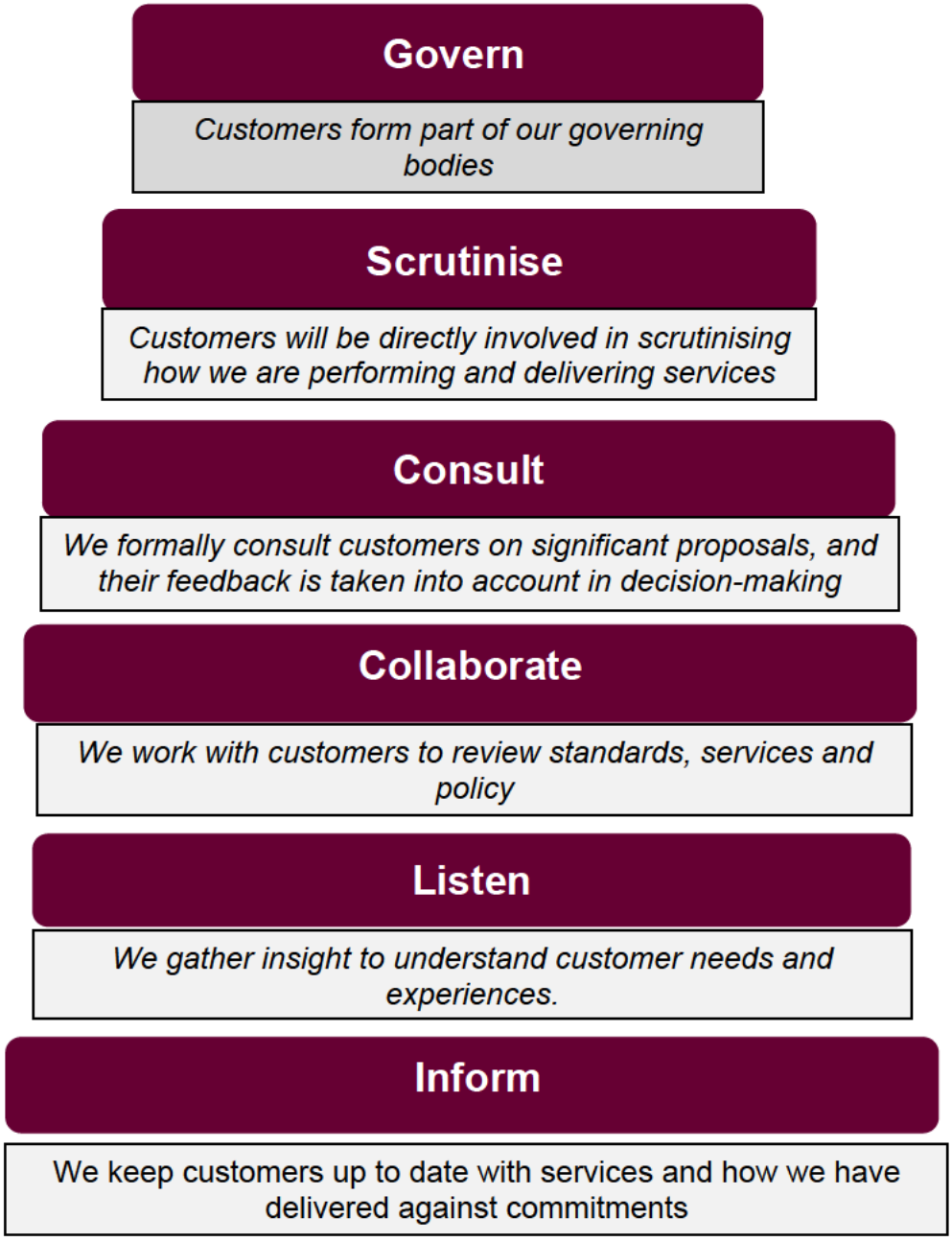


5. Engagement model

Different levels of engagement and varied engagement and insight channels will help us to strengthen the customer voice across our organisation.

In all cases, we will support individual customers to engage by applying reasonable adjustments and supporting accessibility. Where an engagement opportunity is not open to all, we will make the target audience clear.

To support customer choice in how and when they engage with us, we will offer six levels of engagement.



Registered Tenant Organisations (RTOs)

To qualify as an RTO, a tenant group must demonstrate a clear constitution, democratic operation, transparent financial management, a defined representative area, and commitment to promoting tenants' housing interests. These criteria are set nationally by the Scottish Government.

We will publish our register of RTOs as well as information on how to apply for registration and how we will support any applications on individual RSL websites. Information will also be available on request in alternative formats.

Scrutiny panel

Our scrutiny approach is designed to be independent, formal and effective and reflects Scottish Government guidance.

Our Scrutiny Panel activity will operate with clear terms of reference, agreed priority areas against the Charter, access to performance information and a defined reporting route to governing bodies. Scrutiny recommendations will be recorded in a tracker, with agreed actions, timescales and published responses explaining what we will do and why.

6. Engagement Channels

We will provide customers with a range of channels through which they can engage with us, including:

Channel	Summary
Digital engagement	Surveys, consultations, local updates, websites and social media facilitated digitally
Local engagement	Walkabouts and local events focused on investment, regeneration and the environment
Focus groups	Independently facilitated focus groups and customer journey mapping to explore set topics and experiences
Scrutiny	Regular review of RSLs performance against the Charter, including where appropriate a more in-depth thematic review
Governance	Tenant Board Member pathway programme and Board membership

Customers who wish to be involved in engagement activities for specific topics and methods can become a **Customer Voice**. By registering as a Customer Voice, customers will be invited to get involved in the activities in which they have an interest.

In addition to this, we will consider and learn from other routes that customers provide us with feedback on our services, including:

- Complaints;
- Independent Satisfaction Surveys; and
- Annual Tenant Visits.

7. Key roles and responsibilities

The roles and responsibilities for the implementation and delivery of this framework are as follows:

Role	Responsibility
Governing bodies	▪ Receive customer feedback summarises and reports from the Scrutiny Panel ▪ Ensure that customer feedback and Scrutiny Panel recommendations are considered in its decision making ▪ Agree RSL specific engagement plans which set out specific areas of focus for engagement.
Executive Team	▪ Oversee the delivery of this framework and RSL specific engagement plans
Customer experience & engagement teams	▪ Design and facilitate engagement opportunities, including provision of the necessary support for customers to participate
Operational teams	▪ Raise awareness of opportunities to participate ▪ Local engagement with customers on services, investment and neighbourhood plans. Provide insight and feedback to enable continuous improvement

8. Measuring success and reporting

We will monitor and report against this framework through the following key performance outcomes:

Success Category	Direct Monitoring ➢ Associated strategic measures
Participation	Provision and uptake of engagement activities ➢ 90%+ of customers satisfied with opportunities to participate ➢ 90%+ of customers feel treated fairly and with respect
Influence	'You said, We did' publications Thematic reviews - Percentage of agreed recommendations implemented ➢ 90%+ customer satisfaction with listening to views and acting upon them ➢ 100% of customer facing policies and strategic projects informed by customer insight
Impact	RSL engagement plans will demonstrate tangible impact at a local level, such as neighbourhood and property improvements ➢ 90%+ of customers satisfied with our contribution to the management of neighbourhoods at a locality level ➢ 90%+ customer satisfaction with the quality of their home ➢ 90%+ of our customers feel safe and secure in their home

We are committed to maintaining customer trust by demonstrating clear action and transparent reporting. Each RSL will report on customer engagement and insight publicly as follows:

- Annual Report to Tenants against the Charter;
- Annual Engagement Plan progress update;
- Annual complaints insight report;
- Scrutiny Panel thematic reports; and
- Customer consultation outcomes.

9. Equalities

We will remove barriers to participation by providing reasonable adjustments and covering agreed out-of-pocket expenses (such as travel, childcare or care costs) in line with our expense guidance.

We will also provide training and support so that customers involved in scrutiny and governance roles can participate effectively.

Report

To: **Wheatley Homes South Board**

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

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

Subject: **Protecting People Policies**

Date of meeting: **25 March 2026**

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1. Purpose

1.1 The purpose of this paper is to seek comment on the updated suite of Protecting People Policies.

2. Authorising and strategic context

2.1 Under the Group Standing Orders, the approval of certain policies is reserved for the Group Board. The protecting people policy suite is reserved to the Group Board, to ensure there is consistency across Wheatley in how we deal with sensitive issues relating to adult and child protection.

2.2 Under the Intra Group Agreements, the Group Board reserves the right to designate policies applying Group-wide and applicable to all Group partners.

2.3. This Board is asked to consider and comment on the suite of policies prior to finalising the documents before seeking approval from the Group Board.

3. Background

3.1 In 2016, we developed our first Group Protecting People Policy Framework ("**the Framework**"). The purpose of the Framework was to set out our commitment to protecting people through a range of operational policies and practices to safeguard those at risk of harm in our homes and our communities.

3.2 The policies referred to within The Framework included:

- Adult Support and Protection Policy;
- Child Protection Policy;
- Multi-Agency Public Protection Arrangements Policy ("**MAPPA**"); and
- Domestic Abuse Policy.

Classified as Public

3.3 The overarching Framework set out the shared objectives across each policy, how these link to our current strategy, as well as setting out an overview of the purpose of each policy.

4. Discussion

4.1 Our Protecting People suite of policies continues to be of importance to us in delivering our services to customers. The policies set out the legal frameworks within which we are expected to operate, as well as supporting our staff to understand their role in protecting our customers from risk and harm across the areas of Adult and Child Protection, MAPPA and Domestic Abuse.

4.2 The Framework and associated policies were due for their triennial review this year. On reviewing the policies, we have considered:

- Changes in legislation;
- Changes in best practice;
- Organisational changes; and
- How accessible the information within the policies is to a range of stakeholders.

4.3 As part of this review, we are proposing the removal of the overarching Group Protecting People Framework. The Framework was established before the development and implementation of each policy and acted as a placeholder and summary of the details contained within the individual policies. As such, there is a significant amount of duplication across the documents, and the Framework no longer fulfils its intended purpose. In addition, we have added a new policy to the suite, Suicide Risk policy which is detailed later in the report.

4.4 Across all policies there has been minimal change to relevant legislation and best practice guidance since the last review. As part of the review, we have:

- Simplified and reduced the amount of text within each document to ensure that duplication of information is removed;
- Ensure that the information is as accessible as possible for staff, customers and third parties;
- Established the role and responsibilities of staff more succinctly and added flow charts to depict this where appropriate;
- Revised our language to ensure it is ‘trauma informed’;
- Refocused the ‘introduction’ section on why we have the policy rather than setting out national statistics as the basis for the policy; and
- Reduced/brought up to date the amount of detail setting out our various wraparound services.

Policies with tracked changes are available on request.

<u>Staff, customer and stakeholder engagement</u>

4.5 Staff from across the organisation were engaged in reviewing the policy. All feedback was considered in the update of the policies.

4.6 Seventy-four customers were engaged from across the organisation. The most frequent feedback was in relation to our promotion of these policies. Each policy was reported to be easy to understand and follow; however, many customers suggested we bring more visibility of these policies to customers generally. They commended the use of plain language and the shortening of the detail within the policies.

4.7 A range of stakeholders were engaged across the policies including:

- Principal officers for Child Protection;
- Team Leader Prison Homelessness Team & SOLO Team;
- Violence against women and girl's coordinator;
- Community Safety Managers; and
- ASSIST – specialist domestic abuse support.

4.8 The feedback from the stakeholders did not result in any material changes to the policies but all feedback has been taken into consideration and incorporated where required.

Adult Support and Protection Policy

4.9 The Adult Support and Protection Policy (Appendix 1) supports staff to recognise and respond to adults who may be at risk of harm. The policy is informed directly from The Adult Support and Protection (Scotland) Act 2007 and sets out types of harm and abuse, how to recognise this, and what to do in response.

4.10 There have been no changes to legislation or best practice, and as such, the policy has no material changes. The changes to the policy reflect current organisational structures and practices. The Adult Support and Protection Policy applies across the organisation but is mostly utilised by customer facing staff.

Child Protection Policy

4.11 The Child Protection Policy (Appendix 2) supports staff to recognise and respond when they believe a child in our homes or our communities is at risk. The Policy is informed by the National Guidance for Child Protection in Scotland (2021), which reflects relevant underpinning legislation.

4.12 The policy sets out how to recognise signs of abuse and neglect, how we should respond to concerns and how we work with statutory agencies when a child is considered to be at risk. We have included in the policy a flow chart showing referral processes as well as a template referral form.

4.13 Since we last reviewed the policy, the Scottish Government has embedded in law the UN Conventions on the Rights of the Child through the UN Convention on the Rights of the Child (incorporating) (Scotland) Act 2024. This requires all Public Bodies to actively uphold children's rights in all decisions and services as set out in the Act. The Child Protection Policy is fundamentally underpinned by the human rights of a child to live safely, free from harm or abuse and their wellbeing needs being met.

4.14. While there have been no changes to the National Guidance for Child Protection in Scotland (2021) yet, we anticipate that the Guidance will be updated in the coming year, at which point we will consider any further amendments to our policy and associated practices.

Multi-Agency Public Protection Arrangements ("**MAPPA**") Policy

4.15 The MAPPA Policy (Appendix 3) supports staff to understand our responsibility as RSLs to cooperate with agencies that have a statutory responsibility for managing the risks posed by people considered under MAPPA. The policy explains MAPPA, details our duties and role in MAPPA and summarises how we execute these duties.

4.16 MAPPA are a set of statutory partnership arrangements established under the Management of Offenders etc. (Scotland) Act 2005. They place a legal duty on Responsible Authorities (Police Scotland, Local Authorities, Health Boards and the Prison Service), within each local authority area, to jointly assess and manage the risk posed by certain categories of offenders:

- Registered Sex Offenders ("**RSOs**");
- Mentally disordered restricted patients; and
- Risk of serious harm offenders.

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4.17 There have been no legislative changes or changes to best practice guidance since the last review. As part of this review, we have explicitly detailed in this policy the Police Scotland Sex Offender Community Disclosure Scheme to ensure staff across the organisation are aware of the scheme.

4.18 As part of the policy review, we have drafted a staff toolkit which will more clearly inform how staff are expected to implement the policy and who is responsible across the organisation at each stage of the processes. Following feedback from staff, we will revise and implement the new toolkit alongside the revised policy.

Domestic Abuse Policy

4.19 The Domestic Abuse Policy (Appendix 4) supports staff to understand what constitutes abuse and the different types of abuse victims can experience, how to recognise signs of abuse and what options are available to support any customer experiencing domestic abuse.

4.20 The policy has been aligned with the Domestic Abuse: a good practice guide for Social Landlords, which was produced by Scottish Women's Aid and the Chartered Institute of Housing in 2019. While there have been no further legislative changes since the previous review of the policy, the Domestic Abuse (Protection) (Scotland) Act 2021 has yet to come into force despite receiving Royal Assent in May 2021. It is expected that all elements of the Act will be in force by 1 August 2026.

4.21 The new Act strengthens protections for victims, especially those living with their abuser. It gives RSLs the power to apply to the court to end the tenancy rights of someone abusive if the victim wants to stay in the home. Guidance for RSLs and other agencies is still being drafted. Once received from the Scottish Government, this policy will be reviewed. We anticipate this over the course of the next quarter.

4.22 An internal working group has been established and is considering the potential implications of the Act on both our Domestic Abuse Policy and practice as well as other policies such as our Allocation Policy and Tenancy Agreements.

4.23 The Housing (Scotland) Act 2025 builds on the strengthened protections for victims of domestic abuse that are detailed in domestic abuse legislation. The Act has a specific focus on tenants affected by domestic abuse. The measures within are designed to reduce homelessness amongst women and children who are disproportionately affected by domestic abuse. Our processes and approach to supporting people experiencing domestic abuse or survivors of domestic abuse will take cognisance of the new legislation.

Suicide Risk Policy

4.24 Our first document outlining our approach to suicide risk was established in 2023 and was developed as a Framework and approved by the Group Board on 23 April 2023. It was designed as an awareness raising and improvement tool. It set out the scale of suicide risk within our communities, aligned us with national strategies, articulated our ambitions around prevention, partnership and training, and helped normalise conversations about suicide across our teams.

4.25 Self-harm and suicide risk is essentially a safeguarding and risk to life issue that requires clarity and consistency in organisational roles when concerns arise. As we reviewed our Framework, we reflected that a dedicated policy as part of our wider suite of protecting people policies will bring more clarity to customers, staff and stakeholders about our role and our approach in responding to suicide and suicide risk. The policy remains fully aligned with the national strategy. The national strategy, *Creating Hope Together*, promotes a whole population, trauma informed approach to suicide prevention, with a strong focus on early identification of risk, reducing stigma, and consistent, partnership-based responses.

Next steps

4.26 While the policy revisions were minimal in terms of changes to legislation or best practice we intend, as part of our implementation of the policies, to strengthen the oversight of protection and safeguarding activity at a group level rather than local level. As an example, as part of this we will introduce central monitoring of protection referrals, sampling content, and understanding thematically the reasons for concern. This will inform our strategic responses and allow us to better liaise with statutory partners around challenges and solutions.

4.27 The activity associated with protection and safeguarding is closely linked to our proposed strategic themes of personalising our services and supporting better lives. The team that supports safeguarding activity is currently under review to ensure we have the appropriate focus to support our vision for even more personalised services across the spectrum of need from statutory safeguarding requirements to wider vulnerabilities.

4.28 The priorities for the team, subject to policy approval, are:

- Implementation of the revised policy through staff briefings;
- Revision of the suite of all safeguarding training and associated materials;
- Develop appropriate processes for the strengthened oversight of safeguarding activity;
- Review our representation at external safeguarding/protection fora and carry out a benefit analysis; and
- Review data collection, storage and reporting across all safeguarding activity.

4.29 It is proposed that we introduce an annual report to this Board from March 2027 outlining safeguarding and protection activity for the purposes of regular visibility of our practice in these areas.

5. Customer Engagement

5.1 Seventy-four customers were engaged and feedback sought. Feedback has been considered and is reflected in our revised policies.

6. Environmental and sustainability implications

6.1 There are no specific environmental and sustainability implications from the Policies or the content of this report.

7. Digital transformation alignment

7.1 A priority is to review how we collect, store and share the data linked to safeguarding activity as well as wider vulnerability data. This will enable us to better understand our customers, thematic challenges across the organisation and improve our approaches specifically around personalising our services.

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

9.1 Each policy reflects current legal and regulatory requirements and have been reviewed by our legal team.

10. Risk Appetite and Assessment

10.1 These policies minimise the risk of harm to people and communities by setting out our responsibilities and our approaches to safeguarding and public protection. The policies and associated training support staff to recognise and respond to concerns about our customers. They support care staff specifically to ensure they meet their duty of care to people they support, particularly around adult protection concerns.

11. Equalities implications

11.1 The policies have been designed to be inclusive, non-judgmental and promote a consistent approach when supporting those impacted by the issues covered within the policy suite.

11.2 Equality Impact Assessments ("**EIA**") were undertaken for all policies.

12. Key issues and conclusions

12.1 These policies have been reviewed in line with their triennial review cycle and have been updated to reflect all relevant legislative, regulatory, organisational and procedural changes.

12.2 The policies have been refreshed to improve clarity and accessibility for staff, customers and third parties. They do not introduce any material changes to our approach; instead, they more clearly articulate existing practice, including our commitment to delivering personalised services.

12.3 Our protecting people suite of policies is vital to us in delivering our services to customers, whilst setting out the legal frameworks within which we are expected to operate, as well as defining staff's role and responsibilities in protecting our customers from risk and harm.

12.4. The policies are a resource for customers, staff and partner agencies. The policies support the application of the correct measures, reporting processes are followed, and support is provided to help reduce the risk of harm or abuse.

12.5 The policies support a coordinated approach in public protection and safeguarding, whilst ensuring our staff are equipped with the knowledge and guidance to recognise and respond to customers experiencing these issues. This ensures that we are providing a personalised approach and strengthens our response in supporting some of our most vulnerable customers.

12.6. An additional policy has been added to the suite setting out our role and approach to responding to suicide or suicide risk in our homes and communities.

13. Recommendations

13.1 The Board is asked to review and provide comment on the updated suite of Protecting People Policies.

LIST OF APPENDICES:

Appendix 1: Group Adult Support and Protection Policy;
Appendix 2: Group Child Protection Policy;
Appendix 3: Group Multi-Agency Public Protection Arrangements Policy;
Appendix 4: Group Domestic Abuse Policy; and
Appendix 5: Group Suicide Risk Policy.

Wheatley Group

Making homes and lives better
wheatley-group.com

Group Adult Support & Protection 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 479 7979 or email 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 479 7979 lub wyślij e-mail na adres info@wheatley-group.com

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در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Group Board*
Date of approval	*TBC*
Review Year	*Updated July 2022* *Updated March 2026*
Customer engagement required	*Yes*
Trade union engagement is required	*Yes – For info*
Equality Impact Assessment	*Yes*

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1. Introduction

This policy is part of a suite of policies designed to safeguard and protect people. This Adult Support and Protection Policy outlines how we support customers at risk of harm and guides both customers and staff in understanding our responsibilities and the response process when we are concerned about an adult.

This policy should be read in conjunction with the following policies:

- Child Protection;
- Multi-Agency Public Protection Arrangements (MAPPA);
- Suicide Risk; and
- Domestic Abuse.

Protecting adults at risk is a shared responsibility. Everyone has a part to play, including social services, police, health, housing, and social care organisations. Adults at risk should be supported to live free from harm and make their own choices wherever possible.

This policy explains how we work with others to protect adults at risk, as defined by the Adult Support and Protection (Scotland) Act 2007. As an organisation, we have a duty of care to report any concerns or disclosures about harm. Our staff play a key role in this by working directly with customers in their homes and communities. Through day-to-day contact, tenancy visits, repairs interactions, and routine customer conversations, staff are often well-placed to notice changes, pick up on early indicators of risk, and provide a safe environment for customers to share concerns. It is therefore our expectation that staff use these interactions to support the identification and reporting of harm, helping to safeguard our customers.

Staff will refer to this policy in the course of their work with Wheatley Group.

2. Policy Aims & Objectives

Our Aims

This policy has been designed to support staff and customers in understanding our approach to Adult Support and Protection. The policy aims to support staff to:

- understand Adult Support and Protection legislation;
- understand and recognise different types of harm;
- effectively support those at risk of or affected by harm;
- uphold the wellbeing and rights of all those who we deliver services to; and
- effectively report concerns to the relevant statutory agencies.

Our Objectives

For an effective approach to Adult Support and Protection to be embedded, our objectives are to:

- make sure our policy and supporting processes are clear, practical and easily accessible;
- ensure relevant staff are aware of their role and responsibilities and that these are clearly defined;
- provide training to relevant staff so they can confidently recognise and respond to signs of harm;
- build partnerships with agencies responsible for investigating adult protection concerns and supporting adults at risk through regular structured contact; and
- monitor Adult Protection activity across the organisation to determine themes arising and ensure continuous improvement and strengthening of our approach through quality assurance of reports.

3. What is Adult Support & Protection?

Adult Support and Protection is about keeping people safe from harm when they may not be able to protect themselves.

The Adult Support and Protection (Scotland) Act 2007 was developed to protect adults at risk of harm. The Act states that councils and other public services must work together to help adults who are at risk. The Act clearly defines an adult at risk. The Adult Support and Protection Code of Practice is a statutory guidance document issued under the 2007 Act. The purpose of the code of practice is to ensure consistent, lawful and effective safeguarding of adults at risk of harm across Scotland.

Who is an Adult at Risk?

The Act defines an adult at risk as someone aged 16 or over who:

- can't protect their own wellbeing, property, or rights;
- is at risk of harm; and
- is more vulnerable because of disability, illness, or mental health.

All three of these points must apply for someone to be considered at risk under Adult Support and Protection legislation. This is known as the '**three-point test'**. Having a condition such as a disability doesn't automatically mean that someone is an adult at risk under the 2007 Act. All three criteria must be met. It is the full picture of someone's circumstances that may make them more vulnerable to harm than others.

Where staff have concerns about an adult, but the adult does not appear to meet the three-point test, a report should be made to the local authorities' social work department, who will consider other avenues for support. A multi-agency approach will be used to determine the best way to support the individual, which may include providing practical help, health, or social care support.

There can be some overlap in legislation between Adult Support and Protection and Child Protection. Child Protection guidance applies to children and young people up to the age of 18. To ensure that individuals aged 16-18 do not fall between eligibility and service criteria, an assessment will be undertaken by statutory services on how to best manage the risk and meet their individual needs.

When staff are concerned about a person at risk who they know or believe to be between the ages of 16-18, then a Child Protection referral should be completed. Statutory services will then determine whether the referral should be dealt with under Adult or Child Protection Processes.

4. Types of Harm

What is Risk of Harm?

The 2007 Act clearly states that an adult is at risk of harm if:

- another person's conduct is causing (or is likely to cause) harm to the adult; or
- the adult is engaging (or is likely to engage) in conduct which causes (or is likely to cause) self-harm.

What is Harm?

The 2007 Act states that harm includes all harmful conduct and can be caused by someone else or by the person themselves. It includes:

- physical harm (e.g. hitting, pushing);
- psychological harm (e.g. causing fear, alarm, or distress);
- unlawful actions affecting property, rights, or interests (e.g. theft, fraud, embezzlement or extortion); or
- self-harm (e.g. hurting themselves intentionally or refusing help).

Harm can happen anywhere; at home, in care settings, or in public settings and may be a single or repeated act.

Types of Harm or Abuse

Harm under the 2007 Act includes a wide range of categories, not limited to those listed below. Examples of harm not explicitly listed include domestic abuse, gender-based violence, forced marriage, human trafficking, stalking and hate crime. These are all considered crimes that can contribute to harm. Alleged or actual victims of crime should always be encouraged to report a crime. Staff should report suspected or actual crimes against an adult deemed at risk in Scotland, even if the adult does not want them to, as this is a legal duty under the 2007 Act.
Sometimes, the person causing harm may also be at risk. This needs to be taken into consideration when implementing Adult Support and Protection processes. Where both perpetrator and victim are considered as being an adult at risk, separate Adult Protection Referrals should be submitted for both parties.

Harm can take many forms and affect individuals and/or multiple people. It can occur in relationships, service settings or within communities. Although we must respond to each incident of harm or potential harm, it is important to look beyond single incidents and consider patterns and underlying dynamics.

Below are some examples of the types of harm that staff may observe or that may be disclosed to them. The examples are not exhaustive and should only be used as a guide.

Physical harm or abuse involving actual or attempted injury to an adult who is defined as being at risk. For example:

- slapping, pushing, hitting, kicking;
- misuse of medication;
- pinching, biting, shaking;
- forcible feeding;
- restraining or holding an individual back – locking in a room, tying to a bed or chair;
- inappropriate touching; and
- being threatened with a weapon.

Sexual harm or abuse involves an activity of a sexual nature where the adult at risk cannot or does not give consent. For example:

- inappropriate sexual contact, touching, kissing;
- sexual assault, rape, non-consensual contact, sexualised comments;
- indecent exposure;
- being made to listen to or watch pornography without consent; and
- voyeurism.

Psychological and emotional harm or abuse resulting in mental distress to the adult at risk. For example:

- threats, manipulation, inappropriate treatment;
- humiliation, overt control and dominance;
- isolation and abandonment;
- bullying and intimidation by word or act;
- access to a person being denied;
- misuse of power or influence;
- threats of harm or abandonment;
- putting down, ignoring someone;
- controlling behaviour;
- taking away privacy; and
- constant criticism.

Financial or material harm or abuse involving the exploitation of resources and property belonging to the adult at risk. For example:

- theft or fraud;
- misuse of money, property, or resources without the informed consent of the adult at risk; and
- no control over household finances, with the adult at risk being given an allowance at the perpetrator's discretion.

Verbal harm or abuse involving the use of language to cause distress to the adult at risk. For example:

- Inappropriate use of language, disrespect, name-calling, shouting, sarcasm, inappropriate use of humour, and using language to confuse or to exclude.

Institutional harm or abuse involves the adult at risk having their individuality ignored. For example:

- Removal of individuality within an institution by strict, inflexible regimes and routines, lack of accommodation relative to individual choice and lifestyle.

Discriminatory harm or abuse refers to the abuse of an adult due to prejudice against their personal characteristics and can affect the adult at risk in several ways.

For example:

- unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics under the Equality Act 2010);
- verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic;
- denying access to communication aids, not allowing access to an interpreter, signer, or lip-reader;
- denying basic rights to healthcare, education, employment, and criminal justice relating to a protected characteristic; and;
- neglect of accommodation; and
- substandard service provision relating to a protected characteristic.

Self-harm where the adult at risk carries out acts to cause injury or distress to themselves. For example:

- refusal to eat or drink;
- substance misuse;
- cutting, burning, scalding, or hitting parts of own body;
- risk taking behaviour;
- banging head or other parts of the body;
- swallowing harmful substances;
- attempts or makes threats of suicide; and
- overdosing.

Signs of Harm

There are many signs of harm. Customer facing staff are best placed to be able to recognise and respond to signs of harm and are supported to do so.

Some examples of signs of harm that staff may observe:

- unexplained or unusual injuries;
- changes in behaviour;
- fear of another person;
- unexplained deterioration in health or appearance;
- misuse of medication;
- an unexplained delay between illness or injury and the person getting appropriate treatment;
- unpaid bills or sudden debt;
- another person using the adult's possessions, bank account or property without their informed consent;
- poor health or hygiene;
- hostile behaviour from carers;
- lack of basic needs like food or heating;
- not being informed of their rights or being misinformed; and
- victims of repeated antisocial behaviour.

The above list is not exhaustive. Our customer facing staff are trained to recognise these signs and respond quickly. We also work with other agencies to provide extra support when needed.

5. Our Role in Adult Support & Protection

As a housing, care and property management provider, our main role is to:

- recognise signs of harm, abuse or adults potentially at risk;
- respond appropriately and effectively; and
- report concerns to statutory agencies in line with Adult Support and Protection legislation and requirements. If staff are unsure of what action to take, they should speak with their line manager or contact the Group Protection Team for guidance.

Adult Support and Protection is everyone's responsibility. **Appendix 1** sets out the process if staff are concerned that an adult may be at risk of harm or abuse.

Recognising signs of harm

Our customer facing staff are well placed to identify customers who may be at risk of harm or abuse and are trained to identify signs of abuse and remain alert.

We may learn that someone is at risk through:

- what a customer tells us;
- information from someone else;
- observations by staff;
- insights from our customer information; and
- multi-agency meetings (e.g. case conferences).

We will gather enough information to decide what action to take, regardless of how we have become aware.

Responding to adults at risk of harm

Our staff will respond to those affected by harm or abuse by reporting our concerns and offering additional support to the individual. There are clear processes in place to support staff to respond appropriately and report their concerns.

If someone tells us they're being harmed:

- our default position will be to believe them;
- we act quickly to offer help;
- we will create a safe environment for discussions relating to harm and can offer options like same-sex staff or translation services;
- we treat everyone with empathy and respect, and without judgment; and
- we explain that while we keep things confidential as far as practicably possible, we may need to share information with social work or police to keep people safe. This is linked to our requirement within the 2007 legislation and the duty of care that we have to protect our customers from risk of harm. Any information shared will be in accordance with the rules for sharing personal data. See section 11 for further information.

Responding to Self-Harm and Suicide Risk

Some customers may be at risk of self-harm or suicide. Our Suicide Prevention Framework guides staff in supporting someone experiencing suicidal behaviours. Warning signs include:

- feeling anxious, depressed, or withdrawn;
- changes in eating, sleeping, or drinking habits; and/or
- difficulty coping with everyday problems.

If we're concerned, we will:

- take all signs seriously;
- ask how the person is feeling;
- listen carefully;
- offer support and refer to specialist services; and
- report concerns to statutory agencies or Police Scotland when needed.

We work in partnership with police, social work and health agencies and will support the coordination of any investigations.

Reporting concerns about an adult at risk

Local Authorities lead on Adult Protection; however, keeping people safe works best when everyone - housing, care, health, police, and other services - shares information and works together. Before making a report, you should ensure that you adhere to data protection requirements regarding data sharing. Under UK GDPR and the Data Protection Act 2018, personal data may be shared without consent when necessary to safeguard an adult at risk of harm. This includes situations where sharing is in the adults' interests or required for public task under the 2007 Act. Consent is not required if seeking it would increase risk or prevent timely intervention. However, the principles of Data Protection apply. Any information shared must be necessary, proportionate and secure. See section 11 for further information.

If we believe someone may be at risk of harm:

- We report it to the Local Authority using their specific process and standard forms or by calling the social work duty team. An example of an Adult Support and Protection referral form (AP1) can be found appended to this policy (Appendix 2).
- If a crime may have or has happened, we have a duty of care to report this to Police Scotland on 101 or 999, depending on the urgency.
- Escalate any concerns to your line manager or to the Group Protection Team. For Wheatley Care, this may be to on-call outwith hours.

You can find contact details for Adult Support and Protection Teams across the 32 local authority areas here: http://www.actagainstharm.org/getting-help/find-your-local-contact.

If a **neighbour or another person tells us someone is at risk**, we'll usually let the individual concerned know that we're reporting it if it is appropriate to do so, unless it's unsafe or not possible to do so. Staff should speak to their manager or the Group Protection Team if unsure.

Where there is a concern that an adult is at risk of harm, consent does not need to be obtained to submit a referral to statutory agencies. The reason why consent was not gained should be recorded on the AP1 referral.

6. A Personalised Approach to Adult Support & Protection

We adopt a personalised approach to Adult Support and Protection, tailoring services to each customer's needs. We will work with partner agencies, focusing on the individual's outcomes, wishes and strengths, rather than a service-led response. We will work collectively to ensure that the adult feels empowered to make their own decisions, promoting their choice and control in their lives. Key elements of this include:

- seeking the person's views at the earliest opportunity;
- supporting and contributing to the development of strength-based plans;
- supporting the least restrictive intervention to safeguard the adult at risk from harm; and
- consideration of any reasonable adjustments in line with the Equality Act 2010.

Our approach to Adult Protection includes consideration of human rights in accordance with the Human Rights Act 1998, as well as considering any children's human rights in line with the UNCRC (incorporation) (Scotland) Act 2024 (where applicable.

Our unique position helps us to spot signs of harm early, like sudden rent arrears or repeated antisocial behaviour, and allows us to respond quickly.

We provide advice and practical solutions to improve home security and personal safety, including safety products and guidance on online safety. Where appropriate, safety apps can be demonstrated to help individuals stay protected.

If an individual feels unsafe in their current home, we will respond and offer a Housing Options interview and work with partners to explore safer housing solutions. We will also refer to our Anti-Social Behaviour Policy when needed.

Alongside these measures, we offer wraparound support to individuals who need extra assistance, ensuring they have access to the right services and resources to meet their needs.

7. Measuring our Impact

We will measure our impact in Adult Support and Protection by:

- monitoring the number of Adult Support and Protection referrals submitted; and
- reviewing referrals routinely to understand emergent themes or hotspots of concern, which will then inform our work on Adult Protection.

This approach will guide our future actions, enable us to allocate resources effectively and identify training and support needs.

8. Legislation & Strategic Drivers

This policy is based on key Scottish laws that protect adults and support their rights:

- **Adult Support and Protection (Scotland) Act 2007** – protects adults who may be at risk of harm.
- **Adults with Incapacity (Scotland) Act 2000** – helps protect people who can't make decisions for themselves.
- **Mental Health (Care and Treatment) (Scotland) Act 2003** – supports people with mental health conditions.
- **Protection of Vulnerable Groups (Scotland) Act 2007** – helps ensure people who work with vulnerable groups are safe to do so.
- Data Protection Act 2018
- Human Rights Act 1998
- General Data Protection Regulation (Regulation (EU) 2016/679)
- Domestic Abuse (Scotland) Act 2021
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024
- Adult Support & Protection Code of Practice 2022

9. Policy Review & Consultation

This policy has been developed in consultation with key stakeholders working in statutory agencies. The policy shall be reviewed every three years; however, more regular reviews will be considered where, for example, there is a need to respond to changes in legislation or guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our staff intranet, WE Connect, and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages, e.g. Braille.

10. Policy Awareness & Training

Staff across the organisation will be aware of the existence of this policy and of the requirement to apply the process contained within when an adult has been identified as being at risk. Customer facing staff will be trained in Adult Support and Protection policy and process.

11. Confidentiality & Data Protection

Everyone working in our organisation has a duty to help protect children, young people, and adults who may be at risk. The law provides clear exemptions that allow information sharing for safeguarding purposes without consent.

Sometimes, we may need to share personal information with other organisations to keep someone safe. This must follow strict rules under data protection laws, including the Data Protection Act 2018 and General Data Protection Regulations GDPR. Data Protection should not be a barrier to sharing proportionate, necessary information for adult protection and instead provides a framework to ensure information sharing is lawful, secure and documented.

Before sharing any information:

- staff must check the Wheatley Group's Data Protection Policy (especially Appendix 2);
- staff must be satisfied that data sharing complies with the General Data Protection principles in Article 5 UK GDPR and that there is a lawful basis for sharing the data;
- the decision to share must be recorded, including the reason;
- information should only be shared on a "need to know" basis; and
- an audit trail must be kept.

We understand that Adult Protection can include very sensitive information. If staff are unsure, they should speak to the Information Governance Team for advice on data protection issues that arise from Adult Protection concerns and reports, and to ensure that any data sharing is in accordance with the UK GDPR, the Data Protection Act 2018 and the requirements of our Data Protection Policy and the Group's Special Category Data Policy.

Any requests for information should be shared with the Information Governance Team, who will check that there are data sharing agreements in place.

12. Equal Opportunities Statement

This Policy aligns to our Equity, Diversity and Inclusion (EDI) and Human Rights Policy. We recognise our pro-active role in valuing and promoting EDI and equity of opportunity by adopting and promoting fair policies and procedures.

We are committed to providing fair and equitable treatment for our stakeholders and will not discriminate against anyone on the grounds of race, ethnicity, nationality, language, religion, belief, age, sex, sexual orientation, gender reassignment, trans history, disability, marital status, pregnancy or maternity. We will endeavour to achieve fair outcomes for all.

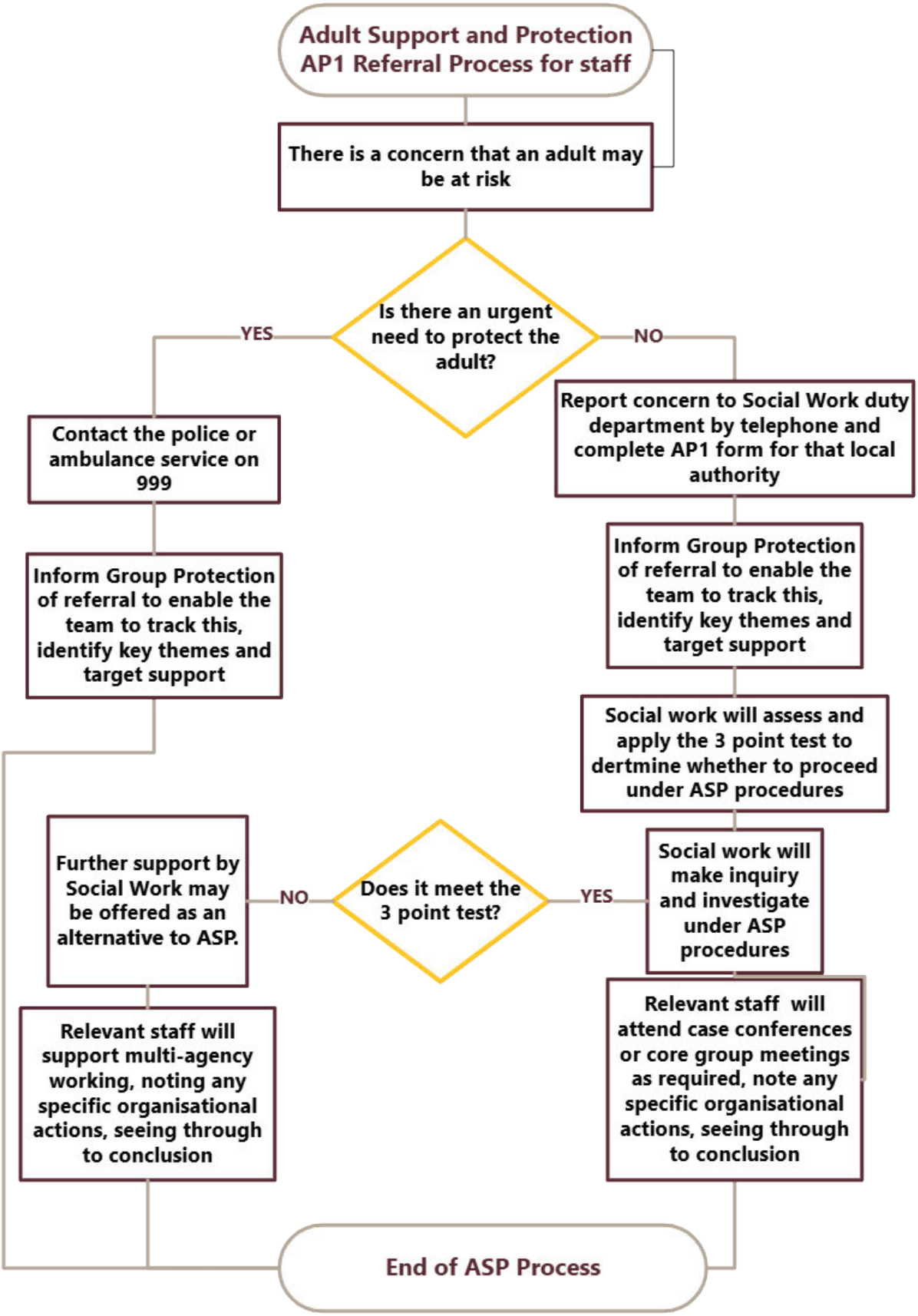
As required, we undertake Equality Impact Assessments on relevant policies, strategies, projects and frameworks to help us take appropriate action to address inequalities likely to result or resulting from the implementation of the policy and procedures and to maximise positive impacts.

13. Complaints

We aim to get things right the first time. However, if a customer is unhappy with this policy or how it's applied, they can make a complaint.

A summary of our Complaints Policy and Procedure is available on our Wheatley Group and subsidiary websites.

Appendix 1


Adult Support and Protection AP1 Referral Process for staff
There is a concern that an adult may be at risk
Is there an urgent need to protect the adult?
YES
NO
Contact the police or ambulance service on 999
Report concern to Social Work duty department by telephone and complete AP1 form for that local authority
Inform Group Protection of referral to enable the team to track this, identify key themes and target support
Inform Group Protection of referral to enable the team to track this, identify key themes and target support
Social work will assess and apply the 3 point test to dertmine whether to proceed under ASP procedures
Does it meet the 3 point test?
NO
YES
Further support by Social Work may be offered as an alternative to ASP.
Social work will make inquiry and investigate under ASP procedures
Relevant staff will support multi-agency working, noting any specific organisational actions, seeing through to conclusion
Relevant staff will attend case conferences or core group meetings as required, note any specific organisational actions, seeing through to conclusion
End of ASP Process

Appendix 2

ADULT PROTECTION REFERRAL FORM (AP1)

A word copy of this form suitable for typing and printing can usually be found on the Local Authority/HSCP and NHS Adult Support and Protection webpage.

ADULT AT RISK DETAILS (please PRINT details, thank you)					
NAME			DOB		
HOME ADDRESS			CURRENT WHEREABOUTS		
POSTCODE			POSTCODE		
TEL NO:			TEL NO:		
GENDER		ETHNIC ORIGIN		RELIGION	
COMMUNICATION NEEDS (Please provide details, including communication aids by the adult and specify the first language if not English)					
GP NAME / ADDRESS					

REFERRER DETAILS (please PRINT details, thank you)			
NAME		DESIGNATION	
AGENCY		DIRECT DIAL TEL NO:	
EMAIL ADDRESS			
RELATIONSHIP TO ADULT BEING REFERRED:			
SIGNATURE			
DATE			

IS IT SUSPECTED THAT A CRIME HAS BEEN COMMITTED, AND HAVE POLICE BEEN INFORMED? (Include date, time, known action taken, etc.)

DETAILS OF CONCERN (please PRINT details, thank you)	
1) IN YOUR OPINION IS THE ADULT ABLE TO SAFEGUARD THEIR OWN WELLBEING, PROPERTY, RIGHTS OR OTHER	

INTERESTS? (If no, please state reason)	
2) IN YOUR OPINION IS THE ADULT AT RISK OF HARM? (if yes, please state reason)	
3) IN YOUR OPINION IS THE ADULT AFFECTED BY DISABILITY, MENTAL DISORDER, ILLNESS OR PHYSICAL OR MENTAL INFIRMITY (if yes, please specify)	

GIVE DETAILS OF HARM (SUSPECTED / WITNESSED / DISCLOSED / REPORTED). DATES, PROTECTIVE ACTIONS TAKEN INCLUDE DETAILS OF ANY PREVIOUS CONCERNS. (please use separate sheet if required)

HAVE YOU (OR ANY OTHER PERSON) TOLD THE ADULT THAT THIS INFORMATION WILL BE SHARED WITH SOCIAL WORK OR OTHER RELEVANT AGENCIES	**YES / NO (delete as appropriate) If NO please state reasons**

DETAILS OF PERSON SUSPECTED OF CAUSING HARM (If known) (please PRINT details, thank you)			
NAME		**RELATIONSHIP TO ADULT:**	
ADDRESS		**TEL NO**	

DETAILS OF MAIN CARER / RELATIVE / POA / GAURDIAN (please PRINT details, thank you)			
NAME		**RELATIONSHIP TO ADULT:**	
ADDRESS		**TEL NO**	

Wheatley Group

Making homes and lives better
wheatley-group.com

Group Child Protection 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 479 7979 or email 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 479 7979 lub wyślij e-mail na adres 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 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجانًا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضًا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Group Board*
Date of approval	*TBC*
Review Year	*Updated July 2022* *Updated March 2026*
Customer engagement required	*Yes*
Trade union engagement is required	*Yes – For info*
Equality Impact Assessment	*Yes*

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1. Introduction

This policy is part of a suite of policies designed to safeguard and protect people. This Child Protection Policy outlines how we support children and young people at risk of harm and guides both customers and staff in understanding our responsibilities and the response process when we are concerned about a child.

This policy should be read in conjunction with the following policies:

- Adult Support & Protection;
- Multi-Agency Public Protection Arrangements (MAPPA);
- Suicide Risk; and
- Domestic Abuse.

Protecting children who are at risk from abuse or neglect is a shared responsibility. Everyone has a part to play, including social services, police, health, housing, and care organisations. Children should be supported to live free from harm.

The policy explains how we work with others to protect children at risk and support partner agencies whose responsibility it is to investigate where children may be at risk of abuse or neglect and provide support. As an organisation, we have a duty of care to report any concerns or disclosures about harm. Our staff play a key role in this by working directly with customers in their homes and communities. Through day-to-day contact, tenancy visits, repairs interactions, and routine customer conversations, staff are often well-placed to notice changes, pick up on early indicators of risk, and provide a safe environment for customers to share concerns. It is therefore our expectation that staff use these interactions to support the identification and reporting of harm, helping to safeguard our customers.

Staff will refer to this policy in the course of their work with Wheatley Group.

2. Policy Aims & Objectives

Our Aims

This policy has been designed to support staff and customers in understanding our approach to Child Protection. The policy aims to support staff to:

- understand Child Protection legislation;
- understand and recognise different types of harm and neglect;
- effectively support those at risk of or affected by harm;
- uphold the wellbeing and rights of all those who we deliver our services to; and
- effectively report concerns to statutory agencies (e.g. Police, social work, or health) when a child is at risk.

Our Objectives

For an effective approach to Child Protection to be embedded, our objectives are to:

- make sure our policy and supporting processes are clear, practical and easily accessible;
- ensure relevant staff are aware of their role and responsibilities and that these are clearly defined;
- provide training to relevant staff so they can confidently recognise and respond to signs of harm and neglect;
- build partnerships with agencies responsible for investigating Child Protection concerns and supporting children at risk through regular structured contact; and
- we will monitor Child Protection activity across the organisation to determine themes arising and ensure continuous improvement and strengthening of our approach through quality assurance of reports.

3. What is Child Protection?

The principles of the National Guidance for Child Protection in Scotland, 2021 state that every child deserves to live free from fear, harm, or abuse. Child Protection means recognising when a child might be at risk and taking steps to keep them safe. This includes the consideration, assessment, and planning of required actions. Police, social work, or health services evoke Child Protection procedures when they believe a child has been harmed or is at serious risk.

In Scotland, the definition of a child varies in different legal contexts; however, statutory guidance that supports the Children and Young People (Scotland) Act defines a child as anyone under the age of 18.

Where a young person between the ages of 16 and 18 requires support and protection, statutory services are required to consider which legal framework best supports each individual's needs and circumstances. This will ensure that these individuals do not fall between eligibility and service criteria due to an overlap in legislation between Adult Support & Protection and Child Protection.

In the context of the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024, a child means every human being below the age of 18. Where applicable, the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024 can give rise to rights and obligations relating to children and young people up to the age of 18.

When staff are concerned about a person at risk who they know or believe to be between the ages of 16 and 18, then a Child Protection referral should be completed. Statutory services will then determine whether the referral should be dealt with under child or adult protection processes.

In Scotland, the Child Protection Register refers to a confidential list of all children in a local authority who have been identified as being at risk of significant harm and are therefore subject to statutory oversight or intervention.

Any statutory agencies working with a child who is on the Register is aware of the urgent need for everyone to remain alert and act quickly to protect these children deemed at risk. Routinely, Wheatley Group staff would not be advised of a child being placed on the register unless this information was shared during case conferences, Multi-Agency Risk Assessment Conferences (MARAC), or at Disclosure Scheme Domestic Abuse Scotland (DS DAS) meetings, which our staff may attend. The Group Protection team will maintain a record of any child on the register whom we are aware of.

4. Types of Abuse & Neglect

Abuse and neglect are forms of child maltreatment. They may occur through direct actions or omissions that result in or fail to prevent significant harm. Abuse can happen within families, institutions, or, more rarely, by strangers.

All children have a fundamental right to care and protection. A child may require protection when their basic needs, such as food and warmth, are not met, or they may need protection from harm from other people.

The following categories of abuse and indicators are not exhaustive and should be used as guidance and not as a checklist.

Physical Abuse is the causing of physical harm to a child or young person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating. Physical harm can also happen when a parent or carer pretends a child is ill or deliberately makes them ill.

Possible signs of physical abuse:

- unexplained injuries or burns, particularly if they are recurrent;
- improbable excuses given to explain injuries;
- refusal to discuss injuries;
- untreated injuries or delay in reporting them;
- excessive physical punishment;
- arms and legs kept covered even in hot weather;
- fear of returning home;
- aggression towards others;
- running away; and
- administration of toxic substances.

Emotional Abuse is the persistent emotional neglect or ill-treatment of a child that causes severe and lasting harm to their emotional development. It may include:

- conveying to a child that they are worthless, unloved, or inadequate;
- valuing a child only insofar as they meet the needs of another;
- imposing age or developmentally inappropriate expectations; or
- causing the child to feel frightened, in danger, exploited, or corrupted.

Emotional abuse is often present in all forms of maltreatment, but it can also occur independently.

Possible signs of emotional abuse:

- low self-esteem;
- continual self-deprecation;
- sudden speech disorder/refusal to speak;
- fear of carers;
- severe hostility/aggression towards other children;
- significant decline in concentration span; and
- self-harm.

Sexual Abuse & Exploitation is any act involving a child in sexual activity for the gratification of another person, regardless of whether the child is said to have consented or assented. It includes:

- physical contact – penetrative or non-penetrative acts; or
- non-contact activities – exposure to indecent images, watching sexual acts, use of sexual language, or encouraging sexually inappropriate behaviour.

Child sexual exploitation is a form of sexual abuse where a person(s) of any age uses a power imbalance to force or entice a child into sexual activity in exchange for the sexual activity. The presence of perceived consent does **not** negate the abusive nature of the act.

Possible signs of sexual abuse or child sexual exploitation:

- sleep disturbances or nightmares;
- complaints of genital itching or pain;
- self-harm/eating disorders;
- unexplained pregnancy;
- acting in a sexually explicit manner;
- anxiety/depression/withdrawn;
- fear of undressing, e.g. for physical exercise;
- low self-esteem;
- inappropriate sexual awareness;
- running away;
- developmental regression; and
- lack of trust or over-familiarity with adults.

Online abuse is any type of abuse that happens on the internet. It can happen across any device that is connected to the web, like computers, tablets and mobile phones, and can happen anywhere online, including:

- social media;
- text messages and messaging apps;
- emails;
- online chats;
- online gaming; and
- live-streaming sites.

Children can be at risk of online abuse from people they know or from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse may only happen online.

A child or young person experiencing abuse online might:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media;
- seem distant, upset or angry after using the internet or texting;
- be secretive about who they are talking to and what they're doing online or on their mobile device; and
- have lots of new phone numbers, texts or email addresses on their devices.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may involve:

- failing to provide adequate food, shelter, and clothing;
- not protecting the child from physical harm or danger;
- failing to ensure access to appropriate medical care or treatment; or
- ignoring or failing to respond to the child's basic emotional needs.

In severe cases, neglect may result in a diagnosis of non-organic failure to thrive, where a child fails to reach normal growth or developmental milestones without a physical or genetic cause. In its extreme form, neglect can lead to malnutrition, lack of stimulation, and life-threatening consequences, especially for young children

Possible signs of neglect:

- constant hunger or inappropriate/erratic eating patterns;
- poor hygiene;
- constant tiredness;
- lack of adequate clothing;
- failure to seek appropriate/necessary medical attention; and
- unhygienic home conditions.

If a child says they're being abused, even if there are no visible signs, take it seriously and report it immediately to the appropriate authorities.

The above list is not exhaustive. Our customer facing staff are best placed to be able to recognise and respond quickly to signs of harm and are supported to do so. We also work with other services to provide extra support to children and families when needed.

5. Our Role in Child Protection

Child Protection is everyone's responsibility, not just those who work directly with children. Social Work and Police Scotland lead investigations, but they rely on others to report concerns.

As a housing, care, and property management provider, we may not investigate abuse, but we play a vital role in **recognising**, **responding** to, and **reporting** any concerns. Customer facing staff are best placed to recognise and respond to concerns of abuse or neglect and are supported to do so. **Appendix 1** sets out the process of staff are concerned that a child may be at risk of abuse or neglect.

Recognising signs of abuse or neglect

Our customer facing staff are well placed to identify children who may be at risk of abuse or neglect and are trained to remain alert and to identify concerns early.

We may learn that a child is at risk of abuse or neglect through:

- a parent or carer sharing a concern;
- information from someone else;
- observations by staff;
- insights from our customer information; and
- multi-agency meetings (e.g. Children's Hearings).

Sometimes, a child may tell us directly. No matter how we find out, we must act appropriately and safely. If you are unsure what to do, speak with your line manager or contact the Group Protection Team for support.

Responding to concerns of child abuse or neglect

Our customer facing staff will respond by reporting concerns and offering additional support to the child and family. There are clear processes in place to support staff to respond appropriately and report their concerns.

If someone shares a concern:

- we take it seriously, our role is to report, not investigate;
- we listen and avoid asking probing questions;
- we act quickly to offer help and refer to specialist services;
- we explain that the information must be passed on. This is linked to our requirement within legislation and our professional duty to act. Information will be shared in accordance with the rules for sharing personal data;
- we treat everyone with empathy and respect, and without judgement;
- we reassure the person they've done the right thing;
- if a child is in immediate danger, we call the emergency services. If there is any uncertainty, speak with your manager or the Group Protection Team, and
- we report to statutory agencies (local authority, police or health) following the guidance on making reports below. This is linked to our requirement within legislation and the duty of care that we have to protect children from the risk of harm.

Reporting concerns of child abuse or neglect

If you're worried about a child's safety, it's important to act quickly and follow the correct steps. Before making a report, you should ensure that you are following the rules regarding data sharing. Under UK GDPR and the Data Protection Act 2018, personal data may be shared without consent when necessary to safeguard a child. This includes situations where sharing is in the child's interests or required for public task. Consent is not required if a child is at risk of harm. However, the principles of Data Protection still apply. Any information shared must be necessary, proportionate and secure. See section 11 for further information.

Use the standard reporting templates and specific process to contact the Local Authority where the child lives or call the local authority to report concerns. An example of a Child Protection referral form (CP1) can be found appended to this policy (appendix 2).

If a crime may have or has been committed, report it to Police Scotland by calling 101 or 999, depending on the urgency.

Escalate any concerns to your line manager or to the Group Protection Team. For Wheatley Care, this may be to on-call outwith hours.

You can find contact details for all 32 council Child Protection Teams here: https://www.childprotection.scot/useful-links/council-social-work/

If a **neighbour or another person tells us a child is at risk**, we'll usually let the individual concerned know that we're reporting it if it is appropriate to do so, unless it's unsafe or not possible to do so. Staff should speak to their manager or the Group Protection Team if unsure.

Where there is a concern that a child is at risk of harm or neglect, consent does not need to be obtained to submit a referral to statutory agencies.

6. A Personalised Approach to Child Protection

At the heart of Child Protection guidance and procedures is ensuring the safety and wellbeing of children including protecting their human rights. We follow Scotland's national approach, Getting It Right for Every Child (GIRFEC), which means:

- offering the right help, at the right time, from the right people; and
- putting children's rights and wellbeing at the centre of everything we do (where relevant).

Our approach to Child Protection includes consideration of human rights in accordance with the Human Rights Act 1998, and children's human rights in line with the UNCRC (incorporation) (Scotland) Act 2024).

We tailor support to each family's needs by offering a diverse range of services and making referrals to specialist services. We ensure that each interaction is personal as we recognise that there is no one-size-fits-all approach.

We provide advice and practical solutions to improve home security and personal safety, including safety products and guidance on online safety. Where appropriate, safety apps can be demonstrated to help families stay protected.

If a family feels unsafe in their current home, we will respond and offer a Housing Options interview and work with partners to explore safer housing solutions.

Alongside these measures, we offer wraparound support to families who need extra assistance, ensuring they have access to the right services and resources to meet their needs.

7. Measuring our Impact

We will measure our impact in Child Protection by:

- monitoring the number of Child Protection referrals submitted; and
- reviewing referrals to understand emergent themes or hotspots of concern, which will then inform our work on Child Protection.

This approach will guide our future actions, enable us to allocate resources effectively and identify training and support needs.

8. Legislation & Strategic Drivers

This policy is based on key legislation, laws and guidance that protect children and support their rights:

- Social Work (Scotland) Act 1968
- Children (Scotland) Act 1995
- Children (Scotland) Act 2020
- Human Rights Act 1998
- Children's Hearings (Scotland) Act 2011
- Children and Young People (Scotland) Act 2014
- Data Protection Act 2018
- General Data Protection Regulation (Regulation (EU) 2016/679)
- Domestic Abuse (Scotland) Act 2018
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024
- National Guidance for Child Protection in Scotland (2021)
- Getting it Right for Every Child (GIRFEC)

9. Policy Review & Consultation

This policy has been developed in consultation with key stakeholders working in statutory agencies. The policy shall be reviewed every three years; however, more regular reviews will be considered where, for example, there is a need to respond to changes in legislation or guidance. Reviews will consider legislative, performance standard and good practice changes.

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Everyone working in our organisation has a duty to help protect children, young people, and adults who may be at risk. The law provides clear exemptions that allow information sharing for safeguarding purposes without consent.

Sometimes, we may need to share personal information with other organisations to keep someone safe. This must follow strict rules under data protection laws, including the Data Protection Act 2018 and General Data Protection Regulations GDPR. Data Protection should not be a barrier to sharing proportionate, necessary information for child protection and instead provides a framework to ensure information sharing is lawful, secure and documented.

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- the decision to share must be recorded, including the reason;
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Any requests for information should be shared with the Information Governance Team, who will check that there are data sharing agreements in place.

12. Equal Opportunities Statement

This Policy aligns the Group's Equity, Diversity and Inclusion (EDI) and Human Rights Policy. We recognise our pro-active role in valuing and promoting EDI and equity of opportunity by adopting and promoting fair policies and procedures.

We are committed to providing fair and equitable treatment for our stakeholders and will not discriminate against anyone on the grounds of race, ethnicity, nationality, language, religion, belief, age, sex, sexual orientation, gender reassignment, trans history, disability, marital status, pregnancy or maternity. We will endeavour to achieve fair outcomes for all.

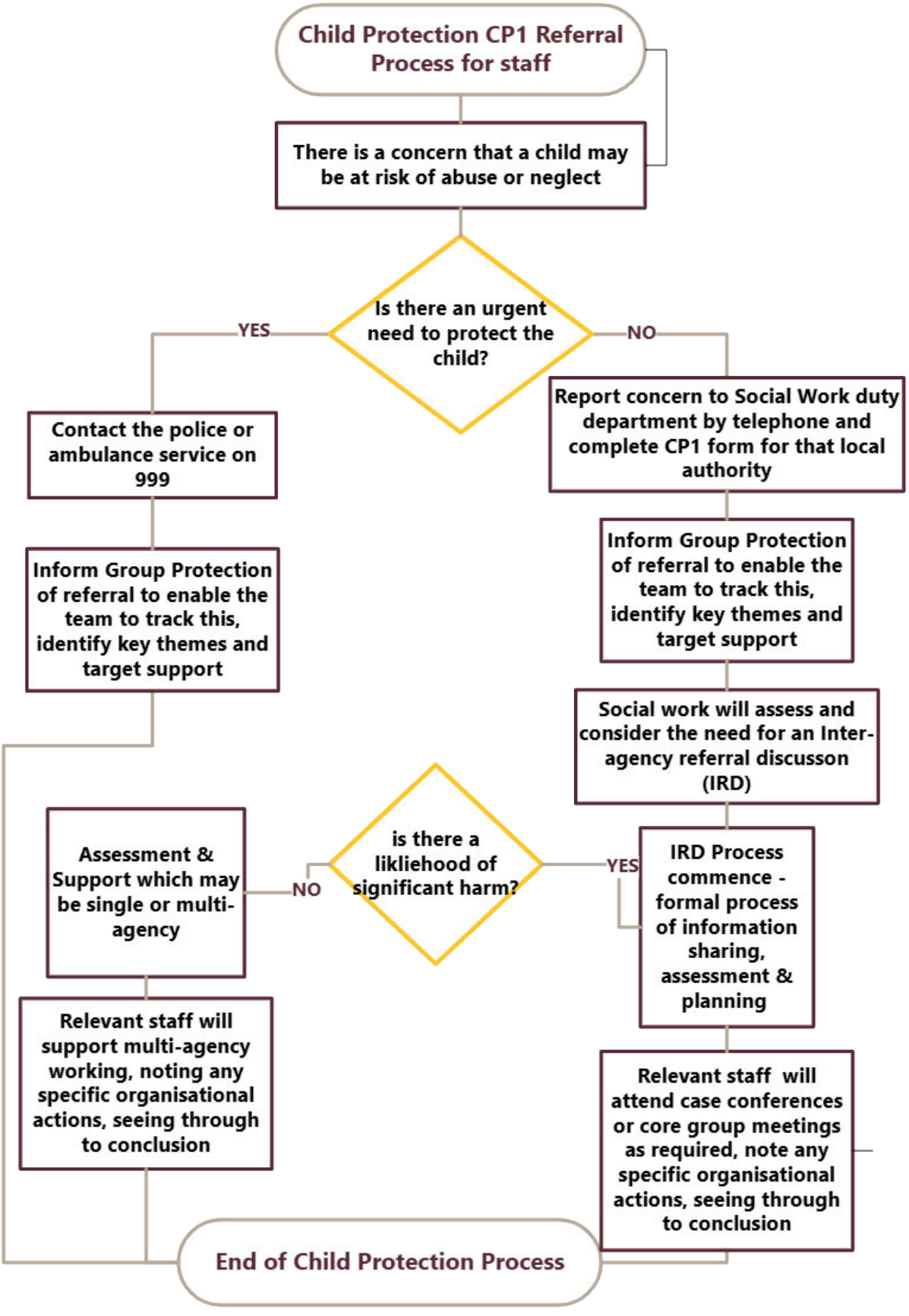
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A summary of our Complaints Policy and Procedure is available on our Wheatley Group and subsidiary websites.

Appendix 1


Child Protection CP1 Referral Process for staff
There is a concern that a child may be at risk of abuse or neglect
Is there an urgent need to protect the child?
YES
NO
Contact the police or ambulance service on 999
Report concern to Social Work duty department by telephone and complete CP1 form for that local authority
Inform Group Protection of referral to enable the team to track this, identify key themes and target support
Inform Group Protection of referral to enable the team to track this, identify key themes and target support
Social work will assess and consider the need for an Inter-agency referral discusson (IRD)
is there a likliehood of significant harm?
NO
YES
Assessment & Support which may be single or multi-agency
IRD Process commence - formal process of information sharing, assessment & planning
Relevant staff will support multi-agency working, noting any specific organisational actions, seeing through to conclusion
Relevant staff will attend case conferences or core group meetings as required, note any specific organisational actions, seeing through to conclusion
End of Child Protection Process

Appendix 2

Request for Assistance

Getting it right for every child

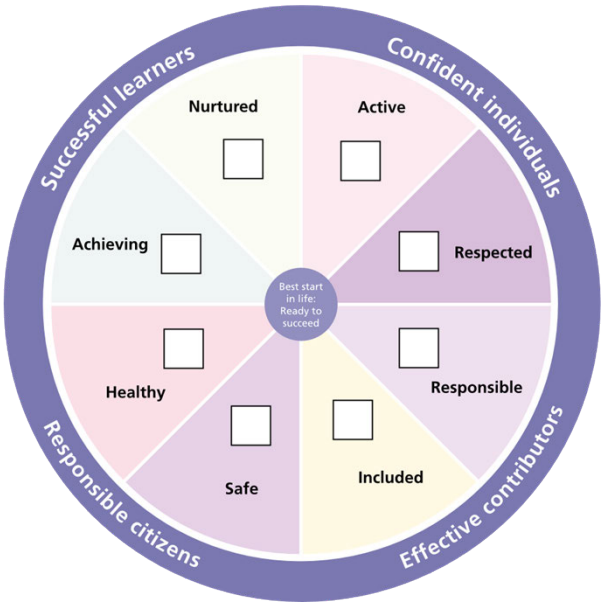
Is there an immediate child protection concern? If yes go straight to child protection procedures

☐ **Safeguarding Hub**

☐ **Please tick this box if you are identifying a 'Wellbeing**

1. Child's Details			
Name		**Agency Identifier**	
Date of Birth/EDD		**School**	
Address		**Telephone Number**	
Parents/Carer Name		**Parental Rights Responsibilities**	
Name of GP		**Named Person**	
LAC Status			

2. Form Completed By:		
Name:		
Designation/ Agency		
Contact Details	**Address:**	
	Tel No:	**Email:**



MAKE SURE YOU HIGHLIGHT THE WELLBEING INDICATORS THAT ARE CURRENTLY CAUSING CONCERN

http://www.gov.scot/Topics/People/Young-People/gettingitright/wellbeing

3. What Specifically Is The Concern?

4. How is this impacting on the child?

5. What assistance are you requesting?

6. What assessments/tools have you already undertaken to support your decision to request assistance? (what tools have you used)

7. What has your agency already done to help this child?

8. Full name/s of OTHER CHILDREN in the household, if known and significant to this request	DOB (EDD if unborn)	Relationship to the child

9. Information Sharing. The family should have been informed of this Request for Assistance Please record any relevant views from the child/ Parent/ Carer

Has consent been given by the Parent/Child/Carer for this Request?	Yes		No	

If not, why not?

Is the Named Person aware of this Request for Assistance?	Yes		No	

If no, why not?

10. Form Sent To:			
Name:		**Agency:**	
Date & Time:			
Signature		**Date**	

Wheatley Group

Making homes and lives better
wheatley-group.com

Group Multi Agency Public Protection Arrangements (MAPPA) 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 479 7979 or email info@wheatley-group.com

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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 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجانًا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضًا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Group Board*
Date of approval	*TBC*
Review Year	*Updated July 2022* *Updated March 2026*
Customer engagement required	*Yes, at Implementation*
Trade union engagement is required	*Yes – For info*
Equality Impact Assessment	*Yes*

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1. Introduction

This policy is part of a suite of policies designed to safeguard and protect people. This Multi-Agency Public Protection Arrangements (MAPPA) policy outlines how we support customers who are subject to MAPPA conditions and guides both customers and staff in understanding our responsibilities.

This policy should be read in conjunction with the following policies:

- Adult Support and Protection;
- Child Protection;
- Suicide Risk; and
- Domestic Abuse.

We work with the police, health services, local authorities and other agencies that have legal responsibility for managing these risks. Our role is to support them by sharing information, helping with allocation of housing, and making sure relevant staff are trained and confident in understanding the legal frameworks within which we work and our specific role in working with customers under MAPPA.

The Policy explains how we work with others to protect those at risk and support partner agencies whose responsibility it is to investigate abuse or neglect and provide support. As an organisation, we have a duty of care to report any concerns or disclosures about harm. Our staff play a key role in this by working directly with customers in their homes and communities. Through day-to-day contact, tenancy visits, repairs interactions, and routine customer conversations, staff are often well-placed to notice changes, pick up on early indicators of risk, and provide a safe environment for customers to share concerns. It is therefore our expectation that staff use these interactions to support the identification and reporting of harm, helping to safeguard our customers.

Staff will refer to this policy in the course of their work with Wheatley Group.

2. Policy Aims & Objectives

Our Aims

This policy has been designed to support RSL staff and customers in understanding our approach to MAPPA. The policy aims to support staff to:

- understand MAPPA legislation and national guidance;
- understand public protection and to work with statutory agencies to manage the risk of harm to the public from individuals managed under MAPPA;
- understand our role and duty to cooperate as an RSL to share information with Responsible Authorities (Police Scotland, Scottish Prison Service, and local authorities);
- understand our responsibility and role in risk assessment, considering the environmental risks associated with an offender's housing arrangements as well as the risk to the community; and
- uphold the wellbeing and rights of all those who use our services.

Our Objectives

For an effective approach to public protection and embedding protection into the services that we deliver, our objectives are to:

- make sure our policy and supporting processes are clear, practical and easily accessible;
- ensure relevant staff are aware of their role and responsibilities and that these are clearly defined;
- provide training to relevant staff so that they are confident and informed when working with individuals managed under MAPPA;
- strengthen processes to manage risks linked to high-risk offenders, especially across our RSL subsidiaries; and
- the Group Protection Team work closely with Responsible Authorities like Police Scotland and Social Work to meet our legal duty to cooperate within our RSL subsidiaries.

3. What is MAPPA?

The Multi Agency Public Protection Arrangements are a set of statutory partnership working arrangements introduced in 2007 by virtue of sections 10 and 11 of the Management of Offenders etc (Scotland) Act 2005.

The purpose of MAPPA is centred around a structured approach to public protection and managing the risk of serious harm. MAPPA is not a statutory body, but rather a mechanism through which the Responsible Authorities discharge their statutory responsibilities and protect the public in a coordinated manner.

The 2005 Act places a statutory duty on the Responsible Authorities within a local authority area to jointly establish arrangements for assessing and managing the risk posed by certain categories of offenders. MAPPA ensures that individuals who pose a risk are managed safely and fairly. It protects the public, supports rehabilitation and helps build safer communities.

Responsible Authorities

The main agencies responsible for MAPPA are known as the Responsible Authorities, comprising:

- Police Scotland;
- Local Authorities (Criminal Justice Social Work);
- Health Boards; and the
- Scottish Prison Service.

Categories of Offenders Managed Under MAPPA

MAPPA helps manage people who may pose a serious risk to others. Three main categories of offending fall under MAPPA, which are defined by law.
Registered Sex Offenders: these are individuals who have been convicted of certain sexual offences listed in Schedule 3 of the Sexual Offences Act 2003 and are legally required to register with the police and follow legal rules known as Sex Offender Notification Requirements (SONR). This group includes:

- those under Sexual Offences Prevention Orders (SOPOs); and
- those who have breached Risk of Sexual Harm Orders (RSHOs).

Mentally Disordered Restricted Patients: these are individuals who have committed an offence but, due to a mental health condition, are treated and rehabilitated in hospital instead of being sent to prison. They are managed under specific legal orders, including:

- patients who are detained following conviction under section 57A and section 59 of the Criminal Procedure (Scotland) Act 1995;
- patients who are detained under section 57(2)(a) and (b) of the Criminal Procedure (Scotland) Act 1995 Compulsion order with a Restriction Order following a finding of unfitness for trial or acquittal by reason of mental disorder; and
- prisoners detained in hospital on a Hospital Direction under section 59A of the Criminal Procedure (Scotland) Act 1995 or a transferred prisoner on a Transfer for Treatment Direction under section 136 of the Mental Health (Care and Treatment) (Scotland) Act 2003.

Restricted patients are managed under a compulsion order with a restriction order. They are ordered to be detained in a hospital for treatment, without limit of time. Additional oversight of their care and treatment is provided by the Scottish Government Mental Health Directorate.

Restricted patients may apply for housing as they prepare to leave the hospital and live in the community under supervision. Our housing process supports these individuals and ensures the most appropriate letting for tenancy sustainment and public protection.

Other High-Risk Offenders: this category was introduced in March 2016. It includes individuals who are not registered sex offenders or restricted patients, but:

- are under supervision in the community; and
- have been assessed as posing a high or very high risk of serious harm.

High risk offenders may apply for housing. Our housing process supports these individuals and ensures the most appropriate letting for tenancy sustainment and public protection.

4. Risk Management

MAPPA uses a structured approach to manage individuals who may pose a serious risk to others. There are three levels of risk management, depending on the level of concern and the support needed.

Level 1 – Routine Risk Management is managed by a single agency (e.g. Police or Social Work) using standard procedures.

Level 2 – Multi-Agency Risk Management requires regular coordination between agencies to manage more complex cases.

Level 3 – Multi-Agency Public Protection Panels (MAPPP) is used for the most serious cases where high-level planning and resources are needed.

The three management levels allow for a consistent approach to MAPPA. Cases should be managed at the lowest MAPPA level proportionate to delivering a defensible risk management plan designed to address the risk of serious harm posed by the offender.

Within each level, the Responsible Authorities must then determine the level of risk of serious harm posed by the offender, i.e. low, medium, high, or very high.

Risk Management Levels

Offender Category	Level 1 - Routine Risk Management	Level 2 - Multi agency Risk Management	Level 3 - Multi Agency Public Protection Panels
Registered Sex Offenders	X	X	X
Restricted Patients		X	X
Other High-Risk Offenders		X	X

Understanding Risk Levels

MAPPA uses four categories to assess the likelihood and impact of serious harm:

- **Very High** – The risk is imminent and likely to cause serious harm.
- **High** – There are clear signs that the person could cause serious harm at any time.
- **Medium** – The person could cause harm if circumstances change (e.g. loss of housing, relationship breakdown).
- **Low** – There is no current evidence to indicate a likelihood of causing serious harm.

Serious harm means violent or sexual behaviour that is life-threatening or traumatic, and recovery may be difficult or impossible. Many High or Very High risk cases are managed at level 2, unless they require senior management or exceptional resources.

The level at which an offender is managed, and their risk classification, can change. That's why strong information-sharing processes between Responsible Authorities are vital. This ensures that any changes are considered and that risk management plans remain effective and appropriate. Within the Wheatley Group, this is done through the Group Protection Team, who work closely with partner agencies to support keeping communities safe.

5. Our Role in MAPPA

Our RSLs have a legal duty to cooperate with Responsible Authorities and do not require consent to share this information to support public protection. While RSLs do not assess or manage risk directly, they support the Responsible Authorities to do so by:

- sharing housing information to help assess and manage risk;
- allocating housing that has been approved as suitable by the Responsible Authorities;
- working closely with partners to monitor, report and manage any risks linked to the offender's housing; and
- maintaining clear arrangements with the Sex Offender Liaison Officer (SOLO) and other Responsible Authorities to respond quickly if a property becomes unsuitable.

A staff toolkit will be developed to support staff in managing MAPPA cases, providing extensive support to enable them to effectively deal with any queries in relation to MAPPA.

Managing MAPPA

New Tenants: Our housing application asks applicants whether they or anyone in their household is a registered sex offender. If they are, this is coordinated centrally by our Group Protection Team and there is a clear process to follow that includes:

- liaising with Sex Offender Liaison Officers (SOLOs) to confirm MAPPA involvement; and
- ensuring housing decisions are made with safety and risk management in mind.

Restricted patients, those detained in hospital under mental health legislation, usually apply for housing as they prepare for discharge. These cases are:

- supported through a structured referral process by our Housing Options team; and
- are handled with care and attention.

For other High-Risk Offenders, we would become aware of an individual being managed under MAPPA through a formal notification process by the Responsible Authorities, via the Group Protection Team, who:

- exchanges information;
- identifies suitable housing; and
- manages housing-related risks in cooperation with the Responsible Authorities.

Environmental Risk Assessments: before offering housing to a registered sex offender or restricted patient, an Environmental Risk Assessment will be undertaken. If the Responsible Authorities advise that the risk cannot be safely managed at a specific address, the offer will not go ahead.

Allocation of a Property: when a registered sex offender or restricted patient moves into a property that has been assessed as safe and manageable, an alert is added to that property. This helps us carry out extra checks if a nearby property becomes available in the future.

We recognise that we cannot control every situation. For example:

- a neighbouring property may be privately owned or rented, and not part of our housing stock; or
- changes within neighbouring households, such as someone moving in or a tenant becoming pregnant, may happen without our knowledge.

In these cases, we aim to inform the Responsible Authorities as quickly as possible when we become aware of changes that could affect risk management.

This process helps us balance safety with fairness, ensuring that housing decisions are made responsibly and in partnership with Responsible Authorities.

Existing Tenants: if a tenant is convicted and becomes subject to MAPPA monitoring, we take steps to ensure their housing situation continues to support public safety:

- we share information with Responsible Authorities about the surrounding households, following our established protocols and guidance;
- if the Responsible Authorities assess that the current property is not suitable, we work with them and the tenant to explore alternative housing options; and
- aim to find a safe and manageable solution. This may include helping the tenant move to a different property where risks can be better controlled.

This process ensures that we respond quickly and responsibly to changes in risk, while continuing to support both the individual and the wider community.

National Accommodation Strategy for Sex Offenders (NASSO)

Stable housing and effective monitoring are key to reducing the risk posed by registered sex offenders managed under MAPPA. These individuals live in all types of housing across Scotland, and housing providers play an important role in supporting public safety.

NASSO is part of the MAPPA framework and outlines how housing organisations contribute to managing risk. It focuses on assessing whether a person's housing situation, location, property type, and community help to reduce the risk that they may pose.

Key Principles of NASSO

No blanket exclusions: registered sex offenders cannot be automatically excluded from housing. Everyone aged 16 and over in Scotland has the legal right to apply for housing and be added to the housing waiting list. Blocking access could increase risk, for example, by making it harder to monitor someone who goes missing.

No automatic priority: being a registered sex offender does not mean someone should be given priority for housing. However, if the Responsible Authorities assess that housing would help manage risk and improve public safety, an offer may be made. Any decision to provide housing for a registered sex offender is made in the context of managing risk and improving public safety.

Local housing first: offenders should usually be housed in mainstream housing within the local authority area where they come from. In exceptional cases, they may be housed elsewhere if it helps manage risk more effectively.

This strategy ensures that housing decisions are made fairly, legally, and with public safety in mind.

Access to Housing

We are committed to making our housing services safe, fair, and accessible for all, including individuals managed under MAPPA. To ensure our housing lists are as accessible as possible:

- we help registered sex offenders in temporary accommodation express interest in suitable properties; and
- support restricted patients in doing the same, especially when a referral under Section 5 of the Housing (Scotland) Act 2001 has been accepted.

This approach ensures that housing decisions are made safely, fairly, and in partnership with Responsible Authorities.

Public interest in Registered Sex Offenders

When a registered sex offender's status becomes public, sometimes the identity or location of a registered sex offender managed under MAPPA becomes known in the community. This can happen through:

- news or social media;
- community awareness;
- self-disclosure; or
- vigilante groups.

When this occurs, we have a coordinated approach. Through our Group Protection Team we liaise with Responsible Authorities to assess the situation and agree on the best course of action.

If it's decided that the offender (and their family, if applicable) can no longer safely remain in the property:

- a housing options approach is used to assess risk and explore alternative accommodation with partner agencies; and
- if a Band A Management Transfer is recommended, staff must follow the Band A guidance for MAPPA cases.

If the offender chooses to stay, or it's considered safe for them to do so by the Responsible Authorities:

- we will offer wraparound support through services like the Safe and Secure service;
- we will offer and provide additional safety measures, such as door chains or security lighting, and
- the Responsible Authorities may add a STORM marker to the property, ensuring that any police calls receive a priority response.

This process helps protect both the individual and the wider community, ensuring safety is managed with care and professionalism.

Keeping Children Safe – Disclosure Scheme

The Disclosure Scheme was introduced in Scotland in 2011 and is managed by Police Scotland. It allows members of the public to request information about someone who has access to a child, if they are concerned that the person may pose a risk to the child's safety or wellbeing. This scheme is an important part of Child Protection, and efforts continue to raise public awareness of it.

If a registered sex offender's status becomes known in the community, staff can:

- inform concerned customers about the Keeping Children Safe scheme; and
- direct them to official resources for more information and guidance.

This can help reassure the public and ensure concerns are handled appropriately.

Full details of the scheme are available on the Police Scotland website:

https://www.scotland.police.uk/advice-and-information/child-abuse/the-sex-offender-community-disclosure/

If there is an immediate threat or risk of harm to a customer, staff must always contact the police by calling 101 or 999, depending on the urgency.

Information Sharing

We work with MAPPA partners to create and regularly review information-sharing protocols. These protocols ensure that all agencies understand their legal responsibilities under:

- General Data Protection Regulation (GDPR);
- Data Protection Act 2018; and
- Other relevant legislation.

Our non-RSL subsidiaries are not legally required to cooperate under MAPPA. If these teams receive a request for information, it must be passed to our Information Governance Team, who will review it in line with data protection laws (GDPR and the Data Protection Act 2018).

Information sharing with private landlords is handled by the police, who decide what to share on a case-by-case basis. If these teams receive a request for information, it must be referred to the Information Governance Team, which will assess the request in line with data protection laws.

We provide clear guidance and procedures for staff to follow when sharing information. This approach ensures that information is shared safely, legally, and effectively, supporting public protection while respecting privacy. See section 11 for further information.

6. A Personalised Approach to MAPPA

We adopt a personalised approach to supporting MAPPA customers, ensuring that they receive the support they need in a way that respects their circumstances and promotes safety for everyone.

This involves working with Responsible Authorities, ensuring that risk management plans are tailored to the specific risks, needs, and circumstances of each offender, using information from various agencies to coordinate monitoring, supervision, treatment, and intervention strategies. This personalised approach supports rehabilitation and helps individuals settle safely into the community.

This approach is based on creating a balance of preventative, supportive, and contingency measures within a shared risk management plan that is regularly reviewed for effectiveness and appropriateness.

We recognise that customers managed under MAPPA may face extra challenges, such as:

- restrictions that limit access to online services; and
- complex needs linked to safety, rehabilitation, or legal conditions.

We will tailor our services to support individuals in overcoming these challenges within the confines of the law and consider any requests for reasonable adjustments in line with the Equality Act 2010.

We also tailor support for restricted patients who may face barriers when preparing to return to the community. To support this transition, we can:

- offer in-hospital interviews to guide them through the housing process; and
- support individuals to express interest in properties and navigate each stage of their application.

Our approach to MAPPA includes consideration of human rights in accordance with the Human Rights Act 1998, as well as considering any children's human rights in line with the UNCRC (incorporation) (Scotland) Act 2024 (where applicable.

We provide advice and practical solutions to improve home security and personal safety, including safety products and guidance on online safety. Where appropriate, safety apps can be demonstrated to help individuals stay protected.

If an individual feels unsafe in their current home, we will respond and offer a Housing Options interview and work with partners to explore safer housing solutions. We will also refer to our Anti-Social Behaviour Policy when needed.

Alongside these measures, we offer wraparound support to individuals who need extra assistance, ensuring they have access to the right services and resources to meet their needs.

7. Measuring our Impact

We will measure our impact in MAPPA by:

- monitoring the number of customers and housing applicants who are subject to MAPPA;
- monitoring the number of cases managed by MAPPA that progress from temporary accommodation to a permanent housing solution, particularly when a referral under Section 5 of the Housing (Scotland) Act 2001 has been accepted; and
- monitor tenancy sustainment for customers subject to MAPPA;

We will use this data to:

- identify trends and patterns in MAPPA-related activity;
- inform decisions about resource allocation;
- highlight training and support needs for staff; and
- strengthen our engagement with Responsible Authorities, especially around housing and risk management under MAPPA and NASSO.

This approach ensures we continuously improve our services and maintain high standards in safeguarding and public protection.

8. Legislation

This policy is based on key Scottish laws and guidance relevant to areas of protection:

- Management of Offenders etc (Scotland) Act 2005
- Children (Scotland) Act 1995
- Children (Scotland) Act 2020
- Children and Young People (Scotland) Act 2014
- Adult Support and Protection (Scotland) Act 2007
- Abusive Behaviour and Sexual Harm (Scotland) Act 2016
- General Data Protection Regulation (Regulation (EU) 2016/679)
- Human Rights Act 1998
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024
- Data Protection Act 1998
- Housing (Scotland) Act 2001
- Housing (Scotland) Act 2014
- Criminal Procedure (Scotland) Act 1995
- Scottish Government MAPPA National Guidance 2022
- Scottish Government National Accommodation Strategy for Sex Offenders 2019

9. Policy Review & Consultation

This policy has been developed in consultation with key stakeholders working in statutory agencies. The policy shall be reviewed every three years; however, more regular reviews will be considered where, for example, there is a need to respond to changes in legislation or guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our staff intranet, WE Connect, and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages, e.g. Braille.

10. Policy Awareness & Training

Staff across the organisation will be aware of the existence of this policy and of the requirement to apply the process contained within when a customer or applicant is subject to MAPPA. Relevant customer facing staff will be trained in MAPPA policy and processes.

11. Confidentiality & Data Protection

Everyone working in our organisation has a duty to help protect children, young people, and adults who may be at risk.

Sometimes, we may need to share personal information with other organisations to keep someone safe. This must follow strict rules under data protection laws, including the Data Protection Act 2018 and the General Data Protection Regulations GDPR.

Before sharing any information:

- staff must check the Wheatley Group's Data Protection Policy (especially Appendix 2);
- staff must be satisfied that data sharing complies with the General Data Protection principles in Article 5 UK GDPR and that there is a lawful basis for sharing the data;
- the decision to share must be recorded, including the reason;
- information should only be shared on a "need to know" basis; and
- an audit trail must be kept.

We recognise that MAPPA can include very sensitive information. If staff are unsure, they should speak to the Wheatley Group Information Governance Team for advice on data protection issues that arise from MAPPA concerns and reports and to ensure that any data sharing is in accordance with the UK GDPR, the Data Protection Act 2018 and the requirements of the Wheatley Group's Data Protection Policy and the Group's Special Category Data Policy. This is essential for non-RSL subsidiaries as there is no duty to cooperate.
This ensures that we protect individuals' privacy while fulfilling our duty to keep people safe.

Any requests for information should be shared with the Information Governance Team, who will check that there are data sharing agreements in place.

12. Equal Opportunities Statement

This Policy aligns the Wheatley Group's Equity, Diversity and Inclusion (EDI) and Human Rights Policy. We recognise our pro-active role in valuing and promoting EDI and equity of opportunity by adopting and promoting fair policies and procedures.

We are committed to providing fair and equitable treatment for our stakeholders and will not discriminate against anyone on the grounds of race, ethnicity, nationality, language, religion, belief, age, sex, sexual orientation, gender reassignment, trans history, disability, marital status, pregnancy or maternity. We will endeavour to achieve fair outcomes for all.

As required, we undertake Equality Impact Assessments on relevant policies, strategies, projects and frameworks to help us take appropriate action to address inequalities likely to result from or resulting from the implementation of the policy and procedures and to maximise positive impacts.

13. Complaints

We aim to get things right the first time. However, if a customer is unhappy with this policy or how it's applied, they can make a complaint.

A summary of our Complaints Policy and Procedure is available on our Wheatley Group and subsidiary websites.

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Group Domestic Abuse Policy

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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 479 7979 lub wyślij e-mail na adres 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 479 7979 ou envie um e-mail para: info@wheatley-group.com

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Trade union engagement is required	*Yes – For info*
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1. Introduction

This policy is part of a suite of policies designed to safeguard and protect people. This Domestic Abuse Policy outlines how we will support customers who are either a victim, survivor or perpetrator of domestic abuse and guides both customers and staff in understanding our responsibilities and approaches.

This policy should be read in conjunction with the following policies:

- Adult Support & Protection;
- Child Protection;
- Multi-Agency Public Protection Arrangements (MAPPA); and
- Suicide Risk

As a housing, care and property management provider, we engage with our customers frequently, placing us in a strong position to offer early support if someone discloses that they have been subject to domestic abuse or if we recognise signs of abuse. We know that the majority of domestic abuse incidents occur in a home or dwelling. This highlights the vital role housing providers play in tackling domestic abuse.

We take all reports seriously and offer person-centred support to victims and survivors. We also recognise the importance of supporting perpetrators who want to change their behaviour, helping them access housing, financial support, and employment opportunities.

We also support staff affected by domestic abuse and have a dedicated staff policy.

The Policy explains how we work with others to protect those at risk or experiencing domestic abuse and support partner agencies whose responsibility it is to investigate abuse or neglect and provide support. As an organisation, we have a duty of care to report any concerns or disclosures about harm. Our staff play a key role in this by working directly with customers in their homes and communities. Through day-to-day contact, tenancy visits, repairs interactions, and routine customer conversations, staff are often well-placed to notice changes, pick up on early indicators of risk, and provide a safe environment for customers to share concerns. It is therefore our expectation that staff use these interactions to support the identification and reporting of harm, helping to safeguard our customers.

Staff will refer to this policy in the course of their work with Wheatley Group.

2. Policy Aims & Objectives

Our Aims

Domestic abuse continues to be a serious issue affecting our communities. In 2023–2024, 63,867 incidents were reported to Police Scotland, with 81% of victims being female and a male identified as the suspected perpetrator[1]. However, these figures only reflect reported cases, and many incidents go unreported. Victims often experience abuse multiple times before contacting the police.

This policy has been designed to support staff and customers in understanding our approach to domestic abuse and sets out our commitment to customers who are experiencing, or are concerned about, another individual affected by domestic abuse. The policy aims to support staff to:

- understand domestic abuse legislation;
- recognise the impact that domestic abuse has on the abused person and their family;
- ensure that individuals experiencing or at risk of domestic abuse are aware of the range of support services available to them;
- effectively support those at risk of or affected by domestic abuse;
- uphold the wellbeing and rights of all those who use our services; and
- effectively make referrals to other agencies.

Our Objectives

For an effective approach to managing domestic abuse to be embedded, our objectives are to:

- make sure our policy and supporting processes are clear, practical and easily accessible;
- ensure that relevant staff are aware of their role and responsibilities and that they are clearly defined;
- provide training to relevant staff so that they can confidently recognise and support someone who is at risk or is affected by domestic abuse;
- build partnerships with specialist agencies who can provide specialist support to individuals experiencing domestic abuse, as well as agencies providing rehabilitative support to the perpetrator through regular structured contact;
- identify risks early and make referrals under the Disclosure Scheme for Domestic Abuse Scotland (DSDAS); and
- raise awareness across the organisation and in our communities, focusing on education about the prevalence of abuse, encouraging people to take action to promote social change and to alert individuals affected by domestic abuse to the options and resources available to them.

3. What is Domestic Abuse?

Domestic abuse can happen to anyone. While women and girls are disproportionately affected, abuse can happen - regardless of gender, age, disability, race, religion, sexual orientation, or relationship status.

This policy adopts the nationally agreed definition of domestic abuse as used by the Scottish Government, as:

Any form of physical, verbal, sexual, psychological, or financial abuse including coercive control, occurring within a relationship context, perpetrated by a partner or ex-partner which may amount to criminal conduct. It includes:

- physical abuse: assault and physical attacks involving a range of behaviours;
- sexual abuse: acts that degrade and humiliate women and are carried out against their will, including rape; and
- mental and emotional abuse: threats, verbal abuse, racial abuse, withholding money, and other controlling behaviours such as isolating someone from their family or friends.

This definition recognises that domestic abuse is not limited to physical violence. It includes a wide range of behaviours intended to exert power and control over another person, often leaving lasting emotional and psychological harm.

A common feature of domestic abuse is **coercive and controlling behaviour**. This means using tactics like emotional manipulation, isolation, and intimidation to gain power over someone. These behaviours often happen alongside or instead of physical violence.

Legal Protections in Scotland

- Domestic abuse is a criminal offence in Scotland. The **Domestic Abuse (Scotland) Act 2018** recognises coercive control as a behaviour that will be prosecuted, even when there has been no physical violence.
- The **Domestic Abuse (Protection) (Scotland) Act 2021** was introduced to strengthen protections for victims, especially those living with their abuser. This law allows for **immediate short-term protection** to help victims stay safe while deciding what to do next. It also gives **social landlords** the power to apply to the court to end the tenancy rights of someone abusive in a sole tenancy or end their interests in a joint tenancy, making it possible for the victim to remain in the home should this be their wish.

Guidance from the Scottish Government on how to enact this law is expected in late 2025, with the Housing (Scotland) Bill also addressing Domestic Abuse, ensuring that social landlords provide better support to tenants affected by domestic abuse. Our policies and procedures will thereafter be updated accordingly.

Domestic abuse can take many forms. Below are some common types, with examples of behaviours that may be involved:

Physical Abuse includes all types of assault and physical attacks, such as:

- hitting, punching, kicking, or burning;
- choking or strangulation;
- using objects to cause harm; and
- any form of physical assault.

Sexual Abuse includes a wide range of acts such as:

- unwanted sexual contact or demands;
- sexual name-calling or humiliation;
- using threats, force, or intimidation to obtain sex;
- inflicting pain during sex or combining sex with violence; and
- forcing someone to engage in sexual acts against their will, including rape.

Psychological or Emotional Abuse includes:

- threats of violence or harm;
- constant criticism, name-calling, or verbal abuse;
- controlling where someone goes, who they see, or what they do;
- isolating someone from friends, family, or support networks;
- accusations of infidelity or threats to share private images (e.g. “revenge porn” or intimate image abuse); and
- threatening to reveal personal information (e.g. sexual orientation or health status).

This type of abuse often involves:

- humiliation and degradation;
- making the victim dependent on the abuser; and
- controlling behaviour and limiting independence.

Economic or Financial Abuse includes:

- controlling access to money or bank accounts;
- forcing someone to explain every expense;
- running up debts in the victim's name;
- controlling how money is spent;
- preventing the victim from working or studying;
- controlling access to transport and technology as well as property; and
- stealing money or putting all assets in the abuser’s name (e.g. sole tenancy).

Stalking and Harassment includes:

- repeated unwanted contact (calls, texts, emails);
- an increase in threatening behaviour;
- turning up uninvited at home or work; and
- monitoring someone's movements or online activity.

Coercive Control is a pattern of behaviour used to dominate and frighten someone. It may not leave physical marks, but it can have a serious and lasting impact. Coercive and controlling behaviour is at the heart of domestic abuse and can have a significant and long-lasting impact that restricts a person's freedom.

Examples include:

- isolating someone from friends and family;
- controlling what they wear, where they go, or when they sleep;
- monitoring their time or online activity;
- using online communication tools or spyware to monitor movements;
- depriving them of food, medical care, or other basic needs;
- repeatedly putting them down or making them feel worthless;
- humiliating or degrading them;
- controlling their finances; and
- making threats or using intimidation.

4. Our Role in Domestic Abuse

As a leading housing, care and property management provider, we play a vital role in responding to domestic abuse. Our focus is on:

- raising awareness;
- identifying abuse early; and
- providing tailored support that meets the needs and ensures the safety of those affected.

Domestic Abuse, Stalking, and Honour-based Violence Risk Identification Checklist (DASH RIC), is a risk assessment tool regularly used by professionals to identify high-risk cases of domestic abuse, stalking or honour-based violence, once current abuse is disclosed, to ensure victims receive the appropriate support and are referred to MARAC.

Once domestic abuse has been disclosed to our staff, the member of staff should liaise with the Group Protection team, who will check with the Domestic Abuse Investigation Unit (DAIU) to determine if either the victim or the perpetrator is known to them. We will also confirm if the victim has been referred to MARAC.

For the majority of our customers, statutory agencies or independent domestic abuse advocacy agencies (IDAAs) will have completed the DASH RIC. However, if not done by agencies, then the customer-facing staff should complete the DASH with support from the Group Protection Team if required. A copy of the Dash can be found on the staff Intranet under Protecting People, as well as **Appendix 1** of this policy. Once the DASH has been completed, this should thereafter be forwarded to the Group Protection Team, who will take the required action.

Responding to Domestic Abuse

Once domestic abuse is identified in one of our properties, our staff will:

- engage with the customer;
- offer access to our internal wraparound support services such as Housing Options, financial wellbeing support or safe and secure services; and
- refer or signpost to specialist agencies using established referral pathways with consent of the individual.

In some cases, it may be appropriate to report concerns to:

- Police Scotland; and
- Local Authority Social Work Departments.

Before making a report, we will ensure that we are following the rules regarding data sharing. Where there are adult or child protection concerns, consent for the sharing of information does not need to be sought if there is a safeguarding concern. However, the principles of Data Protection apply. Any information shared must be necessary, proportionate and secure. See section 10 for further information.

We may become aware of domestic abuse through:

- a customer telling us directly;
- a third-party sharing concerns;
- participation in multi-agency forums such as Multi-Agency Risk Assessment Conference (**MARAC**), Multi-Agency Tasking and Coordination (**MATAC**) or Disclosure Scheme for Domestic Abuse Scotland (**DSDAS)**;
- staff observations; and
- insights from our customer information.

If someone tells us they are experiencing domestic abuse, they can expect:

- we will believe them;
- we act quickly to offer help and support;
- we will create a safe environment for discussions relating to domestic abuse and can offer options like same-sex staff or translation services;
- we treat everyone with empathy and respect, and without judgment;
- we gain consent to make referrals to specialist services;
- we will ensure careful handling of perpetrator contact, ensuring the victim is not blamed or put at further risk; and
- we explain that while we keep things confidential as far as practicably possible, we may need to share information with social work or police to keep people safe.

Reporting Concerns – our staff will share relevant information with Police Scotland. This is done through secure and agreed procedures and helps support the safety of individuals affected by domestic abuse.

The Police should be called when someone is in immediate danger. In such cases, staff must:

- call **999** in emergencies; and
- call **101** for non-emergencies.

If a **neighbour, another person, or the victim discloses a concern**, we'll usually let the individual concerned know that we're reporting it if it is appropriate to do so, unless it's unsafe or not possible to do so. Staff should speak to their manager or the Group Protection Team if unsure.

Working with Police Scotland - we work closely with Police Scotland's Domestic Abuse Investigation and Safeguarding Units in areas where we operate. Information is shared securely.

This partnership, however, does not replace the need to call the police if someone is at immediate risk.

Special Bail Conditions - courts can impose special bail conditions to protect victims during legal proceedings. These may include:

- banning the perpetrator from contacting the victim;
- restricting access to certain locations; and
- electronic monitoring.

If staff become aware of a breach of these conditions, they must report it to the Police immediately via **101** or **999**, depending on the situation.

It is the responsibility of Police Scotland to enforce special bail conditions. The Police may carry out unannounced visits or make regular enquiries to ensure that the perpetrator does not contact anyone named within the special bail conditions.

Non-Harassment Orders (NHOs) are a court order that prevents a perpetrator from contacting or approaching the victim. It can be issued:

- by a civil court; or
- after a criminal conviction.

Breaching an NHO is a criminal offence. Any suspected breach must be reported to the police immediately via 101 or 999, depending on the circumstances.

Children and Domestic Abuse - the National Guidance for Child Protection in Scotland (2021) recognises domestic abuse as a serious risk factor for children and young people. Children living in households where domestic abuse occurs are at increased risk of significant harm. This harm may result from:

- witnessing abuse;
- being directly abused; and
- living in a disrupted and unsafe environment.

Even if children do not see or experience the abuse directly, it can still affect their emotional, mental, and physical wellbeing. Domestic abuse can undermine a child's sense of safety and stability.

If children are involved:

- staff must assess whether to report concerns to Social Work or Police Scotland in line with the Child Protection Policy; and
- the Group Protection Team should be consulted for advice and support.

Adults at Risk and Domestic Abuse - Some adults affected by domestic abuse may also be considered adults at risk under the Adult Support and Protection (Scotland) Act 2007. This is determined using what's known as the three-point test.

An adult (aged 16 or over) may be at risk if they:

- cannot protect their own wellbeing or rights;
- are at risk of harm; and
- are more vulnerable to harm due to disability, illness, or mental health conditions.

If staff believe that an adult at risk meets the three-point test:

- they should report the concern to Social Work or Police Scotland, following the Adult Support and Protection Policy; and
- the Group Protection Team should be consulted for advice and support.

Multi-Agency Forums – We are recognised as a key strategic partner in the multi-agency response to domestic abuse. Through our Group Protection Team, we actively participate in various forums across the areas where we operate.

These forums allow us to:

- share intelligence and information with other agencies;
- coordinate support for customers affected by domestic abuse; and
- strengthen partnerships to improve safety and outcomes.

By working together with police, social services, and specialist organisations, we ensure that our response is informed, proactive, and aligned with best practice.

Preventative measures

The Disclosure Scheme for Domestic Abuse Scotland (DSDAS) was introduced across Scotland on 1st October 2015. It provides a formal way for individuals to find out if their partner has a history of abusive behaviour.

Partners who are concerned about their relationship, or relatives, friends, or professionals who are worried about someone's safety can make a request.

If the request is considered necessary, lawful, and proportionate, the person at risk, or someone best placed to protect them, will be given the relevant information.

Police Scotland can also proactively inform individuals if they are at risk of abuse from their partner.

The scheme helps people make informed decisions about their relationships and provides support and guidance to those who may be at risk.

Our role is to:

- actively promote DSDAS to both staff and customers;
- if concerned for a tenant's safety, staff can submit a referral with support from the Group Protection Team;
- the Group Protection Team participate in multi-agency meetings related to DSDAS across our housing areas; and
- the identity of the person making the request is never disclosed.

5. A Personalised Approach to Domestic Abuse

We adopt a personalised approach to domestic abuse, tailoring services to each customer's needs. We will ensure that individuals feel empowered to make their own decisions, promoting their choice and control in their lives. To support this approach, we will focus on the following key actions:

- seeking the person's views at the earliest opportunity, focusing on their needs and choices;
- supporting the development of strength-based safety plans in partnership with Independent Domestic Abuse Advocacy services and other specialist services;
- offering holistic and practical support by signposting to specialist services;
- supporting the rehabilitation of perpetrators; and
- consideration of any reasonable adjustment in line with the Equality Act 2010.

Our approach to domestic abuse includes consideration of human rights in accordance with the Human Rights Act 1998, as well as considering any children's human rights in line with the UNCRC (incorporation) (Scotland) Act 2024 (where applicable.

As a housing, care and property management provider, we are uniquely placed to identify early warning signs and act promptly to protect and support our customers.

We understand that leaving an abusive relationship can be complex and may involve multiple attempts. We will assist customers to re-engage with support whenever they need it, without judgment.

We have a dedicated team which focuses on both strategic planning and day-to-day support. They work with local partners and attend multi-agency meetings to ensure coordinated and informed responses to domestic abuse.

We provide advice and practical solutions to improve home security and personal safety, including safety products and guidance on online safety. Where appropriate, safety apps can be demonstrated to help individuals stay protected.

If an individual feels unsafe in their current home, we will respond and offer a Housing Options interview and work with partners to explore safer housing solutions. We will also refer to our Anti-Social Behaviour Policy when needed.

Alongside these measures, we offer wraparound support to individuals who need extra assistance, ensuring they have access to the right services and resources to meet their needs.

Support for People Leaving Abusive Relationships

Whether the person leaving is a victim or perpetrator, we aim to make their move to a new home as smooth as possible. We provide support before, during, and after the move.

In urgent and extreme cases, we may offer a management transfer—a process that allows an existing Wheatley tenant to move to another property. This is used to avoid homelessness and prioritise safety. Tenants in this priority band are matched to suitable homes in safer areas, as outlined in our Housing Information, Advice and Letting Policy.

Our wraparound Support is available to customers, providing practical help and support as required.

6. Measuring our Impact

We will measure our impact on domestic abuse and ensure that our domestic abuse response is effective by:

- tracking and analysing domestic abuse cases across the organisation;
- identify trends to inform future planning and decision-making;
- allocate resources where they are most needed;
- review the referrals made to our safe and secure service and our wrap-around support, ensuring that vulnerable customers have access to the right support at the right time; and
- track the number of management transfers due to domestic abuse.

This approach ensures we continuously improve our services and remain responsive to the needs of our customers and communities.

7. Legislation

This policy is based on key Scottish laws, guidance and strategies relevant to areas of protection and domestic abuse:

- Domestic Abuse (Scotland) Acts 2011 & 2018
- Matrimonial Homes (Family Protection) (Scotland) Act 1981
- Family Law (Scotland) Acts 1985 & 2006
- Protection from Harassment Act 1997
- Protection from Abuse (Scotland) Act 2001
- Adult Support and Protection (Scotland) Act 2007
- Criminal Justice and Licensing (Scotland) Act 2010
- Abusive Behaviour and Sexual Harm (Scotland) Act 2016
- Antisocial Behaviour etc. (Scotland) Act 2004
- Human Rights Act 1998
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024
- General Data Protection Regulation (EU 2016/679)
- Data Protection Act 2018
- Housing (Scotland) Acts 2001 & 2014
- Domestic Abuse (Protection) (Scotland) Act 2021 – *Received Royal Assent on 5 May 2021 but is not yet in force. This law will significantly strengthen the role of housing providers in protecting victims.*

- **Equally Safe (Scottish Government Strategy, 2018) -** a national commitment to end violence against women and girls. It recognises that while men can be affected, women and girls are disproportionately impacted by domestic abuse.

- **Domestic Abuse: A Good Practice Guide for Social Landlords -** Developed by the Association of Local Authority Chief Housing officers (ALACHO), the Chartered Institute of Housing (CIH), the Scottish Federation of Housing Associations (SFHA), Shelter Scotland, and Scottish Women's Aid, and supported by COSLA.

This guide helps social landlords:

- prevent homelessness for women and children;
- provide effective support for victims; and
- hold perpetrators accountable.

8. Policy Review & Consultation

This policy has been developed in consultation with key stakeholders working in statutory agencies. The policy shall be reviewed every three years; however, more regular reviews will be considered where, for example, there is a need to respond to changes in legislation or guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our staff intranet, WE Connect, and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages, e.g. Braille.

9. Policy Awareness & Training

Staff across the organisation will be aware of the existence of this policy and of the requirement to apply the process contained within when an adult has been identified as being a victim or perpetrator of domestic abuse. Customer facing staff will be trained in domestic abuse policy and process.

10. Confidentiality & Data Protection

Everyone working in our organisation has a duty to help protect children, young people, and adults who may be at risk. The law provides clear exemptions that allow information sharing for safeguarding purposes without consent.

Sometimes, we may need to share personal information with other organisations to keep someone safe. This must follow strict rules under data protection laws, including the Data Protection Act 2018 and the General Data Protection Regulations GDPR. Data Protection should not be a barrier to sharing proportionate, necessary information for either adult or child protection and instead provides a framework to ensure information sharing is lawful, secure and documented.

Before sharing any information:

- staff must check the Wheatley Group's Data Protection Policy (especially Appendix 2);
- staff must be satisfied that data sharing complies with the General Data Protection principles in Article 5 UK GDPR and that there is a lawful basis for sharing the data;
- the decision to share must be recorded, including the reason;
- information should only be shared on a "need to know" basis; and
- an audit trail must be kept.

We recognise that domestic abuse can include very sensitive information. If staff are unsure, they should speak to the Wheatley Group Information Governance Team for advice on data protection issues that arise from concerns of Domestic Abuse and to ensure that any data sharing is in accordance with the UK GDPR, the Data Protection Act 2018 and the requirements of the Group's Data Protection Policy and the Group's Special Category Data Policy.

Any requests for information should be shared with the Information Governance Team, who will check that there are data sharing agreements in place.

11. Equal Opportunities Statement

This Policy aligns the Wheatley Group's Equity, Diversity and Inclusion (EDI) and Human Rights Policy. We recognise our pro-active role in valuing and promoting EDI and equity of opportunity by adopting and promoting fair policies and procedures.

We are committed to providing fair and equitable treatment for our stakeholders and will not discriminate against anyone on the grounds of race, ethnicity, nationality, language, religion, belief, age, sex, sexual orientation, gender reassignment, trans history, disability, marital status, pregnancy or maternity. We will endeavour to achieve fair outcomes for all.

As required, we undertake Equality Impact Assessments on relevant policies, strategies, projects and frameworks to help us take appropriate action to address inequalities likely to result from or resulting from the implementation of the policy and procedures and to maximise positive impacts.

12. Complaints

We aim to get things right the first time. However, if a customer is unhappy with this policy or how it's applied, they can make a complaint.

A summary of our Complaints Policy and Procedure is available on our Wheatley Group and subsidiary websites.

Appendix 1

Please explain that the purpose of asking these questions is for the safety and protection of the individual concerned. Tick the box if the factor is present. Please use the comment box at the end of the form to expand on any answer. It is assumed that your main source of information is the victim. If this is not the case, please indicate in the right hand column	YES	NO	DON'T KNOW	State source of info if not the victim (eg police officer)
1. Has the current incident resulted in injury? Please state what and whether this is the first injury.	☐	☐	☐	
2. Are you very frightened? Comment:	☐	☐	☐	
3. What are you afraid of? Is it further injury or violence? Please give an indication of what you think [name of abuser(s)] might do and to whom, including children. Comment:	☐	☐	☐	
4. Do you feel isolated from family/friends? Ie, does [name of abuser(s)] try to stop you from seeing friends/family/doctor or others? Comment:	☐	☐	☐	
5. Are you feeling depressed or having suicidal thoughts?	☐	☐	☐	
6. Have you separated or tried to separate from [name of abuser(s)] within the past year?	☐	☐	☐	
7. Is there conflict over child contact?	☐	☐	☐	
8. Does [name of abuser(s)] constantly text, call, contact, follow, stalk or harass you? Please expand to identify what and whether you believe that this is done deliberately to intimidate you? Consider the context and behaviour of what is being done.	☐	☐	☐	
9. Are you pregnant or have you recently had a baby (within the last 18 months)?	☐	☐	☐	
10. Is the abuse happening more often?	☐	☐	☐	
11. Is the abuse getting worse?	☐	☐	☐	
12. Does [name of abuser(s)] try to control everything you do and/or are they excessively jealous? For example: in terms of relationships; who you see; being 'policed' at home; telling you what to wear. Consider 'honour'-based violence (HBV) and specify behaviour.				
13.Has [name of abuser(s)] ever used weapons or objects to hurt you?	☐	☐	☐	
14.Has [name of abuser(s)] ever threatened to kill you or someone else and you believed them? If yes, tick who: You ☐ Children ☐ Other (please specify) ☐	☐	☐	☐	

Tick the box if the factor is present. Please use the comment box at the end of the form to expand on any answer.	YES	NO	DON'T KNOW	State source of info
15. Has [name of abuser(s)] ever attempted to strangle / choke / suffocate / drown you?	☐	☐	☐	
16. Does [name of abuser(s)] do or say things of a sexual nature that make you feel bad or that physically hurt you or someone else? If someone else, specify who.	☐	☐	☐	
17. Is there any other person who has threatened you or who you are afraid of? If yes, please specify whom and why. Consider extended family if HBV.	☐	☐	☐	
18. Do you know if [name of abuser(s)] has hurt anyone else? Consider HBV. Please specify whom, including the children, siblings or elderly relatives: Children ☐ Another family member ☐ Someone from a previous relationship ☐ Other (please specify) ☐	☐	☐	☐	
19. Has [name of abuser(s)] ever mistreated an animal or the family pet?	☐	☐	☐	
20. Are there any financial issues? For example, are you dependent on [name of abuser(s)] for money/have they recently lost their job/other financial issues?	☐	☐	☐	
21. Has [name of abuser(s)] had problems in the past year with drugs (prescription or other), alcohol or mental health leading to problems in leading a normal life? If yes, please specify which and give relevant details if known. Drugs ☐ Alcohol ☐ Mental health ☐				
22. Has [name of abuser(s)] ever threatened or attempted suicide?				
23. Has [name of abuser(s)] ever broken bail/an injunction and/or formal agreement for when they can see you and/or the children? You may wish to consider this in relation to an ex-partner of the perpetrator if relevant. Bail conditions ☐ Non Molestation/Occupation Order ☐ Child contact arrangements ☐ Forced Marriage Protection Order ☐ Other ☐				
24. Do you know if [name of abuser(s)] has ever been in trouble with the police or has a criminal history? If yes, please specify: Domestic abuse ☐ Sexual violence ☐ Other violence ☐ Other ☐	☐	☐	☐	
Total 'yes' responses				

For consideration by professional

Is there any other relevant information (from victim or professional) which may increase risk levels? Consider victim's situation in relation to disability, substance misuse, mental health issues, cultural / language barriers, 'honour'-based systems, geographic isolation and minimisation. Are they willing to engage with your service? Describe.	
Consider abuser's occupation / interests. Could this give them unique access to weapons? Describe.	
What are the victim's greatest priorities to address their safety?	

Do you believe that there are reasonable grounds for referring this case to Marac?		Yes ☐ No ☐	
If yes, have you made a referral?		Yes ☐ No ☐	
Signed		**Date**	
Do you believe that there are risks facing the children in the family?		Yes ☐ No ☐	
If yes, please confirm if you have made a referral to safeguard the children?	Yes ☐ No ☐	**Date referral made**	
Signed		**Date**	
Name			

Practitioner's notes
[1]Domestic abuse recorded by the police in Scotland, 2023-24 https://www.gov.scot/news/domestic-abuse-recorded-by-the-police-in-scotland-2023-24/

Wheatley Group

Making homes and lives better
wheatley-group.com

Group Suicide Risk 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 479 7979 or email 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 479 7979 lub wyślij e-mail na adres 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 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجانًا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضًا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Group Board*
Date of approval	*TBC*
Review Year	*March 2029*
Customer engagement required	*Yes - Implementation*
Trade union engagement is required	*Yes – For info*
Equality Impact Assessment	*Yes*

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1. Introduction

This policy is part of a suite of policies designed to safeguard and protect people.

The Suicide Risk Policy sets out our role in responding to concerns about self-harm and suicide, and the processes for escalating risk to services with statutory responsibility.

This policy should be read in conjunction with:

- Adult Support & Protection;
- Child Protection;
- Multi-Agency Public Protection Arrangements (MAPPA); and
- Domestic Abuse.

As an organisation, we want our staff to be prepared and to know what to do when they become aware of a risk to life through self-harm or suicide in the course of their work. This includes raising concerns, sharing information lawfully and working with statutory partners to reduce harm and support the safety of our customers, staff and communities.

It is not our role to diagnose mental health conditions, assess clinical suicide risk or provide therapeutic interventions. These responsibilities sit with the NHS, social work and other statutory services. However, we want our staff to be able to escalate concerns without delay and work with statutory partners who hold responsibility for assessment and intervention.

This policy explains how we work with statutory and partner agencies, including Police, health and social services who have the authority to assess clinical risk and provide treatment or protective intervention where required when a customer informs us or we become aware of self-harm or suicide ideation

Our staff are often well placed to notice early signs of distress through routine contact such as with our Customer First Centre, tenancy visits, repairs, welfare checks and neighbourhood management activity. These everyday interactions can provide opportunities for individuals to disclose concerns or for staff to identify changes in behaviour or circumstances that may indicate increased vulnerability specific to self-harm or suicided ideation.

Staff will refer to this policy in the course of their work with Wheatley Group.

2. Policy Aims & Objectives

Our Aims

We recognise that self-harm and suicide are complex and deeply personal, and that outcomes cannot always be controlled. This policy focuses on our role in responding with compassion, escalating concerns appropriately, and working with partners to reduce harm and influence positive outcomes when staff become aware of self-harm or suicide risk.

This policy has been designed to support staff and customers in understanding our approach to Protecting Life Critical Incidents Policy. This policy aims to support staff to:

- Recognise and respond to suicide risk;
- Effectively support those who may be at risk of harm by suicide and
- Work effectively with statutory and external agencies;

Our Objectives

For an effective approach to suicide risk when working with customers, our objectives are to:

- Make sure our policy and supporting processes are clear, practical and easily accessible;
- Ensure that relevant staff are aware of their role and responsibilities and that they are clearly defined;
- Provide training to relevant staff so that they can confidently recognise and support someone who may be at risk or is affected by risk of death by self-harm or suicide;
- Build partnerships with specialist agencies who can provide support to individuals experiencing self-harm or suicide ideation,
- Raise awareness across the organisation and in our communities through education about the risks associated with self-harm and suicide ideation, encouraging early action and ensuring that individuals affected are aware of the support options and resources available to them.

3. What is Self-Harm and Suicide?

Self-harm and suicide risk refers to situations where an individual may be at risk of harm to themselves because of distress, crisis or complex personal circumstances. Risk may fluctuate over time and should be understood in the context of a person's circumstances, experiences and access to support, rather than as a fixed or static condition. While outcomes cannot always be controlled, timely recognition and a proportionate response may reduce harm and support safety.

Self-harm and suicide risk may be:

- **Immediate or imminent**, where there is intent, a plan or access to means; or
- **Emerging or escalating**, where someone expresses distress, hopelessness, thoughts of suicide, or engages in, or is at risk of, self-harm.

Our organisation does not diagnose, assess clinical risk or replace health services. Our role is to:

- Take concerns seriously, including expressions of self-harm or suicidal distress;
- Escalate concerns to appropriate services without delay; and
- Avoid inaction where there is a risk to life or serious harm.

Any expression of suicidal thoughts, threats, behaviours or self-harm must be treated as a serious safeguarding concern.

4. Our Roles in self-harm and suicide risk

As a housing and property management provider, our main role is to:

- Ensure customers are provided an appropriate referral, escalation or signposting to statutory or specialist services where a risk becomes known to us;
- Work in partnership with health, social work, police and appropriate social care organisations where relevant; and
- Respond with compassion, dignity and respect at all times.

Where self-harm or suicide ideation risk is identified, staff should consider whether proposed housing or enforcement actions require additional planning, support or co-ordination with support from the Group Protection Team. This supports risk aware and proportionate decision making. Staff should seek management or safeguarding advice where appropriate.

This does not prevent necessary or lawful action being taken. Where action is required, it should proceed alongside appropriate safeguarding escalation rather than being delayed.

If someone tells us there is a suicide risk, they can expect:

- We will believe them;
- We will act quickly to offer help and support;
- We will provide clear pathways and signposting to appropriate external support;
- We will treat everyone with empathy and respect, and without judgment;
- We will explain that while we keep things confidential as far as practicably possible, we may need to share information with police, health or social work to keep people safe.

We have a responsibility to ensure that staff are supported to recognise, respond to and escalate safeguarding concerns, confidently and without fear of blame. Staff will never be criticised for raising concerns in good faith, even where risk is later assessed as low. We are committed to creating an environment where concerns are taken seriously, staff wellbeing is prioritised, and appropriate action is taken to protect individuals at risk.

If a neighbour, another person, or the victim discloses a concern, we will let the individual concerned know that we're reporting it if it is appropriate to do so.

Repeated expressions of self-harm or suicidal ideation must always be taken seriously. Patterns of behaviour may indicate ongoing risk and should be escalated through safeguarding routes rather than managed in isolation.

Staff are not expected to make clinical judgements, manage suicide risk alone, or guarantee outcomes. Their responsibility is to recognise concerns, escalate appropriately and record actions taken.

5. Adult and Child Protection Concerns

When it becomes known to us that a customer is at risk of self-harm or suicide it is important to consider whether adult or child protection processes should be implemented.

Adults at Risk of Self-harm or Suicide

An adult may be at increased risk where self-harm or suicide ideation concerns are present alongside significant psychological distress, persistent feelings of hopelessness, social isolation, recent adverse life events, substance use, physical or cognitive impairment, or previous contact with services due to mental health crisis.

The presence of one or more of these factors does **not automatically** mean an adult meets the criteria for Adult Support and Protection; however, where such factors are present alongside self-harm or suicide ideation, staff should consider whether the three-point test may be met and seek advice. An individual is an adult at risk under the Adult Support and Protection (Scotland) Act 2007. The Act defines harm as including self-harm and provides the framework for protecting adults who may be unable to safeguard their own wellbeing or rights.

Whether an adult is considered at risk is determined using the three-point test. An adult (aged 16 or over) may be at risk if they:

- Cannot protect their own wellbeing or rights;
- Are at risk of harm, including self-harm; and
- Are more vulnerable to harm due to disability, illness or mental health conditions.

If staff believe an adult meets the criteria:

- Concerns should be reported to Social Work or Police Scotland in line with the Adult Support and Protection Policy; and
- The Group Protection Team should be consulted for advice and support.

<u>Children and Self Harm and Suicide Ideation Risk</u>

Self-harm and suicide ideation risk in children and young people is a serious safeguarding concern. The National Guidance for Child Protection in Scotland (2021) recognises that children and young people may be at risk of significant harm where there are indicators of self-harm, suicidal ideation, emotional distress or behaviours that suggest a risk to their safety or wellbeing. Where suicide or self-harm risk is identified, this must be considered a child protection concern

If children are involved:

- Staff should report concerns to Social Work or Police Scotland in line with the Child Protection Policy; and
- The Group Protection Team should be consulted for advice and support.

6. Responding to a Self-harm or Suicide Risk

Responding to a self-harm or suicide risk can be challenging and emotionally demanding and we will provide support to any staff member who requires it.

This section sets out how we expect staff to act when concerns arise, recognising that staff are not expected to make clinical judgements or manage risk alone.

Our approach prioritises compassion, timely escalation and clear action to reduce risk, while ensuring staff are supported and guided throughout.

Immediate or Imminent Risk

Where there is immediate danger to life:

- Emergency services must be contacted via **999**;
- If appropriate, staff should remain with the person or keep them on the line where safe to do so;
- Managers and the Group Protection Team should be informed; and
- Actions must be recorded clearly and promptly.

Protecting life takes priority over confidentiality.

Non-Immediate but Significant Risk

Where risk is present but not immediate:

- Staff should listen and respond with empathy;
- Encourage engagement with appropriate health services;
- Escalate via safeguarding routes where appropriate; and
- Agree follow-up actions and record clearly.

Responding to a Death by Suicide

While timely action and support can reduce harm, it may not always be possible to prevent a death. A death by suicide (suspected or confirmed) does not mean that staff or services have failed and we recognise that, despite all appropriate actions and support, death by suicide can still occur.

A death by suicide is a traumatic and complex event that can have a significant impact on families, communities and staff. This section sets out how we will respond in a coordinated, compassionate and proportionate way, ensuring that immediate actions are taken to protect others, support those affected and manage the situation with dignity and care. Staff are not expected to manage these situations alone and will be supported throughout the response and subsequent review.

Where we become aware of a death by suicide, or a suspected death by suicide our role is to:

- Ensure emergency services are contacted immediately;
- Work with Police Scotland;
- Support affected tenants, neighbours and staff;
- Manage properties with dignity and sensitivity; and
- Coordinate communications appropriately.

Our focus will be on care, dignity, customer and staff wellbeing, learning and prevention of further harm, including consideration of suicide cluster risk.

Following a death by suicide, we will consider the wider impact on teams and services, including the need for team-based debriefs, additional management support and review of practice.

We are committed to learning from incidents, supporting staff and customers affected by suicide risk or loss, and continually strengthening our approach to safeguarding across our homes and communities.

7. Measuring our Impact

We will measure our impact in responding to self-harm and suicide risk by:

- Monitoring the number and nature of self-harm and suicide related concerns raised across the organisation;
- Reviewing referrals made to statutory services and partner agencies to ensure appropriate escalation and timely support;
- Identifying themes, patterns and repeat concerns to inform learning, training and service improvement;
- Reviewing critical incidents, including deaths by suspected suicide, to understand what worked well and where practice can be strengthened;
- Monitoring staff training, support and wellbeing following exposure to self-harm or suicide risk; and
- Using learning from incidents to improve guidance, processes and staff confidence.

This approach supports continuous improvement, strengthens safeguarding practice and ensures that both customers and staff are supported appropriately when self-harm or suicide risk is identified.

8. Legislation

This policy is based on key Scottish laws, guidance and strategies relevant to areas of self-harm or suicide risk:

- Mental Health (Care and Treatment) (Scotland) Act 2003
- Health and Safety at Work etc. Act 1974
- Children and Young People (Scotland) Act 2014
- Adult Support and Protection(Scotland) Act 2007
- Child (Scotland) Act 2020

We have also considered the following national strategies and guidance documents:

- Scottish Suicide Prevention Strategy
- National Guidance for Child Protection in Scotland (2021)
- Adult Support and Protection Code of Practice (2022)

9. Policy Review & Consultation

This policy has been developed in consultation with key stakeholders working in statutory agencies. The policy shall be reviewed every three years; however, more regular reviews will be considered where, for example, there is a need to respond to changes in legislation or guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our staff intranet, WE Connect, and on our website. A hard copy is also available on request. Customers may also request a copy of the policy in other formats and community languages, e.g. Braille.

10. Policy Awareness & Training

All staff across the organisation will be made aware of this policy and their responsibility to apply the procedures outlined within it where a risk of self-harm or suicide is identified.

A range of self-harm and suicide risk awareness training is available across the organisation. All staff have access to suicide awareness training appropriate to their role. Customer-facing staff are required to complete mandatory training on suicide risk identification, policy, and associated procedures, to ensure they are confident in recognising risk, responding appropriately, and escalating concerns in line with organisational processes.

11. Confidentiality & Data Protection

Everyone working in our organisation has a role to help protect children, young people, and adults who may be at risk. The law provides clear exemptions that allow information sharing for safeguarding purposes without consent.

Sometimes, we may need to share personal information with other organisations to keep someone safe. This must follow strict rules under data protection laws, including the Data Protection Act 2018 and the General Data Protection Regulations GDPR. Data Protection should not be a barrier to sharing proportionate, necessary information for either adult or child protection and instead provides a framework to ensure information sharing is lawful, secure and documented.

Before sharing any information:

- Staff must check the Wheatley Group's Data Protection Policy (especially Appendix 2);
- Staff must be satisfied that data sharing complies with the General Data Protection principles in Article 5 UK GDPR and that there is a lawful basis for sharing the data;
- The decision to share must be recorded, including the reason;
- Information should only be shared on a "need to know" basis; and
- An audit trail must be kept.

We recognise that self-harm and suicide risk can include very sensitive information. If staff are unsure, they should speak to the Wheatley Group Information Governance Team for advice on data protection issues that arise from concerns of self-harm and suicide risk and to ensure that any data sharing is in accordance with the UK GDPR, the Data Protection Act 2018 and the requirements of the Group's Data Protection Policy and the Group's Special Category Data Policy.

Any requests for information should be shared with the Information Governance Team, who will check that there are data sharing agreements in place.

12. Equal Opportunities Statement

This Policy aligns the Wheatley Group's Equity, Diversity and Inclusion (EDI) and Human Rights Policy. We recognise our pro-active role in valuing and promoting EDI and equity of opportunity by adopting and promoting fair policies and procedures.

We are committed to providing fair and equitable treatment for our stakeholders and will not discriminate against anyone on the grounds of race, ethnicity, nationality, language, religion, belief, age, sex, sexual orientation, gender reassignment, trans history, disability, marital status, pregnancy or maternity. We will endeavour to achieve fair outcomes for all.

As required, we undertake Equality Impact Assessments on relevant policies, strategies, projects and frameworks to help us take appropriate action to address inequalities likely to result from or resulting from the implementation of the policy and procedures and to maximise positive impacts.

13. Complaints

We aim to get things right the first time. However, if a customer is unhappy with this policy or how it's applied, they can make a complaint.

A summary of our Complaints Policy and Procedure is available on our Wheatley Group and subsidiary websites.

Appendix 1

The following services are provided by third-party organisations and therefore eligibility, opening times and availability will be subject to change. A more comprehensive list is available through ALISS.

Organisation Name	Additional information	Website and/or Email Plus service opening times	Contact Number
Breathing Space	Breathing Space offers free and confidential advice for people experiencing low mood, depression or anxiety, whatever the cause.	Web: https://breathingspace.scot/ Weekdays: Mon – Thur 6pm – 2am; Friday 6pm – Monday 6am	0800 83 85 87
Childline Scotland	Childline Scotland is a counselling service for children and young people. Online and on the phone at any time	https://www.childline.org.uk/ This Service has 1 2 1 Counsellor Chat under the "Get Support" heading on the main page.	0800 1111
Cruse Bereavement Care Scotland	Free bereavement support for anyone struggling with the loss of someone close.	Open weekdays 9am-8pm & weekends 10am-2pm https://www.crusescotland.org.uk /	Free Helpline: 0808 802 6161
HOPELINE UK	Advisers work to understand why thoughts of suicide might be present. They also want to provide a safe space to talk through anything happening that could be impacting on someone's ability to stay safe. For children and young people under the age of 35 who are experiencing thoughts of suicide	https://www.papyrus-uk.org/ Or email: pat@papyrus-uk.org 9am to midnight every day of the year, including weekends and bank holidays	Free phone 0800 068 41 41 (charges from mobiles will apply) text: 077860 039 967* You do not have to give your name or whereabouts

	Anyone who is concerned that a young person could be thinking about suicide		
National Self Harm Network	Offers support to individuals who self-harm to reduce emotional distress and to improve their quality of life. The forum provides crisis support, information and resources.	www.nshn.co.uk Use link to access forum, closely monitored 24/7.	
NHS 24	For the provision of urgent health advice when GP surgeries are closed. You should also be encouraging the individual to link in with their GP for tailored, localised support within their community.	Web: https://www.nhs24.scot/ 24 hours per day, 7 days per week.	111
NHS Living life Free phone	A free telephone support service, based on Cognitive behavioural therapy approach, available to anyone over the age of 16 feeling low, anxious or depressed. Can be accessed with be GP referral or phoning the number directly.	www.nhs24.scot/our[1]services/living-life/ Monday – Friday 1-9pm	0800 328 9655

PETAL Support (People Experiencing Trauma and Loss)	For people affected by homicide or suicide they provide one to one counselling and other therapies. The service provision includes children and young people.	Web; www.petalsupport.com Email: info@petalsupport.com Mon- Thur 9am - 5pm Fri 9am - 4pm	01698 324502
Samaritans	Provide confidential, non[1]judgemental support for people who are experiencing feelings of distress or despair. They also have a self help which customers can download. It can be used to “Track Mood” and look for patterns as well as creating a safety plan, help with techniques to cope with challenging situations. It also tracks helpful activities and suggests new things to try. It can be used on smartphones or on computer and requires an account set up to operate.	24 hours a day, 7 days per week.	116 123
Scottish Association for Mental Health (SAMH)	SAMH is Scotland’s Mental Health Charity, and they work with adults and young people providing mental health social care support.	Web: https://www.samh.org.uk/ Email: info@samh.org.uk Monday – Friday 9am-6pm except Bank Holidays	0344 800 0550

SHOUT	Shout is a free confidential, 24/7 text support service for anyone in the UK who is struggling to cope. Our trained volunteers are here to listen at any time of the day or night, and messages won't appear on your phone bill.	https://giveusashout.org/get[1]help/how-shout-works/ To start a conversation, text the word "SHOUT" to 85258	85258
SOS Suicide	Emotional health, suicidal thoughts, emotional wellbeing & mental health, bereavement, isolation, struggling to fit into the world, have a terminal illness or simply need to hear another voice.	4pm until midnight on Saturday and Sundays Every night 8pm-midnight https://sossilenceofsuicide.org/#1668177077935-eae401b2-3119	Freephone: 0808 115 1505
Staying Safe Touched by Suicide Scotland,	StayingSafe.net offers compassion, kindness and easy ways to help keep people safer from thoughts of harm and suicide, seek support and discover hope of recovery through powerful videos from people with personal experience. They are a self-help organisation, made up of people who have been 'touched by suicide' and exist to meet the needs and break the isolation of those bereaved by the suicide of a close relative or friend. Services available includes a	https://stayingsafe.net/home Web: http://touchedbysuicidescotland. Org Email: touchedbysuicidescotland@hotmail.co.uk They run groups in:- Irvine, Girvan, Largs Ayr, Kilbirnie, Kilmarnock	01294 229087 01294274273 Glasgow office 0141 5845754 It could potentially be an answer phone, but if the individual leaves a message

	confidential telephone helpline, support information, help by e-mail, and group meetings Shettleston, Scotstoun, Airdrie, Lanark, Whitburn and Glenrothes Monday – Friday 9 – 5pm someone will get back to them.		
Young Minds	Committed to improving the emotional wellbeing and mental health of children and young people. Provides information on coping with self-harm and suicidal feelings.	www.youngminds.org.uk Crisis	Text service also available 24/7 Text YM to 85258 a Parents Helpline: 0808 802 5544 Mon – Fri 9.30am – 4pm.

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 28 February 2026**

Date of Meeting: **25 March 2026**

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1. Purpose

1.1 The purpose of this paper is to provide the Board with:

- an overview of the Finance Report for the period to 28 February 2026;
- seek approval for the 2026/27 Budget; and
- note the advanced payments of donations of £1,231k to the Wheatley Foundation, payable in March 2026 that were approved by the Group Board in February 2026.

2. Authorising and strategic context

2.1 Under the terms of the Intra-Group Agreement between Wheatley Homes South and the Wheatley Group and this Board's Terms of Reference, the Wheatley Homes South Board is responsible for the ongoing monitoring of performance against agreed targets. This includes the oversight of financial performance.

3 Background - Financial performance

3.1 The results for the period to 28 February are summarised below:

	Actual £'000	Budget £'000	Variance £'000
Turnover	54,937	52,273	2,664
Operating expenditure	(38,812)	(39,599)	787
Operating surplus	**16,125**	**12,674**	**3,451**
Operating margin	*29%*	*24%*	
Net interest payable	(6,492)	(6,707)	215
Surplus	**9,633**	**5,967**	**3,666**
Net Capital Expenditure	**22,842**	**20,707**	**(2,135)**

Classified as Public

4. Discussion

4.1 The financial results report a continued strong financial performance with a statutory surplus to the end of February 2026, which is £3,666k favourable to budget with favourable variances in both income and expenditure. Additional Young Persons service charges and the faster turnaround of void properties have driven favourable variances in rental income and the earlier completion and handover of 8 units at Johnstonebridge has generated the earlier than budgeted recognition of grant income of £1,514k. Expenditure continues to be well managed; and favourable variances against budget are reported across most lines.

Key highlights:

4.2 Total income is £2,664k favourable to budget reflecting the strong letting performance, earlier recognition of grant income of £1,514k on new build units and the additional adaptations grant funding of £690k.

4.3 The majority of other expenditure lines are reporting improved performance compared to budget.

- Repairs spend overall is £27k favourable to budget. Responsive repairs are £9k unfavourable due to increased job volume in December and January compared with budget, partly offset by an overall lower average cost per job.
- Gas planned maintenance, is in line with the programme of works, and is £161k favourable to budget with lower cost of works compared to the allocated budget
- Other compliance spend is £125k unfavourable to budget; driven by additional asbestos removal works carried out in void properties. All compliance work is delivered within the required legislative timeframe.

4.4 Capital investment income is £443k lower than budget. The timing of the receipt of new build grants is £1,133k lower than budgeted due to changes in the timing of various site starts. This is partly offset by an increase in adaptation income of £690k following the approved uplift in funding. The unfavourable variance in new build expenditure of £287k is driven by the same projects.

4.5 Total capital investment spend of £13,964k is £1,358k higher than budget reflecting the additional approved funding allocated to the core programme for improvements in tenants' homes in line with our tenant commitments, higher environmental spend reflecting demand and additional funded aids & adaptations spend.

2026/27 Budget

4.6 The budget is summarised below and compared against the financial projections.

	Full year 2026/27		
	Budget £'000	**Business Plan* £'000**	**Variance £'000**
Turnover	82,743	80,831	1,912
Operating expenditure	(43,929)	(43,929)	-
Operating surplus	38,814	36,902	1,912
Operating margin %	*47%*	*46%*	
Net interest payable	(7,305)	(7,305)	-
Surplus	**31,509**	**29,597**	**1,912**
Net Capital Expenditure	**34,744**	**32,818**	**(1,926)**

**Excluding property valuation movements, which do not form part of the management accounts*

4.7 At the previous meeting in February 2026, the Board was presented with the detailed five-year financial projections and supporting commentary. It was agreed that the 2026/27 figures would form the basis of the 2026/27 annual budget and would be brought back to this Board meeting for formal approval. The 2026/27 annual budget is presented within Appendix 1.

4.8 The 2026/27 budget reports an operating surplus of £38,814k, and a statutory surplus of £31,509k, both £1,912k higher than financial projections approved in February 2026. The variance relates to the recognition of gift aid paid to WH South from Wheatley Developments Scotland Ltd (WDS) with corresponding higher costs in new build spend. The gift aid payment is an intra-group item and as has a nil effect on the consolidated results for both the RSL Borrower Group and the full Wheatley Group.

RSL Borrower Group covenant compliance

4.9 [redacted]

[redacted]

Classified as Public

4.11 Given the higher level of certainty over the financial outturn at Q3, at their February meeting the Group Board approved utilising a portion of the £9.6m headroom. They approved the advance payment of donations to the Wheatley Foundation by the RSLs in March 2026, agreeing that the RSL Borrower Group will deliver a Trading Cash cover of 105%, which is out with the Golden Rule policy parameters..

4.12 For WH South we have approval to make donations of £1,231k to the Wheatley Foundation in March 2026. This will be used to create financial capacity in the RSLs in 2026/27 and 2027/28. This will be used to deliver higher levels of investment in our existing properties and allow the Foundation to continue to fund projects which directly contribute towards the aims and objectives of our RSLs such as Wheatley 360 and Group protection and helping tenants facing financial pressures to maintain their rent accounts. The Foundation will invest surplus cash funds in a money market account until they are needed.

4.13 The impact of the donations as detailed above was reflected in WH South's djrereergtt52026/27 financial projections approved by this Board in February. The payments will be made in March 2026 and reported in the Finance Report to 31 March 2026.

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 There are no direct environmental or sustainability implications arising from this report. Our investment programme includes capital expenditure in our tenants' homes which will improve their energy efficiency.

7. Digital transformation alignment

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

8. Financial and value for money implications

8.1 Our cost efficiency targets are built into our budgets and delivery of these is a key element of continuing to demonstrate value for money. Performance is monitored against budget each month.

8.2 In preparing the 2026/27 budgets, WH South continues to be financially resilient delivering an underlying surplus of £11.5m.

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 "being prepared to invest for reward while managing risks to a tolerable level to minimise the potential for financial loss".

11. Equalities implications

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

12. Key issues and conclusions

12.1 This paper reports a strong financial performance position for the period to 28 February 2026 with a statutory surplus £3,666k higher than budget; reflecting the favourable letting performance and early recognition of new build grant income both reported within income and the overall favourable expenditure position against budget.

12.2 The 2026/27 annual budget is in line with the financial projections reported to the Board in February 2026 and takes into account the recognition of the gift aid payment of £1,912k to WH South from WDS. As demonstrated in the financial projections, WH South will continue to meet its key financial parameters and across the RSL Borrower Group the overall budgeted operating surplus and covenant compliance is in line with the financial projections.

12.3 The paper also notes the advanced donations of £1,231k to the Wheatley Foundation, payable in March 2026 that were approved by the Group Board in February 2026.

13. Recommendations

13.1 The Board is requested to:

1) Note the Finance Report for the period to 28 February 2026;
2) Approve the 2026/27 Budget; and
3) Note the advanced donation of £1,231k to the Wheatley Foundation, payable in March 2026 that were approved by the Group Board in February 2026.

LIST OF APPENDICES:-

Appendix 1: Period 11 – 28 February 2026 Finance Report and 2026/27 Budget.

Wheatley Homes South

Period to 28 February 2026

Finance Report and 2026/27 Budget

Wheatley Group

1) Operating statement – Period to February 2026

OPERATING STATEMENT	Period to Feb 2026 Actual £ks	Budget £ks	Variance £ks	Full Year Budget £ks
INCOME				
Rental Income	50,410	50,341	69	54,778
Void Losses	(271)	(549)	278	(600)
Net Rental Income	**50,139**	**49,792**	**347**	**54,178**
Grant Income	1,514	0	1,514	6,244
Other Grant Income	2,209	1,443	766	1,542
Other Income	1,075	1,038	37	2,364
TOTAL INCOME	**54,937**	**52,273**	**2,664**	**64,328**
EXPENDITURE				
Employee Costs - Direct	4,912	4,899	(13)	5,344
Employee Costs - Group Services	3,184	3,203	19	3,492
Direct Running Costs	2,771	2,769	(2)	3,348
Running Costs - Group Services	1,832	1,870	38	2,086
Revenue Repairs and Maintenance	11,420	11,447	27	12,496
Bad debts	304	1,026	722	1,119
Depreciation	14,385	14,385	0	15,695
Demolition and compensation	4	0	(4)	0
TOTAL EXPENDITURE	**38,812**	**39,599**	**787**	**43,580**
NET OPERATING SURPLUS	**16,125**	**12,674**	**3,451**	**20,748**
Net operating margin	*29%*	*24%*	*5%*	*32%*
Interest receivable	102	83	19	90
Interest payable & similar charges	(6,594)	(6,790)	196	(7,311)
STATUTORY SURPLUS	**9,633**	**5,967**	**3,666**	**13,527**

INVESTMENT	Actual £ks	Budget £ks	Variance £ks	Budget £ks
TOTAL CAPITAL INVESTMENT INCOME	**17,537**	**17,980**	**(443)**	**19,930**
Capital Investment spend	13,964	12,606	(1,358)	13,908
New Build Programme	24,561	24,274	(287)	27,229
Other Fixed Assets	1,854	1,807	(47)	1,983
TOTAL INVESTMENT EXPENDITURE	**40,379**	**38,687**	**(1,692)**	**43,120**
NET CAPITAL EXPENDITURE	**22,842**	**20,707**	**(2,135)**	**23,190**

Key highlights

The financial results report a statutory surplus of £9,633k for the period, £3,666k favourable is reported. The favourable position reflects the letting performance, the recognition of grant income on earlier than budgeted new build completions and the overall favourable expenditure position to budget.

- Net rental income is £347k higher than budget. Void losses are £278k favourable to budget, with a void loss rate of 0.5% vs 1.1% in budget. Rental income is favourable to budget after successful negotiations with DGC to increase the service charge income at Young Persons Project (YPP).
- Grant income is £1.5m favourable to budget due to the earlier handover of 8 units at Johnstonebridge at the end of February (budgeted for completion in March 2026).
- Other grant income includes £690k of additional aids & adaptations grant (with corresponding higher investment costs) and higher renewable heat incentive (RHI) grant funding.
- The additional other income received is for the settlement of an insurance claim from 2023/24.
- Total employee costs (direct and group services) are £6k favourable to budget due to timing of changes in the budgeted structures in both front-line Housing and Wheatley Solutions.
- Total running costs (direct & group services) are £36k favourable to budget mainly due to cost savings across several departments within Wheatley Solutions.
- Repairs costs are £27k favourable to budget. Responsive repairs are £9k unfavourable due to an increase in job numbers vs budget in December & January, partly offset by an overall lower average repair cost compared to budget. Gas planned maintenance is £161k favourable to budget, with the works up to date but costing less than the allocated budget and other compliance spend is £125k higher than budget due to additional asbestos removal jobs and compliance work.
- Bad debts are £722k favourable to budget. A prudent approach was taken when setting the budget.

Interest payable of £6,594k represents interest due on the loans due to Wheatley Funding No.1 Ltd and external funders. The favourable position is due to lower drawdowns than budgeted to date and a lower variable lending rate than budgeted.

Net capital expenditure of £22,842k is £2,135k higher than budget.

- Capital investment income is £443k lower than budget. Adaptations grant income is £690k higher, in line with additional spend reported in capital investment spend. New build grant income is £1,133k less than budget with a delayed start at Leswalt, lower than budgeted spend at Gladstone and Dumfries High Street and College Mains grant claimed in 24/25. This is partly offset by additional grant income due to accelerated progress at Ashwood Drive.
- Total capital investment spend of £13,964k is £1,358k higher than budget reflecting the additional funding allocated to the core programme to meet tenant commitments, higher environmental spend reflecting demand and additional funded aids & adaptations spend.
- New Build expenditure is £287k higher than budget, driven by higher spend at Ashwood Drive and College Mains partly offset by delayed start to Gladstone and Dumfries High Street.
- Other capital expenditure of £1,854k is £47k higher than budget due to accelerated spend on the office at Ashwood Drive of £141k , partly offset by reduced costs due to the timing of IT project spend.

1b) Underlying surplus – Period to February 2026

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 2018).
- 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 table 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, gift aid and depreciation but including capital expenditure on our existing properties.
- For the period to February 2026, an underlying surplus of £8,540k has been generated which is £794k favourable to budget reflecting the good operating performance to date, with additional net rental income reported from reduced void losses, additional adaptation grant funding, reduced loan interest costs and a favourable expenditure position, fully offsetting the approved increased investment expenditure YTD.

Underlying Surplus - Period to Feb 2026				
	YTD Actual £ks	YTD Budget £ks	YTD Variance £ks	FY Budget £ks
Net Operating surplus	16,125	12,674	3,451	20,748
add back:				
Depreciation	14,385	14,385	0	15,695
less:				
Grant income	(1,514)	0	(1,514)	(6,244)
WDS Gift aid	0	0	0	(1,202)
Net interest payable	(6,492)	(6,707)	215	(7,221)
Total expenditure on Core Programme	(13,964)	(12,606)	(1,358)	(13,908)
Underlying Surplus	**8,540**	**7,746**	**794**	**7,868**

2) In House Repairs Service – Period to February 2026

In House Repairs	YTD			
	Actual £ks	Budget £ks	Variance £ks	Full Year Budget
INCOME				
Internal	11,420	11,037	383	12,049
External Customers	621	410	211	447
TOTAL INCOME	**12,042**	**11,447**	**595**	**12,496**
COST OF SALES				
Staff Costs - salaries	4,709	4,709	(0)	5,146
Staff costs - overtime	343	303	(41)	330
Materials	2,402	2,645	243	2,873
Subcontractor & Other Costs	3,075	1,794	(1,281)	1,972
TOTAL COST OF SALES	**10,529**	**9,450**	**(1,079)**	**9,991**
GROSS PROFIT	**1,512**	**1,997**	**(485)**	**2,505**
Margin %	13%	0%	13%	20%
Overheads	**1,808**	**1,997**	**189**	**2,175**
NET (LOSS) / PROFIT	**(296)**	**0**	**(296)**	**0**

Key Comments:

- Income is £595k higher than budget, driven by increased income from external customers following the re-negotiation of the contract with the Home Group in addition to increased job volume YTD, and increased job volume for internal repair works.
- Employee costs are in line with budget however overtime is £41k higher YTD following additional out of hours jobs over the festive period and storm related jobs.
- Materials are under budget reflecting mix of jobs and type of materials required.
- Subcontractor and other costs are £1,281k over budget due to the increased usage of sub contractors for general and specialist works including roofing and heating repairs and M & E compliance work.
- Overheads are £189k favourable to budget with savings in vehicle lease costs, lower than budgeted insurance and timing of spend across other lines. The budget assumed off-hire fleet charges however the vehicle leases are being extended (£120k savings vs budget).

3) Repairs and Investment – Period to February 2026

Revenue Repairs and Maintenance	YTD			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
Reactive	9,110	9,101	(9)	9,941
Gas planned maintenance	959	1,120	161	1,219
Compliance	1,351	1,226	(125)	1,336
TOTAL	**11,420**	**11,447**	**27**	**12,496**

Repairs

Repairs and maintenance costs are £27k favourable to budget.

- Reactive repairs are £9k unfavourable to budget driven by higher job volume (+217 jobs vs budget). The average cost per job has remained stable throughout the year with an overall lower average cost than budgeted.
- Gas planned maintenance are in line with the programme of works and are favourable to budget due to the cost of works being lower than budgeted.
- Compliance is £125k adverse to budget with additional asbestos removal works in void properties, higher spend on play parks due to timing of items needing replaced and higher spend on M & E compliance works. All compliance work is delivered within the required legislative timeframe.

Core Investment Programme	To 28 Feb 2026			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
Investment programme grant income				
Aids and Adaptations	1,215	525	690	540
Total	**1,215**	**525**	**690**	**540**
Investment programme spend				
Core Programme	6,706	6,276	(430)	7,017
Capitalised repairs	865	865	0	944
Capitalised environmental	874	630	(244)	687
Capitalised Voids	3,230	3,251	21	3,565
Aids and Adaptations	1,215	525	(690)	540
Capitalised Staff	1,074	1,059	(15)	1,156
Total	**13,964**	**12,606**	**(1,358)**	**13,908**
Net Investment Spend	**12,749**	**12,081**	**(668)**	**13,368**

Investment

Net investment in our existing homes was £12,749k, which is £668k higher than budget.

- Core programme is £430k over budget reflecting the approved additional funding allocated to the core programme for improvements in tenant's homes in line with our tenant's commitments. The Q3 forecast amount will be spent which includes additional kitchen spend.
- Capitalised environmental spend is £244k higher than budget reflecting increased demand. This is being reviewed by the repairs team with the repair not replace message being reiterated going forward.
- Voids are £21k favourable to budget driven by lower number of voids, partly offset by a higher cost per void.
- The unbudgeted adaptation spend is in line with the additional adaptation grant funding for 2025/26 with the confirmed £1.4m award reflected in the forecast.
- Capitalised staff is slightly ahead of budget with a £15k unfavourable variance reflecting the structure within the team.

4) New Build – Period to February 2026

Development Name	Status	Contractor	YTD P11			Full Year Budget
			Actual	Budget	Variance	
Johnstonebridge	On Site	Ashleigh	5,455	5,375	(80)	5,381
Glenluce	Feasibility	Ashleigh	35	26	(9)	26
Leswalt	On Site	McTaggart	7,551	7,731	180	8,498
College Mains	On Site	Ashleigh	7,073	6,195	(878)	6,878
Gladstone / Troqueer	In Development	CCG	100	782	682	940
Summerhill	On Site	CCG	231	300	69	731
Ashwood Drive	On Site	McTaggart	1,949	915	(1,035)	1,022
Newington	In Development	TBC	280	251	(30)	334
Osborne (Lochside)	In Development	TBC	135	120	(16)	135
Findlater (Lochside)	In Development	TBC	74	32	(42)	32
Maxwelltown High	In Development	TBC	47	158	111	158
Catherinefield	In Development	CCG	106	242	136	242
Thornhill	Feasibility	CCG	32	53	21	53
Spring Bank Road	In Development	TBC	6	11	4	11
Dumfries High Street	In Development	TBC	132	538	406	673
Feasibility	Feasibility	N/A	118	193	74	210
Development Fund	N/A	N/A	0	0	0	50
Completed PY	Complete	TBC	101	198	97	198
Total Social Rent			**23,425**	**23,117**	**(307)**	**25,569**
Capitalised Staff			1,136	1,157	20	1,264
Capitalised Interest			0	0	0	396
Total New Build Investment			**24,561**	**24,274**	**(287)**	**27,229**
Grant Income			16,322	17,455	1,133	19,390
Net New Build Cost			**8,239**	**6,819**	**(1,420)**	**7,839**
Grant Income Completions (recognised in OPS)			**1,514**	**0**	**1,514**	**6,244**

On site:

- ***Johnstonebridge/ MacLean Drive (SR/33):*** Works started on site in October 2024 and are progressing well. In February 2026, 8 units were handed over and a further 20 are expected in March 2026. The remaining 13 are scheduled for handover in April 2026.
- ***College Mains (SR/44):*** Site acquired March 2025 and works have resumed following the access issue previously identified has been resolved. Completion is expected by September 2026, earlier than budgeted, resulting in spend ahead of budget.
- ***Ashwood Drive (SR/9):*** Works commenced on site in May 2025, earlier than budgeted, and site completion is expected in August 2026.
- ***Leswalt (SR/56):*** Site start was delayed with works commencing towards the end of May 2025 resulting in the reported underspend in the year to date. Completion expected December 2026.
- **Summerhill *(SR/44):*** Demolition works are complete, planning approved and tender submitted by contractor. Approval sought at WDS Board in November 2025 and works commenced February 2026.

[redacted]

Regeneration:

- **Lochside:** Consultation process for the first phases of Lochside Regeneration (Osborne and Findlater) have begun with the Masterplan approved in June 2025. Two Planning Application Notice ("PAN") events took place in July 2025 and November 2025. Planning for Findlater is targeted for April 2026 and Q2 26/27 for Osborne.
- **Maxwelltown High:** Part of the Lochside Masterplan, this is a former High School site. Site Investigation work completed with final report expected end of March 2026 which will determine final unit numbers and phasing. Work is ongoing to submit a planning submission in Q3 2026/27.
- **Newington:** Demolition works are now complete except for Springbells which will be completed as part of the new build contract. Tenders received from contractors and approval to be taken to WDS Board in May 2026.
- **Gladstone/ Troqueer (SR/12):** Demolition works complete and planning approved. Tender was submitted by contractor; however, costs were unviable. Re-procurement of contract to take place via mini competition in Q4 of 25/26 with tender approval in 2026/27.

5) Balance Sheet – Period to February 2026

	28 February 26	31 March 25
Fixed Assets		
Social Housing Properties	491,760	467,620
Other Fixed Assets	4,447	2,593
Investment Properties	11,853	11,851
Fixed Assets	**508,060**	**482,064**
Current Assets		
Stock	900	900
Trade debtors	394	309
Rent and service charge arrears	2,667	2,519
less: provision for rent arrears	(1,190)	(1,138)
Prepayments and accrued income	2,073	2,546
Other debtors	4,427	4,771
Due from other group companies	44	115
Total debtors	**9,315**	**10,022**
Bank and cash	3,019	2,847
Current assets	**12,334**	**12,869**
Creditors: within 1 year		
Trade Creditors	(1,393)	(2,337)
Accruals	(4,072)	(1,889)
Deferred income (Grant)	(21,506)	(4,184)
Prepayments of Rent and Service Charge	(1,543)	(1,277)
Other Creditors	(807)	(745)
Amounts due to Group Undertakings	(10,994)	(6,971)
Current liabilities	**(40,315)**	**(17,403)**
Net Current Liability	**(27,981)**	**(4,534)**
Long Term Creditors		
Bank loans	(81,950)	(81,017)
Due to other group companies	(87,000)	(92,500)
Deferred Income	(3,292)	(5,809)
Other provisions	(171)	(171)
Net Assets	**307,666**	**298,033**
Capital and Reserves		
Revenue Reserve	166,006	156,373
Revaluation Reserve	141,660	141,660
Shareholders' funds	**307,666**	**298,033**

Key Comments:

The balance sheet as at 31 March 2025 reflects the audited position and year end statutory adjustments, including the revaluation of both housing and investment properties.

At 28 February 2026:

- **Fixed assets** of £508m – 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 & College Mains), and Home Group income.
- **Creditors: within 1 year:**
  - Accruals includes investment works (CBG), materials & sub-contractors costs. The increase from March 2025 is due to timing of payments.
  - Deferred income relates to Johnstonebridge, Ashwood Drive, College Mains and Leswalt which are all due to complete in 2026/27.
- **Long-Term Creditors:**
  - Loan term loans include Allia and THFC loans. The increase since 31 March is due to the Allia accrued interest.
  - The roll up of accrued interest on Allia loans is not payable until the end repayment date of the loan. £7.3m has been accrued since the drawdown of the loans.
  - Due to other group companies is the WFL1 intra-group loan.
  - Grant income received is deferred until the completion of new build properties. The balance relates to Catherinefield, Thornhill and Summerhill which are all expected to complete 2027/28 onwards.
  - Provision of £171k relates to dilapidations for offices and hubs.

6) Budget 2026/27

	2026/27		
	Budget	Business Plan	Var
	£'000	£'000	£'000
INCOME			
Rental Income	59,558	59,558	0
Void Losses	(632)	(632)	0
Net Rental Income	**58,926**	**58,926**	0
Grant Income recognised in the year	20,232	20,232	0
Other grant income	567	567	0
Other income	3,018	1,106	1,912
TOTAL INCOME	**82,743**	**80,831**	**1,912**
EXPENDITURE			
Employee Costs - Direct	4,891	4,891	0
Employee Costs - Group Services	3,775	3,775	0
ERVR	309	309	0
Direct Running Costs	2,737	2,737	0
Running Costs - Group Services	2,195	2,195	0
Revenue Repairs and Maintenance	12,826	12,826	0
Bad Debts	918	918	0
Depreciation	16,220	16,220	0
Demolition	58	58	
TOTAL EXPENDITURE	**43,929**	**43,929**	**0**
NET OPERATING SURPLUS / (DEFICIT)	**38,814**	**36,902**	**1,912**
Operating Margin	*47%*	*46%*	
Interest Receivable	75	75	0
Interest Payable	(7,380)	(7,380)	0
STATUTORY SURPLUS / (DEFICIT)	**31,509**	**29,597**	**1,912**

Total Capital Investment Income	**25,644**	**25,644**	**0**
Total Expenditure on Core Programme	14,078	14,078	0
New Build Expenditure	44,629	42,703	(1,926)
Other Capital Expenditure	1,681	1,681	0
TOTAL CAPITAL EXPENDITURE	**60,388**	**58,462**	**(1,926)**
NET CAPITAL EXPENDITURE	**34,744**	**32,818**	**(1,926)**

Key highlights:

The 2026/27 budget shows a net operating surplus of £38,814k and statutory surplus of £31,509k, both £1,912k higher than the Business Plan financial projections presented to the Board in February 2026. The movement is due to the recognition of intra group gift aid paid to WH South from Wheatley Developments Scotland Ltd (WDS).

- **Net rental income** of £59,558k is in line with the financial projections. The budgeted void rate is prudently assumed at 1.1% for all properties.
- **Grant Income** recognised on completion of new build units is budgeted at £20,232k with 122 new build homes for social rent anticipated to complete in 2026/27.
- **Other Grant Income** includes £540k aids and adaptation grant income and £27k renewable heat incentive grant funding.
- **Other Income** includes the recognition of the gift aid payment from WDS of £1,912k, reflecting the management charge income received from WH South in WDS net of running costs incurred by WDS (£14k). This is an intra-group item and has a net nil impact at an RSL Borrower Group level.
- **Expenditure** is in line with the financial projections previously presented with analysis for employee costs, running costs and repairs and maintenance. The provision for repairs recognises the sustained increase in demand that we have experienced in 2025/26 and growth from the additional stock.
- **Capital Investment Income** of £25,644k includes £25,104k new build grant income and £540k adaptation grant income.
- **Investment** programme expenditure includes provision to meet tenant commitments as well as recognising the growing statutory duties, the delivery of our neighbourhood plans and a programme of environmental improvements.
- **New build** expenditure of £44,629k has been included in the budget for 2026/27, £1,926k higher than the financial projections recognising a 5% management charge on the design and build services provided by WDS. The design and build costs are reimbursed to WH South through gift aid recognised in Other Income.

7) Budget – Underlying Surplus 2026/27

Key highlights :

- The Operating Statement (Income and Expenditure Account) on page 8 is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2018).
- 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 table below therefore shows a measure of underlying surplus for the 2026/27 budget which adjusts our net operating surplus by excluding the accounting adjustments for the recognition of new build grant income, gift aid and depreciation, but including capital expenditure on our existing properties.
- An underlying surplus of £11,507k is budgeted, in line with the financial projections.

WH South Underlying Surplus - Budget 2026/27	FY Budget 26/27 £'000	Business Plan 26/27 £'000
Net Operating Surplus	38,814	36,902
add back:		
Depreciation	16,220	16,220
less:		
Grant income	(20,232)	(20,232)
WDS gift aid income	(1,912)	0
Net interest payable	(7,305)	(7,305)
Investment Programme Expenditure	(14,078)	(14,078)
Underlying surplus	**11,507**	**11,507**


Wheatley
Homes
South

Report

To: **Wheatley Homes South**

By: **Alex Lamb, Managing Director**

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

Subject: **Strategic Partnership - Wheatley Care**

Date of meeting: **25 March 2026**

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1. Purpose

1.1 The purpose of the report is to provide the Board with an update on the progress made on the strategic partnership with Wheatley Care.

2. Authorising and strategic context

2.1 Under the Group Standing Orders, the establishment, disposal or dissolution of subsidiaries is reserved to the Group Board for approval. The individual legal entity constitutions are the principal governance instruments through which the necessary changes are required to alter the legal status of a subsidiary.

3. Background

3.1 At the Group Board's meeting on 12 November 2025 it was agreed that we transition from a governance partnership of Parent/Subsidiary with Wheatley Care to a strategic partnership with Wheatley Care, which would also become an independent organisation outside the legal confines of the Group structure.

3.2. The key elements of the strategic partnership proposed with a direct impact on Wheatley Homes South were as follows:

- Wheatley Housing Group Limited ("**WHGL**") ceases to be the Parent of Wheatley Care from April 2026;
- RSLs individually agree to lease and give nomination rights to reflect current care accommodation arrangements; and
- RSL care-related contracts with local authorities are novated to Wheatley Care, with staff associated with these services subject to TUPE.

3.3 An update was provided to this Board at its last meeting on 11 February 2026 confirming that the key work streams were progressing as planned and that the Service Agreements with Wheatley Care were in draft form and subject to final approval.

4. Discussion

4.1 We remain on track to conclude a strategic partnership with Wheatley Care from April 2026. Across the key workstreams, no material issues have been identified that create any new or increased risk to the strategic partnership.

4.2 A more detailed update on the steps with concluding the partnership in each of these key workstreams is set out below.

Staff, trade union and stakeholder engagement and consultation

4.3 We have now concluded all staff, trade union and stakeholder engagement and consultation. The stakeholder engagement has included the Care Inspectorate, Scottish Social Services Council, and Dumfries and Galloway Health and Social Care Partnership. There has been no adverse feedback or issues identified during this engagement and consultation. Elected members have been briefed this month with no concerns raised.

Contract assignation

4.4 Dumfries and Galloway Council have concluded contract assignation for the relevant care related contracts, and these will be assigned to Wheatley Care as of the 1 April 2026. The following care contracts will be assigned:

- Temporary Accommodation with Support for Homeless People
- Sheltered Services
- Young Persons Temporary Accommodation

4.5 The arrangements required to effect the TUPE transfers of staff working in care services in Dumfries and Galloway and currently employed by Wheatley Homes South are in place and will take effect on the 1 April 2026. Twenty-one staff will transfer on protected terms and conditions and will move to be employed by Wheatley Care at this date.

4.6 Wheatley Care have had responsibility for managing and overseeing all our care services for over five years, and while there will be a legal change of employer for the staff working in these services the working relationships are well established and positive.

Contractual relationship

4.7 As part of the strategic partnership we have agreed we want to retain an ongoing relationship with Wheatley Care through a strategic partnership. As part of these arrangements, we are proposing the lease of accommodation to Wheatley Care for staff offices and service delivery purposes together with nomination rights for specific tenancies linked to care and support contracts.

4.8. Lease and property agreements have been drafted by our legal advisors. These detail the properties which we will lease to Wheatley Care for use as staff hubs and offices, the properties Wheatley Care will have nomination rights for and detail any special arrangement in place such as where Wheatley Care will manage occupancy agreements on our behalf. The lease and property agreements reflect the current arrangements in place.

4.9. The strategic partnership will be subject to formal monitoring at a Group and subsidiary level to ensure that the arrangements in place continue to meet our needs.

5. Customer Engagement

5.1 We are communicating with tenants throughout March. To date no issues or concerns have been raised by customers or, where appropriate, their representatives. Tenants are being reassured that there will be no change to the service they receive.

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 arising from this report.

8. Financial and value for money implications

8.1 The contractual changes arising from the change in relationship with Wheatley Care have been reflected in the 25/26 Business Plan as approved by the Board on 11 February 2026.

9. Legal, regulatory and charitable implications

9.1 Legal advisors have drafted all relevant agreements on our behalf.

9.2 Legal and regulatory responsibility for the Care Services will transfer to Wheatley Care as a result of contract assignation from 1 April 2026.

10. Risk Appetite and assessment

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

10.2 The new strategic partnership is underpinned by property agreements as set out in the report. These are subject to formal monitoring and routine review to ensure that the arrangements continue to meet our needs.

11. Equalities implications

11.1 There are no equalities implications associated with this report.

12. Key issues and conclusions

12.1 Key elements of the Strategic Partnership proposal between WHGL and Wheatley Care is contract assignation of relevant Wheatley Homes South care services and the transfer of associated staff to Wheatley Care on the 1 April 2026 and the leasing of properties for care to use as staff offices or service delivery accommodation.

12.2. Key activity required to enact the change is underway and on track for the 1 April 2026.

13. Recommendations

13.1 The Board is asked to note the progress made in developing the new strategic partnership with Wheatley Care.

LIST OF APPENDICES: None

Report

To: **Wheatley Homes South Board**

By: **Laurie Carberry, Director of Procurement**

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

Subject: **Group Procurement strategy and policies**

Date of meeting: **25 March 2026**

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1. Purpose

1.1 The Wheatley Homes South Board is asked to note prior to publication the following:

- Wheatley Procurement Strategy 2026-2028;
- Wheatley Procurement Policy 2026;
- Wheatley Sustainable Procurement Statement 2026; and
- Wheatley Community Benefits Statement 2026.

2. Authorising and strategic context

2.1 Under our Terms of Reference, the Solutions Board has delegated authority to approve the Group Procurement Strategy and Policies on behalf of the Group Board. The strategy and policies need to be reviewed annually, by 31st March, to meet statutory requirements.

3. Background

3.2 A Procurement Strategy is a legal reporting requirement for all large Scottish 'contracting authorities'. As a minimum, the strategy must include the following elements:

- 12-month retrospective review of contracts awarded;
- 24-month forward plan of future contract opportunities;
- Community Benefit Delivery;
- Proposed Sustainability requirements; and
- Embedded compliance with legislation.

4. Discussion

<u>Procurement framework</u>

Classified as Public

4.1 The Procurement Strategy sets out how we plan to achieve organisational objectives and meet our compliance obligations. The Procurement Strategy is supported by our Procurement Policy, Sustainability Statement, and Community Benefit Statement and together they form our procurement framework. These documents are essential to ensuring consistent and effective procurement processes across Wheatley.

4.2 The key changes in each document are set out below:

Procurement Strategy 2026 – 2028

4.3 The updates to the Procurement Strategy reflect us transitioning into a new 5-year strategy period, consequential amendments to the pipeline section to reflect the new time period covered and updated tender thresholds. There are no material changes to the Strategy. The updated document, including a summary of changes, is attached at Appendix 1.

Procurement Policy (Appendix 2)

4.4 There has been limited change to the Procurement Policy 2026. We have taken the opportunity to strengthen our oversight of contract management with clearer accountability and expectations for Contract Management activity by enhancing our Supply Chain Risk protocols with clear cyber incident notification requirements and termination rights.

4.5 All suppliers must promptly inform Wheatley of any cyber incidents, data breaches, or related events affecting their contracted services. Immediate notification enables us to work with the supplier to undertake a timely assessment and take appropriate action.

4.6 We intend to further strengthen contractual provisions so that failures to report cyber incidents constitute a contractual breach. This approach, and the wider refresh of supplier cyber-security management, has been considered by the Group Audit Committee. Alongside this, we are currently refreshing our approach to supplier management from a cyber security perspective, with a more detailed update having been recently considered by the Group Audit Committee.

Sustainable Procurement Statement (Appendix 3)

4.7 Within the Sustainable Procurement Statement 2026, we have updated our long-term sustainability targets. These include working towards becoming carbon neutral across our corporate estate, reducing fuel poverty and carbon emissions from our homes in line with legislative requirements. Procurement will actively support these ambitions by sustainably sourcing goods, services and materials, whilst ensuring that our supply chains also work towards Scottish Government targets.

4.8 Throughout 2025, we engaged in a series of discussions with our supply chain partners to determine which suppliers have implemented, or are in the process of developing, a Sustainability or net-zero strategy. This work establishes a baseline for future monitoring and reporting. We expect additional Scottish Government guidance on reporting requirements to be released later this year, which will enhance our ability to track the progress and objectives of our supply chain in relation to sustainability.

Community Benefits Statement (Appendix 4)

4.9 The Community Benefits Statement 2026 has been updated to ensure continued alignment with Scottish Government guidance, legislation and proportionality, as set out within Scottish Procurement Laws.

4.10 The contribution level to the Wheatley Foundation from our New Build contractors has been increased from £775 per unit to £895 per unit, reflecting inflation over the past four years.

5. Customer engagement

5.1 All procurement exercises will consider customer engagement. Customer consultation will be conducted when applicable. Community benefit delivery outcomes will also include our key customer engagement activities.

6. Environmental and sustainability implications

6.1 Sustainability outcomes will be measured against Group targets. Procurement will actively be supporting these goals through sustainable sourcing of goods, services, materials and supply chains.

7. Digital transformation alignment

7.1 The Contract Management System supports the Group's digital transformation by strengthening contract visibility, assurance and data led oversight.

8. Financial and value for money implications

8.1 The objectives of the Group are being achieved by leveraging the Group's size and scale to ensure we deliver greater value for money for our customers.

8.2 Effective procurement is a key approach to meet the Group business plan, sustainability targets and identified savings targets.

9. Legal, regulatory, and charitable implications

9.1 By publishing the Group Procurement Strategy by March 2026, we are meeting our legal obligation and adhering to government requirements. All procurement within the Group adheres to legislative procurement requirements.

9.2 All documentation now references the changes to legislation that come into force in February 2025, Procurement Act 2023.

10. Risk appetite and assessment

10.1 Our agreed risk appetite relating to laws and regulations is **"Averse"**. This level of risk tolerance is defined as "Avoidance of risk and uncertainty is a key organisational objective."

10.2 The key procurement strategic risk ("**SSR15**") for the Group is Non-Compliance with current Scottish Procurement Legislation/Regulation relating to procurement and award of contracts. We mitigate this risk through:

- Compliance with Group and subsidiary standing orders;
- Annually reviewed Group procurement policy;
- Visibility of our Contract Register;
- Mandatory training for all staff authorised;
- Procurement plans for above-threshold procurements; and
- A dedicated procurement team with specialist knowledge/legal advice as required.

10.3 The Procurement Policy 2026, the updated Procurement Strategy 2026 - 28, Sustainable Procurement Statement 2026 and Community Benefits Statement 2026 help us mitigate the risks of non-compliance with regulation and legislation by setting out our approach in clearly defined documents.

11. Equalities implications

11.1 Updates to our Procurement Policy and Community Benefits approach support our EDI aims as a Group. Furthermore, our procurement strategy ensures an inclusive process through Equal Treatment, Non-Discrimination, Transparency and Proportionality, Prevention of Modern Slavery, Fair and Ethical trading, the Living Wage, and support for small and medium businesses and social enterprises.

12. Key issues and conclusions

12.1 Wheatley must comply with legislative requirements for procurement and contracting arrangements due to our classification as a Contracting Authority. We do this through our procurement framework. Beyond meeting our compliance requirements, a key focus for us is using our scale to leverage benefits for our communities.

13. Recommendations

13.1 The Wheatley Homes South Board is asked to note the contents of the report.

LIST OF APPENDICES:

Appendix 1: Procurement Strategy 2026 – 2028
Appendix 2: Procurement Policy 2026
Appendix 3: Sustainable Procurement Statement 2026
Appendix 4: Community Benefits Statement 2026

Summary of Changes:

The 2026–2028 Procurement Strategy strengthens alignment to the Group's new "Making homes and lives better 2026–31" framework, updates legislative compliance to reflect the Procurement Act 2023 and Cross-Border Regulations 2025, and embeds the latest PCSR thresholds. It significantly enhances Contract & Supplier Management by mandating CMS as the single corporate source of contract data and introducing a risk-based CSM model.

Sustainability expectations are elevated through mandatory supplier reporting of Scope 1 & 2 emissions to support Wheatley's Scope 3 baseline. Community Benefits have clearer thresholds and are now monitored through CMS/CSM, while Fair Work and Living Wage requirements are reinforced.

Business continuity expectations have been modernised to align with ISO 22301 principles, and the 24-month procurement pipeline has been fully refreshed to reflect upcoming investment, digital and operational priorities.

Comparison Table

Area	2025–2027	2026–2028	Change
Approval & Review	Feb 2025 approval; review Jan 2026	Feb 2026 approval; review Jan 2027	Dates rolled forward and aligned.
Strategic Framing	Based on previous Group Strategy	Aligned to 2026–31 Group Strategy	Updated themes and framing.
Legislative Context	Act 2023 pending	Act 2023 + Cross-Border Regs 2025	Clarified cross-border application.
Award Terminology	MEAT/MAT mixed	MEAT standardised	Consistency fixed.
Thresholds	Older PCSR thresholds	Jan 2025 VAT-inclusive thresholds	Updated statutory values.
Procurement Routes	Quick Quote and Waiver model	Clarified Negotiated procedure	Minor clarity edits.
CSM	CSM referenced	Expanded CSM framework	CMS set as single source.
Sustainability	General ESG	Scope 1 & 2 supplier reporting	Strengthened carbon tracking.
Living Wage / Fair Work	Promoted	Essential criterion for services	Compliance strengthened.
SME Participation	Lotting encouraged	Lotting + stronger engagement	Incremental enhancement.
Community Benefits	Applied as appropriate	Thresholds + CMS monitoring	Reinforced obligations.

Area	2025–2027	2026–2028	Change
Business Continuity	General statements	ISO 22301-aligned wording	Updated supplier expectations.
Pipeline	2025–27 pipeline	Refreshed 2026 pipeline	Updated procurement forecast.
EDI	Desirable requirement	Desirable + annual reporting	Added reporting detail.
E-auctions & DPS	Mentioned	Explicit references retained	Minor clarity edits.
Legislative References	Appendix aligned to 2025–27	Appendix aligned, pages verified	No page update needed.

Wheatley Group

Making homes and lives better
wheatley-group.com

Wheatley Procurement Strategy

2026-2028

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 479 7979 or email 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 479 7979 lub wyślij e-mail na adres info@wheatley-group.com

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يمكننا إنتاج معلومات عند الطلب مجانا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو

برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Solutions Board*
Date of approval	*February 2026*
Review Year	*January 2027*
Customer engagement required	*No*
Trade union engagement required	*No*
Equality Impact Assessment	*No*

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1. Introduction

Introduction to Wheatley

Wheatley is one of the UK's leading housing and property-management groups.

Our purpose is 'making homes and lives better.' Owning or managing over 90,000 homes, Wheatley delivers award-winning services across 19 local authorities in Scotland. Wheatley is firmly rooted in our communities and is focused on delivering excellent services tailored to customers' needs.

Wheatley employs 2900 people directly and a further 2000 as joint owners of one of Scotland's largest repairs and maintenance companies, City Building (Glasgow).

We are committed to providing homes that are safe, warm, and affordable places where customers feel safe, secure and proud to live. We value the dedication of our staff, whose efforts ensure customers receive the best possible experience every day.

Our focus on being a responsible business and continuously improving is evidenced through national and international awards and accreditations from organisations ranging from EFQM, to Investors in People, Investors in Young People and the UK Government Cabinet Office, which oversees Customer Service Excellence.

Our priorities are shaped by our customers, people and partners. Our procurement is purpose driven. We wish to leverage our scale to build strategic procurement partnerships, attract private sector expertise into the public domain, and support local businesses and create job and training opportunities for our customers.

Purpose, Vision and Values

Wheatley subsidiaries are united by our values. Together, by focusing on what matters most to customers, we will deliver on our purpose and improve the lives of our customers.

Our Purpose

Making homes and lives better

Our Vision

Our homes and neighbourhoods are places we, and our customers, are proud of. We listen, we learn, and we deliver what matters most to them.

Our Values

Excellence: we proactively pursue the highest standards.
Inclusion: every voice matters and is treated with respect.
Trust: we take pride in always doing the right thing.
Ambition: we are bold, innovative and challenge ourselves

Wheatley Structure

Wheatley comprises of:

- **Wheatley Homes Glasgow** – social landlord with over 43,000 affordable homes managed in Glasgow.
- **Wheatley Homes South** social landlord with over 10,000 homes owned or managed in Dumfries and Galloway
- **Wheatley Homes East** – social landlord with over 7000 homes in Edinburgh, the Lothians and Fife.
- **Loretto Housing Association** – social landlord with over 2000 properties owned and managed across the central belt
- **Lowther Homes –** private rented landlord with over 1000 homes and property management service provider to over 28,000 customers who own their properties.
- **Wheatley Solutions** – corporate support services, ranging from finance, IT and procurement to governance, assurance, legal, marketing and communications
- **Wheatley Foundation** – charity that delivers our community and better lives activity.
- ***City Building (Glasgow) –** joint venture jointly owned with Glasgow City Council and provides repairs and investment services.

*We refer to the 50/50 Joint Venture with Glasgow City Council, City Building (Glasgow), as a Partner Organisation, although City Building (Glasgow) have their own governance procedures and undertake their own procurement processes for the supply of all goods and services.

2. Public Procurement and Core Principles

Public procurement in Scotland is based on four basic principles:

- **Transparency** – the reasons for procurement decisions must be clear to all.
- **Accountability** – The Group is required to be accountable to our Board, stakeholders, and customers for all decisions that we make when spending money. This principle requires that decision making can be audited to ensure consistency with other principles and that any potential conflicts of interest are avoided.
- **Fairness, Equal Treatment and Non-Discrimination** – All parties involved in procurement decisions must be treated fairly, with no potential supplier being treated either more or less favourably than any other potential suppliers. This also means that contract opportunities must be advertised widely enough to ensure that genuine competition between suppliers is possible.
- **Proportionality** – The requirements made of potential suppliers must be made on a scale which is consistent with the type and size of the contract opportunity.

Our Procurement Vision

- To deliver commercially effective, transparent, compliant procurement processes across the Group and delivering value for money and Best Value to our customers and Stakeholders.
- To be recognised as having leading commercial, procurement and skills delivering outstanding outcomes.
- To provide key input towards the Strategy.

Our Strategic Aims and Objectives

Our Procurement Strategy aim is to assist Wheatley to achieve business objectives and to contribute to the achievement of the aims and objectives of our partner organisations.

Deliver savings, value for money and Best Value and we will achieve these by:

- Working together to identify opportunities and continuing to challenge the status quo;
- Ensuring that all opportunities are thoroughly considered and all implications of change in delivery is fully appraised;
- Increasing our collaboration with other organisations; and
- Developing a coordinated pipeline of future procurement projects to improve our services.

Change supplier and internal behaviours, improve processes and policies by:

- Creating Procurement categories to provide support and promote market knowledge and information sharing to oversee implementation of this Strategy;
- Creating Procurement User Intelligence Groups (UIG's) to engage with all partner organisations to oversee implementation of this Strategy;
- Introducing and refining regular reporting of procurement performance and compliance;
- Improve contract and supplier relationship management through the continued use of the Contract Management System (CMS) across the Group to ensure that we are getting the most value and innovation from our contractual relationships;
- Improve contract and supplier management through the new Contract Supplier Management document issued to provide guidance on the Group's requirements for contract owners;
- Reviewing and improving our Purchase to Pay ('P2P') processes to strengthen controls, increase efficiency and provide useful and up-to-date management information;

- Ensuring that there are standard templates in place for all procurement and contracting documentation and ensure that these are regularly reviewed in line with legislation and best practice; and
- Embedding sustainable procurement as business as usual and incorporating community benefits in all appropriate contracts. Supporting local businesses and SMEs through closer working with stakeholders making our processes more streamlined and accessible.

Increase expertise, capacity and effectiveness and we will do this by:

- Developing staff within the Procurement Department through training, secondments, and mentoring programmes; and
- Developing and embedding contract and supplier management practices and improving commercial awareness.

Compliance with Procurement Legislation

The Scottish Government continues to promote a national programme of public sector procurement reform to drive continual improvement in procurement practice and we endorse and support that position. The Strategy recognises that the Wheatley Group and its subsidiaries, as contracting authorities, are subject to the application of the legislative requirements which bind public procurement practice in Scotland namely:

- The Procurement Reform (Scotland) Act 2014
- Public Contracts (Scotland) Regulations 2015
- Procurement (Scotland) Regulations 2016
- Concession Contract (Scotland) Regulations 2016

Where Wheatley is carrying out procurements by means of call-off from a framework agreement or dynamic purchasing systems put in place by contracting authorities in the UK that are themselves subject to the Public Contracts Regulations 2015 or Procurement Act 2023, these legislative requirements will be engaged and Wheatley Group, and its subsidiaries, will require to ensure they meet relevant obligations applying to them.

It is further acknowledged that all procurement activity must conform to the processes and governance detailed in the Group's Standing Orders, Procurement Policy and Procurement online learning tool "Passport to Procure".

Public Contracts (Scotland) Regulations 2015 Thresholds

PCSR 2015	From 1 January 2025 (inclusive of VAT)
Works	£5,193,000
Concessions – Works and Services	£5,193,000
Services and Supplies (non-Schedule 1 Entities)	£207,720
Light Touch Regime	£663,540
Small Lots (works)	£884,720
Small Lots (supplies and services)	£70,778

Procurement Reform (Scotland) Act 2014 Thresholds

Works	£2,000,000
Services and Supplies	£50,000

As a business, we require to be able to respond quickly and proactively to economic, social, legislative, and political factors as they change. We require a dynamic strategy to ensure that there is a clear framework for achieving a continuous programme of improvement and value which is in alignment with our core corporate values and 'Making homes and Lives better 2026-31 strategy.

Current legislation in Scotland includes additional requirements for contracting authorities to demonstrate transparency and equal treatment of suppliers. In order to increase transparency and treat all suppliers equally and fairly, the Procurement Team will continue to undertake all procurement processes over £50,000 in accordance with agreed methodologies and the requirements of the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016, maintaining an audit trail of scoring and rationale throughout the process. The Procurement Team will provide advice to business leaders and budget holders on procurement below £50,000 to support good practice in procurement throughout the organisation.

Procurement Routes Based on Spend

Financial Value	Process	No. of Suppliers
Below £25,000	Guidance on WE Connect that must be followed to achieve best value. Quick Quote process via PCS (quality/price) may be followed if the contract is deemed to be of medium risk or higher.	N/A unless Quick Quote is used. if so, 3 – 5 suppliers must be invited to quote.
£25,000-£50,000	Quick Quote process via PCS (quality / price)	3 - 5
£50,000 (Goods and Services) £2m (Works) and above up to PCSR Thresholds	Tender process via PCS – quality / price in accordance with the requirements of the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016	As per specific procurement route. Seek advice.
Above PCSR 2015 Thresholds	Tender process in accordance with the requirements of the PCSR 2015	As per specific procurement route in the PCSR 2015. Seek advice.
Beneath £50,000 (Goods and Services) and £2m (Works) where a competitive tender process is not possible	Waiver Approval Form	Single Supplier
Above £50,000 (Goods and Services and £2m (Works) where a competitive tender process is not possible	Negotiated Procurement without prior publication of a Contract Notice	Single Supplier

Separate to the above, it may be that the procurement route involves use of a collaborative procurement approach in the form of a framework agreement or dynamic purchasing system, in which case the relevant process will be dictated by the detail of the relevant collaborative procurement approach.

3. 2026-2031 Strategy

‘’Making Homes and Lives Better’

Our ‘Making homes and Lives better 2026-31 strategy sets out our plans and responding to customer, staff and partner priorities. This balances building new homes, investment in existing homes, customer experience, and financial resilience, while having a clear focus on meeting regulatory obligations and supporting Scotland’s long-term transition to a greener housing system. Our strategic themes and key outcomes are as follows:

Strategic theme	Strategic Objectives			
Homes and neighbourhoods to be proud of	*Maintain and enhance homes to meet the Wheatley standard*	*Create thriving neighbourhoods, collaborating with customers and partners*	*Lead the way in expanding supply of affordable, quality homes*	
Personalised services	*Connect with customers through proactive, tailored communication*	*Enhance and apply what we learn to drive customer focused services*	*Deliver seamless services to meet customer needs*	
Better Lives	*Make the largest landlord contribution to ending homelessness in* Scotland		*Shape powerful partnerships to alleviate poverty and open doors to new opportunities*	
Delivering sustainable value	*Nurture and invest in our people, recognising their contribution*	*Drive effective solutions, harnessing digital capabilities and data assets*	*Ensure financial efficiency today, prepared for tomorrow*	*Grow our reputation as an ethical, trusted business*

Specifically, the Procurement Team will have an impact in the following areas:

Theme 1: Homes and Neighbourhoods to Be Proud Of

Delivering the Wheatley Standard

- Achievement of the Wheatley Standard for internal components, external fabric and environmental quality.
- Delivery of EPC C by 2031 (or SHNZ standards once finalised) where technically and economically feasible.
- High-quality materials, modern components and robust supply-chain standards
- Strong assurance on building safety, damp and mould remediation, and compliance with Awaab's Law.
- Specifications for all planned and cyclical investment procurements will be redesigned to ensure suppliers deliver consistently high standards that improve comfort, quality and safety while supporting a "single view of the home."

Supporting Major Regeneration and Development

Procurement will underpin the delivery of:

- A minimum of 4,300 new affordable homes across Scotland.
- Regeneration activity in priority communities including TRAs and emerging regeneration sites.
- Modern, energy efficient homes informed by customer insight and future demographic needs.-efficient homes informed by customer insight and future demographic needs
- Procurement will maintain strong relationships with development partners, landowners, and City Building (Glasgow) to secure best value solutions that improve neighbourhoods and address housing need.-value solutions that improve neighbourhoods and address housing need.

Enhancing Local Environments

- Integrate neighbourhood quality requirements—such as 5-star KSB environmental standards—into relevant contracts
- Commission services that tackle fly-tipping, improve green spaces, and create pride in place
- Ensure community priorities identified through local engagement are reflected in specifications
- Community Benefits will be built into all major works and monitored through the enhanced Contract & Supplier Management system to deliver tangible, local improvements.

Theme 2: Personalised Services

Digital Platforms and Customer Contact

- Deliver systems and tools supporting the Wheatley's shift to seamless digital communication and self-service.-service
- Ensure major system procurements align to the "single view of the customer" approach.
- Secure solutions enabling real time updates, clearer communication, and accessible service options.-time updates, clearer communication, and accessible service options

Strengthening the Repairs and Service Experience

- Support integrated working between Wheatley and City Building (Glasgow) by procuring tools that improve diagnostics, scheduling efficiency and first-time fix rates.-time fix rates
- Ensure repairs and maintenance contracts deliver reliability, accuracy, and customer focused service.-focused service
- Embed continuous improvement requirements into all contracts, informed by customer insight and performance data.

Embedding Customer Insight

- Reshape specifications based on customer priorities such as repairs timeliness, clear communication, and consistent service quality.

Theme 3: Better Lives

Ending Homelessness and Strengthening Support

- Procuring assistive technology and care equipment that enable independence and improve quality of life.
- Supporting contracts that help sustain tenancies by supporting early intervention and prevention activity.

Alleviating Poverty and Creating Opportunities

- Embedding Community Benefits that create jobs, apprenticeships, training and volunteering opportunities.
- Working with suppliers to deliver pathways to employment for Wheatley customers.
- Supporting accessible digital inclusion initiatives, including affordable broadband offers.

Safer and More Resilient Communities

- Sourcing innovative fire prevention technology.-prevention technology
- Solutions that support community safety partnerships.
- Services that enable neighbourhood improvements co-designed with customers.

Theme 4: Delivering Sustainable Value

Driving Efficiency and Financial Resilience

- Deliver intelligent sourcing strategies that maximise value for money and reduce unnecessary cost.
- Introduce continuous improvement cycles across all recurring contracts.
- Leverage the Group's scale to drive commercial benefits and reinvest savings into customer priorities.

Digital, Data and AI-Enabled Procurement

- Securing integrated technology platforms that support predictive analytics, automation, and smarter decision making.-making
- Tools that strengthen contract management, supplier insights and risk visibility.

Responsible and Ethical Business Practices

- Support delivery of the refreshed Sustainability Framework, net zero commitments and circular economy ambitions.-zero commitments and circular economy ambitions
- Ethical sourcing standards, anti-slavery obligations and transparent supply chains.
- Carbon-reduction measures and sustainable materials in all relevant procurements.
- Upholding organisation's Equity Diversity and Inclusion commitments by ensuring suppliers uphold inclusive, fair and ethical practices.

Culture, Capability and Innovation

- Support the Think Yes culture by enabling flexible, customer focused service solutions.-focused service solutions
- Strengthen internal capability through training on procurement law, sustainability, commercial risk and contract management.

- Promote innovation through early market engagement and supplier partnerships that bring forward new ideas and technologies.-market engagement and supplier partnerships that bring forward new ideas and technologies

Building Capability

The Procurement Team will build the knowledge and experience to undertake and support procurement through an updated version of a “Passport to Procure”- a training programme designed to help staff understand the role of procurement, manage procurement compliantly in conjunction with the Procurement Team, use the Public Contracts Scotland portal for low value procurement and become smarter buyers on behalf of the Group.

The Contract and Supplier Management (‘CSM’) enables the Group to maximise the value it derives from its contracts and help to facilitate partnership approaches with key suppliers. This approach will be supported by software to automate and streamline workflows to conduct effective CSM across the organisation. Contract Managers and Administrators will have access to a CSM e-learning course to ensure that they have the requisite skills and knowledge to manage their contracts.

In order to fulfil our strategic vision and aims we have an agreed approach to ensure continuous improvement through a process of external assessment and accreditation. This process will support Business Leads with nationally recognised external frameworks against which they can set improvement activities and measure improvement. The Procurement Team will support the Group’s external accreditation programmes in the following areas:

- **Customer Service Excellence (CSE)** – offers a framework which allows us to validate that the products and services we provide are designed around our customers’ needs, ensuring our customers are satisfied with the service they receive.
- **Investors in People (IiP)** – provides a framework which allows us to validate that we manage, support, encourage and develop our people, realising their potential and creating staff who advocate strongly for the Group to fellow employees, our customers and wider stakeholders.
- **EFQM** (European Foundation for Quality Management) is not just an external accreditation for Wheatley — it is an organisational improvement framework actively embedded in how Wheatley designs strategy, develops leaders, measures performance, and assures culture.

- **PCIP (Procurement & Commercial Improvement Programme) -** PCIP is an onsite audit which provides a means of measuring and reporting on the procurement and commercial capability of organisations through the provision of evidence, based around a series of set questions and other evaluation methods.

Collaborative Procurement Approach

The Procurement Team has a strong track record of collaborative procurement, offering its frameworks for other contracting authorities to utilise and using external frameworks to maximise buying power. The Procurement Team is engaged with key partners in the areas where we work, notably The City of Edinburgh Council, Glasgow City Council, Dumfries and Galloway Council to share knowledge, experience and conduct collaborative procurement where appropriate.

As an associate member of Scotland Excel, we have access to a wide range of corporate and capital frameworks. This access to framework contracts has delivered efficiencies and financial benefit to the Group. The Group is also a participant on the West Territory Hub through Scottish Futures Trust.

Other framework providers being used by us include the Scottish Procurement Alliance (SPA), Northern Housing Consortium (NHC), Health Trust Europe, Crown Commercial Service, ESPO, Scottish Government and Procurement for Housing (PfH). Our procurement programme has been aligned with framework and dynamic purchasing systems availability to ensure contracting for optimal solutions with the best placed suppliers is realised. The overarching requirement to achieve Value for Money remains our key focus.

Procurement includes supporting the role of suppliers in the Group's business continuity arrangements. Working collaboratively with the Business Continuity team, the Procurement Team works with business owners to improve the robustness of our business continuity plans through desktop and scenario testing, building requirements where appropriate into our contracts. Key areas include new build homes, repairs, IT service providers, and facilities management.

Wheatley / City Building (Glasgow) LLP Joint Working Principles

We hold a 50% stake in City Building (Glasgow) LLP. Glasgow City Council holds the remaining stake. City Building (Glasgow) LLP delivers repairs, general maintenance, and investment work within the Group's Registered Social Landlords in the south and west of Scotland (including Wheatley Homes Glasgow, and Loretto Housing), and our commercial housing and property management subsidiary, Lowther Homes. City Building (Glasgow) LLP also delivers repairs and maintenance services to Glasgow City Council.

We are working to develop a collaborative approach to managing procurement, where appropriate, with the City Building (Glasgow) LLP team. This will be developed and agreed in line with the Group's compliance and legislation principles, reflecting best value and sustainability through the supply chain, determining the most effective route to market, jointly supporting SMEs, effectively benefiting the customer through the efficient management of Community Benefits, and ultimately promoting excellence in procurement and service delivery. City Building (Glasgow) LLP currently manages its own procurement policy. We expect City Building (Glasgow) LLP to operate in line with its own procurement policy and for this policy to be subject to approval by Wheatley and GCC.

Funding

Procurement can contribute to the effective cost management of the organisation by leveraging the size and scale, where appropriate. It is understood that this should not be at the expense of being rooted in local communities. This will be delivered through large scale framework contracts, either procured by us or utilising external ones, which incorporate Community Benefits. The Procurement Team will have a key role in monitoring savings and value for money.

The Group acknowledges the increasing importance of ESG outcomes. Some loan agreements are now tied to ESG goals like energy efficiency, housing for homeless households, and education bursaries. Achieving these targets lowers loan costs, incentivising the Group to pursue sustainable benefits for communities.
The Group's subsidiaries use purchasing cards to make local, low-value purchases. This streamlines VAT returns and enhances staff security by minimizing petty cash use.

Alignment to Wheatley Partner Strategies

Procurement is not just about cost, value for money and quality, it encompasses the wider elements of responsible business encompassing sustainability, EDI, economic, social, and environmental measures to generate savings and identify efficiencies that can be reinvested in other areas of Wheatley. This Strategy is therefore part of a coherent strategic approach that complements and is aligned with our Wheatley strategic framework.

Given the need to remain agile and flexible through the life of the Wheatley's five-year strategy, an annual review considers what has been delivered to date, our business operating context and the external operating environment. Our procurement performance will inform the annual review of our five-year strategy, and associated Delivery Plans, and this Procurement strategy updated as appropriate.

Digital & Technology Strategy

Technological innovation and digital transformation will enable us to improve how we deliver services to our stakeholders and communities over the coming years. Procurement will complement the aims of our technology strategy, ensuring that:

- Our technology services meet our business outcomes, are supported and secure;
- We engage and partner with key technology suppliers, influencing product and service roadmaps ensuring ongoing alignment with Group ambition and outcomes;
- We develop more integrated service delivery options through our use of data and technology, ensuring that our business keeps pace with advancing technology and delivery approaches; and
- We continue to develop our technology solutions so that they support the delivery of more effective, efficient services aligned with Group digital ambitions and with our partner organisations.

Implementing and adopting new digital operating models requires new approaches to supplier engagement, flexibility in the delivery of shared outcomes and management of commercial, information and innovation risks. At the same time, procurement transparency and compliance will be delivered through the use of relevant frameworks such as Crown Commercial Services and Scottish Procurement.

The Procurement and Digital Technology Solutions Teams will work collaboratively to deliver an ongoing procurement programme to support this critical area of spend. Key areas include:

- improving technological infrastructure and access to SAAS and cloud services;
- aligning business outcomes with supplier capabilities, products and services;
- ensuring best value delivery of digital services and transformation;
- improving business processes and enabling the delivery of more effective services;
- support for Group-wide digital transformation across the services and channels we deliver to our stakeholders;
- simplification and consolidation of services and vendor offerings;
- automating processes through technology innovation and adoption; and
- improving business delivery and decision making.

Sustainability Framework

Our sustainable procurement policy makes clear we will derive positive environmental impact from the £300m we spend each year on goods, services and works. Minimising environment impact will become embedded in every purchasing decision, in the same way that value for money, statutory compliance and risk management are today. We will expect our supply chain, including our City Building (Glasgow) joint venture, to rise to this challenge by ensuring they reduce emissions in their business and have the skills and solutions to deliver, maintain and repair low emission products and services.

We recognise our impact on our environment does not stop at the activities we undertake directly. The goods and services we procure and the processes that support manufacture and delivery also contribute to the climate crisis. As such, we have a duty to understand these wider emissions and act to minimise them. We will do this through building our knowledge and expertise in this area and requiring suppliers to provide their Scope 1 and 2 information relative to the value of purchases made by Wheatley, as base line of the carbon emissions associated with their product or service. We will use this to understand our own Scope 3 impact and move towards solutions to mitigate, in partnership with our suppliers.

Priorities will include reducing carbon emissions in our energy supplies, waste minimisation and increasing the use of recycled products and products derived from reclaimed or sustainable materials.

We expect our suppliers to meet our standards for sustainability as set out in our Sustainability Strategy. The requirements will vary according to the commodity being procured but we expect all our suppliers to demonstrate their compliance with good sustainability practice throughout the supply chain. Procurement will start to measure Scope 3 emissions data from its key suppliers and contractors. The range of data to be measured will include purchased goods and services, asset emissions, fuel and energy consumption, transportation and waste generation.

Where applicable, the Procurement Team will adhere to requirements of the Sustainable Procurement Duty, as set out by the Procurement Reform (Scotland) Act 2014. Under this legislation, we are required to consider how we can improve social, environmental, and economic wellbeing outcomes as part of contracting activities.

4. Procurement Pipeline

The Group's external expenditure in 2024/25 was £383.2m of which 30.1% (£268.9m) was on capital and 69.9% (£115.3m) on revenue. The Group's new build housing programme and investment in existing homes contribute to the capital spending.

The landscape in which we operate has experienced a challenging economic period over the past two years as inflation rose steeply and the Bank of England responded with sustained interest rate rises, creating financial pressure to both businesses and households. Over the last year the monetary policy decisions by the Bank of England have helped reduce inflation and while there are now signs of economic recovery, and potential for interest rate reductions, challenges remain in keeping inflation close to the Bank of England 2% target and creating sustainable growth. While general Consumer Price Index (CPI) inflation remains above but close to target, costs remain higher for key areas of our business such as repairs and insurance and inflation, in line with market predictions increased slightly at the end of 2024. Forecasts are inflation will remain close to the target prompting further interest rate cuts from the current rate of 5.0% in 2025.

The Group spend budgeted for goods, services and works will be delivered using a combination of existing contracts, use of external frameworks and procurement of new contracts and frameworks.

New contracts will be established through the Group as the lead procurement body on behalf of the Group's subsidiaries to maximise flexibility and leverage value for money. Where a procurement process is specialist in nature for a specific subsidiary or customer group consideration will be given to the "contracting authority" on a case-by-case basis.

Implementation

A range of activities have been identified which will allow us to achieve our aims and objectives. These are divided into the following three areas, more detail on which can be found in the following tables:

a) Strategy, Policy and Advice

b) People and Organisations

c) Processes and System

a) Strategy, Policy and Advice

The Procurement Team will work closely with stake holders to identify how we can add most value to support delivery of the Group's strategic priorities.

We will continue to provide excellent customer service to our stake holders and suppliers and act as a centre of excellence of procurement for the Group. We have developed a clear procurement policy and supplementary guidance for staff on how to purchase goods, services and works. We will work closely with business owners and budget holders in respect of producing a culture of trust and innovation and aim to deliver right-first-time services.

We will also continue to ensure compliance with relevant legislation and integration with Group policies and processes by regular review of our processes and regular training of our staff.

Identified Factor	Future Priorities	How	Target Date
Procurement Strategy	The Procurement Team will work with business owners, budget holders, key stakeholders and suppliers to regularly review this Strategy.	Workshops with key stakeholders On-going review for publication annually.	Annual Review
Best Value / Value for Money	The Procurement Team will, in line with legislation, award all contracts on the basis of the 'Most Economically Advantageous Tender' (MEAT) principle. For all procurement, we will consider the key principles set out in this Strategy and award contracts in a clear, transparent, and proportionate manner. We will ensure applied ratios (cost / quality) are rigorously tested prior to advertising. The applied ratios will take into account qualities such as continued costs, whole life costing throughout the life cycle of the contract, financing and depreciation.	Training and awareness sessions for the Procurement Team. Contractual obligations contained within the terms and conditions of engagement.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	The Procurement Team will also ensure that in all procurement activity economic operators are treated equally and without discrimination, in order to encourage greater competition, promote innovation and encourage a wider range of economic operators to become involved in public procurement. This will assist in delivering value for money and achieving Best Value.	CSM Guidance Document ensures contract owners are aware of their responsibilities for contract monitoring.	
Excellent Service Delivery	The Procurement Team will support business owners, budget holders and stakeholders to delivery excellent customer service and save money across the group.	Procurement Team attendance and input to project groups, tendering, general advice and supporting alternative delivery models.	Ongoing
Communication	We will engage and communicate effectively with all internal and external stakeholders, including community representatives and user groups affected by the procurement, to ensure those affected directly and indirectly by regulated procurement are considered. We will do this by market testing, supplier engagement, and feedback sessions with stakeholders at all stages throughout the procurement process and UIG meetings with internal team members. In doing so, we will consider the best practice principles set out in the National Standards for Community Engagement. The outcomes of these consultations will then be considered, and outputs will be used to assist in implementing our procurement policy.	Training and awareness sessions for staff. Regular meetings with suppliers.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	We will ensure that local suppliers and SMEs are aware of how to tender for our contracts, and we will ensure our tender processes reflect a local dimension where this is appropriate. All regulated procurement opportunities shall be advertised on Public Contract Scotland where a collaborative procurement approach is being used such as a framework or dynamic purchasing or market arrangement.		
Individual Needs	We will utilise our collective strength to procure goods and services which meet the needs of the Group, while recognising individual and specialist needs of particular customer groups.	Regular UIGs with all stakeholders.	Ongoing
Contract and Supplier Management	Embed a consistent, risk-based Contract and Supplier Management approach, ensuring arrangements are proportionate to value, complexity and risk, with enhanced oversight for higher-risk and business-critical contracts. Strengthen contract ownership, performance and resilience, through structured performance monitoring, regular contract review meetings and active risk and resilience management to drive continuity and improvement. Enable effective digital contract management and transparency, supporting secure record-keeping, audit readiness and a live Contracts Register to meet statutory requirements. Strengthen supplier relationships and value delivery, to improve performance, deliver mutual efficiencies and support wider social, community and sustainability outcomes.	Apply the Group's CSM framework across all Regulated contracts. Support clearly defined Contract Owners. Use the Contract Management System (CMS) as the single corporate source for contract information. Take a more collaborative approach to supplier engagement.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	Engage the market and support a diverse supply chain, including “Meet the Buyer” events, to support SME participation, transparency and a competitive, resilient supply base.	Continue proactive market engagement.	
Compliance with Procurement Legislation: **Procurement Reform (Scotland) Act 2014** **Public Contracts (Scotland) Regulations 2015** **Procurement (Scotland) Regulations 2016** **Where relevant: Procurement Act 2023** **Cross-Border Public Procurement (Miscellaneous Amendment) (Scotland) Regulations 2025 (in force from 20 December 2025).**	We will support all Group and subsidiaries to act in accordance with the Groups Standing Orders, the Procurement Policy and Procurement Manual. We will ensure all updates are implemented where not already in place by the completion date: - ▪ Agree revisions required to the procurement strategy on an annual basis. ▪ Continue to consider lot structure within tenders to ensure quality and opportunity for SMEs. ▪ Increase market research at strategy stage. ▪ Comply with the use of the Single Procurement Document (“SPD”)	Training and awareness sessions for staff. Introduction to updated Passport to Procure eLearning tool.	Ongoing
Performance Framework	We will review our compliance regime to monitor “off contract” expenditure and using our best endeavours, manage the transition to a 100% compliance target from a number of legacy contracts and informal procurement arrangements.	Created a performance framework to monitor via Procurement Compliance KPIs including off contract spend.	Ongoing

Identified Factor	Future Priorities	How	Target Date
		Reported monthly to ET and quarterly to Wheatley Solutions board.	
Document Standardisation	We will undertake a complete review of all procurement standard documentation to take cognisance of legislative change. Regular review meetings are held with the legal team and documentation is kept up to date according to legislation and lessons learned.	Review of documentation by Legal team. Regular review to take account of good practice.	Ongoing
Terms and Conditions	We will support the business to use standard terms and conditions for all low value procurement in accordance with the Group Standing Orders, the Procurement Policy and Procurement Manual.	Provide access to template documents on WE Connect Training and awareness sessions for staff. Regular review for compliance.	Ongoing
Contracts Register	We will publish our contracts register on our website at www.wheatley-group.com. The Register is a live document and is updated on a regular basis. Procurement Team will be responsible for managing the Contract Register on behalf of the Group.	The Contract Register will be regularly updated.	Ongoing
Community Benefits	We will build from our good practice and look to apply robust, relevant, and proportionate Community Benefit Clauses at every appropriate opportunity and in line with the legislative requirements outlined in the 2014 Act.	Consider Community Benefit Clauses in all procurement contracts above £2m (Works contracts) / above £200k (all other contracts).	Ongoing

Identified Factor	Future Priorities	How	Target Date
	We will ask suppliers to deliver new jobs, apprenticeships, and training opportunities through their Community Benefit requirements. In utilising Community Benefit Clauses, the Procurement Team will seek to achieve the aims and objectives of the Wheatley Foundation and improve the economic, social or environmental well-being of the local areas in which they operate. In order to do so, we will engage with the local community in order to understand the needs of the area and tailor Community Benefit Clauses to these needs.	Engage with our suppliers to contribute to the Wheatley Foundation. Use customer equality data to analyse employability programmes, engaging with the Wheatley Foundation	
Small – medium sized enterprises (SMEs)	We recognise that procurement activities can contribute to our local communities. In this regard, we will ensure that local suppliers and SMEs are aware of how to tender for our contracts, and we will ensure our tender processes reflect a local dimension where this is appropriate.	An established "Quick Quote" system for lower value/ lower risk procurement on W.E. Connect. Review all larger procurements to consider the option of splitting them into smaller lots, which may encourage SME participation.	Ongoing
The Real Living Wage	We are committed to fair work practices and the Procurement Team will encourage and promote the payment of the Real Living Wage to all employees servicing the Group through external contracts, in line with Scottish Government Guidance on the Real Living Wage.	Scored in accordance with the quality evaluation criteria contained within each procurement.	Onwards

Identified Factor	Future Priorities	How	Target Date
	This will be promoted through all tender exercises conducted by the Procurement Team and considered alongside other relevant factors at the outset of each procurement to ensure an appropriate balance between quality and cost and on a proportionate basis based on the scope, size, and place of performance of each contract. As a Real Living Wage accredited organisation, all current and future exercises procuring services must meet the Living Wage Foundation's criteria will have an essential requirement to pay all workers involved in the delivery of the service at the Real Living Wage level or above. The Procurement Team will promote and evaluate fair work practices including the living wage as an element of quality within a tender.	Contractual obligations contained within the terms and conditions of engagement. CMS surveys for Supplier and Contractor adherence.	
Supported Businesses & Social Enterprises	In line with Regulation 21 of the Public Contracts (Scotland) Regulations 2015 we reserve the right to participate in procurement for the award of a public contract or framework agreement to a supported business or to provide for such a contract or framework agreement to be performed in the context of a supported employment programme. Via our Joint venture with Glasgow City Council City Building Glasgow fully own and operate Royal Strathclyde Blindcraft Industries (RSBi), one of the largest supported manufacturing businesses in Europe. RSBi employs over 250 people, more than 50% of whom have a registered disability.	Identify opportunities to develop and support enterprises which fit with our vision and business needs.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	RSBI supply all the Group requirements for manufactured kitchens, door sets and UPVC windows to our new build and investment works.		
Health and Safety	We will support the Group's commitment to compliance with the Health and Safety at Work etc. Act 1974 and all related provisions and legislation including the Construction (Design and Management) Regulations 2015 and we will expect all of our suppliers to fully comply with the legislation and promote good working practices throughout the supply chain. Assessment of health and safety requirements will be considered on a case-by-case basis and will be monitored by contract managers on an ongoing basis to ensure compliance. We expect suppliers to be responsible for implementing measures to respond to identified risks and will ask suppliers where appropriate for evidence of said measures and of compliance with health and safety legislation.	Promotion through all tender exercises conducted by the Procurement Team.	Ongoing
Fair and Ethical Trading	In support of Scotland's Fair-Trade Nation status, we will look to demonstrate delivery of real and lasting impact by reducing poverty and improving the lives of people in the communities that we serve. We will also work with existing suppliers to increase the range and availability of fair and ethically traded goods and services.	Include a requirement for suppliers to evidence their commitment to fair and ethical traded goods and services to be included in their Expressions of Interest and Tenders.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	We will seek assurances of fair and ethical practices in supply chains from our suppliers and will include conditions relating to the performance of the contract to ensure that the economic operator complies with environmental, social and employment law. We will also consider lifecycle costing as part of our tender processes.		
Prevention of Modern Slavery	We will put in place safeguards in our contracts to prevent the use of slaves in compliance with the Modern Slavery Act 2015.	We shall implement this through the use of clauses in technical specifications, award criteria or contract conditions and is embedded within our procurement policy.	Ongoing
Provision of Food	In all regulated procurements relating to food, we will actively consider how we can improve the health, wellbeing and education of the local communities that we serve, in line with our sustainable procurement duty. We shall actively consider animal welfare standards in the context of each relevant regulated procurement and will promote the highest standards of animal welfare with our suppliers.	Promotion through all tender exercised conducted by the Procurement Team.	Ongoing
Sustainability and the Sustainable Procurement Duty	In line with our sustainable procurement duty, we will take a robust approach by actively considering all sustainability issues at the outset of any regulated procurements to support the Group's Sustainability Strategy.	Training and awareness sessions for staff.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	This will include considering whether or not to include Community Benefit Clauses at every appropriate opportunity in order to improve the social, environmental and economic wellbeing of the areas in which we operate. The Procurement Team will review all larger procurements to consider the option of splitting them into smaller lots in order to facilitate greater access to procurements and promote innovation. The Scottish Government's Scottish Public Procurement Prioritisation Tool and Sustainability Test will be utilised in order to assess sustainability risks and opportunities in line with the Group's Sustainability Strategy.	We shall implement this through the use of clauses in technical specifications, award criteria or contract conditions.	
Payment Terms	We will support requisitioners and approvers across the Group to ensure that all purchasing is carried out using approved system and processes including Purchase to Pay (P2P) and will seek to ensure that the following payments are made within 30 days after a valid invoice for payment is presented: ▪ Payments due by the Group to a contractor ▪ Payments due by a contractor to a sub-contractor ▪ Payments due by a sub-contractor to a sub-contractor Contractual provisions relating to payment terms will be incorporated into the terms and conditions of each regulated procurement.	Contractual obligations contained within the terms and conditions of engagement. Monitored and reported via P2P KPIs. Report published in line with HMRC requirements.	Ongoing

Identified Factor	Future Priorities	How	Target Date
Business Continuity	We will support the Group's business continuity arrangements by working with key suppliers who will help to provide the Group's response in the event of a business impact event.	Contractual obligations contained within the terms and conditions of engagement. Monitored and reported via contract management meetings.	Ongoing
External Audit	We will comply with legislative requirements to undertake external audit.	Formal Request from Scottish Government.	Ongoing

b) People and Organisation

Effective implementation of this Strategy is dependent on having staff with the right skills and experience in place with strong professional relationships with client departments and suppliers. We seek to empower staff with the correct training and skills to provide an excellent customer service experience and to allow for asset growth. We identify that developing collaborative relationships across the sector will help us to deliver on our key strategies.

Identified Factor	Future Priorities	How	Target Date
Customer Service	We pride ourselves on our excellent customer service and in line with our Key Strategic Platform for Customer Service Excellence, we will continue to provide excellent customer service and supplier contract management by building strong and positive professional relationships.	Training sessions for the Procurement Team.	Ongoing
Training	We will support procurement staff to become professionally trained and all permanent staff are encouraged to undertake regular Continuous Professional Development. Introducing the rollout of our online training for Service Department staff 'Passport to Procurement' to increase confidence and ensure compliance for dealing with procurements under £50K in terms of the 'Quick Quote' procedure.	Professional training programme for all procurement staff. Passport to Procurement eLearning tool updated for all staff involved in procurement.	Ongoing
Collaboration	We will seek out opportunities to use collaborative contracts established by other organisations (including central government procurement service, Scotland Excel, Procurement Scotland, local authorities, Procurement for Housing etc.) where it offers us better value for money than conducting our own procurement and meets our business needs. In doing so, we will be mindful of the Procurement Act 2023 and the Cross-Border Public Procurement (Miscellaneous Amendment) (Scotland) Regulations 2025, which came into force from the 20 December 2025.	Engagement with external framework providers.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	We will be aware of the need also to comply with this legislation when it begins to impact on relevant framework and dynamic market arrangements that the Group may use.		
Criminal Convictions / Serious and Organised Crime	We view criminal conduct of our suppliers very seriously and work closely with Police Scotland including an Information Sharing Protocol. As a standard term of contract, we generally require all suppliers to complete a Declaration of Non-Involvement in Serious and Organised Crime. We are expressly required to exclude a business from bidding if it, or someone who holds a senior position in it, has been convicted of specific offences as detailed in the Procurement Reform (Scotland) Act 2014 or the Public Contracts (Scotland) Regulations 2015 unless there are exceptional circumstances as mentioned in Regulation 58(6) relating to public interest, such as public health or protection of the environment.	Implement Information Sharing Protocol. Use of appropriate clauses in tender documentation.	Ongoing
Exclusion of Bidders	The Procurement Reform (Scotland) Act 2014 Act and the Public Contracts (Scotland) Regulations 2015, specifically Regulation 58, detail that as a contracting authority we are required to exclude a potential supplier from bidding for contracts for certain reasons as detailed in the aforementioned legislation. Furthermore, the legislation also allows us to use our discretion to exclude bidders where certain specific circumstances as set out in Regulation 58 of the aforementioned regulations are met.	Awareness training for Procurement Team and all staff involved in procurement. Contractual obligations contained within the terms and conditions of engagement.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	Such exclusions are subject to statutory time limits. In terms of Regulation 58(13) of the Public Contracts (Scotland) Regulation 2015, suppliers who are in breach of certain exclusion grounds have the ability to 'self-clean' by providing a summary of the circumstances and any remedial action taken. We will consider the sufficiency of any such evidence submitted in line with the legislation, and if deemed sufficient will not exclude the supplier. If the evidence is deemed insufficient, we will give the supplier a statement of reasons for this decision. We expect main contractors to be responsible for ensuring the supply chain of potential sub-contractors complies with the legislation and a declaration confirming same shall form a standard term and condition of contract. Going forward, similar approaches to exclusion are in place for collaborative procurement approaches covered by the Procurement Act 2023 namely S.115 and the Cross-Border Public Procurement (Miscellaneous Amendment) (Scotland) Regulations 2025 (the "Cross-Border Regulations"). The Cross-Border Regulations clarify how Scottish law applies when UK authorities use Scottish procurement arrangements, but they do note entirely disapply the Procurement Act 2023. The debarment list is something that Wheatley Group may consider once there are entities on that list.	Contractual obligations are managed and monitored via contract management meetings led by contract owners.	

Identified Factor	Future Priorities	How	Target Date
Detection and prevention of fraud	Should staff become suspicious of bidders acting in a potentially fraudulent manner such activity must be reported in writing (together with any supporting evidence) in accordance with the Fraud Procedure. All reporting of anti-competitive behaviour and fraud will be dealt with in accordance with the Group's Whistleblowing Policy.	Training and awareness sessions for staff. Regular review for compliance.	Ongoing
Continuous Improvement	We are developing a pro-active approach by anticipating future procurement needs and identifying and considering alternative delivery options as part of continuous improvement.	Procurement Team attendance and input to project groups, tendering, general advice and supporting alternative delivery models.	Ongoing
Gifts and Hospitality	All staff involved in procurement must comply with the Group's policy on Gifts, Hospitality, Payments and Benefits.	Awareness training for Procurement Team and all staff involved in procurement.	Ongoing
Conflicts of Interest	The Group contributes to the economies of the areas we work in and has commercial and business relationships with many different companies, contractors, suppliers, and service providers. We will take appropriate measures to prevent, identify and remedy conflicts of interests arising in the conduct of procurement procedures so as to avoid any distortion of competition and to ensure equal and non-discriminatory treatment of all economic operators.	Awareness training for Procurement Team and all staff involved in procurement. Referring to policy and legislation.	Ongoing

Identified Factor	Future Priorities	How	Target Date
Equality, Diversity and Inclusion (EDI)	We require suppliers to adhere to strict ethical standards and behavior, and in return the Group will also demonstrate the highest level of ethical standards. All procurement will be conducted such that all suppliers with the necessary abilities have a fair and equal opportunity to secure Group business. The Group will be fair, honest, and transparent in all dealings with Suppliers and avoid any conduct which is capable of being adversely interpreted. All suppliers will be treated equally and without discrimination. The Procurement Team will review all larger procurements to consider the option of splitting them into smaller lots in order to facilitate greater access to procurements. We have added the existence of an EDI policy as a desirable requirement in our Procurement Policy to highlight our commitment to this to potential suppliers. By retaining this as a desirable rather than an essential, this helps ensure we are not discriminating for example against SMEs who may not have a policy. We will track and report on this requirement through our CMS.	Awareness training for Procurement Team and all staff involved in procurement. Contractual obligations contained within the terms and conditions of engagement are managed and monitored via contract management meetings led by contract owners. EDI policy as a desirable requirement, monitored and reported through CMS. Supplier EDI data will be presented in the Annual Equalities Report.	Ongoing
Equal Treatment, Non-Discrimination, **Transparency and Proportionality**	The Procurement Team will act in a transparent and proportionate manner at all times and at all stages of each procurement. In line with legislation, electronic communication will be available for all procurement activity, all procurement documentation will use plain and concise language in order that it is readily understood by all participants, and the Procurement Team will ensure open and public market engagement.	Utilise Public Contracts Scotland web portal to procure contracts or established collaborative framework or dynamic purchasing/ market arrangement.	Ongoing

Identified Factor	Future Priorities	How	Target Date
	Procurement shall ensure compliance where relevant to the procurement process and principles within Section 8 of the Procurement Reform (Scotland) Act 2014 and Regulation 19 of the Public Contracts (Scotland) Regulation 2015.	Procurement will use templates to ensure that the wording used is consistent and clear to tenderers. The team will comply with procurement regulations at all times and ensure that all internal stakeholders receive training and guidance on procurement	
Procurement of Health and Social Care Services	We will procure Health and Social Care services in line with the provisions of Regulation 74 of the Public Contracts (Scotland) Regulations 2015 and also Section 12 of the Procurement Reform (Scotland) Act 2014 or, if a collaborative approach engaging legisitive arrangements outwith Scotland, then with the relevant provision. We will also adhere to any policies or requirements outlined in the Care Reform (Scotland) Act 2025.	Implementation of the processes in the legislation	Ongoing

c) Process & Systems, P2P, Benefits Tracking, E-Procurement

This element of the Strategy is essential if the Group is to achieve efficiencies in our procurement process. If we do not have detailed processes and effective systems, which are adhered to, savings achieved through the tender process will not materialise. We aim to look for new and innovative ways to work and develop and train our staff to utilise technology in order to achieve this.

Identified Factor	Future Priorities	How	Target Date
Supplier onboarding	To ensure all purchasing is transparent and in line with the Group's Financial Codes, the Purchase to Pay team has introduced a No Purchase Order No Payment process. Suppliers will be given information on how to do business with the Group when they are onboarded. In future all suppliers will be expected to complete onboarding documentation electronically to improve efficiency, minimise risk of fraud and improve accuracy of information on the database.	Contractual obligations contained within the terms and conditions of engagement are managed and monitored via contract management meetings led by contract owners.	Ongoing
Purchase to Pay (P2P)	We have implemented a number of system improvements to help suppliers to be paid on time and accurately and to be publicly reporting in line with HRMC requirements.	Monitoring & reporting	Annually on 31st March
Purchase Cards (PCard)	PCard's have been fully launched and rolled out across the Group. The PCard system provides increased visibility and transparency of spend across the Group. This allows for greater reporting procedures and faster, more efficient payments for suppliers.	Group policy and procedural documentation.	Ongoing
Supplier Management	We have implemented a streamlined, strategic approach and facilitating a standardised approach to supplier management across the Group to develop and improve relationships and payment targets for suppliers. We will monitor the supplier onboarding process to ensure that suppliers are processed efficiently.	To be monitored via Procurement Compliance KPIs to be recorded.	Ongoing

Identified Factor	Future Priorities	How	Target Date
E-Auctions	E-auctions are a simple, transparent procurement method where suppliers compete online. We consider the use of E-auctions at strategy stage for some contracts which we deem suitable an where there are tangible benefits in doing so. We will evaluate the use of e-auctions for contracts and consideration should be given to appropriateness and benefits that may be achieved if used to tender other contracts.	Route to market to be strategically evaluated by the Procurement professional.	Ongoing
Benefits Tracking **Database**	Community Benefits and other financial/non-financial benefits will be monitored as part of contract management review meetings held between the Group and its supply chain. The CMS system will record progress of delivered benefits over the course of the contract. Contract Managers will be responsible for ensuring that the supplier's target is being met in accordance with the contract.	Contractual obligations contained within the terms and conditions of engagement are managed and monitored via contract management meetings led by contract owners.	Ongoing

Procurement of large-scale expenditure above Regulated and PCSR 2015 thresholds is provided at Appendix 1.

Appendix 1 – Outline Procurement Programme

Potential Future Contractual Opportunities

The table below shows examples of potential procurement opportunities which may become available over the next 24 months, once confirmed, all available contractual opportunities will be advertised on Public Contract Scotland procurement portal.

Procurement	Approx. Value	Route	When
Application Management Services & Support	£50k over 1 year	National Framework	Delivery 2026
Asset Management System	£1.5m over 4 years	National Framework	Delivery 2026
Consultants (Various) New Build Wyndford	TBC	Wheatley Framework/National Frameworks	Delivery 2026
Commercial Property Portfolio Services	£300k over 4 years	National Framework	Delivery 2026
Corporate Hotel & Travel Services	£350k over 2 years	Subject to Procurement Plan	Delivery 2026
Customer Engagement Services (Research)	£50k	National Framework	Delivery 2026
Cycle to Work Scheme	TBC	National Framework – Mini Comp	Delivery 2026
Decorating Vouchers	£160k over 2 years	Subject to Procurement Plan	Delivery 2026
District Heating Upgrades	£10m over 5 years	Open Tender	Delivery 2026
Electric Vehicle Charge Points	£0 over 20 years	Open Tender	Delivery 2026
E-Learning Platform	£150k over 2 years	National Framework	Delivery 2026
M&E Group wide testing and repair	£41m over 5 years	National Framework	Delivery 2026
Financial Forensics Software	£50k over 3 years	National Framework	Delivery 2026
Flooring Works – Repairs – Wigtownshire	£100k over 3 years	Open Tender	Delivery 2026
Group Site Surveys & Investigations Framework	£2m over 4 years	Wheatley Framework	Delivery 2026
Grounds Maintenance Equipment & Services	£950k over 3 years	Subject to Procurement Plan	Delivery 2026
Hybrid Mail & Digital Mailroom	£2m over 4 years	Subject to Procurement Plan	Delivery 2026
WHG Investment works	£4m over 2 years	Subject to Procurement Plan	Delivery 2026
Intranet Services	£150k over 2 years	National Framework	Delivery 2026
IT Consultancy Services	£600k over 2 years	National Framework	Delivery 2026
IT Research Services – Subscription Based	£115k	National Framework	Delivery 2026
Legal Services Framework	£55m	Wheatley Framework	Delivery 2026
WHE - Investment	£4m over 2 years	Subject to Procurement Plan	Delivery 2026

Procurement	Approx. Value	Route	When
My Housing Software System	£1m over 4 years	National Framework	Delivery 2026
Network Services including Data, Voice and LAN	£400k over 4 years	National Framework	Delivery 2026
Occupational Health & Employee Assistance Programme	£500k over 4 years	National Framework – Mini Comp	Delivery 2026
Office Stationery Supplies	£200k over 4 years (check)	Subject to Procurement Plan	Delivery 2026
PPE & Workwear	£800k over 4 years	National Framework – Mini Comp	Delivery 2026
Provision of Driver Checks	£42k	National Framework	Delivery 2026
Provision of External Finance Auditor Services	TBC	National Framework	Delivery 2026
Provision of Managed Detection and Response Services	TBC	National Framework	Delivery 2026
Refurbishment Works – 9 Blocks, Osborne Crescent/Road (Dumfries)	£2m over 1 year	National Framework	Delivery 2026
Reinstatement Works to Fire Damaged Property	£300k over 1 year	Open Tender	Delivery 2026
Secure Document Archiving and Scanning	£140k over 2 years (check)	Subject to Procurement Plan	Delivery 2026
Telecare Equipment and Associated Services	£750k over 2 years	National Framework	Delivery 2026
UC Verification RPA Project	£100k over 2 years	National Framework	Delivery 2026
Universal Adapter – Multi Use	TBC	National Framework	Delivery 2026
Virtual Desktop Adoption Project	TBC	National Framework	Delivery 2026
Void Trauma Cleaning Services	£250k over 4 years	Subject to Procurement Plan	Delivery 2026
Waste Management	£7m+ over 5 years	National Framework	Delivery 2026
Wheatley Air Conditioning Refurbishment	£2.5m works	National Framework	Delivery 2026
Wheatley Homes South – Windows and Doors Investment Programme	£12.75m over 4 years	National Framework	Delivery 2026
WHG Fleet Management Software	£40k	National Framework	Delivery 2026
WHG Various Sites - New Build Homes	£85m	Gen 3 Framework	Delivery 2027
WHE Various Sites - New Build Homes	£30m	Gen 3 Framework	Delivery 2027
WHS Various Sites - New Build Homes	£90m	Gen 3 Framework	Delivery 2027
Contract Management System	TBC	National Framework	Delivery 2027
Fleet Provision	£18m	National Framework	Delivery 2027

Procurement	Approx. Value	Route	When
Firewall Replacement & Core Re-design	TBC	National Framework	Delivery 2027
Human Resources Software System	£450k over 4 years	National Framework	Delivery 2027
Lone Working Application & Associated Services	£200k over 3 years	National Framework	Delivery 2027
Loretto Various Sites - New Build Homes	£38m	Gen 3 Framework	Delivery 2027
Microsoft Licensing – Enterprise Subscription Agreement	TBC	National Framework	Delivery 2027
Publishing, Print, Design & Associated Services	£750k over 4 years	Subject to Procurement Plan	Delivery 2027
Risk Management Software	£120k over 2 years	National Framework	Delivery 2027
Rope Access	£4m over 4 years	Open Tender	Delivery 2027
Safer Communities Software	£400k over 4 years	National Framework	Delivery 2027
Security Personnel	£1.3m over 4 years	Subject to Procurement Plan	Delivery 2027
Social Care Agency Staff	£160k over 4 years	Subject to Procurement Plan	Delivery 2027
Software and Associated Services	£85k over 3 years	National Framework	Delivery 2027
SQL & Windows Server Licensing & Associated Services	TBC	National Framework	Delivery 2027
Technical Consultancy Framework	£4m	Wheatley Framework	Delivery 2027
Utilities Technical Improvements Project	TBC	National Framework	Delivery 2027
Voice Channel Licensing	TBC	National Framework	Delivery 2027
Void Maintenance & Repairs – Lowther	£3m over 4 years	National Framework	Delivery 2027
Wheatley Care Catering Sundries	£140k over 3 years	Subject to Procurement Plan	Delivery 2027
Wheatley Care Weekend Chef Cover	£130k over 3 years	Subject to Procurement Plan	Delivery 2027
Wheatley Vehicle Telematics Services	£100k	National Framework	Delivery 2027
Lift Maintenance Services	£660k over 3 years	Subject to Procurement Plan	Delivery 2028
Taxi & Private Vehicle Hire	£160k over 4 years	Subject to Procurement Plan	Delivery 2028

Contracts delivered in the previous 12 months

The table below shows procurement opportunities which were delivered in the previous 12 months and are now showing live in the Contracts Register advertised on the Wheatley Group website.

Procurement	Approx. Value	Route	When
Financial and Tax Due Diligence - Wheatley Care Reorganisation	£75k over 1 year	Quick Quote	Delivery 2025
Lowther Project Management	£480k over 4 years	Open Tender	Delivery 2025
Lowther System Consultancy and Project Assurance	£9k over 1 year	Quick Quote	Delivery 2025
Framespan Subscription	£10k over 1 year	Direct Award	Delivery 2025
Treasury Capital Markets Advisory Services 2025	£130k over 4 years	Quick Quote	Delivery 2025
Remediation Projects Scope Advisory Services	£12k over 1 year	Direct Award	Delivery 2025
Load Balancer Hardware	£140k	Framework	Delivery 2025
WHS - Kitchens and Bathrooms Investment	£6m	Framework	Delivery 2025
Income Management and Epayment Software	£400k	Framework	Delivery 2025
Meraki Hardware and Associated Services	£405k	Framework	Delivery 2025
Utilities RPA Project	£155k	Framework	Delivery 2025
Risk Management Software	£55k	Framework	Delivery 2025
IT Service Management & Support	£245k	Framework	Delivery 2025
Microsoft Copilot Training (300 Users)	£60k	Framework	Delivery 2025
Recruitment Training Software System	£120k	Framework	Delivery 2025
Reactive Maintenance for IT Equipment	£60k	Framework	Delivery 2025
Payment Management Platform Services	£40k	Framework	Delivery 2025
Roof Renewal Works - Langholm	£215k	Quick Quote	Delivery 2025
RAM Financial Software	£260k	Framework	Delivery 2025
Pilot Multi-storey Flats (MSF) Building Survey Services	£10k over 1 year	Quick Quote	Delivery 2025
EFQM-based Strategy Development Consultancy 2025	£11k over 1 year	Quick Quote	Delivery 2025
Investors In People Accreditation Consultant 2025	£15k over 1 year	Quick Quote	Delivery 2025

Procurement	Approx. Value	Route	When
Spray-Cork Insulation Works - Pilot Phase	£20k over 1 year	Direct Award	Delivery 2025
Wyndford District Heating Transition Advice	£25k over 1 year	Quick Quote	Delivery 2025
Site Marketing Services - East Govan / Ibrox TRA	£45k over 1 year	Quick Quote	Delivery 2025
Heating Network Readiness Support	£60k over 1 year	Quick Quote	Delivery 2025
Mould Monitoring / Eradication and Building Survey	£360k over 3 years	Open Tender	Delivery 2025
Roof Repair 8 Murdoch terrace	£200k	Open Tender	Delivery 2025
Roof Repair 11 Murdoch Terrace	£30k	Open Tender	Delivery 2025
Roof Repair 36 Caledonian Crescent	£250k	Open Tender	Delivery 2025
Demolition Wyndford Community Hub	£250k	National Framework	Delivery 2025
Void Property Energy Supplier	£0k over 5 years	Open Tender	Delivery 2025
Roof Repairs West Port	£400k	National Framework	Delivery 2025
Group wide Janitorial Supplies	£900k over 4 years	National Framework	Delivery 2025
Cycle to Work Scheme	£100k over 2 years	National Framework	Delivery 2025
Secure Document Archiving & Scanning	£140k over 2 years	Subject to Procurement Plan	Delivery 2025
Group M&E Compliance Works	£5m	National Framework	Delivery 2025
Group Gas Audit	£1m	National Framework	Delivery 2025
Refurbishment / New Build - Duke Street	TBC	Gen 3 Framework	Delivery 2025
Newbuild - Forfar Avenue	£6m	Gen 3 Framework	Delivery 2025
Newbuild - Cook Street	£26m	Gen 3 Framework	Delivery 2025
Newbuild Newington WHS	TBC	Gen 3 Framework	Delivery 2025
Capital Investment - WHE	£7m	National Framework-Mini Competition	Delivery 2025
Group Server Solution	£175k	National Framework	Delivery 2025
Cyber Security Software	£350k	National Framework	Delivery 2025
Electronic Cash Collection Services	£650k	National Framework	Delivery 2025
Contract Management Software System	£50k	National Framework	Delivery 2025
IT Technical Consultancy Services for Anite System	£350k	National Framework	Delivery 2025
Print Equipment and Associated Services	£350k	National Framework	Delivery 2025
Co-location Services	£275k	National Framework	Delivery 2025

Procurement	Approx. Value	Route	When
Stairlift - installation, removal, repairs and maintenance contract	£450k	National Framework	Delivery 2025
Managed Database Services	£450k	National Framework	Delivery 2025
Insurance Brokerage	£60m	National Framework	Delivery 2025
Decorating Vouchers	£900k over 4 years	Subject to Procurement Plan	Delivery 2025
Lift Maintenance Services	£660k over 3 years	Subject to Procurement Plan	Delivery 2025
Newbuild - WHS Catherinefield Farm	TBC	Gen 3 Framework	Delivery 2025
Newbuild - WHS Jonstonebridge	£9m	Gen 3 Framework	Delivery 2025
Newbuild -WHG Bank Street	£3m	Gen 3 Framework	Delivery 2025
Newbuild -WHG North Toryglen	£12.5m	Gen 3 Framework	Delivery 2025
Newbuild - WHG London/Springfield Rd	TBC	Gen 3 Framework	Delivery 2025
Management System - Lowther	£1m	National Framework	Delivery 2025
Payroll Software System & Associated Services	£450k	National Framework	Delivery 2025
Electronic Signature Software	£40k	National Framework	Delivery 2025
Provision of Furniture & White Goods	£2m	National Framework- Mini Competition	Delivery 2025
External Stonework Repairs - WHE	£300k	National Framework- Mini Competition	Delivery 2025
Safety and Security Services - WHS Temporary Supported Accommodation	£250k	National Framework	Delivery 2025

Appendix 2 – Legislative References

The following table sets out the sections of this Procurement Strategy which relate to the requirements set out in the Guidance under the Procurement Reform (Scotland) Act 2014 issued by the Scottish Government on 17 March 2016 and also in accordance with SPPN 4/2021, to disclose the publication of this strategy to Scottish Ministers.

Legislation	Section	Legislative Reference	Strategy Reference Page
Procurement Reform (Scotland) Act 2014	S.15	To have a Procurement Strategy	Full strategy
Procurement Reform (Scotland) Act 2014	S.15(1)(b)	Annual review of strategy	Full strategy
The Public Contracts (Scotland) Regulations 2015	Reg. 39	Occasional joint procurement	6, 14, 32
Procurement Reform (Scotland) Act 2014	S.9	Sustainable procurement duty	7, 12, 18, 29, 30
Procurement Reform (Scotland) Act 2014	S.8	General duties (equality, non-discrimination, transparency and proportionality)	6, 9 19, 26, 27, 34, 35
The Public Contracts (Scotland) Regulations 2015 Procurement Reform (Scotland) Act 2014	Reg. 5 S.3	Thresholds	8, 9, 10
Procurement Reform (Scotland) Act 2014	S.15(5)(a)(i)	Functions and Purpose	Full strategy
Procurement Reform (Scotland) Act 2014	S.15(5)(a)(ii)	Delivering value for money	6, 7, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 32
Procurement Reform (Scotland) Act 2014	S.15(5)(b)(ii)	Consulting and engaging with those affected by our procurements	7, 11, 12, 13, 14, 17, 19, 21, 22
Procurement Reform (Scotland) Act 2014	S.15(5)(7)	Living Wage	27, 28
Procurement Reform (Scotland) Act 2014	S.35	Contract Register	26

Legislation	Section	Legislative Reference	Strategy Reference Page
Procurement Reform (Scotland) Act 2014	S.15(5)(b)(i)	Community Benefits	7, 12, 15, 16, 26, 38
Procurement Reform (Scotland) Act 2014	S.9(1)(a)(ii)	Small-medium sized enterprises	7, 15, 23, 24, 25, 35
Procurement Reform (Scotland) Act 2014	S.11	Supported Businesses	28
Procurement Reform (Scotland) Act 2014	S.15(5)(b)(iv)	Health and Safety	28
Procurement Reform (Scotland) Act 2014	S.15(5)(b)(v)	Fair and Ethical Trading	29
Modern Slavery Act 2015	S.54	Transparency in the supply chain	35
Procurement Reform (Scotland) Act 2014	S.15(5)(c)(i) S.15 (5)(c)(ii)	Provision of food	29
Procurement Reform (Scotland) Act 2014	S.15(5)(d)	Payment terms	30
The Procurement (Scotland) Regulations 2016 Procurement Reform (Scotland) Act 2014 The Public Contracts (Scotland) Regulations 2015	Reg. 8 Reg. 9 S.27 Reg.58	Criminal Convictions/Serious and Organised Crime	32
The Public Contracts (Scotland) Regulations 2015	Reg.25	Gifts, Hospitality and Conflicts of Interest	34
Procurement Reform (Scotland) Act 2014	S.7	Dynamic Purchasing Systems	8, 10, 14, 15, 23, 35
The Public Contracts (Scotland) Regulations 2015	Reg.36	E-Auctions	38
Concession Contracts (Scotland) Regulations 2016	All Regulations	Procurement of Concession Contracts	8

Guidance Requirement	Legislation Reference	Requirement	Strategy Reference Page.
2.5.1	15(5)(a)(i)	Contribution to carrying out of functions and achievement of purposes	Full Strategy
2.5.2	15(5)(a)(ii)	Ensuring Value for Money	6, 7, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 32
2.5.3	15(5)(a)(iii)	Equal Treatment and Non-Discrimination	6, 9, 19, 26, 27, 34, 35
2.5.4	15(5)(a)(iii)	Acting in a transparent and proportionate manner	6, 9, 19, 26, 27, 34, 35
2.5.5	15(5)(a)(iii)	Sustainable Procurement Duty	7, 12, 18, 29, 30
2.5.6	15(5)(b)(i)	Community Benefit Requirements	7, 12, 15, 16, 26, 38
2.5.7	15(5)(b)(ii)	Consulting and Engaging	7, 11, 12, 13, 14, 17, 19, 21, 22
2.5.8	15(5)(b)(iii)	Living Wage	27, 28
2.5.9	15(5)(b)(iv)	Health and Safety	28
2.5.10	15(5)(b)(v)	Fairly and Ethically Traded Goods	29
2.5.11	15(5)(c)	Regulated Procurements involving provision of Food	29
2.5.12	15(5)(d)	Payments within 30-day timescales	30

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Wheatley Housing Group Limited is a company limited by guarantee and registered in Scotland under the Companies Acts, having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL. It is registered with The Scottish Housing Regulator as a registered social landlord. Company registration no. SC426094 Social Landlord no. 363

Procurement Policy Comparison 2025 vs 2026

Summary of Changes:

The revised Wheatley Procurement Policy 2026 has been updated for changes to governance structures, policy scope and structure, legal and regulatory references, supplier assurance requirements, business continuity expectations, cyber and supply chain risk management, and the operating model for the Contract Management System (CMS).

The 2026 policy places increased emphasis on central procurement oversight, risk-based contract management, clearer accountability, and strengthened compliance and resilience requirements across the supply chain.

Comparison Table

Area	2025 Policy	2026 Policy	Change
Title and Scope	Group Procurement Policy focused on Wheatley Group entities	Procurement Policy reframed with broader Wheatley organisational narrative	Rebranding and stronger purpose-led framing in 2026
Approval and Review	Approved February 2025; Review January 2026	Approved February 2026; Review January 2027	One-year extension of approval and review timeline
Policy Structure	Single Contract & Supplier Management section	Separate CMS and Supply Chain Risk sections added	Structure expanded to strengthen governance and clarity
Legal Framework	Scottish procurement law plus Procurement Act 2023 (forthcoming)	Additional reference to Cross-Border Public Procurement (Scotland) Regulations 2025	Expanded legal compliance scope in 2026
Equity, Diversity and Inclusion	Worker Protection Act 2023 referenced	Worker Protection (Amendment of Equality Act 2010) 2023 with mandatory employer duty	Clearer legal duty and expanded explanation of employer responsibilities
Health & Safety Requirements	General expectation of supplier compliance	Detailed, auditable supplier H&S obligations with escalation consequences	Supplier H&S assurance significantly strengthened

Area	2025 Policy	2026 Policy	Change
Business Continuity Management	General requirement for supplier continuity plans	ISO 22301-aligned BCM with documented testing and evidence	More prescriptive and standards-based BCM requirements
Contract & Supplier Management	CSM described but limited proportionality language	Explicit risk-based, proportionate approach with named Contract Owners	Greater accountability and emphasis on risk
Contract Management System (CMS)	Contract Owners have direct CMS access	CMS access is restricted to Procurement Team only	Major operational change centralising system control
Supply Chain Risk	Risk matrix and review cadence defined	Explicit cyber incident notification duties and termination rights	New enforceable supplier cyber obligations
Thresholds and Financial Limits	PCSR thresholds effective January 2025	Updated PCSR thresholds effective January 2026	Financial thresholds refreshed
Related Policies	Standard list of supporting policies	Adds Strategy 2026–2031, Data Strategy, CSM Guidance	Stronger strategic and data governance linkage

Wheatley Group

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Wheatley Procurement Policy

2026

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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 479 7979 lub wyślij e-mail na adres info@wheatley-Wheatley.com

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يمكننا إنتاج معلومات عند الطلب مجانًا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضًا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-Wheatley.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-Wheatley.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو

برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-Wheatley.com پر ای میل کریں۔

Approval body	*Wheatley Solutions Board*
Date of approval	*February 2026*
Review Year	*January 2027*
Customer engagement required	*No*
Trade union engagement required	*No*
Equality Impact Assessment	*No*

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Schedule of Definitions

Within the table of definitions below, those relevant to procurement processes pick up the terminology under Procurement Law in Scotland. The Procurement Act 2023 introduces new terminology. The Procurement Act 2023 is only relevant to Wheatley's call-off arrangements under collaborative procurement arrangements.

Procurement Terminology	Definition
Board Member	A member of the governing body of an organisation, responsible for making key decisions and overseeing the management and operations of the organisation.
Collaborative Contracts	When two or more groups of people or organisations engage in procurement work together for mutual benefit.
Commodity	A raw material or primary product that is bought and sold e.g. copper, coffee.
Contract	An agreement between two or more parties that is legally binding.
Contract Management System (CMS)	Wheatley's central electronic system used to store and manage contract records, key dates, assurance documentation and supplier information. Access to the CMS is restricted to the Procurement Team.
Contract Notice	A publication which advertises a procurement requirement.
Contract Owner	The individual designated by Wheatley as accountable for the management, performance, compliance and risk associated with a contract throughout its lifecycle, in accordance with this policy and the Contract and Supplier Management Guidance.
Contract Register	The central record of Wheatley contracts maintained within the Contract Management System (CMS) and published in line with statutory requirements. A published list of contracts put in place by a public sector organisation. This is a legislative requirement.
Contract and Supplier Management	The process of monitoring supplier performance against a contract.
Contract Value	This is an estimate of the value of a contract over the whole period of the contract e.g. if the contract is for £50k per year for 3 years the contract value is £150k. The contract value should include any extension periods.
Freedom of Information (Scotland) Act 2002 (FOISA)	This legislation gives individuals access to information held by public authorities.
Frameworks or Framework Agreements	An agreement or other arrangement between one or more contracting authorities and one or more economic operators which establishes the terms (in particular the terms as to price and, where appropriate, quantity) under which the economic operator will enter into one or more contracts with a contracting authority in the period during which the framework agreement applies.
Key Suppliers	Those suppliers identified as business critical in terms of risk/value and business continuity.
KPIs	Key Performance Indicators. Measures put in place as part of the contract to evaluate how effective the contract is.
Life Cycle of Goods/Assets	How much money will be spent on an asset over the course of its life.
Local Authority	A term used for councils in Scotland.

Procurement Terminology	Definition
Lots	Grouping similar requirements within a procurement e.g. by geographical location.
Negotiated Procurement Without Prior Publication	A procurement procedure which can be used, in limited circumstances, by public sector buyers to procure goods or services without advertisement.
Procurement Capability Improvement Programme (PCIP)	The Procurement Capability Improvement Programme (PCIP) drives procurement performance by assessing public sector organisations and identifying areas for continuous improvement.
Prior Information Notice (PIN)	A method of giving advanced notice of future planned procurement exercises.
Procurement Process	A procurement procedure can be run in a number of ways (procurement processes) e.g. a Framework Agreement.
Procurement Category Specialist	The name given to the role/person specialising in a specific market sector of products/services.
Procurement Law	Comprises of the Procurement Reform (Scotland) Act 2014, the Procurement (Scotland) Regulations 2016 and the Public Contracts (Scotland) Regulations 2015 which apply to Wheatley and the Public Contracts Regulations 2015, the Procurement Act 2023 and the Cross-Border Public Procurement (Miscellaneous Amendment) (Scotland) Regulations 2025 which are only relevant where Wheatley uses framework arrangements or dynamic markets put in place by contracting authorities outwith Scotland.
Public Contracts Scotland (PCS) Portal	The national portal used by the Scottish public sector to advertise all regulated procurement opportunities and awards.
Procurement Strategy	It is mandatory document for a Scottish public sector organisation, which estimates it will spend greater than or equal to £5,000,000 on regulated procurements to publish a Procurement Strategy which is proportionate and relevant to its organisation.
Public Sector Body	All organisations which are subject to public procurement laws. This includes government, councils, universities and colleges, the NHS and registered social landlords.
Procurement Team	The specialist team within Wheatley responsible for procurement strategy, sourcing activity, procurement compliance, system governance and oversight of contract and supplier management.
Quick Quote	A process used by public sector buyers in Public Contracts Scotland for low value/low risk procurement requirements (normally under £50k in value).
Regulated Procurement	A procurement whose value is greater than £50,000 excluding VAT for goods and/or services for the full life of the contract. Or greater than £2m for Works contracts.
Risk Management	Activities undertaken to minimise negative impacts.
Single Point of Enquiry (SPoE)	An impartial point of contact where suppliers can seek advice or raise concerns if they are dissatisfied with specific public procurement practices in Scotland.
Small Medium Enterprise (SME)	A small or medium-sized enterprise with fewer than 250 employees and a turnover of less than £36 million. They are further categorised as: Micro – 1–9 employees; Small – 10–49 employees; Medium – 50–250 employees;
Stakeholder	Any person or Wheatley who has a vested interest in the success of the procurement activity, i.e., either provides services to it, or receives services from it.

Procurement Terminology	Definition
Supply Chain	All activities, resources, products, etc. involved in creating and moving a product or service from the supplier to the procurer.
Supported Business	An organisation whose main aim is the social and professional integration of disabled and disadvantaged workers and where at least 30% of their workforce are classed as disabled or disadvantaged.
Tender	The term used to describe the Procurement Process of advertising, requesting and awarding a contract.
Threshold	Values that apply to public procurement exercises.
UK GDPR	General Data Protection Regulation legislates how personal data is handled and stored.
Value for Money (VfM)	An economic assessment by the public sector as to whether a project represents value for money; the optimum combination of cost and quality to provide the required services / goods / works.
Waiver	The process which allows procurements to be achieved without following the full tendering procedures. This is typically used when a purchase is time-critical, there are no other suppliers available, or continuity is required.

1. Introduction

Introduction to Wheatley

Wheatley is one of the UK's leading housing and property-management groups.

Our purpose is 'making homes and lives better.' Owning or managing over 90,000 homes, Wheatley delivers award-winning services across 19 local authorities in Scotland. Wheatley is firmly rooted in our communities and is focused on delivering excellent services tailored to customers' needs.

Wheatley employs 2900 people directly and a further 2000 as joint owners of one of Scotland's largest repairs and maintenance companies, City Building (Glasgow).

We are committed to providing homes that are safe, warm, and affordable places where customers feel safe, secure and proud to live. We value the dedication of our staff, whose efforts ensure customers receive the best possible experience every day.

Our focus on being a responsible business and continuously improving is evidenced through national and international awards and accreditations from organisations ranging from EFQM, to Investors in People, Investors in Young People and the UK Government Cabinet Office, which oversees Customer Service Excellence.

Our priorities are shaped by our customers, people and partners. Our procurement is purpose-driven. We wish to leverage our scale to build strategic procurement partnerships, attract private sector expertise into the public domain, and support local businesses and create job and training opportunities for our customers.

Purpose, Vision and Values

Wheatley subsidiaries are united by our values. Together, by focusing on what matters most to customers, we will deliver on our purpose and improve the lives of our customers.

Our Purpose

Making homes and lives better

Our Vision

Our homes and neighbourhoods are places we, and our customers, are proud of. We listen, we learn, and we deliver what matters most to them.

Our Values

Excellence: we proactively pursue the highest standards.
Inclusion: every voice matters and is treated with respect.
Trust: we take pride in always doing the right thing.
Ambition: we are bold, innovative and challenge ourselves

Wheatley Structure

Wheatley comprises of:

- **Wheatley Homes Glasgow** – social landlord with over 43,000 affordable homes managed in Glasgow.
- **Wheatley Homes South** social landlord with over 10,000 homes owned or managed in Dumfries and Galloway
- **Wheatley Homes East** – social landlord with over 7000 homes in Edinburgh, the Lothians and Fife.
- **Loretto Housing Association** – social landlord with over 2000 properties owned and managed across the central belt
- **Lowther Homes –** private rented landlord with over 1000 homes and property management service provider to over 28,000 customers who own their properties.
- **Wheatley Solutions** – corporate support services, ranging from finance, IT and procurement to governance, assurance, legal, marketing and communications
- **Wheatley Foundation** – charity that delivers our community and better lives activity.
- ***City Building (Glasgow) –** joint venture jointly owned with Glasgow City Council and provides repairs and investment services.

*We refer to the 50/50 Joint Venture with Glasgow City Council, City Building (Glasgow), as a Partner Organisation, although City Building (Glasgow) have their own governance procedures and undertake their own procurement processes for the supply of all goods and services.

This Procurement Policy applies to all employees and its subsidiaries in any situation where they are involved in a purchasing process. 'Purchasing' includes all procurement activities including leasing and hiring and may where appropriate, include other activities accompanying the Life Cycle of Goods (or service contracts) and the end-of-life disposal of goods which have been procured (whether or not they remain in our ownership). Adherence to the Procurement Policy is both an individual and a corporate responsibility; failure to comply may result in disciplinary action.

The purpose of the Procurement Policy is to set out the general operating principles covering the activities and objectives of Procurement within Wheatley. The document explains the principles under which Procurement will be undertaken and proactively managed such that the stakeholders' requirements for supplies, works and services are efficiently and effectively sourced at the lowest sustainable 'total' cost whilst delivering best value for money.

The Procurement Team is responsible for managing procurement ethically and in compliance with legislation. It is responsible for providing guidance and support and to provide advice for staff who procure on behalf of their subsidiary. Should you require any assistance or guidance with any procurement matter please contact procurement@wheatley-wheatley.com.

Wheatley / City Building (Glasgow) Joint Working Principles

We operate a collaborative approach to managing procurement across Wheatley with CBG. This will continue to be developed and agreed in line with Wheatley's compliance and legislation principles, reflecting best value and sustainability through the supply chain, determining the most effective route to market, jointly supporting SMEs, effectively benefiting the customer through the efficient management of Community Benefits and ultimately promoting excellence in procurement.

2. Principles, Aims and Objectives

Procurement activities must comply with all applicable UK laws and regulations. In particular all procurement must comply with, as relevant, the Public Contracts (Scotland) Regulations 2015, The Procurement (Scotland) Regulations 2016, Procurement Reform (Scotland) Act 2014, Concession Contract (Scotland) Regulations 2016 and the Housing (Scotland) Act 2001.[1]

All procurement activity aims to achieve Best Value for Wheatley. Best Value includes not only the initial purchase price but also continuing costs throughout the Life Cycle of equipment, materials works and services, such as financing and depreciation, maintenance requirements and energy usage. Best value also includes the quality and reliability of the supplies, works or services and the punctuality and reliability of their execution.

Wheatley will engage with suppliers to help the Procurement Team better understand stakeholder needs and encourage improvements in products, pricing, quality, and services.

Wheatley will work with Government bodies and other public sector organisations to utilise collaborative procurement arrangements where they offer value for money. In addition, Wheatley will consider including collaborative arrangements within its contracts to enable other public sector bodies to benefit from its rates, learn methods and scope of work.

All procurement for supplies, works and services that Wheatley undertakes and the methods it uses to procure them must not infringe upon laws applicable at the time of the procurement, and must conform to applicable ethical, social and environmental standards.

[1] Going forward, pursuant to the now in force Procurement Act 2023 , which applies predominantly outwith Scotland, where Wheatley undertakes call-offs from collaborative procurement approaches put in place under the Procurement Act 2023 Wheatley will require also to ensure compliance. With transition arrangements, this is not likely to impact materially in 2025.

3. Equity, diversity and inclusion (EDI)

We are dedicated to ensuring fair treatment for all our stakeholders and conducting business in a manner that actively promotes equity of opportunity while championing diversity and inclusion. Wheatley requires the supply chain to comply with the Equality Act 2010 and moreover is committed to ensuring that no one is excluded or discriminated against based on religion or belief, race, age, sex, gender reassignment, sexual orientation, marriage or civil partnership, family circumstances, pregnancy and maternity, or disability, and we work to recognise, understand and respond to the different needs of these groups. EDI informs our procurement and in particular, our community benefit approach.

Wheatley has a zero-tolerance approach to bullying, harassment and victimisation and works to ensure that employees are safe within the workplace from such treatment including sexual harassment.

We also prioritise the highest standards of worker protection, focusing on the safety, well-being, and fair treatment of all our employees in line with the Worker Protection (Amendment of Equality Act 2010) 2023 which imposes a mandatory duty for Wheatley to take reasonable steps to prevent their employees from experiencing sexual harassment in the course of their employment. This Act amends the Equality Act 2010 and strengthens workplace harassment and discrimination rights, particularly against sexual harassment by enhancing protections for employees including from third parties.

Real Living Wage

Wheatley is an accredited Real Living Wage employer that is dedicated to ensuring that our employees receive fair compensation for their hard work. We pay and are committed to paying the real Living Wage, as a minimum, to all our employees. In addition to our internal commitment, we actively encourage our suppliers to adopt the same standard.

We believe that fair wages are essential for fostering a motivated and productive workforce, and we expect our suppliers to share this ethos. By promoting the real living wage throughout our supply chain, we aim to create a positive impact on the broader community and support the well-being of workers at all levels.

Fair Work First

Fair Work First is the Scottish Government's flagship policy for driving high quality and fair work across the labour market in Scotland by applying fair work criteria to grants, other funding and contracts being awarded by and across the public sector, where it is relevant to do so.

Through this approach, the Scottish Government is asking employers to adopt fair working practices, specifically:

- Payment of at least the real Living Wage.
- Providing appropriate channels for effective workers' voice, such as trade union recognition.
- Investment in workforce development.
- No inappropriate use of zero hours contracts.
- Action to tackle the gender pay gap and create a more diverse and inclusive workplace.
- Offer flexible and family friendly working practices for all workers from day one of employment.
- Opposing the use of fire and rehire practices.

Wheatley values the culture of partnership working that has been established with Trade Union Colleagues and will continue to work together to develop transparent mechanisms for employee voice and engagement founded on trust and respect.

Wheatley's values and the priorities are aligned to the Fair Work First principles.

Although not directly applicable to us, we are also considerate of the Fairer Scotland Duty, as set out in part one of the Equality Act 2010. This places a legal responsibility on public bodies in Scotland to actively consider and 'pay due regard to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making strategic decisions'.[2]

Social mobility is a key theme threaded through our EDI actions. Wheatley recognises the role it plays in our local economies and is focused on targeting underlying weaknesses which include underemployment, above average levels of youth unemployment and low levels of qualifications. As a result, it shall support its stakeholders by seeking to provide education/employment opportunities via Wheatley business activity and its supply chain. This includes the social value created by contracting with Supported Businesses.

Our focus goes beyond our legislative duties; to signal our commitment to EDI, when procuring we generally seek that our suppliers and contractors demonstrate the existence of their own EDI policy. Where our suppliers / contractors do not have an EDI policy, we encourage them to consider how EDI can inform their working practices and be considered within their own organisations.

Through our Contract Management System, we survey our suppliers to find out more about their commitment to EDI, their policies, and encourage our suppliers to detail how they reflect our EDI aspirations within their working practices.

You can access Wheatley's EDI and Human Rights policy here.

[2] About the Duty - Fairer Scotland Duty: guidance for public bodies - gov.scot (www.gov.scot)

4. Data Protection

Wheatley holds a wide range of sensitive information, of both personal and commercial nature. We have a duty to protect this information and ensure it is not seen or accessed by people (whether internal or external to Wheatley) without the legal authority to do so.

Wheatley's policy position in respect of data protection is reflected in our Data Protection Policy.

Wheatley must comply with all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR, the Data Protection Act 2018 (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003 (SI 2003 No. 2426) as amended, and the guidance and codes of practice issued by the Information Commissioner.

Wheatley will continue to carry out Data Privacy Impact Assessments (DPIA) when required to do so by law or good practice, on all activities which involve personal data or the exchange of personal data to help us identify the most effective way to comply with our data protection obligations and meet individuals' expectations of privacy.

The UK GDPR requires us to undertake DPIAs in circumstances where we:

- use systematic and extensive profiling with significant effects;
- process special category or criminal offence data on a large scale; or
- systematically monitor publicly accessible places on a large scale.

The Information Commissioner requires data controllers to undertake a DPIA if they plan to:

- use systematic and extensive profiling or automated decision-making to make significant decisions about people;
- process special-category data or criminal-offence data on a large scale;
- systematically monitor a publicly accessible place on a large scale;
- use innovative technology in combination with any of the criteria in the European guidelines;
- use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit;
- carry out profiling on a large scale;
- process biometric or genetic data in combination with any of the criteria in the European guidelines;
- combine, compare or match data from multiple sources;
- process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;
- process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines; and
- process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them.

DPIAs help Wheatley to identify and reduce the privacy risks of a project and document any mitigations we are required to put in place. The purpose of a DPIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met wherever possible. Wheatley also has a duty to be accountable under the UK GDPR and requires DPIAs to be retained and updated by the contract owner where appropriate for audit and compliance purposes.

It is a standard condition of all our contracts that our suppliers and sub-contractors will comply with all data protection legislation and applicable regulations, including the UK GDPR, the Data Protection Act 2018, and all guidance and/or Codes of Practice published by the Information Commissioner's Office.

The requirement for DPIA will be considered within all relevant future procurement activities.

5. Ethical, Social and Environmental Responsibility

Fair and Equal Treatment of Suppliers

All procurement will be conducted such that all suppliers with the necessary abilities have a fair and equal opportunity to secure Wheatley business, including seeking to enable market access opportunities for Small and Medium Sized Enterprises (SMEs).

This includes, within the constraints of the regulated environment in which we operate and by carrying out tendering in line with Procurement Law Procurement Reform (Scotland) Act 2014 and relevant Scottish Government Statutory Guidance, conducting our procurements in a transparent manner, utilising public dynamic purchasing systems, frameworks and procurement processes that promote supplier diversity.

In practice, this enables a diverse range of suppliers to bid for contracts with us. Tender evaluations are conducted in line with Procurement Law. Wheatley is also committed to improving access to our contracts and empowering staff, in accordance with Procurement Law and Sustainable Procurement Duty, to promote sustainability, for example through seeking to buy locally for low risk, low value purchases thus contributing to our local communities.

We shall appropriately review and evaluate all above-threshold and regulated contracts, considering the geographical location and the option of splitting them into smaller Lots, which may encourage SME participation. This will not be appropriate in every circumstance, and we retain our discretion not to Lot or retain larger value contracts as one Lot, determined by the best interests of Wheatley.

In particular, Wheatley will seek, where possible to promote local economic development and regeneration by actively encouraging fair and open competition across a varied supply base thus making it easier for all suppliers regardless of size to bid for contracts.

Prior to commencing a procurement exercise, we may seek to carry out market testing. To be open and transparent in our dealings we will only do this by going out to the market using the appropriate Prior Information Notice (PIN) on the Public Contract Scotland Portal, as applicable to regulated spend thresholds. Any improper approaches, whether in the form of inducements or threats from suppliers, must be reported to line managers, even if they are sufficiently ambiguous to allow for an innocent interpretation.

To ensure transparency and fair treatment of all suppliers during the tendering process and in compliance with the formal Procurement Process, all communication with suppliers will be carried out through the Public Contract Scotland Portal and in accordance with arrangements set out in the Procurement Guidance section on the staff intranet, W.E. Connect, which staff must follow.

Ethical Standards of Staff

Wheatley insists on suppliers adhering to strict ethical standards and behaviour, in return Wheatley will also demonstrate the highest level of ethical standards. Wheatley will be fair, honest, and transparent in all dealings with suppliers and avoid any conduct which may be adversely interpreted.

Persons engaged in any aspect of procurement on behalf of Wheatley will not use their authority for personal gain. Adhering to this policy will also help ensure that we comply with the requirements of The Bribery Act 2010, which makes it an offence to:

- Bribe another person (e.g. offer, promise, or give financial or other advantage to induce or reward improper performance of a function);
- Receive bribes from another person (e.g. agreeing to receive or accept a financial or other advantage for improper performance of a function);
- Bribe foreign officials; and
- Fail to prevent bribery.

Further details are available in Wheatley Fraud, Corruption and Bribery Policy.

Social and Environmental Responsibility

Effective procurement will complement our goals for maintaining awareness of sustainability issues amongst staff and customers. We expect our suppliers to meet our standards for sustainability as set out in Wheatley Sustainable Procurement Strategy.

Wheatley is committed to compliance with the Health and Safety at Work etc. Act 1974 and all subordinate legislation. We expect all suppliers to:

- Comply with all applicable health and safety laws and regulations.
- Provide safe materials, equipment, and services compliant with appropriate legislation
- Co-operate with safety vetting where this may be required
- Implement and maintain effective health and safety management systems, including:
    - Documented policies and procedures.
    - Risk assessments and safe systems of work.
    - Training and competence programmes for staff
- Promote good working practices throughout the supply chain, ensuring safe workplaces and preventing harm.
- Provide evidence of compliance upon request and cooperate with audits or inspections.
- Notify Wheatley promptly of any incidents or risks that could impact Wheatley's operations or personnel.

Failure to meet these requirements may result in escalation, corrective action, or impact on contract renewal.

Gifts and Hospitality

All staff involved in procurement must comply with Wheatley's policy on Gifts, Hospitality, Payments and Benefits, which sets out guiding principles for employees and Board Members to follow to ensure that we meet legal and regulatory requirements. This serves to protect our integrity and avoid the potential for any perception that our procurement processes can be unduly influenced.

All staff have a duty to act with honesty and integrity and must never accept a gift, favourable treatment or incentive in exchange for acting in a certain way.

Conflicts of Interest

Wheatley contributes to the economies of the areas we work in and has commercial and business relationships with many different companies, contractors, suppliers and service providers. In order to comply with Regulation 25 of the Public Contracts (Scotland) Regulations 2015 we are required to take appropriate measures to prevent, identify and remedy conflicts of interest arising in the conduct of procurement procedures so as to avoid any distortion of competition and to ensure equal treatment of all economic operators and equivalent provisions apply under other areas of Procurement Law.

All staff must report connections as outlined in Wheatley's Gifts, Hospitality, Payments and Benefits Policy to their direct Line Manager and complete the relevant Declaration of Interest form, forwarding this to the Governance Team for entry into Wheatley's staff register of interests. Board Members must follow Wheatley Non-Executive Director

Conflicts of Interest policy. For the avoidance of doubt this includes any situation where an employee or Board Member has directly or indirectly a financial, economic or other personal interest which might be perceived to compromise their impartiality and independence in the context of the procurement procedure.

Any Employee or Board Member involved in a decision-making process in respect of any matter covered by this policy shall be required to ensure that, to the best of their knowledge, there has been no conflict of interest and the decision making process has been open and transparent. Alternatively, they shall be required to declare a conflict of interest immediately upon becoming aware of such an interest and where there is a conflict will be removed from the decision-making process.

In order to protect our reputation and demonstrate that we conduct our affairs with openness, honesty and integrity we maintain a staff Register of Interests. As a matter of good practice, all Board Members and Senior Leaders are required to complete a Registration of Interests form annually. All other Employees are required to exercise their discretion and complete such a form if they consider themselves to have a registrable interest. All forms should be passed on to the Governance Team who has the responsibility for maintaining and auditing the register. The Governance Team may contact you regarding the interest you are declaring.

Connections/ Interests will not necessarily prevent Wheatley trading with the supplier concerned but in the interest of ensuring the decision-making process is open and transparent, declarations of interest must be made and retained by the Procurement Category Specialists.

Wheatley employees should avoid, as far as possible, dealings with Wheatley suppliers in their private affairs, particularly if this is likely to put them under some obligation to the supplier. Where such arrangements are unavoidable, it is essential that they are not offered any deal, which could be construed as a reward for actions taken in the course of their employment.

It is the responsibility of Employees and Board Members to manage conflicts of interest that arise between their own personal or business interests and their duties to us, in accordance with the employee and governing body Codes of Conduct. Employees and Board Members give a written undertaking to act in accordance at all times with the Employee terms and conditions of contract and the Code of Conduct for Governing Board Members, which exemplify good governance and reflect relevant legal and regulatory requirements.

Further information can be found in our Wheatley Gifts, Hospitality, Payment and Benefits and Wheatley Non-Executive Director Conflicts of Interest policies.

Criminal Convictions and Serious and Organised Crime

We view criminal conduct of our suppliers very seriously and work closely with Police Scotland with whom we have an Information Sharing Protocol. All suppliers are required, as a standard term of contract, to complete a Declaration of Non-Involvement in Serious and Organised Crime.

In compliance with the Procurement Reform (Scotland) Act 2014 and Public Contracts (Scotland) Regulations 2015 we are required to exclude a business from bidding if it, or someone who holds a senior position within it, has been convicted of specific offences as detailed in the Public Contracts (Scotland) Regulations 2015 the Procurement (Scotland) Regulations 2016 and relevant to future collaborative procurement approaches, the Procurement Act 2023) unless there are exceptional circumstances.

We are also entitled to exclude bidders should they attempt to distort competition. All staff involved in the procurement of goods, works or services should be aware of the potential for bidders to be acting together in order to fix market prices – this is highlighted within our 'Passport to Procure' training which staff involved in procurement are required to complete. Any such arrangement is illegal. Staff may also become aware of potentially fraudulent activity throughout the life of any procurement. Any such suspicions must be reported in writing (together with any supporting evidence) to the Director of Assurance who will investigate and pass to the appropriate department for further investigation if necessary. All reporting of anti-competitive behaviour and fraud will be dealt with in accordance with Wheatley Fraud, Corruption and Bribery Policy and Wheatley Anti Money-laundering and Counter Terrorism Financing Policy.

Slavery & Human Trafficking

We uphold strict ethical standards in our business and supply chain and are dedicated to preventing slavery and human trafficking at every level.

We are committed to developing the economies of the areas we work in and building strong relationships with local Suppliers. We operate solely within Scotland and do not have a large global Supply Chain.

Wheatley is committed to compliance of the Modern Slavery Act 2015 and related legislation such as the Proceeds of Crime Act 2002 as reflected in Wheatley Anti Money-laundering and Counter Terrorism Financing Policy. We expect all our Suppliers to comply with the legislation and promote good working practices throughout the Supply Chain.

We review and present our Wheatley Modern Slavery Statement annually to our Wheatley Board for approval. We publish our statement on our website and are also required to enter this into the UK Government's modern slavery statement registry.

6. Business Continuity and Disaster Recovery

As part of Wheatley's Business Continuity Management (BCM) arrangements in line with ISO 22301, essential activities and service levels have been identified and prioritised through a Business Impact Assessment (BIA) based on the following criteria:

- Critical services – activities critical to each service
- Financial impact – potential cost implications of disruption
- Legislative requirements – compliance with statutory obligations
- Reputational risk – potential damage to Wheatley's reputation

The loss of a supplier is recognised as a key risk, as the ability to maintain these essential activities may depend on the continuity of suppliers, services, and products. Additional risks to the supply chain include pandemic, loss of premises, ICT failure, fuel shortage, severe weather, loss of key staff, and disruption to critical infrastructure.

To mitigate these risks:

- All key suppliers, that have been identified within Business Area Business Continuity Plans, must have effective Business Continuity arrangements in place.
- These arrangements must be documented appropriately and include:
    - A current Business Continuity Plan (BCP)
    - Evidence of annual testing or exercising of the plan
    - Results of tests and any improvement actions
- Testing and Collaboration
    - Wheatley may invite key suppliers to participate in its own continuity exercises.
- Contingency Support
    - Suppliers must confirm what contingency support they can provide to Wheatley in the event of disruption affecting Wheatley's operations.
- Ongoing Assurance
    - Compliance with these requirements will be monitored throughout the contract lifecycle.
    - Failure to maintain adequate continuity arrangements may impact contract renewal or result in escalation to senior management.

7. Route to Market

All Wheatley procurements should be carried out in line with the authority as detailed in the table below. Procurements deemed to be of high business risk political or reputational nature must be reported to the Executive Team (ET) as a minimum.

Financial Value	Process	No. of Suppliers	Responsibility	Authorisation
Below £25,000	Guidance on W.E. Connect that must be followed to achieve best value. Quick Quote process via PCS (quality/price) may be followed if the contract is deemed to be of medium risk or higher.	N/A unless Quick Quote is used. if so, 3 – 5 suppliers must be invited to quote.	Business with advice from Procurement	Budget Holder
£25,000-£50,000	Quick Quote process via PCS (quality / price)	3 - 5	Business with advice from Procurement	Budget Holder
£50,000 (Goods and Services) £2m (Works) and above up to PSCR Thresholds	Tender process via PCS – quality / price in accordance with the requirements of the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016	As per specific procurement route. Seek advice.	Procurement	Budget Holder/ Business Leader/ Executive Team
Above PCSR Thresholds	Tender process in accordance with the requirements of the PCSR	As per specific procurement route in the PCSR. Seek advice.	Procurement	Budget Holder / Business Leader / Executive Team May also require Wheatley Board approval.
Beneath £50,000 (Goods and Services) and £2m (Works) where a competitive tender process is not possible	Waiver Approval Form	Single Supplier	Procurement	Budget Holder/ Business Leader/ Executive Team May also require Wheatley Board approval.

Financial Value	Process	No. of Suppliers	Responsibility	Authorisation
Above £50,000 (Goods and Services and £2m (Works) where a competitive tender process is not possible	Negotiated Procurement without prior publication of a Contract Notice	Single Supplier	Procurement	Budget Holder/ Business Leader/ Executive Tea May also require Wheatley Board approval.

Separate to the above, it may be that the procurement route involves use of a collaborative procurement approach in the form of a framework agreement or dynamic purchasing system, in which case the relevant process will be dictated by the detail of the relevant collaborative procurement approach.

Contracts with a value of less than £50,000 are not subject to Procurement Law and do not require to be publicly advertised. Below this threshold staff will be offered training and support including an introduction to Wheatley's 'Passport to Procure' program to use the 'Quick Quote' process via Public Contracts Scotland as good practice to achieve value for money.

The Quick Quote process is operated through the Public Contract Scotland Quick Quote facility and requires a minimum of 3 quotes from suppliers, who are independently invited to quote. Staff should be mindful when completing the Quick Quote process that they should not simply revert to previous suppliers. Furthermore, staff must ensure that the chosen supplier is appropriate, and that due diligence has been carried out in terms of financial standing and references and the procurement is carried out in line with Wheatley Standing Orders and guidance relating to spend under £50,000.

The rules of aggregation on contracts apply. This means that the Contract Value must be calculated over the duration of the contract. This can be reached by:

- Wheatley having requirements with several suppliers for goods or services, with similar characteristics, which in total exceed the Regulated threshold or;
- Wheatley having requirements with the same supplier over a period of time which exceed the threshold.

Contracts with a value in excess of £50,000 or where it is considered that advertising would be advantageous in terms of obtaining value for money, all contracts shall be advertised on the Public Contracts Scotland Portal.

Regulated: £50k and over (Goods and Services) £2m and over (Works)

The procurement regime for works contracts over £2m and supply/service contracts over £50,000 and the relevant thresholds under the Public Contracts (Scotland) Regulations 2015 (see next section) is governed by the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016. Contracts of this value and nature must be advertised on Public Contracts Scotland using a contract notice or PIN in order to comply with S.23 of the Act.

(Scotland) Act 2014 will continue to be procured as Regulated Contracts. The current thresholds for the PCSR 2015 and the Procurement Reform Scotland Act in relation to Wheatley are set out below:

Public Contracts (Scotland) Regulations 2015 Thresholds

PCSR 2015	From 1 January 2026 (inclusive of VAT)
Works	£5,193,000
Concessions – Works and Services	£5,193,000
Services and Supplies (non Schedule 1 Entities)	£207,720
Light Touch Regime	£663,540
Small Lots (works)	£884,720
Small Lots (supplies and services)	£70,778

Procurements for beneath the regulated thresholds can be undertaken by the Waiver process, these types of procurements are for goods, services & works where a contract is awarded to a single supplier which is deemed to be in the 'Best interests of Wheatley' and the Waiver Approval Form sets out the full background and justification to support the approval process, including any associated risks.

Procurements above the regulated thresholds, where the supplies or services can only be provided by a particular supplier shall be subject to a Negotiated Procedure without Prior Publication. This can be in the following circumstances:

- The Procurement's aim is the creation or purchase of a unique work of art or artistic performance;
- Competition is absent for technical reasons such that only one supplier can deliver;
- The availability of competition is absent on account of exclusive rights; or
- There is urgency, not of the contracting authority's making.

Payment Approval

Payments to suppliers will be made in accordance with the terms of the particular contract. Our standard payment terms are within 30 days of receipt of a completed and valid invoice. Staff should note that payment terms will vary depending on the Commodity being procured and, in particular, construction contracts must follow the payment provision approaches as set out in the Scottish Procurement Construction Policy Note (CPN) 1/2019.

In order to ensure payments throughout the supply chain are made in accordance with the Public Contracts (Scotland) Regulations 2015, contractual obligations contained within the terms and conditions of engagement will be monitored and reported via KPIs.

Statutory Reporting

In order to comply with S.18 Procurement Reform (Scotland) Act 2014, Wheatley will publish an annual report concerning Wheatley's regulated Procurement activities of the previous financial year. Wheatley shall notify the Scottish Ministers of the completion of the report and said report shall be published on Wheatley's website. The Procurement Team shall be responsible for completing the required annual report.

Contract Register

In order to comply with S.35 Procurement Reform (Scotland) Act 2014, Wheatley will publish our Contracts Register on our website. The Register is a live document and is updated on a regular basis.

Delegated Authority to Procure

All procurement will be undertaken in accordance with the procedures set out within this Procurement Policy and read in conjunction with Wheatley Standing Orders.

Staff may undertake Wheatley's 'Quick Quote' for procurement below £50,000 once they have completed Wheatley's 'Passport to Procure' program. Where staff wish to procure goods, services or works above £50,000, they must refer to the Procurement Team for tendering purposes. With the exception of the Waiver process, the Procurement Team shall be responsible for managing all procurement above Staff should refer to the table above outlining appropriate delegation of responsibility.

Contract Approval

Approval to award contracts for goods, services and works will be in accordance with the Scheme of Financial Delegation and the Procurement Policy.

Collaborative Procurement

Wheatley shall seek out opportunities to use collaborative contracts established by other organisations where it offers us better value for money than conducting our own procurement and meets our business needs.

As a result of Wheatley's size and scale we will use our leverage in the market to procure on behalf of other organisations in the housing sectors where value for money can be offered through collaborative procurements. We will use our strength to assist in the development of Wheatley by identifying opportunities to consolidate suppliers to achieve economies of scale where this is appropriate. Where consolidation is not the most suitable approach, including where using SMEs offers better value, flexibility or service outcomes, alternative procurement routes will be considered. We will seek to establish and develop Wheatley wide frameworks, in accordance with the Scottish Procurement Construction Policy Note (CPN) 3/2017 guidance on frameworks, where appropriate.

As an associate member of Scotland Excel, Wheatley has access to a wide range of corporate and capital frameworks. This access to framework contracts has delivered efficiencies and financial benefit to Wheatley. Wheatley is also a participant on the West Territory Hub through Scottish Futures Trust. Other framework providers being used by Wheatley include the Scottish Procurement Alliance (SPA), Northern Housing Consortium (NHC), Health Trust Europe, Places for People, Crown Commercial Service, ESPO, Scottish Government and Procurement for Housing (PfH). Wheatley's procurement programme has been aligned with framework and dynamic purchasing systems availability to ensure contracting for optimal solutions with the best placed suppliers is realised. The overarching requirement to achieve Value for Money remains our key focus.

Plans for PCIP and Internal Audit

Wheatley Assurance function provides an internal appraisal service that reviews internal control systems in place across Wheatley's operations (e.g. Procurement). Internal Audit activity is aligned to the risk profile of Wheatley and provides assurance over the design and operating effectiveness of the controls put in place by management to manage known risks. A Procurement Risk Register is in place and is monitored regularly by Procurement management to ensure it continues to reflect the current procurement risk profile.

Procurement is a Wheatley-wide function which is subject to periodic internal audit activity.

External accreditation is sought on a regular basis via Scotland Excel Procurement & Commercial Improvement Programme (PCIP) external audit.

8. Contract and Supplier Management

A Contract and Supplier Management (CSM) approach will be applied by Contract Owners across Wheatley to provide a consistent, proportionate and risk-based approach to managing contracts throughout their lifecycle.

The purpose of Contract and Supplier Management is to ensure that contracts:

- Deliver intended outcomes and value for money
- Comply with contractual, regulatory and governance requirements
- Actively manage risk and resilience
- Support continuous improvement and sustainable service delivery
- Deliver additional benefits for customers, service users and communities

Effective CSM enhances the value derived from both new and existing contracts by strengthening supplier performance, improving engagement, fostering continuous improvement, and enabling mutual efficiencies. Where appropriate, this approach also supports the development of strategic supplier relationships for business-critical contracts.

Contract and Supplier Management must be proportionate to the value, complexity and risk of the contract. Contracts assessed as higher risk or business-critical require enhanced oversight, more frequent review and active assurance.

A Contract and Supplier Management (CSM) Guidance document accompanies this policy and must be used across Wheatley.[3] The guidance provides detailed direction on managing contracts and suppliers effectively to ensure the delivery of outcomes, value for money and community benefits, and supports Contract Owners in applying a consistent approach across all stages of the contract lifecycle.

Key requirements of Wheatley's Contract and Supplier Management approach include:

Contract Ownership

Every contract must have a named Contract Owner, typically a director or manager, identified at the outset of procurement. The Contract Owner is accountable for managing the contract and supplier in accordance with this policy and the CSM Guidance, including performance, risk, compliance and record-keeping.

Procurement Planning and Transition to Contract Management

The Procurement Team will support the identification of appropriate routes to market and procurement strategies. Once contracts are awarded and mobilised, responsibility for ongoing contract and supplier management rests with the Contract Owner.

Risk, Resilience and Assurance

[3] Contract and Supplier Management Guidance Document - WE Connect

Contracts assessed as high business, political or reputational risk require formal risk assessment and ongoing review. Contract Owners must consider resilience measures, including disaster recovery, business continuity and supply chain risk, where relevant.

Supply Chain Security and Cyber Security

For contracts involving technology services, access to Wheatley systems or the processing of corporate or personal data, Contract Owners must ensure that suppliers meet agreed technical and security requirements. This includes monitoring cybersecurity obligations, KPIs and incident notification requirements through regular engagement and contract review.

Stakeholder Involvement

Relevant internal stakeholders must be identified and appropriately involved during procurement and contract delivery stages to support specification development, risk identification, performance management and assurance.

Contract Administration and Supplier Development

Contract Owners are responsible for contract administration, including change control, performance monitoring and risk mitigation. Working collaboratively with suppliers to improve delivery and maximise mutual benefit is encouraged where appropriate.

The Procurement Team will support Contract Owners in applying the CSM Guidance. All staff with contract management responsibilities will receive training on relevant Contract Management System (CMS) procedures and functionality.

9. Contract Management System (CMS)

Wheatley operates a Contract Management System (CMS) to support effective contract and supplier management. All Wheatley contracts are held on a central electronic Contracts Register within CMS.

The CMS supports governance, transparency and assurance by enabling:

- Central storage of contracts and supporting documentation
- Oversight of contract performance and key obligations
- Monitoring of key dates, risks and actions throughout the contract lifecycle

Access to CMS is restricted to the Procurement Team. Contract Owners do not have direct access to the system.

Contract Owners remain responsible for ensuring that all required contractual documentation, reviews, assurance information, and updates are provided in a timely manner. Any documentation that requires to be uploaded to CMS must be sent to the #Procurement mailbox, where it will be reviewed and uploaded by the Procurement Team on the Contract Owner's behalf.

CMS comprises two modules:

Sourcing Module

The Sourcing module is used to add and maintain supplier records and to undertake routine supplier assurance checks, including insurances and compliance information. This module is primarily administered by the Procurement Team and is also used to issue Requests for Information (RFIs), such as Health and Safety or Equality, Diversity and Inclusion (EDI) compliance checks.

Contract Management Module

The Contract Management module is used to set up contracts and store all relevant contractual documentation, including signed contracts, variations, review records and assurance information. This module is used by both Procurement and Contract Owners, with Procurement leading contract set-up and Contract Owners responsible for ongoing management.

Procurement will work with Contract Owners to set up contracts within CMS and to maximise system functionality at the outset. Following mobilisation, Contract Owners are responsible for contract and supplier interactions and for ensuring that required documentation is provided to Procurement for upload to the CMS.

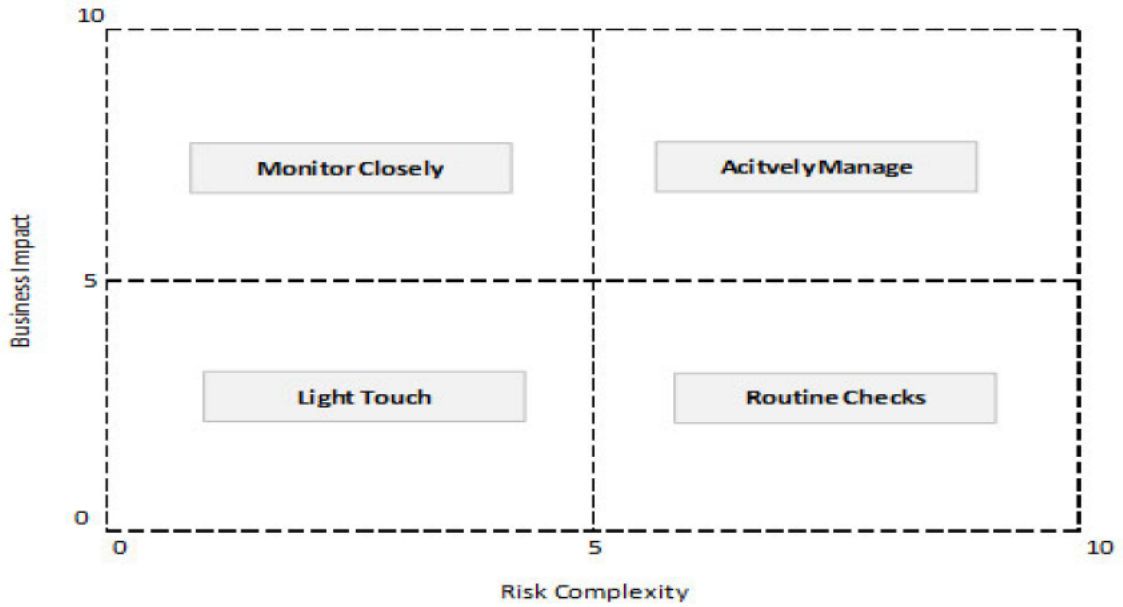
CMS will generate automated alerts to Contract Owners when actions or reviews are due. Alerts will continue until the required action is completed, supporting timely and effective contract management.

10. Supply Chain Risk

A Wheatley Contracts Risk Matrix is available on W.E. Connect.[4] The Risk Matrix is a crucial tool for managing contracts within the organisation. It helps identify and assess potential risks associated with contracts, ensuring that we can mitigate and manage these risks effectively.

The matrix categorises risks into various types, such as financial, compliance, environmental, geopolitical, technological, logistical, and operational. It also scores these risks based on their impact and complexity, placing contracts into one of the four quadrants below:

[4] https://wheatley.interactgo.com/Interact/Pages/Content/Document.aspx?id=55066



This scoring system guides our approach to supplier management and contract oversight, as shown in the table below.

Category	Characteristics	Minimum requirements
Light Touch	Commodities that are found in abundance and/or in low-risk supply markets (e.g. office stationery / PPE wear).	**Annual** review
Routine Checks	Commodities/Services that are important but sourced from low-risk markets (e.g. Legal Services / Technical Consultancy) with solid supply but would have an impact on service if supply were disrupted.	Contracts must include supplier risk for discussion as a minimum **annual** contract review.
Monitor Closely	Service and Goods with a high business impact in economic terms, and where supply continuity is at risk (e.g. new build contractors/insurance providers)	Contract supplier discussions as a minimum every **six months** (contract review, you may also need VSA and H&S checks) Finance checks, Equifax report will be run centrally.
Actively Manage	Services and Works contracts that are important both in terms of economic impact and for supply conditions from complex and/or risky markets (e.g. Servitor)	Contract supplier discussions as a minimum **every quarter** (contract review, you may also need VSA and H&S checks) Finance checks, Equifax report will be run centrally

All Contract Owners for actively managed contracts will be invited to quarterly meetings led by the Procurement Team. These meetings aim to ensure that all documentation, such as DPIAs, H&S, VSAs, and insurance documents, are up to date. Additionally, the meetings will address any challenges or issues and provide an open forum for discussion and technical support.

Notification of Cyber related incidents

All suppliers regardless of services provided are required to promptly notify Wheatley of any cyber incident, data breach or cyber event that may affect their communications, operations, systems, or data relevant to the services contracted by Wheatley. Notification shall be made as quickly as possible to the Contract Owner following discovery of the incident, ensuring that Wheatley can assess any potential impact and respond appropriately.

Failure by the Supplier to provide timely notification of a cyber incident as required under this policy may materially increase Wheatley's exposure to systemic cyber risk across its supply chain. Any such failure shall be considered a breach of the Supplier's obligations and may give rise to corrective measures deemed necessary by Wheatley. Where the Supplier fails to provide the required notification on two occasions within the duration of the contract, this will constitute a material breach, and Wheatley reserves the right to terminate the contract with immediate effect.

Wheatley will provide reasonable support and guidance to any Supplier that requires assistance in bringing its cyber security controls in line with NCSC standards. Such support may include direct advice from Wheatley's Enterprise Security function or referrals to external bodies such as the Cyber and Fraud Centre where appropriate. This support does not remove or diminish the Supplier's responsibility to meet the required cyber security standards or to comply with all notification obligations under this policy.

11. Policy Review

This policy shall be reviewed annually and presented for approval to the relevant governing Board. However, regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our website at www.wheatley-Wheatley.com and it is also available on request. Customers may also request a translated copy of the policy or in alternative formats.

12. Customer Service

Confidentiality

Confidentiality is not only a basis of trust in business relationships but also impacts on the protection of Wheatley's own interests in terms of retaining competitive advantage. It is the responsibility of any member of staff conducting procurement on behalf of Wheatley to ensure that third party information, which is of a commercially sensitive and confidential nature, is properly safeguarded. This may require that the supplier or agent of Wheatley signs a confidentiality agreement.

All personal information given by customers and suppliers in relation to this policy will be treated in accordance with data protection legislation.

Wheatley complies with the Environmental Information (Scotland) Regulations 2004 and is subject to the Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 which extends the Freedom of Information (Scotland) Act 2002 to cover Registered Social Landlords (RSLs) and their subsidiaries in respect of certain functions. This means that we respond to any request for information in accordance with the requirements of these regulations and this legislation. It is a standard condition of all our contracts that suppliers will assist Wheatley in complying with its obligations in terms of Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

Complaints Policy

Our aim is to get it right first time. However, if you are dissatisfied with this policy, its operation or otherwise wish to raise a complaint Wheatley has a Complaints Policy. A copy of the complaints policy can be found on our websites and the staff intranet, or a copy can be requested by contacting Wheatley on 0800 479 79 79. As with all our policies, a copy can be made available on tape, in Braille, in large print or in translation.

Where a complaint relates to the conduct of procurement under The Public Contracts (Scotland) Regulations 2015 the procedures outlined in the Regulations will be followed. The complaint will also be logged in accordance with Wheatley's Complaints Policy.

A Single Point of Enquiry (SPoE) has been established at the Scottish Government Procurement Directorate to which suppliers can address concerns about public funded procurement practices. Further information can be found at:

http://www.gov.scot/Topics/Government/Procurement/Selling/supplier-enquiries

As set out on the website the supplier is expected to liaise with the contracting authority in the first instance to seek resolution or clarification.

13. Relationship to Other Policies

This policy should be read in conjunction with the following key documents which can be found on the staff intranet:

- Wheatley Strategy 2026 - 2031
- Procurement Guidance Page on WE Connect
- Wheatley Procurement Strategy
- Wheatley Data Strategy
- Wheatley Sustainable Procurement Policy
- Contract and Supplier Management Guidance Document
- Scheme of Financial Delegation
- Wheatley Standing Orders
- Gifts, Hospitality, Payments and Benefits Policy
- Non-Executive Director Conflicts of Interest Policy
- Wheatley EDI and Human Rights Policy
- Wheatley Sustainability Framework
- Wheatley Whistleblowing Policy
- Code of Conduct for Governing Body Members
- Wheatley Fraud Corruption and Bribery Policy
- Wheatley Anti Money-Laundering and Counter Terrorism Financing Policy
- Wheatley Data Protection Policy
- Wheatley Freedom of Information Policy

Would you like more information?
Freephone 0800 479 7979
Visit: http://www.wheatley-Wheatley.com/
Email: procurement@wheatley-Wheatley.com

Wheatley Housing Wheatley Limited is a company limited by guarantee and registered in Scotland under the Companies Acts, having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL. It is registered with The Scottish Housing Regulator as a registered social landlord. Company registration no. SC426094 Social Landlord no. 363

Sustainable Procurement Statement Comparison 2025 vs 2026

Summary of Changes:

The 2026 statement retains core themes (lifecycle impacts, circular economy, and fundamental rules such as avoiding single-use plastics), but streamlines some named tool references and reorganises how community benefits are presented.

It expands references to external verification by noting both Planet Mark and SHIFT certification, whereas 2025 references Planet Mark certification and includes specific footprint figures. Supplier carbon reporting requirements shift from whole-life carbon emissions (WLCe) emphasis in 2025 to Scope 1 and Scope 2 baseline and intensity reporting in 2026.

The 2026 statement updates governance metadata (approval and review year), refreshes strategic alignment to the Wheatley Procurement Strategy 2026, and adjusts organisational framing from 'Wheatley Group' to 'Wheatley'.

Comparison Table

Area	2025–2027	2026–2028	Change
Title / framing	'Wheatley Group Sustainable Procurement Statement 2025'.	'Wheatley Sustainable Procurement Statement 2026'.	Branding/framing shifts from explicit 'Group' emphasis (2025) to 'Wheatley' (2026).
Approval & review metadata	Approved February 2025; Review Year January 2026 (front matter).	Approved February 2026; Review Year January 2027 (front matter).	Approval and review cycle moves forward one year.
Foreword – stated ambition	References carbon neutral progression and cites reducing housing stock carbon footprint by 4,000 tonnes per year.	References progressing towards carbon neutral corporate operations and broader national decarbonisation context; does not repeat the 4,000-tonnes-per-year housing stock figure.	2026 removes the explicit "4,000 tonnes per year" housing stock figure while retaining carbon neutral direction.
External verification / certifications	Notes Planet Mark certification and includes specific footprint figures.	Notes Planet Mark and SHIFT certification.	2026 adds SHIFT certification and omits the specific footprint figures included in 2025.
Strategic alignment to Procurement Strategy	States alignment with Wheatley Group's Procurement Strategy 2025.	States alignment with Wheatley Procurement Strategy 2026.	Updated alignment from 2025 strategy to 2026 strategy.

Area	2025–2027	2026–2028	Change
Supplier carbon reporting approach	Statement of Requirements asks for whole-life carbon emissions (WLCe) baseline via life-cycle assessment.	Statement of Requirements asks for Scope 1 and 2 carbon emissions baseline and kgCO2/£ expression.	Reporting emphasis shifts from WLCe (2025) to Scope 1/2 and intensity expression (2026).
Named sustainable procurement tools	Explicitly references SPPPT (Sustainable Public Procurement Prioritisation Tool), Sustainability Test, lifecycle mapping, and Flexible Framework.	References Sustainability Test, lifecycle impact mapping, and Flexible Framework; does not include the SPPPT section as set out in 2025.	2026 streamlines tool references and removes the detailed SPPPT section present in 2025.
Community benefits / social value presentation	Includes a distinct “Community Benefits” subsection covering accessibility for local SMEs/third sector, Fair Work, and Modern Slavery compliance.	Sets out fair and ethical supply chain assurances and references fair/ethical practices; does not include the standalone “Community Benefits” subsection as set out in 2025.	2026 integrates social/ethical commitments without the separate Community Benefits subsection used in 2025.
Fundamental rules	Lists fundamental rules (e.g., avoiding single-use plastics, zero use of insecticides, and waste commitments).	Lists the same fundamental rules.	No material change – fundamental rules are carried forward.
Delivery of the policy	States aims and objectives will be developed and summarised within the Procurement Strategy.	States aims and objectives will be developed and summarised within the Procurement Strategy.	No material change – delivery mechanism wording is retained with updated organisational naming elsewhere.

Wheatley Group

Making homes and lives better
wheatley-group.com

Wheatley Sustainable Procurement Statement

2026-2028

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 479 7979 or email 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 479 7979 lub wyślij e-mail na adres 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 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجانا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو

برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Solutions Board*
Date of approval	*February 2026*
Review Year	*January 2027*
Customer engagement required	*No*
Trade union engagement required	*No*
Equality Impact Assessment	*No*

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1. Foreword

Wheatley have agreed a strategic outcome for sustainability of progressing towards carbon neutral for our corporate operations. We spend approximately £300m each year on a diverse range of goods, services and works. It is critical therefore, that this spending power is used to support our key objectives. This policy has been developed to help Wheatley meet its legal duties and to deliver its key strategic objectives in respect of sustainability.

Our strategic objectives are set out in our Sustainability Framework which should be read in conjunction with this policy document. Using the breadth and depth of the Wheatley's service, combined with our experience and skills, our aim is to be a catalyst for change in the housing sector and a contributor to national decarbonisation goals. Scottish Government have made clear commitments in respect of transitioning to a net zero emissions Scotland for the benefit of our environment, our people and our prosperity and have introduced climate change legislation (Climate Change (Emissions Reductions Targets) (Scotland Act 2019) that sets a target of net-zero for all greenhouse gases by 2045.

Critical to meeting our objectives is how we work with our partners, stakeholders, customers, and suppliers to prioritise sustainable solutions and embed sustainability in each of our decisions. Through this Sustainable Procurement Policy, we will seek to co-develop innovation in sustainability and set out how the contribution of our procurement spend to our overall sustainability goals will be monitored and verified.

This Sustainable Procurement Policy seeks to underpin how, through procurement activities, Wheatley meet not only regulatory obligations but the expectation of our funders and Government partnerships. Increasingly, access to new borrowing, successful tender outcomes, and achieving planning consents are linked to verifiable emissions reduction, environmental quality improvement and social benefit. This Sustainable Procurement Policy should therefore be viewed as aligned with the Procurement Strategy.

1. Introduction

This Sustainability Procurement Policy has been prepared to recognise Wheatley's obligations under the Sustainable Procurement Duty and to support its key priorities:

- Our Sustainable Finance Framework and Environmental Social Governance;
- Wheatley Sustainability Framework and Sustainability Delivery Action Plan;
- Delivering Exceptional Customer Excellence;
- Making the most of our Homes and Assets to ensure sustainability, affordability and homes are energy efficient.

This statement will also contribute towards the Scottish Government's legally binding commitment to transition to a net zero emissions Scotland. Our goals have been aligned to the National Outcomes which seek to reduce the local and global impact of our consumption and production, to value and enjoy our built environment and natural environment and enhance it for future generations, to have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.

This statement supports the commitment to sustainable procurement which is set out in the Wheatley Procurement Strategy 2026. It is intended for all of those who are involved in or affected by Wheatley's procurement activities throughout our communities and beyond.

Wheatley's business-related carbon emissions have achieved both Planet Mark and SHIFT certification as external verification of our transition toward becoming carbon neutral.

It is important therefore to re-emphasise how, through the procurement of goods, services and works, we can help meet the Wheatley's business-related carbon emissions aims, as well as become an exemplar in sustainable transition. Removing annual CO2e will be challenging and requires careful consideration of what we buy with support from our suppliers and staff to first consider how their procurement decisions contribute to this goal.

2. Background

Statutory duties are embedded in procurement regulations and public sector procurement has a greater role than ever before in supporting delivery of key social, economic and environmental outcomes. The Procurement Reform (Scotland) Act 2014 (the Act) places sustainable and socially responsible procurement at the heart of the procurement process through:

General Duties as set out in Section 8 of the Act:

- A contracting authority must also comply with the Sustainable Procurement Duty under the Act.

- The Sustainable Procurement Duty is set out in section 9 of the Act. This requires a contracting authority prior to conducting a regulated procurement, to consider how, in conducting the procurement process, it can: “improve the economic, social and environmental wellbeing of the authority’s area’, ‘facilitate the involvement of SMEs, third sector bodies and supported businesses in the process’ and ‘promote innovation’; and
- A requirement to produce a Procurement Strategy and report performance against this annually (sections 15 and 18 of the Act).

Wheatley’s ambitious sustainability targets and a range of other initiatives will help its long-term aims of becoming carbon neutral in terms of organisational activities and purchasing, eliminating fuel poverty and reduce carbon emissions from its homes. Procurement will support this ambition and our drive towards sustainability will be at the centre of our strategic goals and objectives.

3. Key Strategic Aims and Fundamental Rules

The Procurement Strategy incorporates key strategic objectives in relation to sustainability. Wheatley will, through its Procurement activities, ensure that we consider social, ethical, environmental and economic impacts in our procurement activity. To achieve this our key strategic aims are:

Compliance with Procurement Legislation

We will ensure transparency and promote a culture of decision making that prioritises our long-term Sustainability goals, by;

- Adopting the use of the suite of Sustainable Procurement Tools, developed by the Scottish Government.
- Sustainability lead will maintain awareness of sustainability issues amongst staff and customers, to support effective procurement that complements our goals.
- Regularly challenge suppliers to show innovation and share information on their contribution to sustainable outcomes.
- Require within KPI periodic reporting of the supplier’s carbon emissions in terms of Scopes 1 and 2, in relation to the emissions associated with their business activities relative to the volumes of commodities we procure.

Increasing our efficiency and reducing emissions

Identifying opportunities to improve resource efficiency not only improves the sustainability performance of Wheatley but also makes rational and demonstrable financial sense. In addition, requirements for legislative compliance and performance monitoring around emissions and efficiencies of consumption provides additional impetus. Wheatley will include specific requirements of suppliers where appropriate.

Our aims that underpin these are;

- To promote engagement with our supply chain to address risks and opportunities for new innovative approaches.
- Identify, isolate and wherever possible remove wasteful processes or inefficiencies.
- Target direct emissions within our procurement of goods, services and works as a contribution to our overall Carbon Neutral goal.
- Aim to switch to carbon neutral capable fleet, where suitable electric, hybrid and hydrogen fuelled vehicles exist (i.e., have sufficient gross vehicle weight and range to meet our business need), by the end of 2030.

Sustainable materials and resource consumption

The requirements will vary according to the commodity being procured but we expect our suppliers to demonstrate their compliance with good sustainability practice throughout the supply chain:

- Challenge our specifications and suppliers to make sure that sustainable solutions are at the forefront of the entire supply chain.
- Maximise relevant and proportionate environmental improvement in products and services procured including energy and water efficiency, carbon emissions reduction, waste minimisation, the use of recycled products and products derived from reclaimed or sustainable materials, minimisation and management of hazardous materials and emissions and where practical, enhancement of biodiversity and heritage.
- The Scottish Government's Just Transition 'A Fairer Greener Scotland' vision accords with our strategic objectives to improve homes, develop new skills and access to opportunities for our customers. As we tackle emissions there are opportunities to create lasting change to lives and livelihoods.
- In support of Scotland's Fair-Trade Nation status, we will look to demonstrate delivery of real and lasting impact by reducing poverty and improving the lives of people in the communities that we serve. We will also work with existing suppliers to increase the range and availability of fair and ethically traded goods and services where appropriate.
- We will seek assurances of fair and ethical practices in supply chains from our suppliers and will include conditions relating to the performance of the contract to ensure that the supplier complies with environmental, social and employment law.
- We will promote and support the Buy Social Pledge. A Social Enterprise Scotland (SES) values led initiative bringing together private businesses, small and medium sized enterprises and public sector bodies who are looking to make a commitment to promote and bring social enterprises into their direct and indirect supply chain.

- We will maintain our collaboration with Keep Scotland Beautiful (KSB) to enhance local communities. KSB will continue conduct assessments in our communities to inspire action to combat climate change, tackle litter and waste, restore nature and biodiversity.

4. How Wheatley Will Identify and Monitor Sustainable Procurement

Statement of Requirements

- Wheatley will require suppliers (where appropriate) to provide a baseline of Scope 1 and 2 carbon emissions through a recognised life-cycle assessment.
- Demonstrate actions taken to reduce their Scope 1 and 2 or opportunities for cost effective alternatives.
- Provide the resultant carbon baseline, representative of the volume of services or commodities purchase by Wheatley, expressed in kgCO2/£.

We also seek to challenge suppliers to provide evidence of their consideration of:

- Upstream contribution to emissions reduction and sustainability in relation to production and transportation of materials and finished goods.
- How they have considered mitigation of environmental impact of their commodity, for example, in terms of environmental contamination.
- Opportunities for 'circular economy' in practice, whereby waste can be reprocessed into new goods or commodities.

Wheatley will regularly challenge suppliers, not only in our tendering processes but throughout the contract to continually seek innovation and verification of how they are moving to implement sustainable solutions.

Sustainability Test

The sustainability test is a tool which has been designed by Scottish Government to support delivery of outcomes achieved when using the tool. Wheatley will incorporate the Sustainability Test in the development of Business Plans where appropriate to identify specific risks and opportunities this will also be applied for appropriate individual contract strategies to identify actions and anticipated outcomes.

Lifecycle Impact Mapping

Wheatley will update the procurement processes to incorporate life cycle mapping approaches which consider the risks and opportunities for raw materials, manufacturing and logistics, use and disposal or end of life management. This approach will take cognisance of guidance from Scottish Government and will support the identification of economic, social and environmental impacts at each stage in the product or service delivered.

Scottish Government's Flexible Framework Self-Assessment Tool

To support continuous improvement, Wheatley will continue to use the Scottish Government's Flexible Framework Self-Assessment Tool to review current performance and identify action to improve sustainable procurement across Wheatley.

Staff training and knowledge of sustainable solution opportunities

Wheatley will implement and continually grow our training and knowledge opportunities for staff to enhance awareness of sustainability, and also how each colleague can contribute to the stated aim of Wheatley to work towards Carbon Neutral but also to challenge suppliers and seek verification. We will embed learning through our Academy for all staff as well as seek external specialist training, for example through Zero Waste Scotland or in conjunction with exemplar suppliers that have demonstrated innovation.

Monitoring Performance

Wheatley will review and report on Sustainable Procurement Performance by developing and reviewing the following:

- Ongoing reporting to National Best Practice Indicators and the Procurement and Commercial Improvement Programme (PCIP), all in line with national standards
- Sustainable Supplier Challenge outcomes and their contribution to our overall stated aims
- Lifecycle Impact Mapping.

Fundamental Rules

There are some fundamental rules (in addition to all legal compliance and transparency governance) that shall apply in terms of achieving sustainable Procurement. These are:

- Wheatley is a mission led organisation: to make homes and lives better. Firmly within the scope of how this is achieved will be by providing 'Greener Homes and Greener Lives'
- Wheatley will prioritise carbon emissions reduction where appropriate and seek with support of suppliers to verify this
- Wheatley will not contribute to environmental damage, therefore all use of materials, chemicals and any waste arising must not be detrimental to the immediate or wider environment.
- Wheatley will prioritise sustainable and low (or no) negative environmental impact
- Commitment that Zero waste can go to landfill
- Zero use of insecticides
- Avoiding single use plastic

5. Delivery of the Policy

The aims and objectives of this Sustainable Procurement Policy will be developed and summarised within the Procurement Strategy as to how Wheatley will deliver each key theme including Community Benefits, Fair Working Practices, Developing Sustainable Supply Chains seeking assurances of fair and ethical practices.

Would you like more information?
Freephone 0800 479 7979
Visit: http://www.wheatley-group.com/
Email: procurement@wheatley-group.com

Wheatley Housing Group Limited is a company limited by guarantee and registered in Scotland under the Companies Acts, having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL. It is registered with The Scottish Housing Regulator as a registered social landlord. Company registration no. SC426094 Social Landlord no. 363

Community Benefits Statement Comparison 2025 vs 2026

Summary of Changes:

The 2026 statement refreshes governance metadata and strategic alignment, streamlines document structure, clarifies minimum contractual expectations, and strengthens operational guidance for contract owners.

There is no change to the underlying legislative framework or core principles; rather, the 2026 statement introduces clearer thresholds, expanded value tables for higher-value contracts, and increased delivery flexibility for SMEs.

Comparison Table

Area	2025 Statement	2026 Statement	Change
Title / framing	Wheatley Group Community Benefits Statement 2025.	Wheatley Community Benefits Statement 2026.	Organisational framing shifts from explicit “Group” emphasis to “Wheatley”.
Approval & review metadata	Approved February 2025; Review Year January 2026.	Approved February 2026; Review Year January 2027.	Governance cycle progresses by one year with updated approval and review dates.
Strategic alignment	Aligned to Procurement Strategy 2024–2026 and Sustainability Policy 2025.	Aligned to Procurement Strategy 2026–2028 and Sustainable Procurement Statement 2026.	Strategic references updated to reflect current procurement and sustainability frameworks.
Document structure	Separate sections on legislation, group approach, and monitoring.	Consolidated sections with operational focus on delivery.	2026 streamlines structure while retaining underlying content.
Minimum supplier expectations	Fair Work and Real Living Wage expectations implied.	Explicit minimum requirements: Fair Work, Real Living Wage, Prompt Payment.	2026 makes baseline supplier expectations explicit across all contracts.
Threshold values	Mandatory thresholds set; voluntary application less explicit.	Clear voluntary tier (£100k–£500k) and contractual thresholds clarified.	Greater clarity on when community benefits are voluntary vs contractual.

Area	2025 Statement	2026 Statement	Change
Charitable contribution per new build unit	£775 per unit	£895 per unit	The per-unit charitable contribution to the Wheatley Foundation has increased from £775 to £895 in the 2026 Statement.
Value tables	Value tables present with fewer bands.	Expanded value tables with additional higher-value bands.	Increased ambition and granularity for higher-value contracts.
SME flexibility	No alternative compliance options specified.	SMEs may donate equivalent community benefit value to Wheatley Foundation.	2026 introduces proportional delivery flexibility for SMEs.
Roles & responsibilities	Responsibilities outlined at a high level.	Clear expectations for Contract Owners, Procurement, and Foundation teams.	Operational accountability and delivery roles are strengthened.
Legislative basis	Procurement Reform (Scotland) Act 2014.	Procurement Reform (Scotland) Act 2014.	No material change – legislative basis remains unchanged.

Wheatley Group

Making homes and lives better
wheatley-group.com

Wheatley Community Benefits Statement

2026

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 479 7979 or email 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 479 7979 lub wyślij e-mail na adres 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 479 7979 ou envie um e-mail para: info@wheatley-group.com

يمكننا إنتاج معلومات عند الطلب مجانًا مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. يمكننا أيضًا ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می‌توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیرنوشتاری دیگری ارائه دهیم. همچنین می‌توانیم اطلاعات را به سایر زبان‌ها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمت‌ها، لطفاً از طریق شمارهٔ 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو

برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	*Wheatley Solutions Board*
Date of approval	*February 2026*
Review Year	*January 2027*
Customer engagement required	*No*
Trade union engagement required	*No*
Equality Impact Assessment	*No*

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Schedule of Definitions

Community Benefits Terminology	Definition
Priority Group	A person belonging to one or more of the following categories: ▪ longer–term unemployed people (6-months or over) ▪ people accessing welfare benefits; ▪ people with disabilities; ▪ lone parents; ▪ people who have experienced homelessness; ▪ people who have criminal convictions; ▪ people who have a history of addiction; ▪ BME groups; ▪ veterans.
New Entrant	A person belonging to one or more of the following categories: leaving an educational establishment or a training provider is currently unemployed and is seeking employment (regardless of whether they have previous experience in the field or not). beginning, or part way through a Modern Apprenticeship or newly recruited on another type of trainee contract and is receiving on-site training and assessment or offsite training, or a mix of these.
Social Enterprises	Independent businesses that deliver social and/or environmental goals/services. Surpluses are reinvested back into their social and environmental purposes.
Small and Medium-sized Enterprise (SME)	A small or medium-sized enterprise with fewer than 250 employees and a turnover of less than £36 million. They are further categorised as: Micro – 1–9 employees; Small – 10–49 employees; Medium – 50–250 employees;
Supported Businesses	Supported businesses are defined as organizations whose primary objective is the social and professional integration of disabled or disadvantaged persons.
Wheatley Foundation (The Foundation)	The charitable trust of Wheatley. It focuses on two main priorities: maximising access to employment, training, and learning opportunities, and tackling social exclusion and alleviating the impacts of poverty.
Third Sector	The term covers a wide range of community groups, voluntary organisations, charities, social enterprises, co-operatives, and volunteer organisations that exist wholly or mainly to provide benefits for society or the environment.

1. Introduction

Wheatley is one of the UK's leading housing and property-management groups. Our purpose is 'making homes and lives better.' Owning or managing over 90,000 homes, Wheatley delivers award-winning services across 19 local authorities in Scotland. Wheatley is firmly rooted in our communities and is focused on delivering excellent services tailored to customers' needs.

Wheatley employs 2900 people directly and a further 2000 as joint owners of one of Scotland's largest repairs and maintenance companies, City Building (Glasgow).

Wheatley is dedicated to ensuring that its procurement activities deliver substantial environmental, social, and economic benefits. They also collaborate with various sectors of the business community to foster economic development and greater prosperity.

Community Benefits and Sustainable procurement seek to provide additional value beyond a contract's main purpose, primarily through Community Benefit clauses in most Wheatley contracts or frameworks.

This Community Benefit Statement supports Wheatley's Procurement Strategy 2026 - 2028 and the Wheatley's Sustainable Procurement Statement 2026. It ensures compliance with Sections 24 and 25 of the Procurement Reform (Scotland) Act 2014, which sets out a requirement to:

- consider community benefits requirements in public contracts which are regulated procurements over the value of £4 million
- include a summary of the community benefit requirements in the contract notice or, where not included a statement of reasons for not including such requirements.
- Include in the award notice a statement of the benefits it considers will be derived from those requirements.

2. What are Community Benefits?

Wheatley is committed to delivering significant environmental, social, and economic value through all of its procurement activities. This policy ensures that Community Benefits are always considered and included as clauses in relevant contracts for works, goods, and services whenever suitable.

Community Benefits are contract terms requiring suppliers to generate social value beyond fulfilling the contract's main objectives, at no extra cost to Wheatley. These benefits are meant for the wider community, rather than providing extra goods or services directly to Wheatley.

According to Scottish Government Procurement Guidance, public procurement may consider various community benefit requirements, such as:

- creating jobs and training opportunities,
- offering vocational training and up-skilling,
- supporting equality initiatives,
- developing SMEs, supply chains, or the third sector,
- building capacity in community organisations,
- providing educational support and work experience,
- reducing negative environmental impacts.

Suppliers may also be asked to offer voluntary Community Benefits during the procurement process; however, these are not evaluated or enforced by contract. If such voluntary benefits are not delivered, they cannot be enforced but may still be overseen through contract management.

3. Delivering Community Benefits

A key objective of Wheatley is to reduce inequality by addressing economic, social, and health-related challenges. To support this, all frameworks and contracts will routinely incorporate the specified community benefits, unless the contracting manager can clearly demonstrate that these are not applicable or appropriate.

To ensure consistency in the requirements and implementation of Community Benefits. Contract Owners are required to assess which benefits are relevant and proportionate prior to commencing the tender process, and to include them as contractual obligations. This assessment should be guided by:

- The contract type (e.g., Goods, Services, or Works)
- The procurement route (e.g., tendered contract, framework agreement, dynamic purchasing system, direct award, or mini competition)
- The relevance and proportionality of community benefit inclusion

For all contracts, regardless of value, suppliers are expected, at a minimum, to adhere to:

- Fair Work Practices
- Real Living Wage Promotion
- Prompt Payment in the Supply Chain

For suitable contracts valued above £500k (goods and services) and above £2m (works), further consideration should be given to:

- Job Creation
- Apprenticeships
- Education and Training
- Community Initiatives

Where the supplier or contractor is an SME, an alternative may be to donate to the Wheatley Foundation's Just Giving page. The expectation is that the donation would be equivalent to the value of the community benefit outlined in the contract.

To maximise impact, the Contract Owner must include Community Benefits as a regular agenda item in contract management meetings. The Procurement Team offers guidance on tracking spend and calculating value, while the Contract Owner should refer the contracted party to the Foundation Team for validation and evaluation.

The development of the Wheatley's Community Benefit Statement aligns with Scottish Government guidance, legislation, and the need for proportionate requirements. As such, Wheatley's community benefit requirements will be reflected in contract specifications and integrated into procurement selection and award processes where appropriate.

Lessons learned and Wheatley success stories will be shared in the Annual Procurement Report, in quarterly reporting to the Foundation Board and through internal and external communications channels. Partnership working with contractors and suppliers to deliver community benefits will also support contractors' Corporate Social Responsibility objectives, providing further opportunity to recognise and celebrate a wide range of individual and community impacts.

4. Wheatley Foundation

Wheatley Procurement collaborates closely with business stakeholders and the Wheatley Foundation—Wheatley's charitable trust—to advance community benefit objectives: The Foundation story | Wheatley Group

The Foundation emphasises two principal priorities:

- Enhancing access to employment, training, and educational opportunities
- Addressing social exclusion and mitigating the effects of poverty

Through customer-focused initiatives, the Wheatley Foundation invests in its communities, generating local opportunities, eliminating barriers, and expanding access to employment, education, and supportive wraparound services. These efforts foster enduring resilience and improve overall quality of life. All Foundation programmes are designed to align with these aims and deliver demonstrable benefits for Wheatley customers.

A central community benefit priority is the optimisation of employment and training outcomes for customers. To this end, the Foundation administers the Wheatley Works programme, which equips customers for training, work experience, and job placements through a broad spectrum of employability activities, including those linked to community benefit requirements. Employability - Wheatley Works | Wheatley Group

5. Threshold Values

Wheatley considers including community benefit requirements when tendering a supply and/or services contract at the contract threshold values noted below:

Community Benefit	Contract Type	Contract Value	Community Benefit Requirements
Voluntary	Any	> £100k to £500k	Negotiated where appropriate
Contractual	Goods / Services	> £500k	Mandatory or evaluated (may be based on retrospective contract spend)
Contractual	Works Contract	> £2million	Mandatory or evaluated (may be based on retrospective contract spend)

For most types of work, the number and value of community benefit requirements sought is dependent on contract financial value bandings. These are set out in the Wheatley's Value Tables for New Build Construction (appendix 1) for Works (appendix 2) and for Goods and Services (appendix 3).

While there is no requirement to consider or include community benefits within contracts with values below the relevant thresholds, where applicable, the use of voluntary community benefits may be explored to maximise community and customer outcomes.

6. Contractual Community Benefit Requirements

Community benefits are included within procurement activity on a Contractual or Voluntary basis. Contractual community benefits are included in procurement processes as Mandatory or Evaluated requirements. They form part of contract conditions and suppliers are required to deliver their commitments with appropriate clauses included in the contract.

All contractual community benefit requirements must be stipulated in Contract Notices where applicable and be included in all relevant procurement documentation at tender stage, and as relevant throughout the procurement process in order that they may form part of contractual requirements and KPI monitoring.

Quantified Contracts – Where contract value and outputs are quantified and known at the outset, community benefits will be assessed prescriptively via Mandatory requirements or assessed based on agreed Evaluation criteria.

Where Mandatory and Evaluated community benefits are included within tenders, they will form part of the quality criteria. Weighting of community benefits requirements will be agreed and applied on a case-by-case basis but is likely to range from 5-15% of the quality score.

Failure to respond to the Mandated or Evaluated quality section may result in tenders being non-compliant and rejected unconditionally.

As part of our new build framework, each new build contractor is required to provide a charitable donation of £895 per new build unit to the Wheatley Foundation. The total value of the charitable donation is agreed during the tender process, with payments made at week 26 of site development, or sooner if the development is not on-site more than 26 weeks. This financial contribution adds value by: supporting Foundation to deliver employability, social and financial inclusion programmes, and activities for children and young people; supporting and funding local projects through our Greener Communities programme including the delivery of community growing, food waste reduction, the circular economy and active travel.

Where contract values and outputs are less predictable or are variable (for example Framework agreements), where appropriate Wheatley will consider the inclusion of contractual, retrospective community benefits. For example, when drawing on Framework suppliers, Wheatley may seek community benefits to be delivered retrospectively, based on spend.

APPENDIX 1: NEW BUILD CONSTRUCTION – COMMUNITY BENEFIT VALUE TABLE

This contract has been identified as having a total value of £ and your company and your subcontractors agree to comply with the Community Benefit requirements corresponding to this value, as set out in the table below.

Yes we confirm compliance ☐ (□) No we are unable to comply ☐ (□)

Community Benefits minimum requirements:		**Band 1**	**Band 2**	**Band 3**	**Band 4**	**Band 5**	**Band 6**	**Band 7**	**Band 8**	**Band 9**
		£2m-£4m	**£4m-£6m**	**£6m-£8m**	**£8m-£10m**	**£10-£12m**	**£12m-£14m**	**£14m-£16m**	**£16m-£18m**	**£18m+**
1	Work placement opportunities (16 plus years) provided – no. Priority Group (New entrant) individuals	3	6	7	8	9	10	11	12	13
2	Other training places for Priority Groups (New Entrants)	1	1	1	2	3	4	4	5	6
3	Total Apprenticeship starts - no. individuals	2	2	3	4	5	6	7	7	8
4	Priority Group (New Entrant) Apprenticeship starts - no. individuals	1	1	2	2	3	4	4	4	5
5	Existing Apprenticeships – no. individuals	3	3	4	5	5	5	5	6	6
6	Apprenticeships completed – no. individuals			1	2	2	3	3	4	4
7	New jobs created on project	2	4	5	5	6	7	8	9	10
8	Jobs taken up by priority groups (New Entrants) – no. individuals	1	2	2	2	3	3	4	5	5
9	Up-skilling – vocational training qualifications achieved by priority groups (New Entrants) – no. individuals	1	2	2	2	3	3	4	5	5
10	Graduates – no. individuals employed or provided with paid work experience			1	1	1	1	2	2	2
11	Mentoring, school and educational support activities	1	1	2	2	3	4	5	5	6
12	Supply Chain development activities & SME, 3rd sector, Supported Business & Social Enterprises support	1	2	2	3	3	4	4	5	5
13	All Bands – Charitable Contribution to Wheatley Foundation of £895 per each unit									

Contractor Signature _____Date _____

APPENDIX 2: WORKS – COMMUNITY BENEFIT VALUE TABLE

This contract has been identified as having a total value of £ and your company and your subcontractors agree to comply with the Community Benefit requirements corresponding to this value, as set out in the table below.

Yes we confirm compliance ☐ (□) No we are unable to comply ☐ (□)

Community Benefits minimum requirements:		**Band 1**	**Band 2**	**Band 3**	**Band 4**	**Band 5**
		£2m-£4m	**£4m-£6m**	**£6m-£8m**	**£8m-£10m**	**£10m+**
1	Work placement opportunities (16 plus years) provided – no. Priority Group (New entrant) individuals	1	1	1	2	3
2	Other training places for Priority Groups (New Entrants)	1	1	1	2	3
3	Total Apprenticeship starts - no. individuals	1	1	2	3	3
4	Priority Group (New Entrant) Apprenticeship starts - no. individuals			1	1	2
5	Existing Apprenticeships – no. individuals	1	1	2	3	3
6	Apprenticeships completed – no. individuals			1	1	2
7	New jobs created on project	1	1	2	2	3
8	Jobs taken up by priority groups (New Entrants) – no. individuals	1	2	2	2	3
9	Up-skilling – vocational training qualifications achieved by priority groups (New Entrants) – no. individuals	1	2	2	2	3
10	Graduates – no. individuals employed or provided with paid work experience			1	1	1
11	Mentoring, school and educational support activities	1	1	2	2	3
12	Supply Chain development activities & SME, 3rd sector, Supported Business & Social Enterprises support	1	1	2	2	3

Contractor Signature _____Date _____

APPENDIX 3: GOODS AND SERVICES – COMMUNITY BENEFIT VALUE TABLE

This contract has been identified as having a total value of £ and your company and your subcontractors agree to comply with the Community Benefit requirements corresponding to this value, as set out in the table below.

Yes we confirm compliance ☐ (☐) No we are unable to comply ☐ (☐)

Community Benefits **minimum requirements:**		**Band 1** **£0k-£500k**	**Band 2** **£500k-£1m**	**Band 3** **£1m+***
1	Work placement opportunities (16 plus years) provided – no. Priority Group (New entrant) individuals		1	2
2	Other training places for Priority Groups (New Entrants)		2	4
3	Total Apprenticeship starts – no. individuals			1
4	Supply Chain development activities & SME, 3rd sector, Supported Business & Social Enterprises support		2	3
5	Mentoring, school and educational support activities		4	4
6	Community Activities or donation to Wheatley Foundation	1	4	5

Contractor Signature _____ Date _____

**If the anticipated contract value exceeds £2 million, these terms should be tailored to the contractual requirements.*