

**WHEATLEY HOMES EAST
BOARD MEETING**

**Thursday 19 September 2024 at 5.30pm
New Mart Road, Edinburgh**

(Following the AGM at 5pm and SGM at 5.15pm)

AGENDA

1. Apologies for absence
2. Declarations of interest
3. a) Minute of 22 August 2024 and matters arising
b) Action list
4. Chair and Managing Director update

Main business

5. Strategic asset management plan and strategy update
6. Sustainability update
7. New build development programme – mid-year review

Other business

8. Equity, Diversity and Inclusion
9. Governance update
10. AOCB

Date of next meeting: 28 November 2024

To: Wheatley Homes East Board

By: Stephen Devine, Director of Assets and Sustainability

Approved by: Frank McCafferty, Group Director Repairs and Assets

Subject: Strategic Asset Investment Plan and Strategy Update

Date of Meeting: 19 September 2024

1. Purpose

1.1 To seek approval of:

- a Strategic Asset Investment and Management Plan (“the Strategic Plan”) and updated five-year strategy following the recent Board strategy workshop; and
- proposed updates to the Group Managing Dampness, Mould and Condensation Policy.

2. Authorising context

- 2.1. Under the Group Standing Orders, the Group Board is responsible for the approval of the overarching Group strategy, any Group wide sub-strategies and the designation of policies as being applicable Group wide.
- 2.2. Under our Terms of Reference, we are responsible for approving our 5-year strategy, within the strategic context of the overarching Group strategy. Our strategy to 2026 includes a commitment to Making the Most of Our Homes and Assets.
- 2.3. The Strategic Plan presented here, for approval, is intended to bridge between the direction set in our strategy and the detail in the 5-year investment plan which the Board also approves.
- 2.4. The Board is responsible for the oversight of the implementation of Group wide policies and for providing feedback as part of periodic reviews of Group policies which apply such as the Group Managing Dampness, Mould and Condensation Policy.

3. Background

- 3.1 As part of our ongoing refinement of our five-year strategy process the Board held a workshop in May. The Board had previously agreed that the workshop should focus on the “Making the Most of Our Homes and Assets” strategic theme, specifically our strategic approach to asset management and investing in tenants' homes. The Board noted that other feedback it had given throughout the year which was relevant to our strategy would still be reflected in the strategy update.
- 3.2 Our track record of investing in our assets including through addressing issues as they arise, has ensured that, in general, our homes are:
- good quality with our latest ARC return indicating that tenant satisfaction with the quality of their home is over 95%;
 - safe through meeting asset related compliance objectives including routine gas servicing, fixed electrical testing, installing interlinked smoke and heat detectors and meeting SHQS; and
 - energy efficient with around 97% of our stock being at, or above, energy performance rating C.
- 3.3 Our asset base with various build ages and types, and current and future investment requirements, means there is value in developing the direction in Your Home, Your Community, Your Future. Two particular aspects of this are covered. Firstly, and the main focus of this report, is developing our approach to asset investment through the draft Strategic Plan for approval at Appendix 1. Our aim for the Strategic Plan is to be clear, concise, strategically aligned group-wide and tailored to the particular needs of our stock and customers. In doing this we want to:
- provide clarity on our asset management priorities and what is driving them create a short (5 years) and longer-term framework for planning, delivering and reporting on asset investment;
 - give confidence that regulatory and other key requirements will be met;
 - build a consistent and transparent approach to asset related investment decision making;
 - give assurance that asset investment decisions are routed in delivering value for customers and our business; and
 - provide flexibility that will help ensure we continue to manage new investment requirements effectively.
- 3.4 The first step in doing this was developing the Group Asset Strategy that was approved by our Group Board, after engagement with Group partner Boards, staff and customers, in June 2024. This strategy is built around five key drivers for asset investment and management:

- **Compliance** – investment to ensure statutory and regulatory requirements in areas such as gas servicing and smoke and heat detector ‘relifing’;
- **Component replacement** – investment to ensure facilities like kitchens, bathrooms, windows etc in our homes are to a good standard;
- **Energy efficiency** – covering fabric efficiency and heating system; and
- **Neighbourhood priorities** – investment to ensure our properties and their local environment meet customer needs and our aspirations for our communities
- **Particular stock types** - to reflect the diversity of stock, and therefore particular investment challenges

3.5 Our proposed Strategic Plan, discussed here and at Appendix 1, is the next stage in defining and taking forward our asset investment aims.

3.6 The second aspect of how we will Make the Most of our Homes and Assets covered in this report is planned changes to the Group Managing Dampness, Mould and Condensation Policy. These proposed changes are to reflect how we are continuing to strengthen our approach to dealing with reports of mould and damp in our customers’ homes. The updated Policy is provided at Appendix 2 to this report.

3.7 Our refresh of our Strategy to 2026 reflects a combination of the feedback from the May strategy workshop, updates agreed by the Board to our delivery plan, business plan, development programme and investment programme, and areas the Board has discussed and agreed in principle over the last year pending this annual update to our strategy. The updates are shown in full in a tracked changed version at Appendix 3.

4. Discussion

4.1 The Strategic Plan looks to build on the broad direction, defined through the key drivers for asset investment in the Group Asset Strategy and at paragraph 3.2 above. This is done through examining priorities for investment in our stock, particularly over the next ten years. The balance between the various investment drivers is set out to ensure maximum impact including through meeting compliance and sustainability obligations, delivering value for customers and ensuring the longevity of our assets.

4.2 The Strategic Plan sets out timescales for **compliance** investment in line with requirements in law or regulation. Strategically we have looked to shorten timescales for repeating EICRs and smoke and heat detector renewal from five and ten years respectively. Doing this means required future investment is less concentrated and ‘smoothed’ over a number of years, thereby making planning and delivery more effective.

- 4.3 **Component replacement** requirements are defined through setting volumes to be completed each year reflecting our knowledge, which has been validated by external experts from JLL, on how long kitchens, bathrooms etc, will typically last. Decision making on properties where component replacement works will be carried out in any given year will be based on our data on condition and lifecycles. Implementation will then be optimised to reflect first-hand and up-to-date information where available on actual condition to ensure our focus is on where need is greatest and that we do not replace components where this is not needed, and to ensure effective programme delivery. Information from customers, and housing, investment and surveying staff will be used, as part of this fine-tuning.
- 4.4 The Strategic Plan also has a focus on **neighbourhood priorities** through planned, preventative maintenance to improve the common parts, and local external environment, of applicable properties. This aligns with our neighbourhood driver and is a key part of improving customer satisfaction with their home. Phasing of planned, preventative maintenance (PPM) activities will be focused, initially, on closes, flats and other identified properties where investment will have the greatest impact and will be informed by neighbourhood planning.
- 4.5 Our diverse stock base means that there are challenges with **particular stock types** specifically, pre-1919 and post-1990s tenements, with these properties accounting for 60% of our stock. In addition to challenges with stock types, there are communal/district heating systems that vary in condition. The Strategic Plan sets out the approach for addressing these challenges.
- 4.6 The approach to **energy efficiency** investment in the Strategic Plan is informed by the Scottish Government's on-going consultation on its Social Housing Net Zero Standard (SHNZS). As part of this, our investment will be focused on ensuring minimum fabric efficiency levels in SHNZS are met. Decisions on which energy efficiency measures are applied to which properties will be informed by the payback these will give tenants savings on their heating bills, and guidance from Scottish Government on minimum required fabric measures. Investment in specific fabric efficiency measures is concentrated from the second year in the Strategic Asset Investment Plan. This reflects the:
- relatively good energy efficiency of our stock reflecting the significant investment that has previously been made in fabric efficiency measures;
 - value of waiting for clarity from Scottish Government through the finalised SHNZ; and
 - contribution that priorities through the component replacement driver, including improved efficiency gas boilers and window replacement in the first five- years of the plan, will have on energy efficiency.
- 4.7 Our Strategic Plan, along with the Group Asset Strategy are two, of three, key documents that will inform our asset investment and delivery. The third of these documents is our 5-year investment plan. The latest version of this was approved by the Board in February 2024. Our intention, going forward, is to link the projects and priorities in future 5-year investment plans to the direction set through the Strategic Plan.

- 4.8 The 5-year investment plans will reflect circumstances across our areas, and target investment, including between areas, to ensure it has the greatest impact. Targeting between areas will reflect various factors including:
- feedback on where investment is most needed from customers and staff;
 - condition and surveying data; and
 - insight on where investment is likely to have the greatest impact on the outcomes we want to achieve through our investment, and especially the number of customers that are satisfied with the quality of their home.
- 4.9 The 5-year investment plans will set out the investment we intend on delivering taking account of wider considerations beyond the planning assumption in the Strategic Plan. These wider considerations include the availability of money for investment in the context provided through our business plan, delivery capacity and value for money including suppliers and first-hand understanding of investment needs in particular properties from staff including surveyors, investment planners and housing officers.

Group Managing Dampness, Mould and Condensation Policy

- 4.10 In January this year a consultation was issued by the UK Government seeking views on the proposals for the implementation of Awaab's Law. Although this will apply to England only, we considered there to be merit in assessing our existing processes and procedures against the recommendations in these proposals and to consider whether there are any areas of best practice that we would wish to implement.
- 4.11 There were seven proposals included in the consultation for Awaab's Law and our assessment against these highlighted that we would comply and, in most cases, exceed the requirements. For example, under Awaab's Law the provider has 14 days to investigate a potential hazard. If we are notified of the presence of mould in a customer's home, we will offer an inspection visit within two working days, or if it is deemed an emergency, within three hours. We also aim to complete any repairs required within 15 working days.
- 4.12 One area for improvement identified and taken forward following our assessment was to provide customers with a written summary of the findings from the initial visit. This action has now been addressed and a summary of findings, including the next steps, is being issued to customers, following the initial inspection for all damp or mould reports. This summary also provides customers with guidance on reducing condensation within their homes.
- 4.13 The updated Policy is attached as Appendix 2.
- 4.14 In addition to this change, we have further strengthened the forced access procedure, in line with our zero-tolerance approach. This is highlighted in paragraph 3.18 of the policy which references a reduction from 3 to 2 no access visits before considering forced entry and that this will be progressed as rapidly as possible thereafter as opposed to the 14-day target timescale previously included.

- 4.15 The final change in the updated Policy is to remove the reference to the Processes and Procedures to support this as, given that these are liable to change frequently, as we continue to improve services and respond to our customer needs in an effective manner, this was no longer considered to be relevant for inclusion.

Our strategy to 2026

- 4.16 Our five year strategy has been updated to reflect the drivers of the investment discussed above. We have made some subtle changes in other areas of this chapter to reflect the Scottish Housing Net Zero Standard (SHNZS) consultation and a 'fabric first' approach to asset management and investment planning. Our commitment to a 'just transition' firmly remains and is considered to be strengthened alongside the other changes.
- 4.17 The strategy has been updated to reflect the most recently agreed updates to our five year development programme, investment plan, our emphasis on digital services improving channel choice rather than driving channel shift, and our strong focus on data and data maturity.

5. Customer Engagement

- 5.1 The strategy workshop focused on customer insight and feedback following customer engagement. These areas continue to be referenced within our strategy, such as repairs, neighbourhoods and communication.
- 5.2 We have engaged Customer Voice panels around the drivers in the asset strategy and have collated feedback on investment priorities through our staff who work with customers in their communities. This information has informed the prioritisation and approaches in the Strategic Asset Investment Plan presented here. These discussions have been constructive with support for each of the drivers and a particular emphasis on component replacement and neighbourhood improvements.

6. Environmental and sustainability implications

- 6.1 This aspect is covered through the energy efficiency driver in the draft strategy.

7. Digital transformation alignment

- 7.1 The Group Asset Strategy includes the proposal to explore, through developing appropriate pilot projects, how digital techniques including AI can support asset management. This will build on our already extensive use of data to support our asset investment and management through our PIMSS asset management system.

8. Financial and value for money implications

- 8.1 As discussed at the strategy workshop in May 2024, our financial projections including provision to deliver all of our legislative compliance investment requirements and our planned component replacement investment much of which will also improve the energy efficiency of our homes.

- 8.2 In common with other housing providers in the sector our projections do not yet include provision for the required investment to deliver SHNZS, although we have estimated the likely required spending to meet the fabric efficiency element at c£6.5m over the period in the Strategic Asset Investment Plan.
- 8.3 The financial implications of the investment related to the neighbourhood driver is being informed by the pilot projects that are on-site currently. Findings from these, along with the phasing in the Strategic Plan more generally, will inform discussions on funding options at the Board which in turn will inform the next update to the financial projections in advance of discussions on rent setting.
- 8.4 We have also recently agreed amendments to our financial covenants which provides more flexibility in the funding options for capital investment. In updating the financial projections we will include an assessment of how this can best be utilised.

9. Legal, regulatory and charitable implications

- 9.1 Our Strategic Plan will help ensure that asset related legal and regulatory compliance requirements are met through clearly defining investment requirements and our approach.

10. Risk Appetite and assessment

- 10.1 We have no single risk appetite in relation to strategy. Our risk appetite statements reflect each individual element of our strategy.
- 10.2 Appendix 4 to this report provides our risk appetite for making the most of our homes and assets. The Strategic Plan aligns with our risk appetite in the areas discussed. In addition, a new risk was recently added to the group risk register – Risk 004 '*Delayed investment in existing homes and environments*'. The description of this risk states '*there is a risk that the combined impact of several years of high inflation and increasing regulatory / statutory compliance requirements results in assets which require significant investment in order to meet required standards and expectations.*' The Group Asset Strategy and this asset investment plan will help mitigate this risk.

11. Equalities implications

- 11.1 Equalities implications will be assessed as part of investment delivery related to the Strategic Plan. Our refreshed strategy reflects our ambition as captured in the Group Equity, Diversity and Inclusion and Human Rights policy and associated action plan.

12. Key issues and conclusions

- 12.1 Our draft Strategy Plan is provided at Appendix 1 for approval. This aligns to the Group Asset Strategy that was agreed in June 2024 and builds on the discussion at our strategy workshop in May 2024. If approved, the Strategic Asset Plans, will shape investment delivery including through our 5-year investment plan.

12.2 The key updates to our strategy to 2026 are shown at Appendix 3 and reflect the focus of our workshop on asset strategy. This reflects our continued focus on investing in our tenants' homes whilst taking into account the need to have a financially sustainable approach to investment which also reflects our obligations in relation to building compliance. It also reflects the changes in our operating context, the progress we have made to date and the review of our strategic measures at the last meeting.

13. Recommendations

13.1 The Board is asked to:

- 1) Approve the Strategic Asset Investment Plan at Appendix 1;
- 2) Note the updated Group Managing Dampness, Mould and Condensation Policy at Appendix 2 and agree it should be submitted to Group Board for approval; and
- 3) Approve our refreshed strategy to 2026 at Appendix 3.

LIST OF APPENDICES:

Appendix 1:	WHE Strategic Asset Investment Plan
Appendix 2:	Group Managing Dampness, Mould and Condensation Policy available here
Appendix 3:	WHE Strategy to 2026: Your Home, Your Community, Your Future
Appendix 4:	Risk Appetite: Making the most of our homes and assets

Wheatley Homes East Strategic Asset Investment and Management Plan

Draft

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1. Aims and Outcomes

This Strategic Asset Investment and Management Plan builds on the direction provided in the [Wheatley Group Asset Strategy](#) to set Wheatley Homes East's (WHE) priorities for investing in our housing assets to ensure:

- customers are satisfied with the quality of their home;
- that customer homes are safe and meet all applicable statutory and regulatory requirements.

The primary outcomes we are looking to achieve through this plan and the investment it will direct are:

- Customer satisfaction with the quality of their home: at least [95]%.
- Compliance with gas safety requirements: 100%.
- Compliance with electrical safety requirements: 100%.
- Compliance with the fabric efficiency element of SHNZ: 100% for all stock that is not exempt or covered by an abeyance.

In doing this, the plan looks to:

- balance multiple competing drivers of asset investment as set out in the Asset Strategy
- prioritise and phase investment to reflect WHE's particular circumstances including the quality of its stock and what we know matters most to customers
- provide clarity on upcoming priorities to support annual investment delivery planning

The five drivers set out in our group Asset Strategy are:

- Meeting compliance obligations.
- Component replacement (i.e. ensuring that kitchens, bathrooms, windows, roofs etc are in good condition and have not exceed their useful life).

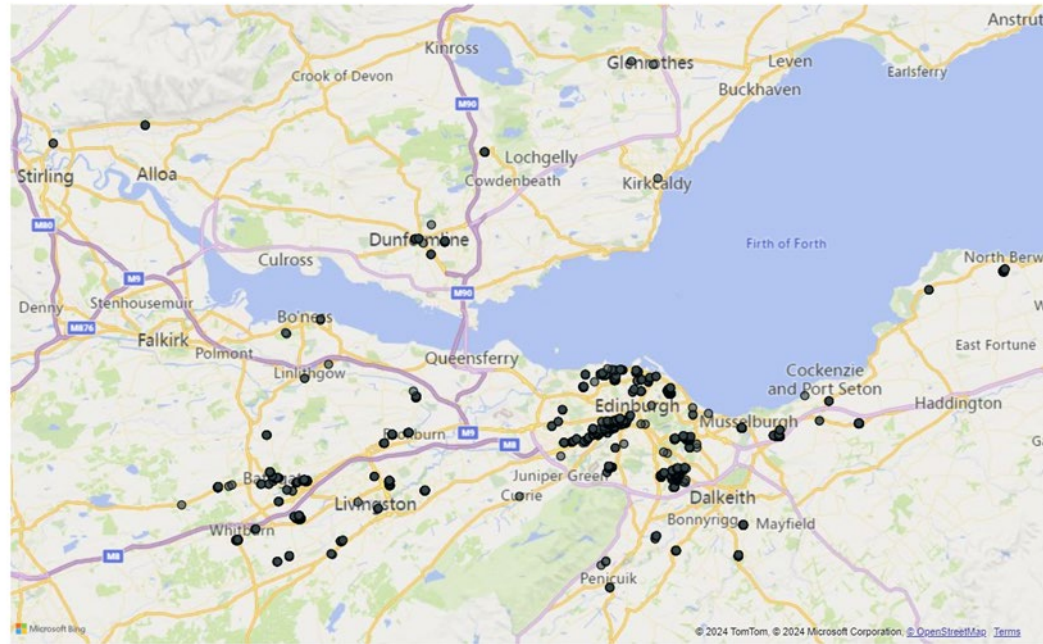
- Delivering warm, energy efficient homes in line with required standards.
- Asset improvement priorities from neighbourhood planning.
- Meeting challenges associated with particular stock types.

For WHE all of the asset investment drivers are fundamental. Meeting compliance obligations is our main priority followed by ensuring that our homes have modern internal and external components. The geographically distributed nature of WHE's stock means that our neighbourhoods are not always readily defined and, as such our investment under this driver will be focused on ensuring our homes and their local environment are in good condition including through robust planned, preventative maintenance programmes, and making better use of the capabilities in our NETS service. WHE's stock means that we do have challenges associated with particular stock types (pre-1919 and post 1990's tenements) where tailored approaches to investment will be needed. Finally, the energy performance of our stock is also fairly good, but we will still need focused investment to ensure our responsibilities through the Social Housing Net Zero standard are met.

The direction provided through this plan will shape WHE's 5-year investment delivery plan for next year, and subsequent years, and inform targets against which progress will be measured each year.

2. Scope of the Strategic Asset Investment and Management Plan

Wheatley Homes East has 6,723 homes as shown below.



Build date	Number of Properties
1). Pre 1919	926
2). 1919 to 1944	178
3). 1945 to 1964	55
4). 1965 to 1982	335

Property Type	Number of Properties
Tenement	4027
House	1387
High Rise	-
4 in a block	805

5). 1983 to 2002	2015	Other flat/ maisonette	504
6). Post 2002	3214	Total	6,723
Total	6,723		

Table 1: stock by build year

Wheatley Homes East, formerly Dunedin Canmore Housing Association, joined the Wheatley Group in 2017. Since that time it has taken on stock transfers from Barony Housing Association and also from West Lothian Housing Partnership. This provided the opportunity for increased investment.

Investment across the 7-year period since joining group was circa £30m involving the installation of new modern bathrooms and kitchens, and energy efficiency measures such as insulated intelligent quantum heating and 'A' rated double glazed windows. There has also been a focus in investing in our historic pre-1919 tenements.

Post-transfer investment brought the stock to a good level and protected our assets, and as outlined through this Plan, provides a platform for future investment in our homes and communities to ensure they remain good quality and places where our tenants want to live.

Customer satisfaction with the quality of their homes is 95%. The main external measure of housing quality is the Scottish Housing Quality Standard (SHQS). It is worth noting that SHQS is a basic requirement intended to ensure homes are fit for purpose, and not a measure of how customers might judge the quality of their homes and the components that make it up. WHE has no SHQS fails.

Energy efficiency through the Social Housing Net Zero Standard (SHNZ) is another key external measure of our stock. WHE's performance in terms of energy efficiency, based on our current understanding of the SHNZS fabric efficiency element which is yet to be finalised, is shown below, along with performance by EPC/R band.

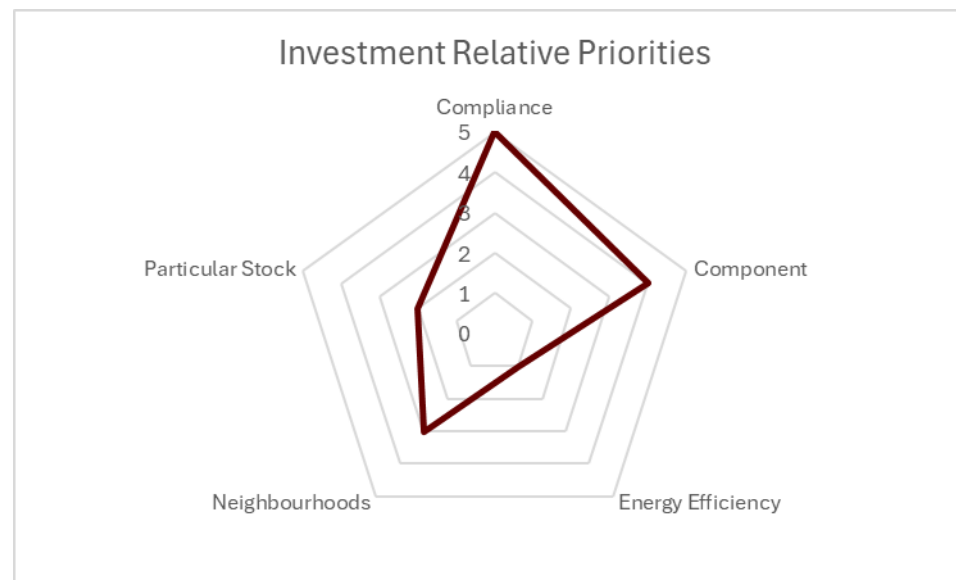
	EESH 2	SHNZS (kWh/m2/yr)
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RSL	EPC/R A	EPC/R B	EPC/R C	EPC/R D	EPC/R E	Better than 71	between 71 and 120	worse than 120
WHE	0%	44%	53%	3%	0%	60%	33%	7%

Table 2: Energy Performance

3. Investment Drivers

As indicated, each of the five drivers in our Asset Strategy are fundamental in ensuring customers are satisfied with the quality of their home and that homes are safe and meet regulatory requirements. To ensure maximum impact and optimal use of resources, it is important that this Strategic Plan looks to strike the right balance between our various drivers. This chart below looks to do this in broad terms through ranking each driver relative to each other with a unique score from one to five.



These rankings reflect the following. Compliance and keeping our customers safe is always essential. Investment in our homes means most components have useful life remaining and we want to ensure this continues through replacing particular components as they require modernised. The external appearance of our blocks, and our investment in building fabric and the local environment, is important in maintaining the neighbourhoods where our homes are located as places where people want to live. Our diverse stock means we will always have specific stock related challenges to address but these are understood and being addressed through established approaches. Finally, we are committed to ensuring our homes are energy efficient and have a strong base in this area to build from, especially as policy becomes fully defined.

Our approach to each driver is discussed below.

3.1 Meeting Compliance Obligations

Periodic programmes of works will be carried out as follows to make sure compliance obligations are met.

Compliance Work Stream	Cycle	Volume
Smoke and Heat Detector re-life programme	Every 10 years	6,732
Electrical (EICR)	Maximum Every 5 years	6,732
Gas Servicing	Annual	5,961
Lift Insurance Inspections	Six monthly	52
Proactive Lift Maintenance	Monthly Checks	52
TMV maintenance	Annual	742
Mechanical and Electrical Work Servicing package - Dependent on asset category. Examples include:	CCTV – six monthly	17
	Lightning conductors - Annual	19
	Sprinkler systems - Annual	107
	Fall arrest systems - Annual	142
Emergency Lighting Maintenance	Annual	219
Asbestos common area re-inspections	Annual	82
Legionella Risk Assessments	Every 5 years	48

Table 3: Compliance schedules

Apart from smoke and heat detector replacements and electrical testing, all other compliance programmes are, and will continue to be, carried out at least once a year. These annual or more frequent programmes will be planned and phased to ensure in-year delivery, with the aim of ensuring that no inspection goes beyond its monthly, six monthly or annual renewal date. Where necessary for 'high risk' compliance works such as gas servicing and electrical, access to the customer home will be forced, after engagement in line with our responsibilities as a landlord.

From 2025 electrical testing, gas servicing and sprinkler system checks will increase by 258 due to ongoing new build developments.

Electrical testing (EICR) and smoke & heat detector replacement operate on five and ten year life cycles respectively. Historic approaches means that most of the work associated with both was carried out in one or two years during each cycle. Continuing this approach introduces risk of non-compliance and delivery inefficiencies because excessive work needs to be undertaken in a short period of time. To address this, we want to spread compliance work for these streams more evenly over the cycle. To do this we will need, as a one off exercise, to bring forward some EICR and smoke and heat renewal so that the checks are undertaken sooner than required by their respective five and ten year life cycles.

Over the next five years, for EICR's we will aim to ensure that the following proportion of tests are completed by the anniversary shown rather than their five year anniversary to smooth the programme going forward:

- Third year anniversary: 55%
- Fourth year anniversary: 80%
- Fifth year anniversary: 100%

A similar approach will be taken for smoke and heat relifing to smooth completion with the following proportion of renewals undertaken by the anniversary shown rather than their ten-year anniversary:

- Seventh year anniversary: 50%
- Eighth year anniversary: 60%
- Nineth year anniversary: 80%
- Tenth year anniversary: 100%

3.2 Component Replacements

Various factors impact when internal and external components in our homes will require replacement including normal wear and tear, usage, quality of original product, inability to source parts for repair and given WHE geography, local environmental factors such as

exposure to prevailing wind and rain. As such, we will look to replace components when needed driven by information we hold, and are continuing to develop intelligence, including from surveys on their condition and information from our staff and customers.

For planning purposes, we need to develop programmes that reflect the condition of components, their expected life cycle and how much of this remains. Over the next ten years, we will look to replace 90% of component on or before their lifecycle replacement date. This reflects various factors including typical access patterns for this work, findings from our stock condition data validation by JLL that provided confidence on our planning assumptions and the priority of this driver relative to other investment drivers discussed here.

Our aim is to move to a rolling component replacement approach in order to mitigate the effect of stop-start investment in our stock. Having a rolling programme with confidence and minimal fluctuation on the volume of work each year also allows service delivery to be optimised, longer term resource planning and the potential for better value for money.

The table below reflects these considerations and is WHE's planned component replacement programmes going forward.

	Component replacement by year									
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2024/25
Renew Bathroom	72	72	101	101	145	145	145	145	145	145
Renew Kitchen	139	139	195	195	278	278	278	278	278	278
Renew Dwelling Windows	87	87	122	122	174	174	174	174	174	174

Renew Front Dwelling Door	91	91	128	128	183	183	183	183	183	183
Renew Rear Dwelling Door	11	11	15	15	22	22	22	22	22	22
Pitched Roof Coverings	10	10	14	14	20	20	20	20	20	20
Renew Close Front Door	14	14	20	20	28	28	28	28	28	28
Renew Close Rear Door	14	14	19	19	27	27	27	27	27	27
Renew Common Windows	12	12	16	16	23	23	23	23	23	23
Install Electric Heating	13	13	18	18	26	26	26	26	26	26
Renew Central Heating Boiler	134	134	188	188	268	268	268	268	268	268

Table 4: Component replacement plans

The volume of components above reflects volumes from a planning perspective, based on lifecycle data rather than a property by property assessment of each component. Components to be replaced each year will be set through WHE's five-year investment plan. This plan will be updated each year and will reflect various consideration including WHE's agreed business plan, insight from customers and staff on actual component condition to ensure that we only replace components when needed, delivery partner capacity, value for money and, the need for non-planned investment to address particular asset related issues that arise from time to time.

In addition to the those delivered through planned programme, some of the annual requirement for kitchens, bathroom, heating components, rewires etc will be replaced during voids, large complex repairs and compliance programmes.

3.3 Asset Improvement from Neighbourhood Plans

We want to ensure that the external condition of the common parts of our homes and the adjacent local environment is a high standard to support aims in neighbourhood plans, and more generally, to deliver value for customers in our communities. Required works will vary depending on current condition, appearance and state of repair of:

- Hard surfaces like paths and paving around a building
- Fences and railings
- Back courts and bin areas
- External doors and windows
- Render and brickwork
- Soffits, fascias and rainwater goods
- Closes and entrances

Investment delivery in this area will be built around three interrelated elements

1. **A universal, reshaped environmental service** to maintain external areas of all applicable properties to a high standard. Work will be undertaken on a cyclic basis, with priorities determined by our frontline staff based on neighbourhood requirements. Works will include power cleaning hard surfaces, gutter cleaning, fence and boundary hedge maintenance, common grass cutting and minor environmental improvements, such as replacing damaged paving slabs. Mechanism for recharging costs of work that are not the direct responsibility of WHE as landlord will be considered but will not get in the way of undertaking necessary works.
2. **Communal works programme.** A planned, programme focused on close painting, entrance way and door repair, and larger local environmental repairs such as to access staircases. Provision for this service will be included in WHE's 5-year investment plan, with works carried out on a rolling programme basis, based on prioritisation from frontline staff and customers

3. **Fabric repair and component replacement programme.** to undertake larger, and more expensive work such as rainwater goods repair and replacement, render cleaning, window painting and soffit/facias improvement. Prioritisation and programming of this work will mainly be through on-site survey, to ensure we take an optimum approach to investing to protect our asset and delivering value for customers. As with the communal works programme, provision will be made in WHE's 5-year investment plan for this programme.

The reshaped environmental service and focused investment programmes will maximise the lifecycle of external components, protect the fabric of the property and, most importantly, delivering customer expectations on the quality of their home and neighbourhood. We will also ensure, as now, that external and environmental repairs are carried out effectively including, where applicable, programming these as part of larger planned fabric repair and replacement works.

WHE has 713 blocks of flatted dwellings with communal areas, the table below reflects these considerations and is WHE's investment programme to improve closes, other common access areas and fabric, especially in tenement blocks, in support of our neighbourhood ambitions

	Planned Preventative Maintenance (closes and other common entrance areas)									
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/25
Communal works	35	35	35	35	35	35	35	35	35	35
Fabric repair and component replacement programme	3	3	3	3	3	3	3	3	3	3

Table 5: Planned, Preventative Maintenance plan

3.4 Challenges Associated with Particular Stock Types

WHE's stock means we have some particularly challenging stock types from an investment perspective including pre-1919 and post 1990's tenements that account for 60% of the stock base. Many of the challenges associated with these types of properties will be addressed through the other drivers discussed in this plan including improving energy efficiency and the local neighbourhood, and ensuring modern components, where needed. However there are also challenges that are particular to these asset types

Pre-1919 Tenements are popular stock types that present particular challenges including relating to the condition of stonework, meeting energy efficiency challenges and obtaining necessary consents for work. In keeping with their value, including as part of the built heritage in Edinburgh, we will continue to develop bespoke approaches and solutions for these tenement blocks and identify funding solutions such as through the Scottish Government's Social Housing Net Zero fund and ECO (Energy Company Obligation) funding.

The main challenge with tenements built from the 1990's is ensuring the expected lifecycles and condition of the external fabric is achieved. However, as highlighted through the neighbourhood driver, the condition of the render in some blocks is compromised cosmetically and in need of maintenance. This will be done through the fabric repair and component replacement programme as part of the neighbourhood driver. This, alongside planned external fabric investment through component replacement, required beyond the ten-year period discussed here, will ensure necessary focus on this property type.

As well as the stock and systems challenges highlighted above, WHE also has operational challenges in delivering investment in some stock because of mixed ownership patterns. As now, we will work closely with Lowther colleagues, other factor agents and owners to gain consent for programmes of works to proceed. We will also where appropriate, and subject to case-by-case appraisal, look to acquire properties in blocks to move WHE to a majority ownership position or dispose of properties where we are in the minority and there is no prospect of necessary investment to the common parts of the block taking place

As well as stock types, challenges also exist in other asset related to our homes. In particular, WHE has 33 district or communal heating systems that serve around 10% of our properties. One of the systems we do not own and have no liability for the maintenance or lifecycle replacement for. Of the systems we are responsible for, the systems are more complex than individual gas or electric heating systems, they also align with current policy on the importance of local shared heating solutions. External assessment on the condition of these systems has highlighted that six systems are approaching the stage in their lifecycle where replacement or

significant upgrades are required over the next ten years. We will work with partners including the Scottish Government to explore opportunities for decarbonisation and take these forward where it delivers value for customers through improved quality and cost effectiveness of heating. For planning purposes, we will work on the basis of replacing two or three systems a year over the next ten years with initial priorities including systems at:

- Dalry Road
- Hawkhill Road
- Nichollfield Crescent
- Royston Mains Crescent
- Hyvot Mill Road
- Westfield Avenue

We will also aim, again reflecting policy direction to replace – following extensive engagement with customers - ‘Heat with Rent’ charging model with metered systems through which there is a direct link between the heat customers use and what they pay.

3.5 Delivering warm, energy efficient homes

In general, WHE’s properties are energy efficient reflecting the significant investment that has been made previously in fabric efficiency measures and modern heating systems.

The new Social Housing Net Zero Standard (SHNZS) is still being developed by Scottish Government with full details not yet available. It is expected that the standard will focus on fabric efficiency and clean heating. WHE’s performance in terms of the SHNZS, based on our current understanding of the standard which is yet to be finalised, is shown below, along with performance by EPC/R band.

	EESH 2	SHNZS (kWh/m2/yr)
--	--------	-------------------

RSL	EPC/R A	EPC/R B	EPC/R C	EPC/R D	EPC/R E	Better than 71	between 71 and 120	worse than 120
WHE	0%	44%	53%	3%	0%	60%	33%	7%

Table 6: Energy efficiency

Until the SHNZS is finalised and beyond, we will focus our energy efficiency investment on “no regret” works i.e. those that clearly benefit tenants, improve our properties and align with the direction in the SHNZS consultation. Our priority will be on properties that do not achieve the 120 kWh/m²/yr. fabric efficiency requirement. The SHNZS consultation lists the following minimum measures:

- 270mm loft insulation
- Cavity wall insulation (CWI)
- Draught proofing
- Heating Controls
- 80mm hot water cylinder insulation
- Suspended floor insulation

Before applying these measures, further research and guidance will be developed on the technical application and feasibility of CWI, to mitigate known issues such as the risk of cold spots forming which can lead to damp. We will also look to clarify the definition and value of draught proofing, and in particular the applicability of measures beyond what is achieved through renewing windows and doors as part of our core investment programme.

WHE properties are predominantly heated by gas central heating, however electrical heating serves 12% of WHE properties and there is a requirement for hot water cylinder (HWC) insulation for 13 properties. All heating systems have controls to enable customers to heat their home to their comfort level.

In addition to the HWC insulation, requirements have been identified for loft insulation for 58 properties and suspended floor insulation for 68 properties that do not meet the expected SHNZ fabric efficiency requirements currently. These programmes are planned from year one reflecting the priority placed on investing in energy efficiency measures.

	Volume planned by Year									
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/25
Loft Insulation		29	29							
Floor Insulation		34	34							
HWC Insulation		13								

Table 7: Energy efficiency measures

The HWC, loft and underfloor insulation investment works are part of the minimum requirements under SHNZ and should mean that all applicable properties meet this aspect of the Standard. These measures will also improve the energy efficiency of the properties. More detailed, property by property, analysis is on-going to inform wider energy efficiency investment to optimise overall impact on fabric efficiency, compliance with SHNZ for all properties that are not covered by an exemption, programme delivery and value for customers. Findings from this analysis, coupled with the clarity that will come once the SHNZ standard is finalised, will allow further energy efficiency related investment works to be planned and the table above updated accordingly to ensure SHNZ is met.

3.6 Other assets

There are other properties and related assets in WHE that require consideration, specifically, garages, lifts and communal aerials.

We have 70 lifts and 670 communal aerials. Routine inspections of the lifts and aerials is carried out as well as proactive monthly maintenance checks for lifts, as part of compliance activities. We are currently undertaking significant investment in our lifts to alarm and monitoring system that use digital technologies, to mitigate the risk from the planned analogue PSTN switch-off in 2025. Future investment in aerial systems will be subject to an assessment of how the broadcast TV market is likely to evolve to ensure that these types of systems are still required, and not surpassed by internet and digital TV.

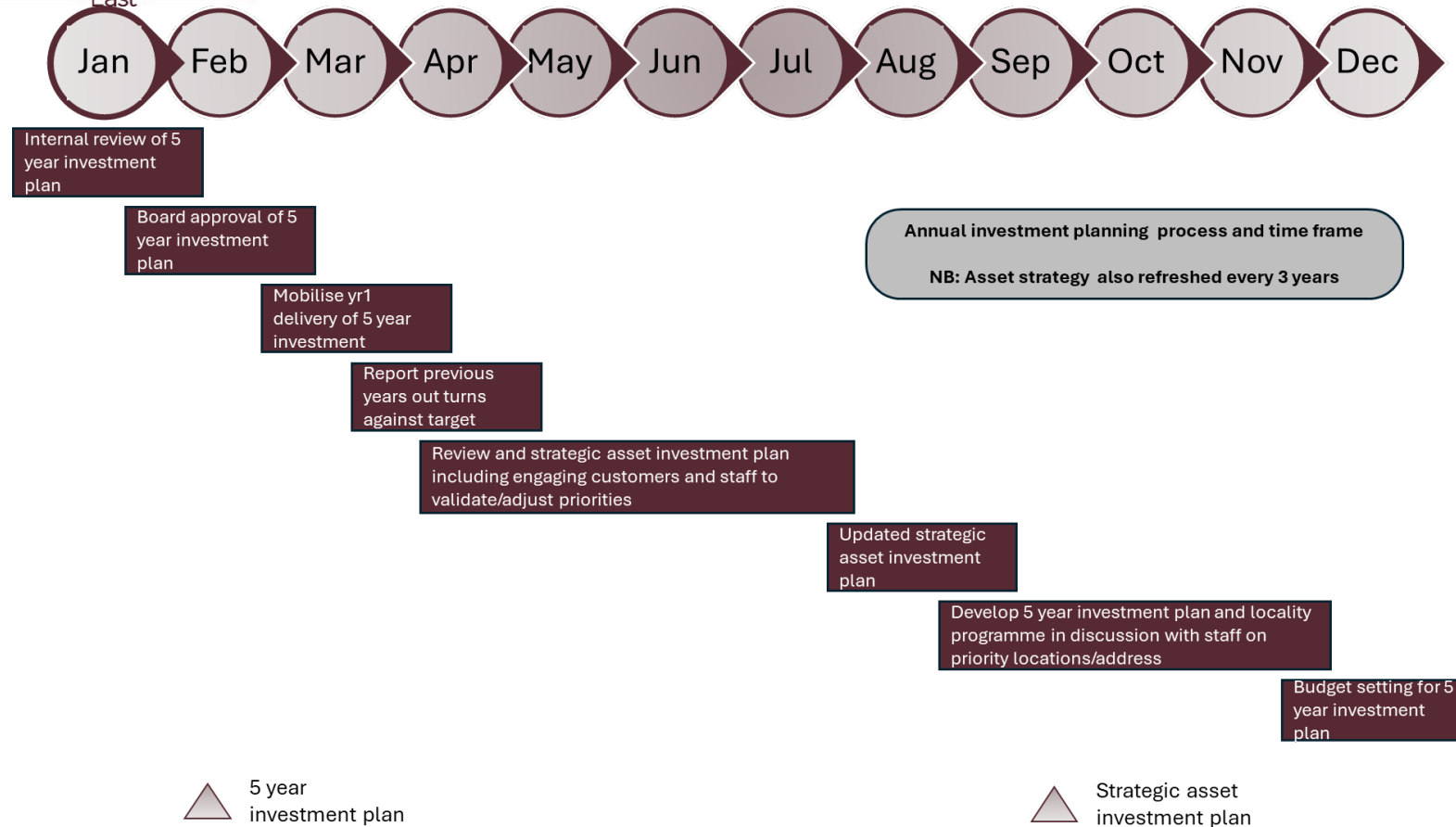
4. Implementation

This strategic asset investment and management plan is one of three - along with the Group Asset Strategy and the annual 5-year investment delivery plan - documents that will define investment in our assets going forward. The purpose and relationship between these documents is illustrated in the diagram below.



The next step in providing the clarity, transparency and alignment we are looking to build in investment planning and delivery is developing WHE's 5-year investment delivery plan. This will reflect particular circumstance and priorities relating to asset investment in the different areas where WHE operates, and allow resource allocation between areas and targeted investment to properties and streets to ensure our investment is focused where it is most needed and has maximum impact.

Alongside these key documents that define our approach to asset management, we are also implementing a systematic planning approach that sets-out the key activities that will be undertaken at specific times each year. The steps in our planning process and when they will be undertaken are shown below along with how they link to this strategic asset investment plan and the 5-year investment delivery plan.



The process above aims to make sure that investment is focused where it is most needed and has greatest impact based on our agreed drivers for asset investment. Having clear outcomes and approaches to measurement are also key to ensuring maximum impact and that there is transparency on what is being achieved through investment in our assets. The table below sets out the measurement framework we will use.

Primary Outcomes (from Asset Strategy)		
Measure	Target (where applicable)	How measured
Customer satisfaction with the quality of their home	95%.	Customer survey
Compliance with gas safety requirements.	100%	Number from total stock completed by annual renewal date
Compliance with electrical safety requirements.	100%	Number from total stock completed by annual renewal date
Compliance with the fabric efficiency element of SHNZ	100% of all properties not covered by an exemption or abeyance by 2033*	Energy input requirement from EPC/R or through cloning for similar properties where up to date EPC/R not available*
Other Outcomes		
Measure	Target (where applicable)	How measured
Progress towards SHNZ fabric efficiency element	Proportion of stock not meeting minimum SHNZ energy efficiency requirement Stock profile by energy efficiency level	Energy input requirement per property from EPC/R or through cloning for similar properties where up to date EPC/R not available*
Progress in smoothing EICR profile	% of properties complete by 3 rd and 4 th year anniversary	Number of homes relative to total requiring EICR
Progress in smoothing Smoke and Heat relief profile	% of properties complete by 8 th and 9 th year anniversary	Number of homes relative to total requiring Smoke and heat
Outputs		
Measure	Target	How measured

Number of completions against compliance requirements in table 3	As per amounts in table 3	Level of compliance activities delivered
Number of specific components replaced (see table p 11 for specific components)	As per annual amount in table 4	Component completions against target in strategic asset investment plan
Number of PPM- communal works completed	As per annual amount in table 5	Close completions against target in strategic asset investment plan
Number of PPM - fabric repair and component replacement programme	As per annual amount in table 5	Close completions against target in strategic asset investment plan

Table 7: outcomes and targets

*subject to confirmation when SHNZ finalised

The outcomes and target above will be incorporate into established performance reporting mechanisms, and in reporting the previous years out turns to board. We will also look, over the next year, to develop an aggregate reporting measure at the property level that provides a measure of the quality of that property relative to others based on the drivers in this report.

Making homes and lives better
wheatley-group.com



Your Home, Your Community, Your Future



2021-2026



Wheatley Homes East part of Wheatley Group
Our five-year strategy



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OUR VISION FOR 2021 TO 2026

Wheatley Homes East, part of Wheatley Group, is rooted in its local communities and committed to delivering outstanding, customer-focused services.

Over the lifetime of this strategy, each year we review what has been achieved in delivering our vision and refresh it to ensure that we remain on track to deliver what is important for our tenants and that our vision continues to reflect our tenant's priorities.

Over 2022 and 2023 we refined our vision as part of creating Wheatley Homes East, bringing together Dunedin Canmore and West Lothian Housing Partnership. Our vision in creating Wheatley Homes East was born from a desire to create a stronger base for affordable rents, new build and investment.

Our vision will be underpinned by a refreshed operating model, endorsed by our tenants, which will provide exceptional customer experience.

Since creating Wheatley Homes East, we have engaged extensively with tenants and reassessed our operating context. As a result, we have strengthened this strategy by:

- **M**ore clearly recognising the importance of neighbourhoods;
- Reflecting that our repairs service is a key priority for tenants
- Reflecting the expanded role of our Customer First Centre in delivering exceptional customer experience; and
- Reflecting the evolving national policy picture in relation to sustainability and Net-Zero, including the potential impact on tenants, investment and new homes.

Your Home, Your Community, Your Future, sets out how we will take our services to the next level on this, the next stage of our journey, from 2021 to 2026.

An ambitious, new-build programme has seen us work closely with our key partners in Edinburgh, East Lothian, West Lothian and Midlothian and the Scottish Government, to bring forward hundreds of much-needed new affordable homes. Over the lifetime of this strategy, we will build hundreds more homes while continuing to invest in the fabric of our existing homes.

But our mission is, and always will be, focused on much more than just bricks and mortar. **“Better homes, better lives”**, is what guides us now, and as we look to the next five years.

Having the keys to one of our homes will continue to lead to new opportunities. We will remain committed to helping people break down the barriers, too often created by disadvantage and poverty. That will include offering people in our homes real opportunities – such as jobs and training – to improve their lives and have more control over what happens in their area. We will also work with our partners and tenants, to create safe, peaceful and connected communities.

Through a modernised, fresh approach to customer engagement, customers will be at the heart of decisions, and we will offer people more choice in how they engage with us as well as how they access our services.

We will deliver our vision for our communities against a backdrop of significant external challenges, energy prices, the impact of Welfare Reform, digital exclusion, rising levels of poverty, continuing public spending cuts and the continuing gap between housing need and supply. We also recognise the challenges our customers are facing in this post Covid-19 era and are facing now during a cost-of-living crisis. Our response has and will continue to demonstrate the adaptability and agility of our model as we supported our customers and communities when they needed us most. From supporting vulnerable customers accessing vital food supplies, providing families with essential items to support their children, to targeted wrap around services to help with benefit claims and fuel advice we have reaffirmed that we are about more than just a home. This experience leaves us ideally placed, working alongside our partners, to support them and play a strong role in a fair and socially just economic recovery.

By 2026, we know that the expectations of our customers and our staff will be very different. We will evolve how we work, listening and responding so that we remain in the best possible shape to deliver on its ambitions. Key to this is understanding will be the needs of customers across our different areas and customer groups so that we can provide a more tailored and responsive service for different customer needs. We have communities in five local authority areas (Edinburgh, East Lothian, West Lothian, Midlothian and Fife) varying from city centre locations to more rural environments. We will also update the information we have on the condition of our housing stock which ranges from pre-1919 tenement flats to new build houses, so that we can ensure our asset management approach is reflective of our diverse housing stock.

At the heart of our strategy to 2026 are five strategic themes:

- **Delivering exceptional customer experience;**
- **Making the most of our homes and assets;**
- **Changing lives and communities;**
- **Developing our shared capability; and**
- **Enabling our ambitions.**

OUR VISION – WHEATLEY HOMES EAST IN 2026

Our vision is to enable our customers to reach their potential for a brighter future for themselves and their families. Our strategy for making this real will deliver an unprecedented shift in the balance of power and control towards our customers, empowering them to make their own choices about the services they want, ensuring they are properly equipped to do things for themselves and involving them in the design of products and services from concept to conclusion. Our task is to ensure that no customer is left behind.

We will deliver this vision through five strategic themes, under which we have defined 16 key outcomes. These are summarised below.

Our purpose: Making Homes and Lives Better				
Our vision: Customers have increased control over their services, their communities and their lives, with new opportunities for building skills and resilience. We will work ethically and sustainably, ensuring our homes are affordable for our customers, digitally enabled and low or net-zero carbon. We will share our expertise and work with others to improve the fabric of our customers' lives while creating great communities.				
Strategic themes:				
Delivering exceptional customer experience	Making the most of our homes and assets	Changing lives and communities	Developing our shared capability	Enabling our ambitions
Strategic outcomes:				
Progressing from excellent to outstanding	Increasing the supply of new homes	Developing peaceful and connected neighbourhoods	W.E. Think – creating our “Think Yes Together” culture	Raising the funding to support our ambitions
Enabling customers to lead	Investing in existing homes and environments	Supporting economic resilience in our communities	W.E. Create – driving innovation	Maintaining a strong credit rating and managing financial risks
Developing a customer led repairs service	Setting the benchmark for sustainability and reducing carbon footprint		W.E. Work – strengthening the skills and agility of our staff	Evolving digital platforms to support our activities
	Building community voice, engagement and resilience			Influencing locally and nationally to benefit our communities.

These themes and outcomes align the strategic priorities across our Group. The particular priorities of our strategy for 2021-26 are detailed in the following sections of this document under each strategic theme.

We have reviewed and updated our values for this new strategy and these are set out below.

Performance indicators will be measured and monitored on a regular basis. These are detailed below each of the relevant themes within this document. The impact measures will quantify our societal and economic impact and provide evidence of statements made in the strategy. These will generally require periodic evaluation studies to assess the results. Our impact measures relate to the following key areas:

- **Strengthening the Economy** – this will include tracking the significant impact this strategy will make to the Scottish GDP.
- **Reducing Poverty and Improving Wellbeing** – this will include ~~measuring how we are reducing the cost of running a home and~~ tracking the positive impact of our support services are making to both customers' financial circumstances and overall wellbeing and resilience.
- **Improving our Environment and Mitigating Climate Change** – this will include ~~working towards reducing our corporate carbon footprint to net zero~~ reducing the CO2 emissions in our Wheatley homes and raising the environmental standard of our New Build homes making them more energy efficient and cheaper to run.
- **Strengthening our communities** – this will include increasing customers' social capital, expanding our engagement methods and measuring the positive impact this is making to our customers and our communities. We will also track how our increased community cohesion is helping to make our neighbourhoods more 'peaceful'.

Our values:

- Excellence – we raise the bar ...in everything we do
- Community – people direct what we do ...and together we build strong communities
- Ambition – we push the boundaries in new ways ...so everyone can fulfil their potential
- Trust – we inspire customers and staff ...to shape the future.

1. DELIVERING EXCEPTIONAL CUSTOMER EXPERIENCE

Excellence is embedded in our culture and we want to build on this foundation of excellence to deliver even more outstanding services.

Our vision is that services will be easy to access and feel seamless for our customers. We'll have a renewed focus on their overall 'experience' with us, seeking to achieve high levels of customer satisfaction.

At the heart of our operating model and making services easy to access for customers is our Customer First Centre ("CFC"). Our CFC will provide exceptional customer experience by quickly and efficiently dealing with customer enquiries at the first time of asking, having specialists on hand where needed and freeing up Housing Officers to spend more time in communities, delivering services to the door of customer's homes, including dealing with more complex and neighbourhood issues. Each customer will ~~be offered~~ receive an annual visit from their Housing Officer to ensure we understand every customer's priorities and needs.

We will, through extensive engagement with customers, also continue to evolve and improve our digital services offerings and provide to make digital self-service quick, easy and intuitive for key services whilst also supporting customer channel choice through our CFC and face-to-face engagement and increasingly a channel of choice for our customers. This will be aligned with ensuring the way we communicate, in particular through our digital channels such as our website and social media, provides ~~ensures~~ the information that our customers need, such as the services and support available and how to access it, is consistent and easy to access and understand. Our customers will be able to access the information and services they need, whenever and however they need them.

Our digital-based services and real time feedback mechanisms, such as GoMobile, My Wheatley Homes East, MyHousing, Book It, Track It, Rate it, My Voice and NETs Taskmaster will also continue to help us strengthen our customer insight. Real-time feedback will also help us identify any issues in real time and offer quick resolution to issues which affect how satisfied people feel with services we know are important to our customers.

We will combine the insight we receive from our digital-based services and real time feedback mechanisms with other sources of insight, such as real-time feedback mechanisms, complaints, annual visits, performance trends and customer engagement, to better understand where we can improve or tailor our services and ensure they are customer insight and priority driven. We also recognise that our customers and communities are diverse and that their priorities and needs will reflect this.

Our new approach to engagement will fundamentally change the way we deliver service improvements, as well as service design. Our redesigned approach to engagement, through our Stronger Voices Framework, will focus on ensuring we hear from a diverse range of voices in a diverse range of ways. We will have over 250 customers engaging with us influencing and scrutinising a wider range of activity than

ever before including our investment priorities, service design, strategic priorities, service policies and standards, rent setting, performance in key areas such as repairs and anti-social behaviour, and digital services.

Customer engagement in these areas will become the norm and services will be increasingly tailored to meet the specific needs of customer groups, whether they are delivered digitally or face to face. This will include working with customers to create customer journey maps for key services, such as repairs, complaints and ASB, as our customers want them to be. As part of our strengthened approach to equity, diversity and inclusion, we will ensure staff and customers' lived experiences shape our services.

The ways in which customers can engage will be more diverse than ever, including through digital and in person engagement panels and focus groups, customer surveys and research, digital consultations and our Scrutiny Panel. Customers will be able to engage in the way that best suits their needs and on the issues that matter most to them.

We will prioritise services which mean most to customers and engage with customer groups who tell us they are less satisfied so we better understand their needs. Our customer insight and engagement consistently highlight that the repairs service is a key priority and driver of satisfaction for our customers.

Our repairs service will focus on customer priorities, including a strong focus on right first-time repairs and reducing the need for multiple visits, efficient coordination of follow on and complex repairs and enhanced communication throughout the process. We will invest in specialist staff at our CFC and across our areas to better coordinate complex, multi-appointment repairs. We will also roll out Book It, Track It, Rate it in 2023. Together, these will both ~~to~~ improve customer communication and empower customers to give us feedback in real time. Our repairs performance framework will be expanded to ensure that it reflects our customers' priorities and we will engage with customers throughout the life of this strategy on how we continually improve the service.

We want to offer quick resolutions to issues which affect how satisfied people feel with our services. That's why we'll build engagement channels into the development of services so that we capture and respond to customer feedback.

Our customer insight and satisfaction analysis shows that families tend to be less satisfied as they struggle to deal with competing demands on their time and money so we will develop a Whole Family Approach to support them through every stage of life.

Our new **Whole Family Approach** will focus on improving outcomes for Wheatley Homes East's families. Children and young people will become part of decision-making in our neighbourhoods, such as assessing our environments and reflecting on how safe and child-friendly they are. In our homes, we'll look to develop more child-friendly features such as better storage for family equipment such as bicycles. New-build homes will be designed to suit modern family living. As children grow we will support families with employment and training opportunities through the Wheatley

Foundation. Young adult children in our homes will be offered a housing options consultation as they consider setting up their own home.

We will work with partners locally and nationally to anticipate the profile and demography of our future customers as well as the issues they will face in 2026 and beyond.

We will demonstrate Wheatley Homes East's progress towards the outcomes under **delivering exceptional customer experience** through the following key performance indicators.

Our key performance indicators:

- Overall customer satisfaction is maintained above 90%
- Customer Satisfaction with the Customer First Centre is 90%
 - Complete a Housing Officer annual visit with at least 75% of customers each year
- Through the ~~Implement~~ “Rate it” score from our ~~b~~Book it, tTrack it, rRate it repairs approach and achieve 90% satisfaction
- Tenant satisfaction with value for money maintained at 85%
- Stage 1 complaints are provided a full response within an average of 5 days or less
- Overall satisfaction amongst households with children improved to 90%
- 90% of customers feel they can participate in the landlords’ decision-making process
- 95% of customers actively engaged in shaping services feel they participate in decision making
- 90% sSatisfaction with the process of getting my new home is improved by 10%

2. MAKING THE MOST OF OUR HOMES AND ASSETS

Our primary purpose of changing lives through providing quality homes remains unchanged. Building on the unparalleled success of the last five years we have set ourselves another challenging target. We will deliver a minimum of 1~~350~~⁵⁰⁰ new homes between 2021 and 2026; with the potential for a further 400, subject to agreement from the Group's lenders to support an increased level of private finance and the availability of government grant funding.

Improving our existing customers' homes remains a key strategic priority. We will use our financial strengths to invest a further £30.2m over the lifetime of this strategy in improving, modernising and maintaining homes, in addition to £40.6m on repairs. ~~This will allow us to reduce the levels of emergency, reactive and maintenance repairs which create inconvenience to our customers as well as being poor value for money.~~

Our investment in our existing homes will be driven by:

- meeting property related compliance obligations;
- component replacement (i.e. ensuring that kitchens, bathrooms, windows, roofs etc are in good condition and have not exceed their useful life);
- delivering warm, energy efficient homes in line with required standards;
- asset improvement priorities from neighbourhood planning; and
- meeting challenges associated with particular stock types.

Improving the external appearance of our properties and their local environment will be a particular focus including through piloting new approaches, linked to our neighbourhood plan, such as to improve tenement stock. We will also develop a strategic asset investment plan which will set out priorities and inform investments delivery plans

We will reconfigure how we deliver repairs -based on customer needs and priorities. This will consider ways we can reduce inconvenience to our customers and demonstrate value for money.

The safety and security of customers will continue to be of paramount importance.

Our engagement framework, "Stronger Voices, Stronger Communities" will place the customer at the heart of how we plan and design our improvement programme and new-build developments. We will maximise the use of technology to engage a diverse range of customers across our geographical footprint in both the investment planning process and the development of our new homes. We will help customers to both design and visualise their new kitchen or bathroom. When pre-allocating our new homes customers will be able to decide on kitchen preferences and finishes to interior décor.

We will harness technology to make home life more convenient for our customers and to support people to live independently for as long as possible. This can range from installing aids or adaptations for older or disabled people to improving digital access for all our customers.

Highly agile working patterns and methods will be more suited to touch-down points rather than assigned desk space, enabling us to repurpose our workplace estate into more creative hubs.

We will ensure our people are equipped with the skills and confidence they need to successfully make this transition and will develop ways of working so that no staff member feels isolated or unsupported due to more flexible working patterns.

A warm, safe and energy efficient home in the right location is a life changing experience for a household that can transform health and well-being, educational attainment and life opportunities. Over the life of this strategy our ambition is to ~~progress make a giant leap forward on our journey towards~~ our long term aims of becoming carbon neutral and eliminating fuel poverty. ~~We will build on the success of our Energy 2020 programme~~ which reflects our commitment to addressing fuel poverty, ~~and achieving the Scottish Governments EESSH standard.~~ This includes installation of efficient heating systems, enhanced insulation and LED common lighting.

Our journey to Net Zero will focus on ensuring it is a just transition for our tenants, with a focus on ensuring we prioritise areas that benefit our tenants such as improving energy efficiency and reducing energy consumption. We will draw on national and international academics and thought leaders, throughout our journey. This will include how we develop a fabric first approach to investment planning and prioritisation focusing on what most benefits our tenants. This work will contribute to meeting the Scottish Housing Net Zero Standard (SHNZS) in the future.

We will also engage key stakeholders to make clear a just transition is one where our customers are not disadvantaged by having to fund net-zero through increased rents, reduced services or lower investment in other areas. We will also ensure our communities benefit from the journey to net zero, such as through green jobs or training opportunities. We will also ensure that our staff have the necessary skills and knowledge to keep pace with changes the types of systems and technology that will come with our transition to net-zero.

The wider social and economic benefits from increased house building activity are well documented and the continuing scale of our programme will deliver significant benefits in employment, training and apprenticeship opportunities for our customers and communities.

Our new homes will be highly adaptable and can easily change as the needs of the household evolves. This means homes will support people at all stages of life creating truly 'lifetime homes'.

In addition to the added value this brings to our customers, it will deliver significant business benefits, including reducing tenancy turnover and future-proofing our homes against changing demographics. We will work with innovative development partners to ensure our house types evolve, and that they are sustainable, connected and

intelligent homes for the future. They will be built as efficiently as possible with the most limited impact on the environment.

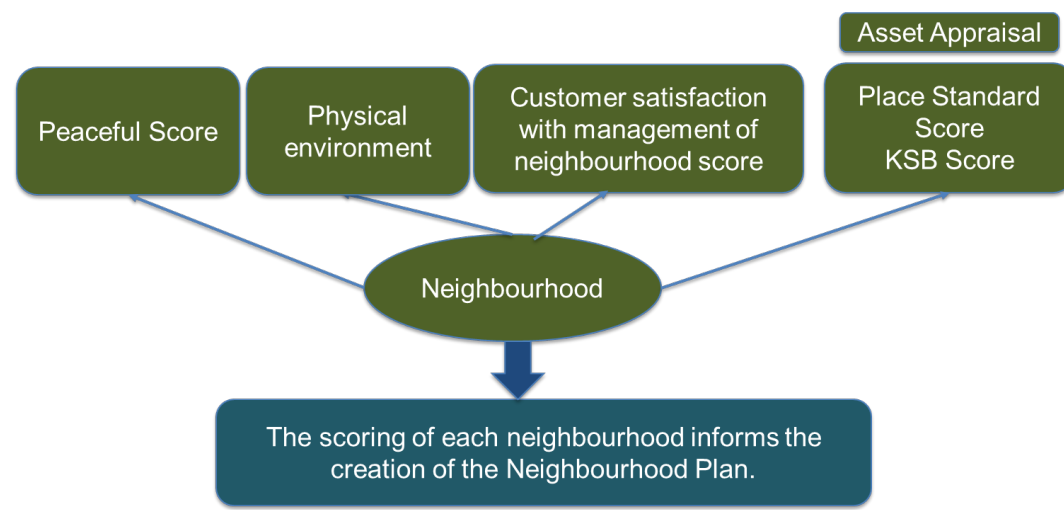
Our engagement model will encourage customers to help shape initial house designs and offer opportunities to stay connected throughout the project.

This approach will place the customer at the heart of how we plan and design our new-build developments. We will adopt the same approach and principles for major improvement programmes.

Tackling fuel poverty, improving energy-efficiency and mitigating increases in energy costs for our customer base continues to be key. We will prioritise solutions for electrically heated homes that enhance control and cost savings for customers, and draw on external research to solve long-standing challenges for improving energy efficiency in non-standard construction types.

Making the most of our homes and assets goes beyond building new homes and investing in existing ones. Our vision for neighbourhoods is one where our customers feel safe and secure and live in peaceful communities. Where customers live in a place that is clean and tidy and environmentally friendly. A place where our customers have access to people and services and where our customers are empowered to make decisions about services within their communities.

In order to realise this vision we will work with our partners in the wider Group to develop and implement an integrated approach to neighbourhoods. [This will be based on the following model:](#)



Our Neighbourhood Plans will emphasise that a strong, ongoing focus on the management of neighbourhoods is critical to their success. Over the life of the strategy, ~~and beyond every priority will be covered by a~~ our Neighbourhood Plans which will be carried out in our communities which have a large concentration of homes and are considered to have significant opportunities for improvement to identify the specific issues and priorities. ~~The plans will in future~~ inform our new build investment and regeneration activities.

We will demonstrate Wheatley Homes East's progress towards the outcomes under **making the most of our homes and assets** through the following key performance indicators.

Our key performance indicators:

- Develop at least 1~~350~~500 new homes across all tenures
- Invest £186.2m of new public and private finance in new build housing
- 95% of customers satisfied with their new-build home
- Invest £30.2m in improving, modernising and maintaining homes
- ~~▪ Achieve a 60:40 ratio of planned to reactive repairs~~
- Maintain existing tenant satisfaction with the quality of their home at over 90%.

3. CHANGING LIVES AND COMMUNITIES

By 2026, we want our customers and our communities to be more resilient. Many of our customers and communities face multiple challenges that have been exacerbated by the Covid-19 pandemic and cost of living crisis, such as financial hardship, working in sectors disproportionately economically impacted by the pandemic, cost of living crisis and poor mental health.

Through the Wheatley Foundation, our Care services and Wheatley 360, we provide a portfolio of wrap-around services and opportunities which help change Wheatley Homes East tenants and their families' lives and encourage individuals not just to harbour aspirations but also to realise them. The Wheatley Works programme will continue to grow, helping customers into jobs, training or apprenticeships and our Wheatley bursaries programme will support customers to attend higher education.

We will explore ways to alleviate food security challenges in our communities by supporting them to improve their resilience **sustainably**.

The pandemic and cost of living crisis has further heightened the national policy focus on homelessness. Through our Group Homeless policy, we will take a leading role in the national agenda around Rapid Rehousing and Housing First for those who have been homeless, supporting the Scottish Government and local authorities in their plans.

We will increase the amount of our homes that go to those who are already homeless. We will ensure that we do this in a way which builds the strength and resilience of the new households and the surrounding community. Our work with people who have lived experience of homelessness to map their customer journeys will be used to direct our services in the way which works best for this customer group and the wraparound services they need. The insight this provides will help us lead the way in strengthening the pathways for homeless people to ensure they can access the support they need easily and at the time they need it.

We will support our older tenants to be as active and independent as possible. We will review the Livingwell model with the intention of developing an enabling approach in Wheatley Homes East to allow older people to use their skills to support others. Our existing Group services including Care and Wheatley 360 will be maximised to deliver support to older people and also tailored for other households who need this type of support.

~~Over the last five years~~ **We have we** worked with our customers and communities to ensure our neighbourhoods are peaceful and places customers are proud to live. Using both online and offline platforms and approaches we will support local engagement and encourage customers to work together to design local solutions in response to local priorities building resilience, skills and confidence so people can make things happen for themselves.

Our **Community Improvement Partnership** approach will take communities from being merely safe to ones which are improving, peaceful and with high levels of satisfaction. This will be based on building a confidence cycle with communities which will support communities to become more resilient through increased confidence to report crimes and other issues. In turn, this will help Wheatley Homes East and our partners to make customers feel safe in their neighbourhood, and communities stronger and more peaceful. A key focus of this work will be in our city centre environments where we know there are more issues around safety and fear of crime/anti-social behaviour. This will be supplemented by our high-quality environmental services and our strong focus on best quality fire safety provisions which will help to reduce the incidence of fires.

Building on our neighbourhood approach, we will take a lead role in influencing other organisations and agencies in the interests of our customers. This will involve establishing common objectives, agreed and co-ordinated approaches, shared data and common indicators of success.

Loneliness is a real issue for many people in our communities. Our aim will be to put the 'Neighbour' back into our neighbourhoods, creating a modern version of 'Neighbourliness' as a hallmark of our communities by 2026. We will seek to co-create opportunities with a focus on supporting families, young people and overcoming isolation across the generations.

We have listened to our customers, and we recognise the importance of connectivity for communities, and work to influence the improvement of transport infrastructure and services for our communities. We will use **MyVoice of the Customer** real-time digital feedback to gather feedback on the work of our neighbourhood environmental teams and to track the impact and progress of all our new developments, ~~when we carry out major investment work, and for Wheatley Foundation activities.~~

Involving customers in creating learning with us will ensure our services are tailored to meet the needs of particular groups, whether they are delivered digitally or face to face. Designing our **digital** services to ensure they feel personal will be crucial for ensuring our customers continue to feel we care about them and they have a strong connection with us, even though engagement is through digital channels.

Our engagement framework will include an innovative community led development approach, involving our customers and wider communities in decision making at all the key stages of our work, whether it be new-build, in existing housing or around service development. As we move through key project milestones, we will provide regular opportunities for communities and customers to re-engage, stimulating deeper and richer connection with the communities that we are investing.

Our refined 'Community Benefit Model' will involve engaging our customers and communities in identifying and prioritising the type of community benefits they most want to see derived from our investment in existing homes and new-build housing projects. We will continue to use our procurement frameworks to drive wider community benefits with our suppliers in order to expand the 'Wheatley Benefit for Customers' providing them with a growing range of opportunities, through the

MySavings rewards gateway to save money and reduce the cost of running their home.

We will demonstrate Wheatley Homes East's progress towards the outcomes under **changing lives and communities** through the following key performance indicators.

Our key performance indicators:

- Meet the agreed contributions to accommodation for homeless households in each local authority we operate in
- Over ~~78~~80% of our customers live in neighbourhoods categorised as peaceful
- Achieve 85% satisfaction with Wheatley Environmental Services
- Reduce the number of accidental dwelling fires by 10%
- 100% of applicable properties have a fire risk assessment
- ~~620~~170 jobs, training and apprenticeships delivered
- ~~20 customers supported by Wheatley bursaries to attend higher education and university~~
- Over ~~1300~~420 vulnerable children benefit from targeted Foundation programmes

In addition to the above Wheatley Homes East specific KPIs, Wheatley Homes East will also contribute to and monitor against the following Group-wide KPI:

- 250 customers supported by Wheatley bursaries to attend higher education and university

4.DEVELOPING OURSHARED CAPABILITY

During 2020 we made significant progress in reshaping our operating model as we moved to deliver services using a blended approach of face to face and virtual engagement with our customers. Our staff have risen to this challenge remarkably and during the life of this strategy, we will continue to invest in our people to ensure they have the exceptional skills, attitude, engagement and influence to excel in this new, increasingly virtual, working environment.

Our unique Think Yes culture inspires staff to develop innovative solutions and build insightful, trusting relationships with customers and communities. By 2026 our culture will have evolved still further under our **W.E. Think** approach so that our customers will increasingly be 'thinking yes' for themselves. As a result of our '**Think Yes Together**' culture, we will transform our culture and our thinking in order to create value for customers in different ways as they increasingly self-serve and build self-reliance.

The success of our transition towards self-directed services will require significant skill and capacity building for both staff and customers: our shared capability. As our service offerings change, the skill sets required to deliver them will also change. At the same time, building the capacity of our customers and communities over the next five years will be equally important in bringing about the new empowering relationship we are seeking to establish with them.

W.E. Create will drive innovation across all aspects of our business and in our communities. Wheatley Homes East tenants and communities will benefit from a wide range of ways to co-create with us, shaping the opportunities available and driving positive changes. ~~the creation of a Community Academy.~~ We will engage with customers on the types of learning and skills-building they want. Our delivery will include drawing in and signposting to local partners where they are best placed.,.

Creating environments and opportunities for our staff and customers to learn together will re-enforce our Think Yes Together culture. By 2026, we will:

- embed customer driven learning, ensuring learning is designed with customer using insight and feedback
- focus on building individual capacity to help customers prepare for the world of work
- bring access to apprenticeships to our customers' doorstep

W.E. Work will deliver the transformational changes to our roles and operating model required to ensure this Strategy is delivered. For example, by 2026 our customer-facing roles will have evolved to include developing relationships of trust online, building the capacity of customers to do things for themselves, helping communities have a stronger voice, linking people with their neighbours, helping them being involved in activities and engaging with influence.

We anticipate the workforce of 2026 will be significantly different from the workforce of today; fully digital and increasingly looking for more flexible career models, work arrangements, reward programmes and career development opportunities. Up to 75% of our workforce will no longer work a traditional Monday to Friday pattern by 2026. Our aim is to deliver a gradual and smooth transition towards a new workforce model that is more agile in responding efficiently to changes in customer requirements. We will:

- explore opportunities for creating modern employment terms and conditions and working practices that appeal to our evolving workforce and ensure maximum flexibility to meet changing needs
- introduce a new approach to staff and leadership learning and development which puts staff in control of managing their own career and encouraging leaders to share talent for the benefit of the business
- value staff who are highly skilled in building and managing relationships and have the capacity to lead creative outcomes.

In addition, we will work to improve the diversity of our workforce. We are committed towards creating a working environment that is inclusive for everyone. Our Different Together campaign will help to promote our equity, diversity and inclusion focus both for staff and with our customers and communities.

Our Future 250 programme in Wheatley Group will provide a sought-after route for young people to develop their talent, attracting an external talent pipeline for our evolving business requirements. Each year, a cohort will be identified and provided with structured opportunities to move around the business to build their skills and experience portfolio, honing their talents and demonstrating their potential. At Wheatley Homes East we will encourage young people in our communities to engage with this programme and we will provide opportunities for those on the programme.

We will demonstrate our progress towards the outcomes under **developing our shared capability** through the following key performance indicators.

Our key performance indicators:

- Over 90% of staff say they feel appreciated for the work they do
- Staff absence is maintained at 3% for housing staff
- Staff turnover remains at less than 7%
- 40% of promoted posts filled with internal candidates.

In addition to the above Wheatley Homes East specific KPIs, Wheatley Homes East will also contribute to and monitor against the following Group-wide KPIs:

- 50 graduates provided with opportunities to work and gain experience in our sectors
- 250 young people provided with structured opportunities to build their skills within the Group
- Our workforce demographic makeup more closely resembles that of the communities in which we operate.

5. ENABLING OUR AMBITIONS

The funding platforms we put in place provide a strong basis to raise the funding to support our ambitions. However, new facilities will be required in the latter years of the strategy period and we will look to bond, bank and other potential sources to identify the most advantageous options. Access to Scottish Government grant, which was such a vital element of the new-build programme we delivered from 2015-20, will continue to be key to our ambitions.

Our continuing focus on social rented housing, supported by Scottish Government subsidy, will help in our objective to maintain a strong credit rating and manage financial risks. We will test our business plan against a set of financial golden rules and ensure we have mitigating actions ready to address a wide range of adverse scenarios and stresses.

By 2026 Wheatley Homes East's customers and staff will become the most digitally enabled in Scotland. Our evolving customer and staff facing digital platforms - across web self-service, social media, mobile applications and online knowledge - will help to support our activities and ensure that our interactions with customers provide timely, value added services. ~~a rich portal for customers to draw down services, save money on fuel bills, interact with their community and tap into a host of other benefits.~~ Importantly, how we enable and support our customers and staff to use our digital platforms ~~the transition that our customers and staff make to self-managed services~~ must be both successful and sustainable ~~as well as being~~ based on offerings that fundamentally improve services and meet customer needs beyond that which is possible in an off-line environment. ~~To achieve this, we will optimise digital channels for customers to drive positive engagement and give them finger tip access to the data they need to make informed decisions.~~

Technology and digital innovation will continue to enhance the work performed also ~~augment the work that is done~~ by people within the organisation ~~by integrating productivity and automation tools.~~ Through process improvement and smarter utilisation of our digital platforms, we will improve our efficiency and service capabilities. The ongoing implementation of our Group Data Strategy ~~data strategy~~ will bolster our vision of establishing a unified ~~Creating a single~~ source of trusted, secure information for all core front line staff. This will ensure our decision-making is informed in real time and that our decisions strategically, tactically and operationally are intelligence led and, in turn, meet customer needs.

To support our ambitions and ensure that our investments are properly focused on those areas that will realise both customer and business value, we will continue to review and assess our digital programme ~~mature our model for assessing digital investment~~ to consider strategic fit, complexity, risk, people and quality measures as well as financial considerations. We will explore opportunities to measure the progress in our digital maturity against others in our sector and beyond. We will prioritise digital platforms and services in areas that we know are important for our customers, such as online repairs, our website and digital contact channels.

We will continue to focus on how we leverage data and new technology digital to deliver efficiencies in the way we deliver services, innovating in how we secure funding and focus on efficiency more widely to support keeping rents affordable for tenants.

Our success over the last five years has ensured Wheatley has been accepted and recognised as a force for good in Scotland. Building on these strong foundations, we are well positioned to confidently and deliberately take a leading role on the UK and international stage influencing locally and nationally to benefit our communities in Wheatley Homes East.

Over the life of this strategy we will also adopt an international dimension to our search for best practice. Identifying and exploring different ways of working and solutions developed across a broader range of contexts will stimulate and inform our thinking. This will enhance our international profile and reputation through showcasing our own role-model approaches across the world.

Our staff will increasingly be recognised as thought leaders and practice experts in their particular discipline. Staff will increasingly liaise with, inform and influence strategic decision makers in Scotland through membership of committees and advisory groups.

We will demonstrate Wheatley Homes East's progress towards the outcomes under **enabling our ambitions** through the following key performance indicators.

Our key performance indicators:

- gGross rent arrears are less than 4.5%
- Average days to let a home in less than 16 days
- ~~Over 50% of customers actively using their online account to transact with Wheatley Homes East.~~

In addition to the above Wheatley Homes East specific KPIs, Wheatley Homes East will also contribute to and monitor against the following Group-wide KPI:

- Maintain a strong investment credit rating of A+ stable.

Risk Appetite: Making the most of our homes and assets

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

Report

To: Wheatley Homes East Board

By: Stephen Devine, Director of Assets and Sustainability

Approved by: Frank McCafferty, Group Director of Repairs and Assets

Subject: Sustainability update

Date of Meeting: 19 September 2024

1. Purpose

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

2. Authorising and strategic context

- 2.1 'Setting the benchmark for sustainability and reducing carbon footprint' is a stated key outcome in our Group Strategy - ***Your Home, Your Community, Your Future***. Our Sustainability Framework, which the Board considered last year, provides the direction for how this vision will be realised. This update details progress in priority areas from the Sustainability Framework.

3. Background

- 3.1 "Setting the benchmark for sustainability and reducing carbon footprint" is a stated key outcome in our Group Strategy, ***Your Home, Your Community, Your Future***. Our Sustainability Strategy, which we published in early 2023, builds on this through setting key areas of focus, namely:
- **Existing homes:** Achieve EESSH2 target by end of 2031/32 and have Net-Zero emissions from all properties where technically and economically feasible by end of 2043;
 - **New Homes:** All properties at minimum of EPC B and with Net-Zero heating systems in line with planning timescales;
 - **Business operations:** Carbon neutral by end of 2026 including decarbonised fleet where feasible, and use of green electricity; and
 - **Supporting contributors:** Build understanding and support action including among staff and communities to address the climate emergency.
- 3.2 The Social Housing Net Zero Standard (SHNZS), which the Scottish Government consulted on in early 2024, is intended to replace EESSH2. While conclusions from this consultation are not yet available, the direction set clarifies the energy efficiency related improvements that will be expected in our existing homes. These improvements will have two parts relating to the:

- fabric efficiency of the property (i.e. the amount of heat required to heat the home); and
- source of heating for the home which will have to be ‘clean’ (i.e. not requiring fossil fuel to be used in the home)

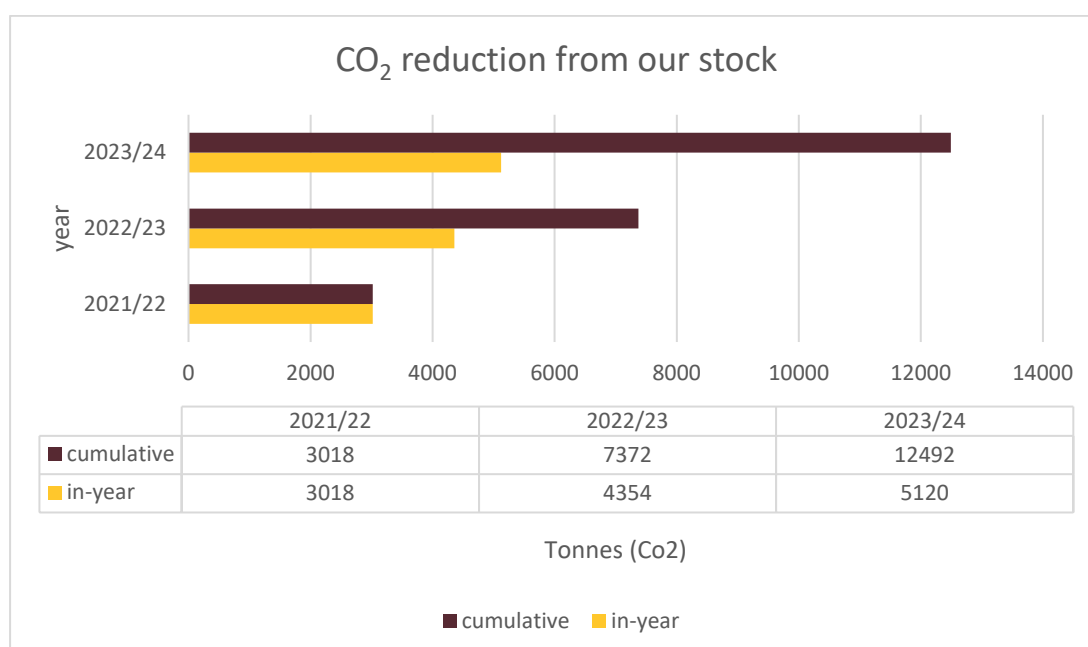
3.3 For planning purposes, and throughout this report we have used the targets proposed in the SHNZS consultation. We would also intend, as we indicated we would do in our Sustainability Strategy, to refine the objective for improving the energy efficiency of our existing homes to align with SHNZS, so that it reads:

- **Existing homes:** Achieve the fabric efficiency and clean heating elements of SHNZS in line with the timescale set in the standard.

4. Discussion

Existing homes

- 4.1 We estimate that across the Group, heating our homes produces around 150,000 tonnes of CO₂ each year. This is based on typical energy consumption in UK properties and the heating systems used in our homes. More specific information, such as details of actual energy usage, is not available because it is proprietary to tenants and not shared by energy companies.
- 4.2 Through our Group Strategy, ***Your Homes, Your Community, Your Future***, we committed to reducing these emissions by 20,000 tCO₂ by 2026. At the end of March this year, three years into the five-year period covered by the Strategy, 12,492 tCO₂ has been reduced through our investment in energy efficiency measures. The chart below shows both reduction by year and cumulative progress towards our 20,000-tonne target.



- 4.3 This year (2023/24), 111.18 tCO₂ was reduced as a result of our investment. Key contributions through our investment programme to the Group carbon reduction target above included:

Investment Item: 2023/2024	tCO ₂
Install Electric Heating	7.64
Install Loft Insulation	0.36
Internal Thermal Treatment	51.72
Renew Central Heating Boiler	32.87
Renew Dwelling Windows	18.60
Total	111.18

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

	EESSH 2					SHNZS (kWh/m ² /yr)		
RSL	EPC/R A	EPC/R B	EPC/R C	EPC/R D	EPC/R E	Better than 71	between 71 and 120	worse than 120
WH East	0%	44%	53%	3%	0%	60%	33%	7%

- 4.5 We are currently developing plans, as part of the direction set in our draft Strategic Asset Investment Plan that the Board is due to consider at this meeting, for the works needed to achieve the fabric efficiency element of SHNZ by 2033. These works will be archetype specific and focus initially on the minimum works identified in the consultation, where they are practical and provide a benefit for tenants from the required investment, including:

- 270 mm loft insulation;
- cavity wall insulation;
- draught proofing;
- heating controls;
- 80 mm hot water cylinder insulation; and
- suspended floor insulation.

- 4.6 We have also successfully bid to the Scottish Government's Social Housing net Zero heat fund for financial support to improve the energy efficiency of some of our harder to treat properties. Our successful bids, which were confirmed in August 2024, are for £480,000 to retrofit 24 void sandstone tenement flats in Edinburgh using a mix of Internal Wall Insulation, underfloor insulation, double glazing air tightness measures (taping, skirting and draught proofing), Connected Response or High Heat Retention Storage Heaters depending on the condition of the current heating systems.
- 4.7 These works are being planned currently with completion targeted by the end of March 2025.
- 4.8 Our latest successful bid builds on earlier funding of almost £400,000 from the Scottish Government for Energy Efficiency works.

New Build

- 4.9 All our new homes approved over the last year have achieved an energy performance rating of B.
- 4.10 The Heat in Buildings Strategy developed by the Scottish Government requires all affordable homes delivered by RSLs to be zero emissions by 2026. Our Performance Specification has been amended to reflect these new requirements.
- 4.11 Our new-build specification allows for enhanced insulation and U-values which are in excess of the current building regulations. This ensures the efficiency of the building fabric is maximised and supports our tenants in the cost of heating their homes. We have also developed a tool which will allow an assessment of what scale of PV installation is possible, the likely benefit to the customer (based on heating system, occupancy and tariff) and what benefit there is in the SAP rating. This will ensure that our PV systems are sized to provide maximum efficiency and benefit to our customers. The tool can be used for new builds and existing stock.
- 4.12 In December 2022, the Minister for Zero Carbon Buildings, Active Travel and Tenants' Rights confirmed that the Scottish Government will make legislation by December 2024 to deliver "a Scottish equivalent to the Passivhaus standard". This aligns with the Shared Policy Programme agreement on "explicit support for Passivhaus and equivalent standards" and the recommendation from the Climate Assembly "to ensure that, within the next 5 years, all new housing is built to Passivhaus standards (or an agreed Scottish equivalent)".
- 4.13 We have engaged directly with the Building Standards Division and the wider Scottish Government through membership of the Government's Energy Review Working Group to input into the design and implementation of the proposed new standard. The new regulation is expected to be laid by the end of 2024 with implementation in late 2027/2028. Our homes will be designed to the new standard as required.
- 4.14 A new Zero Emissions New-Build Affordable Homes Strategy is expected to be developed by the Scottish Government which will focus on greater use of offsite construction, informed by the findings of their 'Edinburgh Home Demonstrator' project. Across Group we already make use of offsite manufactured open and closed panel systems with projects for modular housing also being progressed. We will continue to explore offsite opportunities and their ability to deliver against our programme ambitions as the market matures.
- 4.15 The concept of 20-minute neighbourhoods and place planning remains a key factor in our development programme. All projects are assessed based on key services available locally which support the delivery of new homes and our tenants, with exemptions in rural areas.

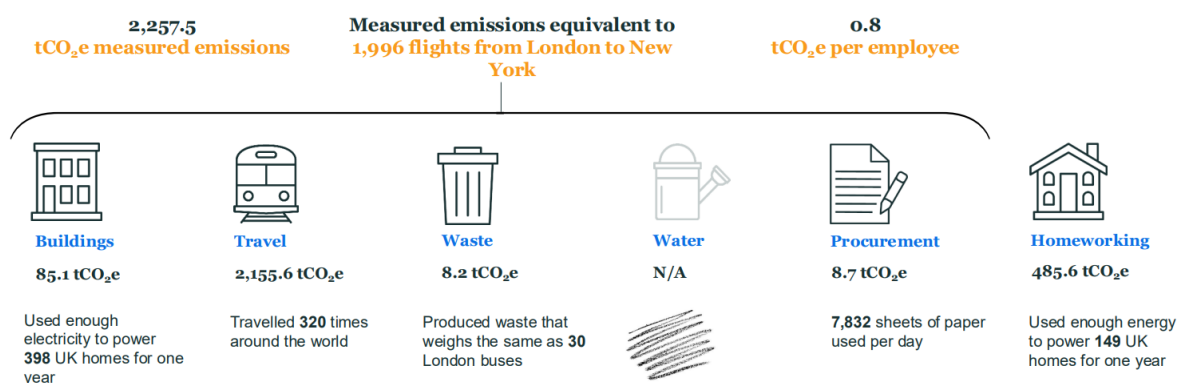
- 4.16 To support biodiversity in relation to our new homes, the use of 'Green Infrastructure' (use of natural systems in place of 'man-made' or hard engineering alternatives) is adopted in line with the National Planning Framework to reduce pollution, attenuate flood water, minimise overheating, increase wellbeing and support biodiversity. For new projects, Contractors and Design teams will be expected to work with a 'Building with Nature (BwN) Assessor'. This will help ensure that our new development meets the BwN framework standards at the design stage and the highest standards for wellbeing, water quality and wildlife resilience.

Our business operations

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

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

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



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

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

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

Our supporting activities

4.23 We established a Community of Excellence in June 2023 to bring together staff from across the Group and to help ensure that every part of the Group contributes to supporting our sustainability objectives. A priority for the Community of Excellence was to understand and articulate the wider contribution we make beyond the specific steps we are taking to reducing emissions relating to our existing homes, new homes and business operations.

4.24 In December 2023, we commissioned Planet Mark (to ensure consistency with our emissions reporting) to capture examples of this wider contribution. Planet Mark facilitated a workshop with staff as part of the Sustainability Community of Excellence. Following this workshop, data analysis was conducted by Planet Mark using measurement methodologies aligned with the Greenhouse Gas Protocol (a globally recognised standard for measuring emissions) to quantify key initiatives and, where possible, attribute a carbon reduction or avoided equivalent.

4.25 Planet Mark's analysis was able to quantify impact from Group-wide initiatives that led to 312.3 tonnes of avoided carbon emissions. Planet Mark also comments that our effort will have led to significantly more potential avoided emissions, however it was not possible to quantify the impact due to the lack of an appropriate baseline measurement or referenceable carbon equivalent metric.

4.26 The initiative identified with savings, since they were introduced, are summarised in the table below.

Area	Initiative	Emissions saved (tCO2)
Supporting communities with access and infrastructure for electric vehicles.	EV car rental scheme for customers and wider community	23.9
	Installing 73 Electric Vehicle charging points within our communities	185.7
Home Comforts programme – furniture and white goods recycling	Diverting an estimated 132.26 tonnes from landfill	68.8
Active Travel, Cycling Infrastructure and Bike Shelters	installing nearly 1000 free-to-use, secure bike shelter spaces across our communities	12.9
Food vulnerable households and Wheatley Larders	Partnership with Fair Share food charity, using ‘surplus for a purpose’, redirecting unsold food	21.0
Total		312.3

4.27 Group wide we have also planted around 3,000 saplings since 2021 giving an estimated 45 tCO2 of carbon storage to date. This contribution is not counted above because the saplings were not planted in accordance with a verified woodland code, and as such, it is not possible to assign a true carbon savings value in line with the GHG protocol. It is worth noting that 3,000 trees planted in line with the protocol would achieve total carbon storage of 1,500 tonnes over 100 years.

4.28 PNAG (Pathway to Net Zero Advisory Group) is continuing to inform our sustainability activities. Recent support has included considering and reforming our response to the Scottish Government’s consultation on SHNZ, reviewing sustainability aspects of our new build development and considering our approach to district heating systems including how to optimise, and where these potentially provide advantages for customers.

4.29 Going forward, we plan to build on the understanding we are developing on how we impact the environment through external validation of our approach and data. We also plan to explore the availability of a suitable single approach to estimating emission, that can also meet various current and future reporting requirements including as part of funding agreements and financial reporting obligations.

5. Customer Engagement

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

6. Environmental and sustainability implications

- 6.1 This report focuses on environmental and sustainability implications.

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

- 10.1 Our risk appetite for setting the benchmark for sustainability and reducing carbon footprint is as follows:
- Financial or VFM: Open - A significant investment in retrofitting will be required to increase the energy efficiency and reduce the carbon footprint of our existing homes. In this context we are prepared to invest for reward, considering both the value and benefits which this investment will bring. However, we must still minimise the possibility of financial loss by managing risks to a tolerable level.
 - Reputation and Credibility: Open - We aim to establish Wheatley Group, as a role-model for sustainability nationally and beyond, as well as influencing the rest of the sector to raise its standards. We seek to partner with the Scottish Government and other organisations to achieve our common climate change and sustainable development goals. We are prepared to be innovative to deliver these aims and take decisions that might expose us to additional scrutiny, but only where success is likely and we have taken appropriate steps to minimise any negative exposure.

- Operational Delivery: Hungry - We are eager to be innovative and pioneer new approaches to sustainability through the delivery of innovative energy generation opportunities. We will prioritise solutions that enhance control and cost savings for customers, and work with research partners to solve long standing challenges for improving energy efficiency in non-standard construction types. We are prepared to take greater risks where we believe opportunities will significantly support our aim to 'break the mould' and establish us as a leader in sustainability and reducing carbon footprint.
- Compliance: Legal / Regulatory: Cautious - this area is gaining more importance for stakeholders, including potential investors, staff and customers. We must be able to demonstrate that we have taken action to comply with all existing and emerging legislative and regulatory requirements in this area and be reasonably sure we would win any challenge.

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

11. Equalities implications

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

12. Key issues and conclusions

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

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

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

13. Recommendations

13.1 The Board is asked to note this progress update.

LIST OF APPENDICES:

NONE

Report

To: Wheatley Homes East Board

By: Lindsay Lauder, Director of Development and Regeneration

Approved by: Frank McCafferty, Group Director of Repairs and Assets

Subject: New build development programme: mid-year review

Date of Meeting: 19 September 2024

1. Purpose

- 1.1 To provide the Board with a mid-year review of our new build programme performance, including any programme highlights and/or exceptions.

2. Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for approving our rolling five-year development programme each February. Once the programme is approved, the Wheatley Developments Scotland Limited ("WDSL") Board is responsible for scrutinising and approving each individual contract award in line with our agreed development criteria.
- 2.2 Our development programme links to our 2021 - 2026 strategy and the strategic theme, 'Making the Most of our Homes and Assets' as follows:
- Properties developed will be warm, safe and energy efficient homes, meeting Aspects 1 and 2 of Silver Sustainability Standards;
 - Regenerating communities to make them sustainable for the next 20 years;
 - Work to place the customer at the heart of how we plan and design our new build developments.
- 2.3 Our new build programme also helps us to deliver against the strategic theme of 'Changing Lives and Communities' through increased opportunities for training and employment and through community benefit contributions to the Wheatley Foundation.

3. Background

- 3.1 We continue to be a key partner for the Scottish Government and the City of Edinburgh Council (CEC) and the Local Authorities of the Lothians (West Lothian Council, Midlothian Council, East Lothian Council). We have an ambitious growth programme in these areas supporting the Scottish Government's *More Homes Scotland* programme.

- 3.2 WHE are engaged in developing sites across Edinburgh and the Lothians, including the regeneration of Deans South, West Lothian and across strategic sites in Winchburgh, Wallyford, Blindwells and West Craigs.
- 3.3 On 19 December 2023 the Scottish Government announced a 26% reduction in funding for the Affordable Housing Supply Programme reducing from £752m in 2023/24 to £556m in 2024/25 (£196M reduction). On 26 April 2024, the Scottish Government announced that £80M would be made available over the next two years to support acquisitions. We await the details of this proposal and will work with the Local Authorities of Edinburgh and the Lothians to secure funding where possible.
- 3.4 Implications of the reduction in grant will affect the delivery of our programme in the East and we continue to assess the implications of the grant position with the Scottish Government and the Local Authorities of Edinburgh and the Lothians. The impact on future programme is also being assessed and we anticipate that many projects planned to be brought forward in 2024/25 are likely to be deferred until at least 2025/26. A full update will be brought to Board as part of the Business Planning process in February 2025.

4. Discussion

- 4.1 Details of our new build development activity are provided in **Table 1** below:

Table 1:

Indicators	Highlights & Exceptions
Unit completions	<p>During financial year 2023/2024 we completed 197 new homes across the following developments:</p> <ul style="list-style-type: none"> ▪ 34 units at Raw Holdings (SR) ▪ 36 units at Macmerry (SR) ▪ 35 units at Penicuik (SR) ▪ 12 units at Roslin Ph1 (SR) ▪ 6 units at Roslin Ph2 (SR) ▪ 14 units at Roslin Ph2 (MMR) ▪ 12 units at The Wisp Ph3c (SR) ▪ 33 units at Wallyford 7 (SR) ▪ 15 units at Wallyford 7 (MMR) <p>As a result of the handovers above, the following projects are now fully complete: Macmerry, Penicuik, Roslin Phase 1, Roslin Phase 2, Wisp 3C, Wallyford 7</p> <p>In addition, 21 mid-market rent units were completed at Raw Holdings in East Calder through the Lowther Homes new build development programme.</p> <p>At the end of August 2024, we have completed 156 new homes in financial year 2024/2025, as follows:</p> <ul style="list-style-type: none"> ▪ 23 units at Blindwells 11 ▪ 9 units at Deans South Ph 1B ▪ 25 units at Doctor's Field Rosewell ▪ 33 units at Rowanbank ▪ 11 units at South Fort Street (SR) ▪ 14 units at South Fort Street (MMR)

	<ul style="list-style-type: none"> ▪ 41 units at West Craigs 4 (MMR) <p>The handovers above complete the developments at Blindwells, Doctor's Field Rosewell, Rowanbank and South Fort Street.</p> <p>In addition, a further 4 mid-market rent units at Raw Holdings have completed for Lowther Homes, which completes the Raw Holdings development</p>
On site	<p>We have 663 homes under construction across 9 live development sites:</p> <ul style="list-style-type: none"> ▪ 37 units at Deans South 1B (9 complete) ▪ 117 units at West Craigs 4 (41 complete) ▪ 142 units West Craigs 5 ▪ 125 units at West Craigs 13 ▪ 12 units at St Crispin's ▪ 29 units at Sibbalds Brae ▪ 81 units at Winchburgh BB ▪ 30 units at Dalhousie South Phase 1 ▪ 90 units at Wallyford 5 <p>There are also 24 mid-market rent units under construction at Victory Lane in Wallyford for Lowther Homes.</p>
Due on site	<p>We have 67 homes due on site across 3 developments:</p> <ul style="list-style-type: none"> ▪ 38 homes at Deans South Ph2 ▪ 6 homes at Deans South Ph1A ▪ 23 homes at Buileyeon Road 3
Programme	<p>Subject to grant funding, a pipeline of projects is being progressed to identify new opportunities to contribute towards delivery of the business plan target. Key projects to highlight include:</p> <ul style="list-style-type: none"> ▪ 60 homes at Wallyford 6, East Lothian ▪ 69 homes at Winchburgh P3, West Lothian ▪ 37 homes at Deans Ph 3a & b, West Lothian ▪ 37 homes at Dolphinstone, East Lothian ▪ 24 homes at Auchendinny, Midlothian ▪ 28 homes at South Gilmerton, Edinburgh ▪ 23 homes at Merchant Quay, Edinburgh ▪ 34 homes at Maybury West, Edinburgh <p>As noted above, the progression of these sites will be subject to grant funding availability.</p>
Budget versus Spend	<p>Spend is £30.7m against budget of £29.5m to the end of July 2024. The spend variance is in large due to the change in contracting at Blindwells 11 to a Turnkey, with completion and expenditure happening earlier than projected.</p>

Engagement Status	<p>We have three 'High Engagement' projects':</p> <ul style="list-style-type: none"> ▪ West Craigs this is due to the size of the project of 425 homes ▪ Winchburgh BB is technically complex and ▪ Deans South Phase 1, a high profile, challenging regeneration area. <p>Updates on each of the projects are shown below.</p>
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Project Updates

Deans South

- 4.2 Progress continues in line with programme. 9 properties were handed over in July 2024 with the remaining properties due for handover in September and November 2024. We are due on site with 38 new homes at Deans South Phase 2 A, subject to agreement on the grant funding position in 2024/25.

Winchburgh BB

- 4.3 Works are progressing well and ahead of contractual programme, with a potential for 25 handovers in 2024/25. The site will deliver a total of 81 properties.

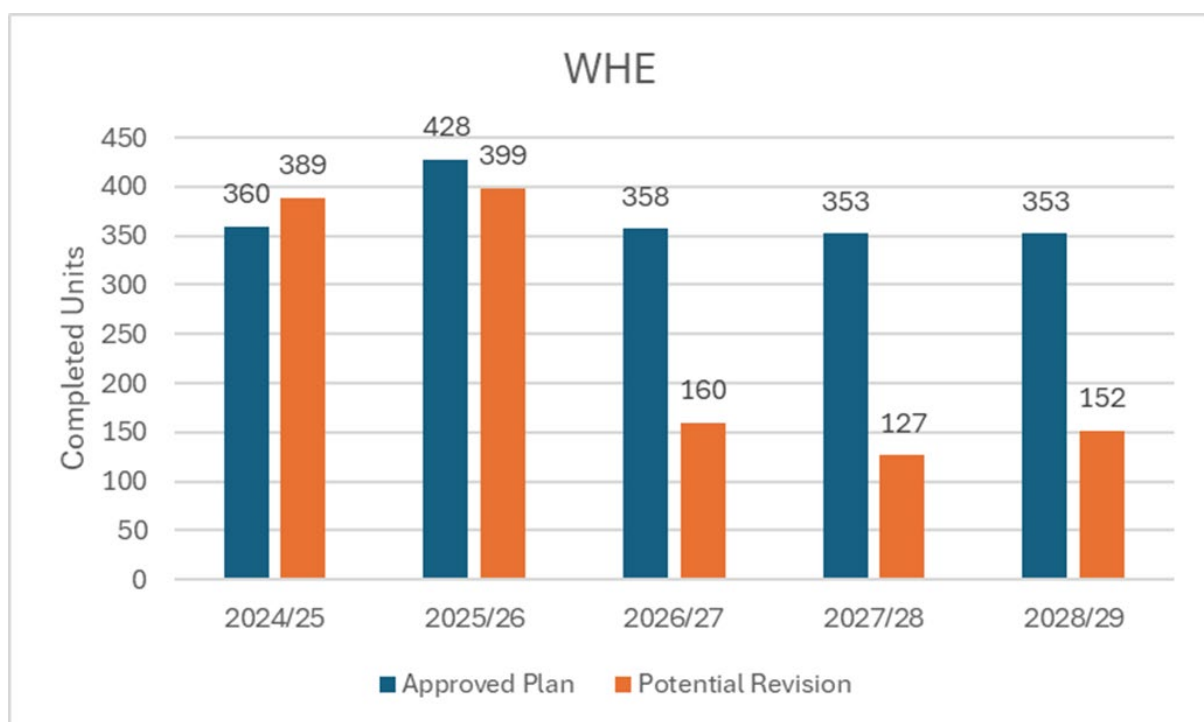
West Craigs, Edinburgh

- 4.4 Works are progressing well across all three phases and remains on schedule. The project has successfully delivered 41 homes to date, with a further 190 homes planned for completion this financial year.

Future Programme

- 4.5 We actively engage with the Local Authorities of Edinburgh and the Lothians, along with private-sector developers to identify future development opportunities. Given the current grant restraints, we are in the process of prioritising our future pipeline with the Scottish Government and the Local Authorities of Edinburgh and the Lothians.
- 4.6 We have more projects that could be brought forward than there is grant funding available to support their delivery. In Edinburgh, we could provide tender approval for 133 homes in 2024/25, however grant funding is currently available for 23 homes at Builyeon Road. We will seek to bring forward the remainder of the projects for tender approval in 2025/26, but this will be subject to the availability of grant within that year. The impact is a reduction in the number of projects we can deliver in 2024/25 and will also delay the delivery of projects planned for 2025/26 and 2026/27 into the following years.

- 4.7 In West Lothian, grant will be available to deliver Deans South Phase 1A but approval for Deans South Phase 2 will be subject to our forward funding. To support delivery in 2024/25, the Local Authority has asked that we make use of our private finance resource to front fund projects where grant would normally be used, with grant funding being paid from 2025/26. Our standard project funding approach uses grant drawdowns from the commencement of works and continues until it is exhausted, at which time private finance would fund the remainder of the project. This allows us to minimise our interest costs associated with private finance drawdowns. We are exploring our front funding capacity with WLC to help support the delivery of Deans South, which is a strategically important regeneration project.
- 4.8 Following feedback from local authorities and the Scottish Government we have forecasted the impact of the grant reduction against our approved business plan, and this forecasts a reduction of 625 units over the five-year period from 2024/25, as shown below:



- 4.9 For the majority of projects, the impact of the budget cut for new projects is a delay in the planned start as opposed to the projects no longer proceeding. As a result, the list of projects approved for inclusion in the business plan remains largely unchanged over the 10-year period. We continue to be the preferred RSL in several significant future projects in the CEC SHIP which fall out with the 5-year completion figures noted above including sites at Crosswinds, Redford Barracks, West Town and future phases at West Craigs.

Local Housing Strategy

- 4.10 In November 2023, CEC were the first of eight local authorities to declare a housing emergency, with the announcement being issued in advance of the Scottish Government Affordable Housing budget reduction. The housing emergency will be a key factor in the development of the new Local Housing Strategy for Edinburgh. Consultation and engagement are being undertaken to develop the Strategy and we have been involved in the early engagement and will continue its engagement as the consultation progresses.

Sustainability

- 4.11 The Heat in Buildings Strategy developed by Scottish Government requires all affordable homes delivered by RSLs to be zero emissions by 2026. Our Performance Specification has been amended to reflect these new requirements.
- 4.12 Wheatley Development have engaged directly with the Building Standards Division and wider Scottish Government through membership of the Government's Energy Review Working Group to input to the design and implementation of the proposed new Scottish Equivalent Passive House standard. The new regulation is expected to be laid by the end of 2024 with implementation in late 2027/2028. Our homes will be designed to the new standard as required and we are actively engaged in the delivery of a demonstrator project of the anticipated new standard at our Shandwick Street development in Glasgow.
- 4.13 A new Zero Emissions New-Build Affordable Homes Strategy is expected to be developed by Scottish Government which will focus on greater use of offsite construction, informed by the findings of the Edinburgh Demonstrator project. Across Group we already make use of offsite manufactured open and closed panel systems with projects for modular housing also being progressed. We will continue to explore offsite opportunities and its ability to deliver against our programme ambitions as the market matures.

Housing for Varying Needs

- 4.14 In June 2023 the Scottish Government launched a consultation on its new accessible homes standard which replaces the Housing for Varying Needs Standard. This standard aims to ensure that all new homes are designed and built to be more accessible and adaptable for future use, making 'homes for life'. The standard itself looks at a number of factors related to a property including; space standards, kitchen lay outs, external finishes and corridor widths.
- 4.15 We worked with partners to provide a response to the Scottish Government on the proposed standard. We anticipate the changes will increase the cost per unit to build new homes. As yet, no response has been issued by Scottish Government to the consultation and no date set for the implementation of the standard in Scotland.

Market Status

- 4.16 We continue to undertake quarterly meetings with the Framework Contractors. As Equifax ratings and published accounts are backward-looking, we are keen to be proactively engaged with the contractors with reviews of management accounts where possible, up-to-date information on subcontractor performance, pipeline of work and general market intelligence.
- 4.17 All report steady market conditions in relation to material prices and subcontractor availability, given the ongoing reduction in activity in the for-sale housebuilding market. Challenges continue to exist in the time taken for projects to move through the planning process as well as the time from project inception to secure a site start. The restricted grant environment is further impacting on the time taken to achieve a site start across contractors affordable housing projects.
- 4.18 Our market intelligence derives from monitoring of planning applications and discussion with developers identifies a steady but reduced number of applications coming forward. Concerns have been lodged from the development industry in relation to the deliverability of the Edinburgh City Plan 2030 and its ability to address the number of new homes required to readdress the housing emergency declared by CEC in November 2023. Similar concerns are being raised in East, Mid and West Lothian.

5. Customer engagement

- 5.1 Our engagement framework, “Stronger Voices, Stronger Communities” places our customer at the heart of we plan, design and specify our development projects. Our Design Guide will be influenced by Customer Engagement across our geographic areas and through encouraging different customer voices as part of that process. The Design Guide will set the standard for our new homes in terms of design and specification and our customers will play a key part in shaping this.
- 5.2 The majority of our programme is delivered through projects secured as part of developer’s s75 obligations. On these projects, neighbouring communities have opportunity to input into design of the development through the statutory the planning process. We select projects and delivery partners who provide high quality, inclusive design. We provide input into these projects, where possible using the principles established within our Design Guide.
- 5.3 Where possible, we will ensure that the Whole Family Approach Research undertaken on behalf of Wheatley by Neil Morland and Co. in 2022 is reflected in our approach to the design and specification of new homes. Where we are able to influence the mix of housing, we will deliver family homes as a core part of our development programme. This will include the delivery of larger family homes (4 bed +) where there is an identified need.
- 5.4 We have reviewed the handover, defect rectification and making good defects procedures using feedback from all stakeholders involved; including housing teams, customers and repairs services. The new procedures will help enhance and improve our approach and overall customer satisfaction.
- 5.5 Our new build programme continues to support the work of the Foundation through financial contributions and delivery of community benefits including jobs, training and apprenticeship opportunities.

6. Environmental and sustainability implications

- 6.1 Our journey to Net Zero will focus on ensuring it is a just transition for our tenants, with a focus on ensuring we prioritise areas that benefit our tenants such as improving energy efficiency and reducing energy consumption.
- 6.2 Our Group Sustainability Framework sets out our key actions in relation to new build homes. This includes:
- New-build homes will meet the planning requirements in relation to no fossil fuel as required through Building Regulations (March 2024);
 - We will size our solar PV systems to generate sufficient electricity to mitigate high cost of operating some systems;
 - Our large-scale regeneration proposals will include an assessment of 'carbon payback';
 - We will explore the implications of design for deconstruction and look to incorporate requirements for this as part of future new-build standards;
 - We will pilot modern methods of construction; and
 - Our new homes will be at least EPC B.
- 6.3 Future projects are developed to meet Aspects 1 and 2 of the Silver Sustainability Standards which covers reduction in carbon dioxide emissions and energy use for space heating. EPC ratings of B have been achieved in all new properties.
- 6.4 As the majority of our programme originates from projects delivered as part of a developer's s75 obligations, the design of the approach to sustainability will be determined by the lead developer. As the building regulations move towards net zero targets, our developer partners provide heating systems to meet this requirement. For example, the recently completed 33 units at Rowanbank with Artisan and the 23 homes with Springfield at Dalhousie South, have non-gas heating and hot water solutions provided as part of these contracts.
- 6.5 The approach taken by our developer partners, often allows us to enter contracts on projects that feature photovoltaic panels that convert sunlight into electricity. Along with a highly efficient thermal specification these solar generation systems help the project exceed the target emission rates required by building standards. Taken as a whole, the specification helps customers reduce their energy bills.
- 6.5 Our new build specification includes the installation of fire suppression systems, electric vehicle charging points and gas-free heating options as a standard. This specification will be used in the negotiation of our s75 contracts and where possible will work towards the national decarbonisation targets for gas-free developments by 2024.

7. Digital transformation alignment

- 7.1 Fibre broadband connectivity will be delivered free to customers in most completed units, where available, to meet our Group strategy objectives to facilitate the aim of developing digital neighbourhoods and creating the digital infrastructure that may assist customers to work from home or live independently for longer. Thereafter, our customers will be free to choose their internet supplier of choice from a range of companies.

8. Financial and value for money implications

- 8.1 The business plan approved by the Board in February 2024 reflects a new build programme of over 1500 new units to be completed over the next five years. noted above, the Business Plan which will be brought to the Board in February 2025 will reflect the currently constrained grant environment.
- 8.2 The table below summarises target and actual spend performance for period 4, which is to July 2024.

Table 2

WHE Capital Expenditure, New Build Programme 2024/25 Period to End July 2024			
Spend	Budget	Variance	Budget for full year
£30.7m	£29.5m	£1.2m	£87.2m

- 8.3 £30.7m of new build expenditure has been incurred in the year to date which is £1.2m higher than budget. The variance can be attributed to the spend profile of the developments, a few of which are progressing faster than was previously programmed. For example, both South Fort Street in Edinburgh and Doctor's Field Rosewell have completed earlier than was previously assumed. Blindwells 11 was expected to be delivered by a design and build contract which would have meant a spend of £2m in the year 2023/24, however, the change to a Turnkey development meant that all expenditure was incurred in the year 2024/25. Individual projects remain on budget in terms of approved costs. Q1 reforecast, has noted a projected gross spend of £84.422m for the year against the budget of £87.201m. This variance is due to projects not progressing as early as planned previously due to the impact of the reduction in grant availability. We will continue to monitor actual delivery against assumptions within the business plan and report on any changes.
- 8.4 [redacted]

9. Legal, regulatory and charitable implications

- 9.1 Legal support for projects is provided by our Property Legal Team and external framework solicitors. Technical support is provided by Employers Agents to compile the construction documentation for signing.
- 9.2 We can call off projects from our Technical Consultant Framework and Generation 3 Housing, Construction and Associated Works Framework which were tendered in accordance with the OJEU and Scottish Government procurement regulations. The contracts are in the form of an SBCC Design and Build contract, updated with the Group's Schedule of Amendments, as procured under the framework.
- 9.3 Where projects are progressed with private developers, the Group is taking advantage of commercial opportunities that has been offered to us. As such, developers cannot be called off the Group's new build framework as they are not part of this.

10. Risk appetite and assessment

- 10.1 Our risk appetite relating to the operational delivery of new homes is 'Open', balancing this with a minimal risk appetite for legal or reputational risk and an adverse financial risk appetite.
- 10.2 Our development programme represents a significant element of our expenditure, in the form of borrowing to fund construction. In the year (24/25) we anticipate spend of over £84.4m, inclusive of Grant funding, on the development programme. The income from the construction of new homes represents a correspondingly significant element to increasing rental income to continue to service borrowing. Additionally, the development programme plays a key role in reducing unit management costs for us as a developing RSL, as overheads are spread over a greater number of units.
- 10.3 A key risk is that we do not identify a pipeline of development opportunities to realise our assumed development programme. This could lead to us not constructing enough units to repay our borrowing levels or achieve assumed reductions in management cost levels.
- 10.4 We have previously mitigated this risk previously by identifying a strong programme of named sites in the proposed five-year programme, alongside developing strategic relationships with our key Scottish Government and Local Authority partners.
- 10.5 However, our ability to bring these identified sites forward is being restricted by the availability of grant. We have reviewed the impact of a reduced programme on our financial projections and while this results in a reduction in long term rental income this is offset by a reduction in interest due to a lower borrowing requirement.
- 10.6 We will continue to progress relationships with key developers and landowners and focus in areas of strategic importance to the Local Authorities, where there is a higher likelihood of funding being targeted. This is critical given the current market conditions and allows us to consider opportunities which may arise from this. We are currently developing sites across the four local Authorities of Edinburgh and the Lothians, including the regeneration of Deans South in West Lothian and across the strategic sites of Winchburgh, Wallyford, Blindwells and West Craigs.
- 10.8 Scottish Government has committed to adjusting the benchmark system annually to account for inflation, with the review dates for 2024 to be confirmed. It is expected that any uplift in the grant benchmark will be aligned to the tender indices as opposed to a wider review. Scottish Government has further committed to convening discussions should evidence demonstrate that there is an increase in the number of applications requiring above benchmark grant funding which is having a material impact on the speed of programme delivery. To date, all project approvals have been supported.
- 10.10 We continue to implement our Risk Mitigation Framework for Development Projects, along with other approaches to financial risk mitigation and contract monitoring. Given the recent administration of two developers, we have increased our contact with key developers across our programme. We will continue to monitor the effectiveness of the Risk Mitigation Framework and agree any amendments with WDSL Board.

- 10.11 Under the contractor Framework we use the Group Schedule of Amendments ("SoA") to the SBCC build contract which allows for tailored contract requirements across all projects through Design & Build, fixed price contracts. Our approach to financial appraisal and IRR ensures a prudent approach to the appraisal of projects. Contractor financial standing is reviewed through their Equifax score on a monthly basis and any adjustments reported to the WDSL Board. We engage with framework contractors on a quarterly basis to review their financial position and wider market context. A suitable regime of monitoring, recording and inspection is undertaken by our Clerk of Works on site to ensure the quality of works and progress against programme is assessed.
- 10.12 Risks in relation to individual projects are assessed and reported separately to the WDSL Board, this Board at business plan approval stage, and are re-assessed and mitigated as each project progresses.

11. Equalities Impact

- 11.1 We consider equalities within our planning and development; all of our new build developments are built to Housing for Varying Needs and in Glasgow, the Glasgow Standard, and continue to provision of housing to wheelchair-accessible standards as a contribution towards Local Authority targets.

12. Key Issues and Conclusions

- 12.1 There are continuing challenges in the sector in relation to sustained higher costs to build and the impact of a reduced Affordable Housing Supply Programme grant level in 2024/25. It is expected that the recent reductions will impact our ability to deliver our programme and we will work with the local authority to secure the grant funding which is available
- 12.2 We continue to be a key partner for the Scottish Government and the City of Edinburgh Council (CEC) and the Local Authorities of the Lothians (West Lothian Council, Midlothian Council, East Lothian Council).
- 12.3 Our development activity includes the delivery of:
- 197 units completed in 2023/24;
 - 156 units completed to August in 2024;
 - 730 units on site / due on site; and
 - A healthy pipeline of units coming forward subject to grant funding.

13. Recommendations

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

LIST OF APPENDICES:

NONE

Report

To: Wheatley Homes East Board

By: Elizabeth Cuthbertson, Strategy and Performance Lead

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

Subject: Equity, Diversity and Inclusion update

Date of Meeting: 19 September 2024

1. Purpose

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

2. Authorising and strategic context

- 2.1 Our Group strategy sets out our desire to increasingly tailor services across the Group to suit the needs of our customers, diversify our Customer Voices and consider how our workforce will more closely reflect our communities.
- 2.2 Under the Group Standing Orders and their Terms of Reference, the Wheatley Solutions Board support us to drive our EDI approach across the Group, including by agreeing and monitoring our Group Action Plan and monitoring progress quarterly. Our Board receives regular updates on the work undertaken, at least annually.

3. Background

- 3.1 The Wheatley Solutions Board approved the updated Group EDI Action Plan on 12 February 2024; we received an update on this at our following Board meeting in March 2024, including the update to our Group definition of 'EDI' to reflect our approach to providing equity of opportunity (rather than equality).
- 3.2 This report provides an update on progress made relative to our Group Action Plan since its approval. In addition to this, we introduced a Group Annual Equalities report last year. This report captures key elements of our EDI activity over the year and is published on our website.

4. Discussion

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

Outcome 1: Different Together with you

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



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

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

Outcome 2 - Different Together in our Group

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

- 4.14 Pre survey launch, WE Connect blogs reminded staff why it was important to complete the survey and what this data had informed. To encourage completion, internal communications included email reminders, TalkTogether, manager's briefing and a staff FAQ document. Our survey is still open; analysis of the data will then take place to be considered by our Executive Team and Wheatley Solutions Board in November; this will also be included in next year's Group Annual Equalities Report.

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Published:30/05/2024 Last Updated:31/05/2024

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

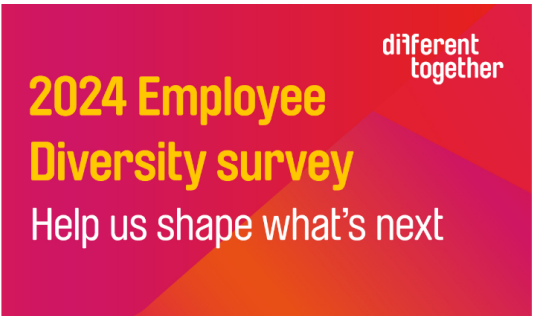
We'll soon be launching our 2024 diversity and inclusion staff survey, part of our Different Together campaign.

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

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

Here's how your feedback made a real difference:

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



different together

2024 Employee Diversity survey

Help us shape what's next

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

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

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

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

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

Outcome 3 - Evolving our data

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

5. Customer Engagement

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

6. Environmental and sustainability implications

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

7. Digital transformation alignment

- 7.1 We have developed digital platforms to allow for easier analysis and utilising of our customer equality data. Evolving our data and improving access to our services through a Digital Maturity approach are focuses within the updated action plan.

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

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

13. Recommendations

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

LIST OF APPENDICES:

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

Report

To: **Wheatley Homes East Board**

By: **Stephen Wright, Director of Governance**

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

Subject: **Governance update**

Date of Meeting: **19 September 2024**

1. Purpose

- 1.1 To update the Board and, where applicable, seek Board approval on the following governance-related matters:
- Our intra-group agreement with Wheatley Housing Group Limited and our Terms of Reference;
 - Annual Board appraisals and succession plan;
 - Proposed 2025 meeting dates;
 - Modern slavery statement; and
 - Updates to the Group-wide assurance policies.

2. Authorising and strategic context

- 2.1 We are a Registered Society under the Co-operative and Community Benefit Societies Act and are governed by our Rules. As a Registered Social Landlord (RSL) within a Group structure, we are also governed by the terms of an intra-group agreement with our parent company, Wheatley Housing Group Limited, and by the Group Standing Orders. The Group Standing Orders include Terms of Reference that are specific to us.
- 2.2 Under our Terms of Reference, our Board responsibilities include:
- Overseeing the implementation of relevant Group frameworks, policies and plans;
 - Undertaking an annual Board self-assessment based on the approach agreed by the Group Remuneration, Appointments, Appraisal and Governance Committee (RAAG); and
 - Not less than annually, reviewing and approving our succession plan.
- 2.3 Under our Rules and the Scottish Housing Regulator's Regulatory Framework we are required to hold a minimum of six Board meetings a year.

- 2.4 Businesses with a turnover higher than £36m are required under the Modern Slavery Act 2015 to prepare a modern slavery statement. Although this is not directly applicable to us, it applies to our parent company Wheatley Housing Group Limited. We have been included in the modern slavery statement approved by the Group Board.

3. Background

- 3.1 As an RSL in a group structure it is important that we regularly consider our key roles and responsibilities within Wheatley Group. We will present our Terms of Reference and intra-group agreement to the Board annually at the first meeting following our Annual General Meeting to ensure that the Board has the opportunity to note these.
- 3.2 We have a strong commitment to Board succession planning and ensuring we have an appropriate balance of skills and experience on our Board. Our annual Board appraisal and succession planning approach helps us with this.
- 3.3 There are a number of annual processes associated with our own and the wider Group's governance. These include setting the schedule of meetings for the calendar year and the submission of a Group Modern Slavery Statement.

4. Discussion

Terms of Reference and intra-group agreement

- 4.1 We operate as part of a Group structure, with roles and responsibilities set out in an intra-group agreement with our parent company, Wheatley Housing Group Limited, and through our Terms of Reference, which are contained in the Group Standing Orders.
- 4.2 In summary, the documents explain that:
- Wheatley Housing Group Limited is our parent company and has responsibility for setting the direction of the Group as a collective;
 - Our Board has responsibility for setting our strategy, budget, rents, new build and asset management plans;
 - In order to ensure the success of the Group as a whole, the Group Board sets the parameters for the matters listed out above; and
 - The Group Board has the ability to set and designate Group policies, with our Board responsible for ensuring these are fit for our purpose. Our Board is also responsible for approving our own operational policies. Where relevant, these should be based on any Group Board-approved frameworks, such as in the case of our approach to disposals and acquisitions.
- 4.3 Copies of our Terms of Reference and the intra-group agreement are attached for noting in Appendices 1 and 2. The names of the parties to the agreement (change to Wheatley Homes East) will be updated following the Rule changes in September. No further substantive changes are being proposed.

Board appraisals and succession plan

Annual Board Appraisal Process

- 4.4 Our appraisal process allows each Board member the opportunity to reflect on their role and contribution to the wider operation of the Board over the year.
- 4.5 The appraisals were undertaken during July and August and focused on the following areas:
- Board effectiveness;
 - Personal effectiveness;
 - Individual skills and succession planning;
 - Continuous Professional Development (“CPD”); and
 - Areas for refinement

Board effectiveness

- 4.6 Board members considered that the Board had been effective during the year. Board members continued to feel that there was a good range of complementary skills and experience.

Personal Effectiveness

- 4.7 The Chair agreed that each Board member had been effective over the year, which was reflected in the overall board effectiveness.

Individual skills; succession planning

- 4.8 Consistent with the first two topics, Board members acknowledged their own skills and experience as well as those of their colleagues. In addition, Board members acknowledged the importance of recruiting and creating a pipeline of future tenant Board members.
- 4.9 Board members provided feedback on their own future tenure plans and these have been included in an updated succession plan which is attached at Appendix 3.

CPD

- 4.10 Board members were pleased with the CPD opportunities throughout the year, including the introduction of online courses and the Role of the Non-Executive by the Institute of Directors. Board members also recognised the value of the upcoming group-wide event, which would provide an opportunity to meet colleagues and to hear from the Group Chief Executive and Minister for Housing.

Areas for refinement

- 4.11 No specific areas that needed refinement were identified which was consistent with the Board being effective overall.

2025 Meeting Schedule

- 4.12 We have now prepared the proposed calendar of meetings for 2025. Our six scheduled meetings will be held on the following dates/times:

- 1) Thursday 6 February at 5pm
- 2) Thursday 27 March at 5pm (preceded by stock tour)
- 3) Thursday 22 May at 2 pm (Board + strategy workshop)
- 4) Thursday 21 August at 5pm
- 5) Thursday 18 September at 5pm (following the AGM)
- 6) Thursday 27 November at 5pm

Modern Slavery Statement

- 4.13 The Modern Slavery Act 2015 was developed by the UK Government to help combat a growing concern about poor ethical practices. The Act came into force on 29 October 2015 and requires all organisations with a turnover in excess of £36m to prepare and publish a statement setting out the steps taken during the financial year to ensure that slavery and human trafficking are not taking place in any part of their supply chains or business. For organisations that are part of a group, a group-wide statement can be made covering each relevant entity.
- 4.14 A copy of the Group statement is attached at Appendix 4. This has not materially changed from the statement agreed last year. The statement was approved on our behalf by the Group Board at its meeting on 28 August 2023 and is applicable to the Group, our organisation and our partner organisations. It will be published **on our website** and submitted to the Government's modern slavery statement registry.
- 4.15 We have assessed the risk of slavery and human trafficking in the Group and its supply chain as low for the following reasons:
- We do not operate a large global supply chain;
 - We have a specialist procurement team which aims to drive up standards within our suppliers through Wheatley pledge and community benefits clauses;
 - We have introduced a requirement into our contracts that obliges suppliers to confirm their adherence to the Act; and
 - We enjoy a high public profile and are aware of the need to ensure that we engage suppliers that demonstrate a commitment to the highest ethical standards.

Group Assurance Policies

- 4.16 As noted previously in this report, our parent company is responsible for designating policies that are applicable on a Group-wide basis. The policies noted below have been designated as Group policies. Given the subject matter of each of the policies, the Group Audit Committee has been given responsibility for approving the policies on behalf of the Group Board. This is included in the Group Audit Committee's Terms of Reference. The policies that have been reviewed are:

Internal Audit policies:

- Group Anti-Money Laundering and Counter-Terrorism Financing Policy;
- Group Fraud, Corruption and Bribery Policy; and
- Group Whistleblowing Policy.

Information Governance policies:

- Group Data Protection Policy;
- Group Special Category Data Policy; and
- Group Freedom of Information Policy.

4.17 The Group Audit Committee considered and approved the updated policies at its meeting on August 2024. A summary of the changes is attached at Appendix 5. Copies of the policies are available on AdminControl.

5. Customer engagement

5.1. The content of the report is reserved to the Board and is of an internal focus. As such there has been no customer engagement.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

7.1. There are no links to digital transformation associated with this report.

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

9.1 We are legally required to produce a Modern Slavery Statement, which must be published within 6 months of the end of the financial year.

10. Risk appetite and assessment

10.1 Our risk appetite in relation to legal and regulatory compliance varies from cautious to averse across each of our strategic outcomes. The updates in this report help us to remain compliant with our legal obligations and are consistent with our risk appetite.

11. Equalities implications

11.1 There are no equalities implications arising from this report.

12. Key issues and conclusions

12.1 The report supports the Board to remain aware of its Terms of Reference and key roles and responsibilities within the Wheatley Group.

12.2 The report summarises the outcome of our annual appraisal process and succession planning. This is an important process that helps us to ensure that we remain well governed, with the skills and experience to help us achieve our strategic outcomes and make homes and live better for our tenants and customers.

12.3 Following a review of our activities, we have assessed the risk of modern slavery in our business as low.

13. Recommendations

13.1 The Board is asked to:

- 1) Note our Terms of Reference and our intra-group agreement with Wheatley Housing Group Limited;
- 2) Note the outcome of our 2024 Board appraisals;
- 3) Approve our three-year succession plan;
- 4) Note the Modern Slavery Statement, approved by the Group Board on our behalf; and
- 5) Approve the schedule of meetings for 2025;
- 6) Note the following Group policies, which are adopted by us:
 - Group Anti-Money Laundering and Counter-Terrorism Financing Policy;
 - Group Fraud, Corruption and Bribery Policy; and
 - Group Whistleblowing Policy.
 - Group Data Protection Policy;
 - Group Special Category Data Policy; and
 - Group Freedom of Information Policy.

LIST OF APPENDICES:

Appendix 1: Intra-group Agreement

Appendix 2: Terms of Reference

Appendix 3: 3-year Succession plan

Appendix 4: **Modern Slavery Statement** available [here](#)

Appendix 5: Summary of policy updates

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Intragroup Agreement

between

Wheatley Housing Group Limited



and

Dunedin Canmore Housing Limited



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This Agreement is between:

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

and

- (2) **Wheatley Homes Glasgow Limited a registered society registered under the Co-operative and Community Benefit Societies Act 2014 with registered number 116, and being a registered Scottish charity (registered number SC034572) and having its registered office at 8 New Mart Road, Edinburgh EH14 1RL (the “Subsidiary”);**

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

Introduction

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

Agreed terms

1 Interpretation

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

“Agreement” means this agreement including the Schedule;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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value;

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

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

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

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

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

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

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

2 Group objectives

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

3 Parent undertakings

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

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this Agreement.

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

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

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

or

3.2.2 where:

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

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Subsidiary or any member of the Subsidiary's Board.

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

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

4 Subsidiary's undertakings

- 4.1 The Subsidiary hereby agrees and undertakes that:

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

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

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

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

5 Responsibilities of the Parties

- 5.1 It is agreed that each Party shall have responsibility for all aspects of its business referred to as its responsibility in Part 2 of the Schedule.
- 5.2 It is further agreed that the Parent Board and the Subsidiary Board shall have the right to manage their respective businesses in accordance with the objects set out in the Parent Constitution or the Subsidiary's Constitution (as the case may be) and in its best interests, subject only to acting in accordance with Performance Standards, Group Policies, the provisions of this Agreement, the Business Plan and Budget, legal and regulatory requirements and the Group Strategy and Group Business Plan set in accordance with the terms of this Agreement.

6 Group Policies

- 6.1 The Parent shall have the right to designate which policies shall be applied as Group Policies and therefore be applicable to all Subsidiaries.
- 6.2 The Parent shall draft Group Policies in such a way as to ensure that the Subsidiary is able to comply with regulatory standards as they apply from time to time and in drafting Group Policies shall have regard to the need to ensure:
- 6.2.1 compliance with:
- 6.2.1.1 reasonable standards of financial and business probity; and
- 6.2.1.2 good practice in governance and risk assessment;
- 6.2.2 that the business of the Subsidiary is carried on in accordance with the Subsidiary's Constitution and with the Group's Business Plan (or the relevant part thereof)

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

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

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

7 Group business plans

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

8 Group services

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

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

9 Staffing

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

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

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

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

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

10 Variations

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

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

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

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

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

11 Resolution of disputes

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

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

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

12 Notices

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

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

12.1.2 48 hours after dispatch by recorded delivery; or

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

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

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

12.2.2 48 hours after dispatch by recorded delivery; or

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

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

13 Jurisdiction

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

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

Commercial in confidence

Subscribed for and on behalf of Wheatley Housing Group Limited


on 29 September 2022

by 
Anthony Allison

Authorised signatory

Subscribed for and on behalf of Dunedin Canmore Housing Limited

on 30 September 2022

by 
Alastair Murray

Authorised signatory

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

Schedule Part 1A
Subsidiary's undertakings

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

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

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

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Schedule Part 1B

Parent undertakings

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

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

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

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

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

Schedule Part 2

Group responsibilities

Parent:

The Parent is responsible for the following functions:

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

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

Subsidiary:

The Subsidiary is responsible for the following functions:

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

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

Schedule Part 3

Form of service agreement

[]

Wheatley Homes East Limited Terms of Reference

General

1. Wheatley Homes East Limited (“the Association”) is a Registered Social Landlord (“RSL”) and a property factor, which it discharges through an agency agreement with Lowther Homes Limited.
2. In accordance with the Association’s Rules from time to time:
 - (i) The Chair appointment will be approved by the Group Remuneration, Appointments, Appraisal and Governance Committee based on having relevant skills and experience; and
 - (ii) Board members appointments, other than tenant Board members, shall be approved by the Group Remuneration Appointments, Appraisal and Governance Committee on behalf of the Parent based on their skills and experience.
3. Relevant members of staff will normally attend meetings of the Wheatley Homes East Board. The Board of Wheatley Homes East has the right to meet in private without the attendance of any non-Board members or staff.
4. The quorum for Board meetings shall be 4, or as otherwise defined by the Rules of Association from time to time.
5. There will be no fewer than 6 meetings per year in compliance with the Scottish Housing Regulator Regulatory Framework requirements.
6. In addition to its Rules, the Association must adhere to the terms of:
 - (i) the Wheatley Housing Group Limited Standing Orders; and
 - (ii) an intra-group agreement with its parent Association which sets out the nature of the parent and subsidiary relationship including roles and responsibilities.

Reserved matters

Strategy, governance and performance

7. Approve the Association’s 5 year strategy and any material updates during the life of the strategy.
8. Annually approve performance measures and Wheatley Homes East specific strategic projects, including measures to achieve the delivery of the 5 year strategy.
9. Approve any amendments to the Intra-Group Agreement with the Parent Association.

10. Approve any amendments to the Services Agreement and associated Business Excellence Framework with Wheatley Solutions.
11. Approve the Agency Agreement with Lowther Homes in relation to the provision of factoring services on the Association's behalf.
12. Periodically review and approve recommendations to the Parent on the Association's Rules.
13. Approve the appointment of tenant Board members.
14. Approve the initiation of any formal consultation with all tenants.
15. Approve the Association's Annual Return on the Charter for submission to the Scottish Housing Regulator.
16. Not less than annually review and approve the Board's skills matrix and succession plan for consideration by the Group Remuneration, Appointments, Appraisal and Governance Committee.

Finance

17. Approve the 5 Year Financial Projections for incorporation into the Group 5 Year Financial projections.
18. Approve the annual loan portfolio and 5 Year Financial Projections returns to the Scottish Housing Regulator.
19. Approve the annual rent increase and associated tenant consultation approach.
20. Annually approve the budget for the financial year.
21. Review and approve the Association's financial statements.
22. Approve entering contracts on behalf of the Association as required under the Scheme of Financial Delegation from time to time.
23. Approve borrowing levels and any associated loan agreements, covenant returns and granting of security.

Development, investment, leases, acquisitions and disposals

24. Annually approve the Association's rolling 5 year development programme.
25. Approve any property acquisitions or disposals by the Association, or parameters for where such acquisitions or disposals may be made under delegated authority.
26. Annually approve the Association's rolling 5 year investment programme.
27. Approve any stock reclassification, including designation of stock for demolition.

28. Approve the form, key terms and any amendments to the lease agreement for the management of Mid-Market properties by Lowther Homes Limited and delegate authority to execute these leases on the Association's behalf.

Assurance, policy and risk

29. Review and approve the Association's risk register and escalate any risk(s) to the Group Board in line with the Group risk management policy thresholds.
30. Approve any remedial action required in relation to Association specific material Internal Audit recommendations.
31. Approve Association specific policies as they relate to its activities, including, but not limited to:
- Advice, Information and Lettings (allocations) policy;
 - Repairs and maintenance policy;
 - Arrears and Debtors policy;
 - Anti Social Behaviour policy; and
 - Engagement Framework.

Other responsibilities

Governance and performance

32. Undertaken an annual Board self-assessment based on the approach agreed by the Group Remuneration, Appointments, Appraisal and Governance Committee.
33. Monitor financial performance against the agreed business plan and budget.
34. Monitor performance against agreed performance targets and strategic projects.

Assurance, policy and risk

35. Oversee the implementation of relevant group policies and frameworks.
36. Monitor the implementation of agreed risk mitigation actions.

Role of the Chair

37. The Chair is responsible for ensuring that the Board discharges its responsibilities.
38. The Chair of the Board or in absentia [any Vice-Chair, whom failing, a Board Member appointed to chair a meeting of the Board is responsible for the smooth running of Board meetings. This includes:

- agreeing the agenda for each meeting;
- ensuring that any action points from previous meetings are considered timeously;
- ensuring that the meeting runs to time and that adequate time is allocated for each item;
- encouraging contributions and questions where appropriate from all members of the Board;
- ensuring that the resolutions identified in the papers are tabled and dealt with; and
- Undertaking an annual appraisal of all Board members and facilitate an annual Board effectiveness review under the approach agreed by the Group Remuneration, Appointments, Appraisal and Governance Committee.

Reporting and escalation

- update the Board on any relevant matters discussed at the Group Board meetings held since the last Board meeting;
- update the Group Board on any relevant matters discussed at Company Board meetings held since the last Group Board meeting;
- in discussion with the Group Chief Executive, advise the Group Chair and escalate to the Group Board any matters they agree may:
 - adversely impact the reputation of the company or the wider Group;
 - have already or have potential to result in material non-compliance with legal or regulatory requirements; or
 - materially impact the financial viability of the Company and/or its ability to meet its obligations under any loan agreements and associated covenants.

Board 3-year Succession Plan

1. Introduction

The Board is committed to succession planning as part of its overall approach to effective governance.

We recognise the importance of succession planning in having an effective Board, which has the appropriate balance of skills and experience. Succession planning plays a key role in achieving an appropriate level of renewal and refreshment on the Board, supporting the Board maintaining and developing the skills and experience it needs to discharge its duties and protect the interests of tenants.

The Board also has a regulatory duty, under the Scottish Housing Regulator's Regulatory Framework, to have a formal succession plan in place.

2. Background and context

Our succession planning arrangements are developed in line with the Group Recruitment and Succession Planning process. The procedure sets the parameters under which our succession plan has been developed, in particular the core requirements of the succession plan in relation to:

- maintaining an up to date record of directors & office holders length of service and retiral due dates;
- details of the core skills and experience each member contributes to the Board, in line with the agreed skills matrix; and
- having an understanding of expected future recruitment requirements

All appointments and reappointments assumed in the plan are subject to:

- tenure restrictions in place from time to time; and
- the requirements of our Rules, including Parent rights with regards to appointment.

3. Current Board tenure and skills

The current tenure stages of each Board member, projected retirement dates and details of the core skills and experience they bring (relative to our agreed skills matrix) are set out below.

Any reappointments beyond the span of this plan will be subject to previous tenure restrictions and Parent reapproval.

Board member	Core skills and experience	9 Years	3 year position
Alastair Murray (Chair)	<ul style="list-style-type: none"> Accountancy and audit, knowledge of relevant statutory requirements Financial and treasury management, funding structures Knowledge of other relevant sectors – health, charities, social enterprise, education, policing, or other 	2026	2026
Ruth Kynoch	<ul style="list-style-type: none"> Accountancy and audit, knowledge of relevant statutory requirements Financial and treasury management, funding structures Project appraisal, management and financial modelling 	2025	2025
Anne McGovern (Tenant)	<ul style="list-style-type: none"> Governance and working as one of a Board team to make good and timely decisions Knowledge of the areas, clients, tenants and communities served Working with local authorities, or other government and statutory bodies 	2026	2026
Jack Cadell	<ul style="list-style-type: none"> Funding, planning and development for housing and regeneration Property, asset management, development, regeneration, surveying etc. Strategic asset management 	2027	2025
Judith MacGlashan (Tenant)	<ul style="list-style-type: none"> Knowledge of the areas, clients, tenants and communities served Knowledge of other relevant sectors – health, charities, social enterprise, education, policing, or other Customer and community engagement 	2027**	2025
Heather Macnaughton	<ul style="list-style-type: none"> Housing management and maintenance of social housing Regeneration Accountancy and audit, knowledge of relevant statutory requirements Organisational strategy and policy development Knowledge of the areas, clients, tenants and communities served 	2027**	2026
Fiona Burden	<ul style="list-style-type: none"> Legal and Regulatory General commercial business, financial & management Corporate Governance Risk identification, management and mitigation 	2028**	2026

**cumulative across Group

4. Succession Plan 2023-2026

The Annual General Meetings are the key stages in the plan, marking where directors will ordinarily retire and any new members will ordinarily be appointed. Planned retirements and appointments for the next 3 AGMs will be as follows:

2025

Ruth Kynoch is due to retire having reached the maximum service of 9 years.

2026

Alastair Murray and Anne McGovern are due to retire. We will link recruitment to Group succession planning. We will be required to recruit to cover accountancy and finance skills which will be lost in 2025 and 2026. We are progressing with the Tenant Board member pathway programme and hope to have tenant Board member candidates who are 'board ready' by 2026.

2027

Jack Cadell, Judith McGlashan and Heather Macnaughton are due to retire.

5. Review

The succession plan shall be subject to annual refreshment as part of the Board Appraisal Process.

Appendix 5 – summary of Assurance policy updates

Group Anti-Money Laundering and Counter-Terrorism Financing Policy

This policy has been updated following a scheduled triennial review. The proposed changes are set out below:

- The content of the policy has been reordered to group it into fewer sections;
- The legal and regulatory framework section has been updated to include reference to the Economic Crime and Corporate Transparency Act 2023, and to remove references to the Money Laundering Regulations 2017, which do not apply to the Group; and
- Additional information has been added on “how to report suspicious activity” and “what happens to a raised concern”. In addition, further money laundering examples have been provided for staff to consider.

Group Fraud, Corruption and Bribery Policy

This policy has been updated following an early review. There are minor changes being proposed which are summarised below:

- The content of the policy has been reordered to group it into fewer sections;
- The legal and regulatory framework section has been updated to include reference to the Economic Crime and Corporate Transparency Act 2023, and the Proceeds of Crime Act 2002; and to clarify that the Fraud Act 2006 does not apply in Scotland; and
- An additional section has been added on “how to report suspicious activity” to provide additional clarity for staff about raising concerns.

Group Whistleblowing Policy

This policy has been updated following a scheduled triennial review. There are minor changes being proposed; these are set out below:

- The content of the policy has been reordered to group it into fewer sections; and
- Additional text has been added to more clearly define whistleblowing and to highlight the difference between a whistleblowing concern and a grievance.

Group Data Protection Policy

This policy has been updated following an early review. There are minor changes being proposed relating to clarifying that we are to comply with UK GDPR General Data Protection Regulation (EU) 2016/679 (the UK GDPR).

Group Special Category Data Policy

This policy has been updated following an early review. There are minor changes being proposed which are summarised below:

- “Introduction” section updated to reflect that the UK GDPRs are now in place – previous version talked about this happening in the future;
- Clarified that privacy notices are now available for all parts of the business – these were not available when the previous version was agreed; and
- “Data minimisation” – policy been updated to say that we use the minimum data to achieve the purposes for which we process the data – the previous version said that we were reviewing this process.

Group Freedom of Information Policy

This policy has been updated following an early review. There are minor changes being proposed which are summarised below:

- Removed the “Policy Statement” section as this is now covered within the text of the “background” section; and
- Added contents page.