

**WHEATLEY HOMES EAST
BOARD MEETING**

**Thursday 27 November 2025 at 5pm
New Mart Road, Edinburgh**

AGENDA

1. Apologies for absence
2. Declarations of interest
3. a) Minute of 18 September 2025 and matters arising
b) Action list
4. Chair and Managing Director update

Main business and approvals

5. 2026-2031 Strategy update
6. Risk register
7. 2026/27 rent setting
8. Performance report
9. Housing (Scotland) Bill
10. Unacceptable Actions Policy Update

Other business

11. EDI Action Plan update and 24/25 Annual Equalities report
12. Finance report
13. 
14. AOCB

Report

To: Wheatley Homes East Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: 2026-2031 Strategy update

Date of meeting: 27 November 2025

1. Purpose

1.1 To update the Board on progress and to present a draft 2026-2031 strategy for the Board's consideration.

2. Authorising and strategic context

2.1 Under our Terms of Reference, we are responsible for approving our five-year strategy, within the strategic context of the overarching Group strategy. We agreed our Wheatley Homes East ("WHE") five-year strategy in February 2021.

3. Background

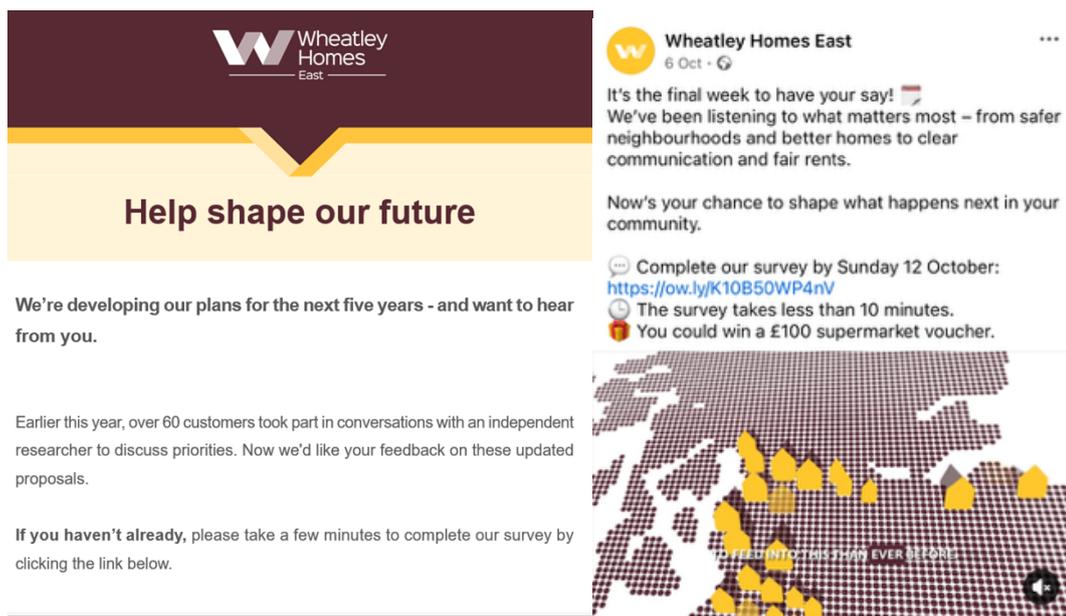
3.1 At our August meeting, the Board provided initial feedback on the proposed purpose, vision and values for our 5-year strategy. The Board also considered the key areas of focus under each proposed strategic theme, and our response to the identified customer priorities.

3.2 The Board agreed in principle that the key themes and the associated areas of focus reflected the strategic direction we want to set out for 2026-2031.

3.3 Our strategy development has been informed by extensive engagement including insight from our staff, customers as well as discussion from our May Board strategy workshop. In September and through October, we developed our strategic themes through cross-team staff workshops. In tandem, we launched a phase 2 digital survey with our customers, and prospective customers, to garner further feedback about our proposals. We aimed to involve a further 35 customers through this survey.

4. Discussion

- 4.1 Following feedback from the Board in August 2025, we have continued to develop our next strategy. As proposed to the Board, we launched a digital survey to understand if our response to identified customer priorities actually met priorities.
- 4.2 We have an ambitious target to engage with or receive feedback from at least 100 customers through all our strategy engagement and were targeting around 35 responses from this survey. **Over 700** customers completed the survey. We also issued a similar survey to those on our waiting lists to capture future customer insight.
- 4.3 This means in total, considering both phases of engagement and discussion through our Group Scrutiny Panel and stronger voices structures, nearly **800** customer voices have helped shape our future.
- 4.4 The survey was primarily promoted through digital channels, including our social media and website with video content which brought to life how we had used customer insight to develop our proposals. Our housing officers and Stronger Voices Officers were also briefed to support customers to provide feedback, and we undertook an MS Dynamics email campaign with a link to a digital survey, which drove responses.



The image shows a social media post from Wheatley Homes East and a website banner. The social media post, dated 6 Oct, says: "It's the final week to have your say! We've been listening to what matters most – from safer neighbourhoods and better homes to clear communication and fair rents. Now's your chance to shape what happens next in your community. Complete our survey by Sunday 12 October: <https://ow.ly/K10B50WP4nV> The survey takes less than 10 minutes. You could win a £100 supermarket voucher." The website banner features the Wheatley Homes East logo and the text "Help shape our future". Below the banner, it says: "We're developing our plans for the next five years - and want to hear from you. Earlier this year, over 60 customers took part in conversations with an independent researcher to discuss priorities. Now we'd like your feedback on these updated proposals. If you haven't already, please take a few minutes to complete our survey by clicking the link below." The banner also includes a graphic of a map of the region with yellow house icons and the text "TO FEED INTO THIS YEAR'S STRONGER VOICES".

- 4.5 Feedback from this phase 2 engagement showed the vast majority (around 90%) supported our proposals, with strong agreement on the importance of keeping rent fair and transparent, investing in existing homes, and improving the repairs experience.

4.6 Open text responses asking customer to consider ‘what’s missing’ reaffirmed our areas of focus - safety, repairs, and maintaining a clean, secure area were the most frequently mentioned personal priorities. From the survey it is evident the most preferred ways to engage are being kept informed about personal queries, replying to online surveys via text or email, and following updates on social media. Many customers also value opportunities to participate in walkabouts and policy discussions. This insight is also valuable to inform our Group customer engagement framework review, being refreshed to align with our future strategy.

Strategy development

4.7 The content under each proposed theme in the strategy has been developed, informed by our customer engagement, through cross-team workshops. These workshops included key staff who will be particularly involved in delivering our objectives and reflected EFQM best practice for business excellence.

4.8 Following the workshops and customer engagement, the draft strategy at Appendix 1 has been produced for consideration by the Board. Objectives under each theme have evolved to more clearly demonstrate our goal as set out below:

| Strategic theme | Strategic Objectives | | | |
|--|---|---|---|--|
| Homes and neighbourhoods to be proud of | <i>Maintain and enhance homes to meet the Wheatley standard</i> | <i>Create thriving neighbourhoods, collaborating with customers and partners</i> | <i>Expand supply of affordable, quality homes</i> | |
| Personalised services | <i>Connect with customers through proactive, tailored communication</i> | <i>Enhance and apply what we learn to drive customer focused services</i> | <i>Deliver seamless services to meet customer needs</i> | |
| Better Lives | <i>Contribute to ending homelessness</i> | <i>Shape powerful partnerships to alleviate poverty and open doors to new opportunities</i> | <i>Grow our reputation as an ethical, trusted business</i> | |
| Delivering sustainable value | <i>Nurture and invest in our people, recognising their contribution</i> | <i>Drive effective solutions, harnessing digital capabilities and data assets</i> | <i>Ensure financial efficiency today, prepared for tomorrow</i> | <i>Grow our reputation as an ethical, trusted business</i> |

- 4.9 Area of particular note above, and in the draft strategy more generally, include:
- Our determination to improve the quality of our homes through a Wheatley Standard that goes beyond published Scottish Government requirements;
 - Our commitment to playing our part, in partnership with others, in helping to address poverty in our homes;
 - Our continuing ambition to lead in addressing homelessness;
 - Our desire to personalise the services our customers receive and our on-going commitment to providing an exceptional repairs service; and
 - Our ambition to exploit the potential to improve our services offered through better use of data and IT, and to raise the funding we need for our new build programme.
- 4.10 We have also considered feedback from the Board, as well as our staff and other Boards across the Group, and refined our vision, more succinct, as follows:

“Our homes and neighbourhoods are places we, and our customers, are proud of. We listen, we learn, and we deliver what matters most to our customers.”

- 4.11 The Board’s feedback on this draft strategy will inform the draft Group strategy to be considered by the Group Board in December. In parallel, we are also considering the impact on our performance management framework and risk registers. Post Group Board in December, refinements will then be made and a draft final designed version will be created for final consideration and approval by the Board in February 2026.

5. Customer engagement

- 5.1 As detailed in this report, customer engagement is a core element of the development of our 2026-2031 strategy. Engagement has exceeded our expectations with more customers than ever shaping our strategic plans. Insight from engaging customers on our strategy will also inform the review of our customer engagement framework.

6. Environmental and sustainability implications

- 6.1 We understand that investment, particularly to ensure energy efficient homes, is a priority for customers, reaffirmed by the phase 2 engagement. Our 2026-31 strategy prioritises this with a focus on improving the energy efficiency of our homes.

7. Digital transformation alignment

- 7.1 Our 2026-31 draft strategy aligns with our digital transformation plans. We understand that there are opportunities to re-shape an organisation for the future with better use of data, artificial intelligence and digital technology. Increased digital and data maturity will therefore support us in making decisions and improving services through to 2031 as detailed under theme 4 of our strategy.

8. Financial and value for money implications

- 8.1 We understand that keeping rents fair and transparent is a priority for customers, so our 2026-31 strategy details how we will maintain financial security and deliver value for money for customers, particularly in delivering investment. This is specifically detailed in theme 4 of the strategy.

9. Legal, regulatory, and charitable implications

- 9.1 The Scottish Housing Regulator (“**SHR**”) Regulatory Standards of Governance sets out a number of requirements which are relevant for the development of our strategy, including that:
- “[the] governing body sets the RSL’s strategic direction”;
 - “The RSL gives tenants, service users and other stakeholders information that meets their needs about the RSL, its services, its performance and its future plans”; and
 - “The RSL actively seeks out the needs, priorities, views, concerns and aspirations of tenants”

10. Risk appetite and assessment

- 10.1 As part of the strategy development process we are considering how the strategy both reflects our existing risks and our future risk appetite in relation to how it is delivered.

11. Equalities implications

- 11.1 As part of our engagement, including with staff, customers and wider stakeholders, and the development of our strategy we will take into account the key principles in our Group Equity, Diversity and Inclusion (“**EDI**”) and Human Rights policy and associated action plan. In particular, our extensive engagement helps ensure a diverse range of customer voices and perspectives has been considered.
- 11.2 Our strategy is also being informed by key partners and stakeholders. In terms of EDI, this includes best practice guidance from Business in the Community to ensure our strategic plans align with EDI sector expectations.
- 11.3 Our strategy will be equality impact assessed to inform its implementation,; we have strengthened our EDI messaging in this strategy, especially supporting our aims around creating pride in neighbourhoods, delivering a personalised service and being a responsible business.

12. Key issues and conclusions

- 12.1 We have undertaken extensive engagement with our people, customers and the Board to ensure, and reaffirm, that our next strategy reflects the priorities and aspirations of these groups. Our draft 2026-2031 strategy has been developed and aligned to international frameworks of excellence.

13. Recommendations

- 13.1 The Board is asked to provide feedback on the proposed 5 year strategy.

LIST OF APPENDICES:

Appendix 1: Draft WHE 2026-31 Strategy

Making homes and lives better



Building on strong foundations – Highlights from our 2021-2026 strategy

A new vehicle for investment

Creation of Wheatley Homes East

A customer focused culture

Retained Customer Service Excellence

Reducing homelessness

1200+ homes to homeless households

High tenant satisfaction

90% tenant satisfaction

Delivering much needed new homes

Developed nearly 1100 new affordable homes

A strong customer voice

A redefined, reshaped approach to customer engagement

New ways of working

Successfully introduced a new operating model

Financially resilient

A+ Credit rating retained

A workforce that feels valued

Retained liP Platinum, the highest level of accreditation for people management

Strategic context

Our 2026-2031 strategy is set against the backdrop of City of Edinburgh Council declaring a Housing Emergency in November 2023, followed by the Scottish Government declaring a National Housing Emergency in May 2024. The legislative context is also changing through the Housing (Scotland) Act 2025, which introduces new duties for landlords, in particular in relation to homelessness and a Scottish equivalent of Awaab's Law. Housing is recognised as a key policy priority at both the national and local levels.

Demand for affordable homes in the East of Scotland continues to outstrip supply and homelessness services are under acute pressure, with over 7,800 homelessness cases and over 4,300 households in temporary accommodation in Edinburgh, and over 1,200 and over 700 in West Lothian respectively. This pressure will continue and building new homes alone will not be enough. Acquisitions, investing to bring long-term voids back to a lettable standard and converting buildings to housing will also need to be part of the solution.

The introduction of Awaab's Law reinforces the need for robust asset data, timely and effective repairs and investment, and a customer-focused culture.

The forthcoming Social Housing Net Zero Standard (SHNZ) will replace the post-2020 Energy Efficiency Standard for Social Housing ("ESSH2"), requiring a fabric-first approach, clean heating systems, and improved ventilation. Delivering this transition at scale will demand significant capital investment, supply chain capacity, and tenant engagement. There remains a lack of certainty over what, if any, grant support will be available to support local authorities and housing associations with capital investment to achieve the standard.

At the same time, rising costs, inflation, and interest rates impact our ability to invest in new homes, existing homes and services. These pressures also impact our customers, with the costs of running a home, from food to heating, putting additional strain on household finances.

The need to recognise the challenges our customers face and be able to respond to their individual needs has never been in sharper focus. That goes beyond the basics of treating customers with dignity and respect and demands that landlords have services which can truly respond to individual needs. Collaboration is vital here. Breaking cycles of disadvantage and truly providing person-centred support means better data, customer-focused policies and processes, listening to customers and acting.

This context underlines the need for a strategy that balances building new homes, investment in existing homes, customer experience, and financial resilience, while having a clear focus on meeting regulatory obligations and supporting Scotland's long-term transition to a greener housing system.

How we developed our strategy

Our strategy is a product of extensive engagement and consultation with our customers, staff, governing bodies and key stakeholders.

Over 2,400 customers engaged with us about what their priorities are for this strategy, ranging from small, independently facilitated focus groups, through our existing engagement and scrutiny structures and a survey open to all customers and prospective customers.

We identified clear priorities for our customers during this engagement:

| Key customer priorities |
|--|
| Safety and Security <i>Customers want to feel safe in their home and neighbourhood</i> |
| Invest in Existing Homes <i>Customers want quality, comfort, and energy efficiency</i> |
| Transform Communication and Customer Contact <i>Excellent communication creates trust and satisfaction</i> |
| Continue to improve the Repairs Experience <i>Customers want consistent, high-quality, and timely repairs completed right first time</i> |
| Create Pride in Place <i>Enhance Local Environments, which matter to wellbeing</i> |
| Keep Rent Fair and Transparent <i>Customers want to feel their rent is affordable and value for money</i> |

The priorities identified by our customers were shared by our staff, Board and partners and have directly influenced the priorities within the strategy. We held local strategy workshops with staff, with nearly 340 pieces of feedback showing the top priority for our people is investment in our neighbourhoods, with repairs, value for money and continuing to improve communication.

Our purpose, vision and values

Our Purpose

Making homes and lives better

Our Vision

Our homes and neighbourhoods are places we, and our customers, are proud of. We listen, we learn, and we deliver what matters most to our customers.

Our Values

Excellence: we proactively pursue the highest standards.

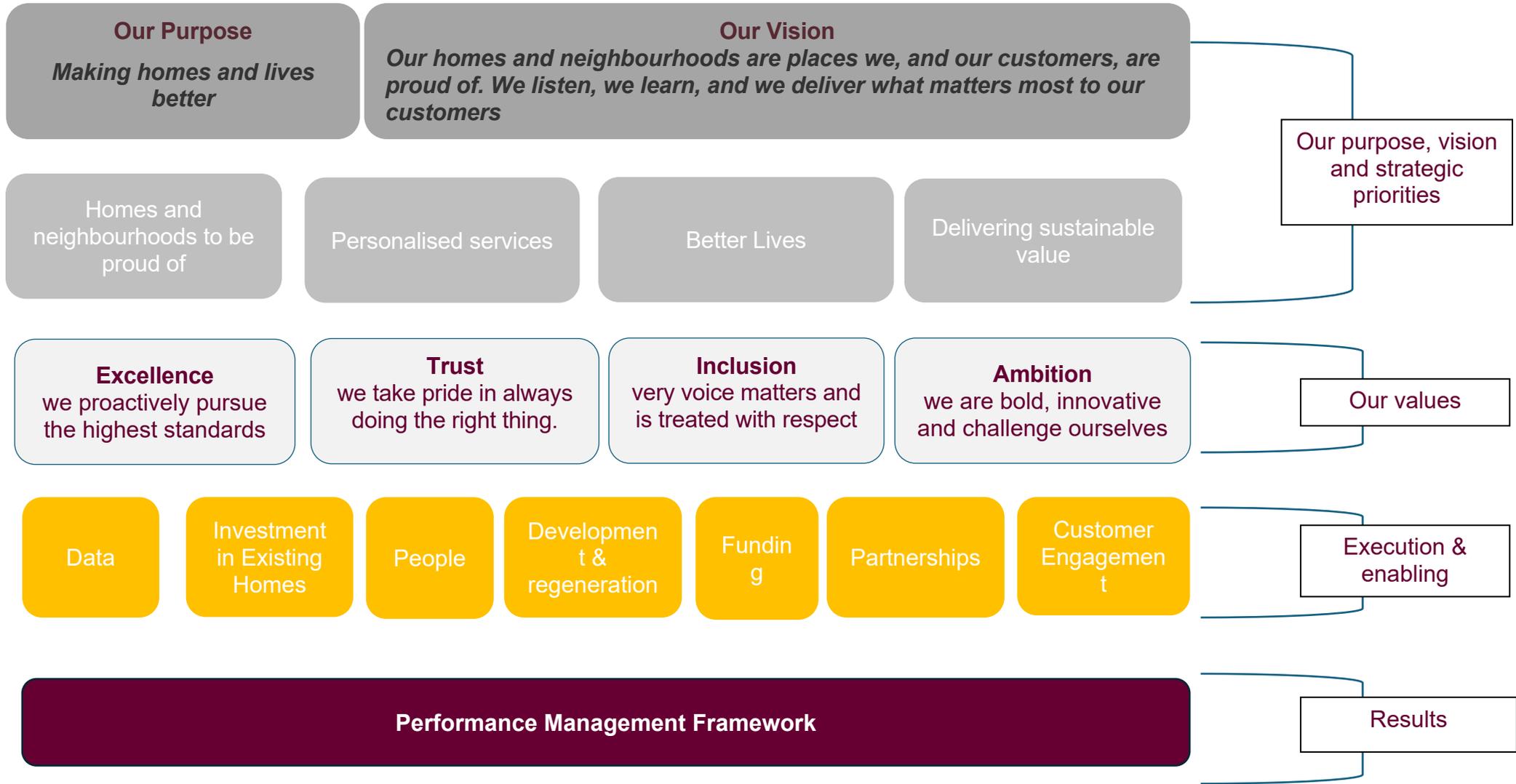
Inclusion: every voice matters and is treated with respect.

Trust: we take pride in always doing the right thing.

Ambition: we are bold, innovative and challenge ourselves

Our strategic plan.....in a page

2026-2031 strategy – Making Homes and Lives better



Our strategic themes and objectives to 2031

Our strategy is structured across four themes, reflecting the priorities of our customers, staff and key stakeholders.

Within each strategic theme, we have identified specific objectives that we want to achieve. This strategy sets out how we will achieve these objectives and how we will measure our progress.

| Strategic theme | Strategic Objectives | | | |
|---|---|---|--|--|
| Homes and neighbourhoods to be proud of | <i>Maintain and enhance homes to meet the Wheatley standard</i> | <i>Create thriving neighbourhoods, collaborating with customers and partners</i> | <i>Lead the way in expanding supply of affordable, quality homes</i> | |
| Personalised services | <i>Connect with customers through proactive, tailored communication</i> | <i>Enhance and apply what we learn to drive customer focused services</i> | <i>Deliver seamless services to meet customer needs</i> | |
| Better Lives | <i>Make the largest landlord contribution to ending homelessness of any Scottish landlord</i> | <i>Shape powerful partnerships to alleviate poverty and open doors to new opportunities</i> | | |
| Delivering sustainable value | <i>Nurture and invest in our people, recognising their contribution</i> | <i>Drive effective solutions, harnessing digital capabilities and data assets</i> | <i>Ensure financial efficiency today, prepared for tomorrow</i> | <i>Grow our reputation as an ethical, trusted business</i> |

Key strategic results:

90%+ customer satisfaction by 2031

1750 homes allocated to homeless households by 2031

At least 1,000 new homes by 2031

Exceed all requirements on addressing damp and mould under Awaab's Law

liP Platinum retained with staff satisfaction over 90% by 2031

Theme 1: Homes and neighbourhoods to be proud of

Our customer engagement and insight consistently identified that investment in homes is a key priority, particularly to deliver energy efficiency, upgraded doors and windows, and new kitchens and bathrooms. Our previous strategy committed to investing £30.2m in improving and modernising our existing homes. We now want to build on this.

Our customers also tell us it is not just about inside their home, that investing in common areas and the local environment contributes to them feeling proud, safe and secure in and around their home.

As part of the largest social landlord Group in Scotland, we play a key role in addressing the housing crisis and increasing the supply of homes of different tenure types. We also recognise the need for wider regeneration to address issues such as low demand stock, vacant and derelict land and a lack of local amenities and social exclusion.

Wheatley Homes East in 2031:

Our customers are clear on the quality of home they can expect from us, through the Wheatley Standard. We will know how our homes measure up to this demanding standard and have a clear plan to ensure every single home meets it. Warm, safe, and decent homes, in thriving neighbourhoods where customers feel proud and secure, will be synonymous with Wheatley Homes East. Through partnership with City of Edinburgh Council and strong relationships with a network of partners across our geographic footprint, Wheatley Homes East is playing a key role in making our communities a great place to live.

Our key objectives over the next 5 years:

| | |
|---|--|
|  | Establish the Wheatley Standard and enhance homes to meet it |
|  | Create thriving neighbourhoods, collaborating with customers and partners |
|  | Lead the way in expanding supply of affordable, quality homes. |

Establish the Wheatley Standard and enhance homes to meet it

We recognise that current published Scottish Government standards for social housing do not align with our or our customers' expectations of a home to be proud of. That is why we will create an ambitious Wheatley Standard, recognising that not all our homes will meet and that the aspiration this provides is essential in driving improvement. For a home to meet the Wheatley Standard it must:

- be free from disrepair, meet the SHQS (Social Housing Quality Standard) and future SHNZ requirements;
- be compliant with all building safety requirements;
- until SHNZ is in place, be energy efficient with an EPC of at least "C", unless this is technically or economically impractical
- have modern internal components including kitchens, bathrooms, windows, heating systems etc
- have external fabric, hard surfaces, back courts, bin areas, external doors, soffits, fascias and rainwater goods, and closes that are in a good condition.
- have an external environment which achieves the 5 star KSB standard

Our roadmap to achieving our objectives.



Maintain and enhance homes to meet the Wheatley standard

| | |
|--|--|
| Wheatley Standard baseline | <ul style="list-style-type: none">➤ Design an assessment framework and criteria, reflecting the ambition of the Wheatley Standard, against which each property can be assessed➤ Systematically assess our properties – using further surveying capability we will develop and data from various sources including repairs history, stock condition assessments and energy performance to provide a ‘single view of each property’ - against the Wheatley Standard, and develop a road map for each property to achieve and maintain the standard➤ Publish in the first year of the strategy our assessment of the number of properties that meet the standard, and details of areas where investment is needed for homes that do not to meet it. Use this assessment as the baseline for measuring progress and more efficiently direct our Strategic Asset Investment Plan.➤ Aim to reduce the number of homes not meeting the Wheatley Standard from the baseline each year |
| Homes where our customers can feel safe | <ul style="list-style-type: none">➤ Continue to deliver our building safety requirements including annual gas safety checks, 5 yearly electrical inspections, checks to common plant such as lifts and water tanks, and specialist condition and fire safety inspections➤ Proactively address damp and mould, including through integrating smart monitoring devices and workforce training to ensure early identification and resolution.➤ Update our policy approach to damp and mould to reflect requirements from Awaab’s law and enshrine specific Tenants Rights to request further investigation➤ Enhance our assurance checks and customer follow-up to ensure customers are satisfied with our response and that no issues remain.➤ Work with the Scottish Government as it develops its approach to Single Building Assessment, and implement these requirements in a structured and phased manner |
| Energy efficient homes | <ul style="list-style-type: none">➤ Unless it is technically or economically not possible, deliver investment to ensure all our homes meet the minimum fabric requirements in SHNZ once finalised, and, in advance of this, ensure our homes are at least EPC C by 2031.➤ Where it is not technically or economically feasible to meet the SHNZ requirement or in advance of this EPC C, maximise the delivery of achievable fabric improvement works➤ Explore modern, affordable future heating options, including district heating and links to wider heating networks.➤ Ensure the heating systems in our homes are easy to operate and cost effective for our customer, while recognising constraints such as the availability of suitable alternative heating options, future net-zero requirements and energy market considerations |

Investing in customers' homes

- Develop and deliver targeted investment strategies for specific property types or issues, including achieving the Wheatley Standard, to address damp and mould, properties in mixed tenure blocks and pre-1919 blocks.
- Make sure we strike the right balance between investment and keeping rents affordable through a needs-based investment approach, based on up-to-date information on stock condition.
- Deliver upgrades so no properties have internal components beyond what a stock condition assessment would consider to be their reasonable economic life.
- Develop and consistently deploy cyclic maintenance programmes including gutter cleaning, fence, door, soffits and facias painting, and explore models that maximise impact for money available
- Ensure customer engagement continues to inform priorities, and that our asset investment, aligns with Neighbourhood Plans which we will publish and deliver with partners as required.



Create thriving neighbourhoods, collaborating with customers and partners

Pride in place and community

- Work with Local Authority partners for the benefit of our customers and communities
- Develop, with customers and partners including City of Edinburgh Council, a common understanding of 'neighbourhood', recognising this will differ according to localities or property type.
- Enhance our neighbourhood approach by developing standards informed by local priorities, customer engagement and data with every neighbourhood achieving the Keep Scotland Beautiful 5 star standard
- Reduce anti-social behaviour and fly-tipping and revitalise underused green spaces in partnership with Local Authorities and community groups.

Safe and welcoming communities

- Review our anti-social behaviour approach and Community Improvement Partnership (CIP) to ensure it is delivering sustained impact in our neighbourhoods for the benefit of customers.
- Through partnership, including with Local Authorities and CIP and local policing, work closer than ever to share knowledge and intelligence, co-ordinate services and provide support so our customers feel safe and secure. We will do this through enhanced structures and shared resources including our Neighbourhood Forums and Community of Excellence.
- Expand environmental service offering and support community-led initiatives, with priorities driven by customer-led walkabouts, engagement and real time feedback.
- Explore and expand the support we can provide together with local partners, being particularly mindful of customers who require extra help, recognising the diversity of our customer base and their needs.
- Strengthen multi-agency partnerships including with Local Authorities and community groups, to address waste management, green space maintenance and vacant land.
- Evolve community safety partnerships including with Scottish Violence Reduction Unit and Scottish Community Safety Network to better understand issues affecting our neighbourhoods and co-create lasting solutions.
- Look to extend sharing and use of neighbourhood data with key partners and undertake experiments to trial new approaches to solve issues faced by our customers.
- Take a resolute approach to preventing and addressing discrimination and harassment in our neighbourhoods, fostering environments where everyone feels respected and safe.

| | |
|----------------------------|--|
| Empowered customers | <ul style="list-style-type: none"> ➤ Increase engagement with customers, including new and younger household members, through education awareness and capacity raising exercises. ➤ Deepen our understanding of customer behaviours utilising and enhancing our customer insight mechanisms and develop messaging to provide clarity on our services and responsibilities, supporting customers to maintain their environment. ➤ Work closely with Police Scotland and Local Authorities to promote and support good neighbourliness and responsibility for maintaining welcoming and safe communal spaces. |
|----------------------------|--|

| | |
|--|--|
|  Lead the way in expanding the supply of affordable, quality homes | |
| Deliver new, high quality homes to help alleviate the housing crisis | <ul style="list-style-type: none"> ➤ Strengthen strategic relationships with Local Authorities and private developers to expand the development pipeline, seeking a programme level agreement for new homes which provides efficiency, streamlining and certainty of delivery. ➤ Diversify funding sources and explore innovative housing models and acquisitions to unlock capacity for new builds, which is aligned with the Scottish Government's commitment to £4.9Bn funding of the Affordable Housing Supply Programme over 4 years. ➤ Evaluate pilot projects, and integrate lessons learned and voice of the customer into future development construction and delivery approach. ➤ Work with Local Authorities and the Scottish Government to purchase suitable homes on the open market to supplement our available housing stock and help alleviate homelessness. |
| Regenerated, rejuvenated communities | <ul style="list-style-type: none"> ➤ Utilise our partnerships with Local Authorities, and develop new and underutilised funding models, such as Partnership Support for Regeneration, to deliver affordable home ownership in areas where there is currently vacant land. ➤ We will work with partners to explore opportunities for wider regeneration projects in areas which support the delivery of mixed tenure housing and address wider community needs and aspirations; creating a sense of place. |
| Ensure new homes are energy efficient, fit for the future, and responsive to customer needs and demographic trends. | <ul style="list-style-type: none"> ➤ Enhance our understanding of future trends and customer needs, further embedding the analysis of the demographics of our prospective customers to inform our development programme such as, for example, building larger family homes that meet the needs of a wider demographic where appropriate. ➤ Development and regeneration efforts will emphasise the need for improved amenities such as playparks, recreational spaces, and local infrastructure which we know are important to customers. ➤ Use the learnings from demonstrator projects, customer satisfaction feedback, trends analysis and legislative requirements to inform future updates to our Design Guide. |

Outcomes:

| | |
|---|---|
| <p>Customer priorities met:</p> | <ul style="list-style-type: none">▪ Safety and Security▪ Invest in Existing Homes▪ Create Pride in Place |
| <p>Outcomes:</p>  | <p>Strategic result: 90% customer satisfaction with the quality of their home</p> <p>We will measure success through:</p> <ul style="list-style-type: none">▪ At least 99.6% of our homes meeting SHQS▪ The percentage of homes that meet the Wheatley Standard▪ All our homes, except where it is not technically or economically possible, will be EPC C by 2031 unless this measure is replaced through the SHNZ |
|  | <p>Overall result: 90% of customers are satisfied with our contribution to the management of their neighbourhood at locality level by 2031.</p> <p>We will measure success through:</p> <ul style="list-style-type: none">▪ The percentage of our customers that feel safe and secure in their home.▪ 100% neighbourhoods maintaining KSB 5-star rating |
|  | <p>Overall result: Net increase of new affordable homes by at least 1,000 by 2031</p> <p>We will measure success through:</p> <ul style="list-style-type: none">▪ Annual progress with our development programme against both social and mid-market targets▪ Satisfaction with new homes annually, with a target of 95%. |

Theme 2: Personalised Services

Our previous strategy focused on tailoring services for an exceptional customer experience, using local teams and a geographic approach. We strengthened wraparound services, launched the Customer First Centre, and enhanced repairs.

We aim to further personalise services, with a strong emphasis on communication and contact, making every interaction timely, relevant, and accessible, as these are top customer priorities.

We recognise that customers value quick resolution over the channel used and are open to digital and Artificial Intelligence (AI) solutions if human support remains accessible. We are now leveraging our rich data and expanded real-time feedback to drive continuous improvement, ensuring customers feel heard and see action taken.

‘Thinking Yes’ to deliver seamless, accountable, and innovative services—especially in repairs—remains central, with a focus on minimising hand-offs and building trust and driving overall customer satisfaction.

In 2031: Through a step change in the personalisation of our services, every customer receives support and communication tailored to their needs. We do this by embedding a culture of proactive engagement, harnessing data and digital tools, and strengthening local delivery and accountability.

Our services are shaped by the customer voice, delivered through empowered local teams, and supported by robust data and digital tools. Through a deeper understanding our customers we will continue to adapt to changing needs and expectations, ensuring that every customer feels listened to, respected, and well served. This supports us to achieve 90+% customer satisfaction and demonstrate value for money with our services.

Our objectives over the next 5 years:

| | |
|---|---|
|  | Connect with customers through proactive, tailored communication |
|  | Enhance and apply what we learn to drive customer focused services |
|  | Deliver seamless services to meet customer needs |

Our roadmap to achieving our objectives:



Connect with customers through proactive, tailored communication

| | |
|--|--|
| <p>Transform the way we connect with customers, making every interaction timely, relevant, and accessible.</p> | <ul style="list-style-type: none"> ➤ Launch a refreshed communication framework, co-designed with customers and staff, ensuring all contact is personal, local, and relevant. ➤ Continue to set out transparently the investment we plan to make in localities so we can be accountable for the promises we make and publish annual progress reports and performance metrics, ensuring transparency and accountability. ➤ Evaluate our service journey maps and communication touch points to keep customers informed at every step and ensure consistent messaging. ➤ Refresh our approach to reasonable adjustments and understanding vulnerabilities, informed by our data, taking steps to ensure customers understand our information and can access our services in a way that suits their need. |
| <p>Proactively communicate, actively listen and in responding, be open and transparent on what we can deliver.</p> | <ul style="list-style-type: none"> ➤ Be more proactive in communicating progress where things cannot be resolved straight away, such as follow-up repairs and anti-social behaviour. ➤ Provide direct contact options, regular updates, and acknowledgement of queries to ensure customers are clear about what contact they can expect from us about their home, such as a visit from a housing officer or a compliance check. ➤ Expand digital self-service options, while maintaining accessible human support for those who need or prefer it. |
| <p>Ensure approach is shaped by customer preferences, with a balance of digital and face-to-face options, and a commitment to clarity and transparency.</p> | <ul style="list-style-type: none"> ➤ Ensure all staff are trained and confident in delivering our communication standards, with clear accountability for follow-up and resolution. ➤ Balance digital offering with personal contact, such as through annual tenant visits, our Stronger Voices engagement approach or face-to-face discussion. ➤ Maintain our network of local hubs with experienced staff and visible community presence, so customers can choose how and where they engage with us. ➤ Offer quality service that are empathetic and knowledgeable, regardless of method of contact (online, phone, email, in-person) channel. |



Enhance and apply what we learn to drive customer focused services

Listen, learn and act - customer insight driven service improvement

- Continue to refine and expand the ways we garner customer insight through a combination of real-time digital feedback, annual tenant complaints, satisfaction surveys and customer engagement.
- Deepen understanding of future needs including through analysis of consumer trends and engagement with our potential future customers, including younger household members or younger people living in our communities, acknowledging the potential for lifetime association through Wheatley Group tenures
- Enhance information flows and review our people processes to help test and pilot learning, supported by a 'culture of curiosity' and innovation.
- Integrate all forms of customer feedback into a single insight platform, enabling learning, targeted interventions and personalised engagement.
- Communicate the impact of customer input through "You said, we did" reporting and regular storytelling. This will support us to demonstrate value for money.
- Use data to inform the architecture of a 'single view of the customer' empowering staff to respond to customer insight and embed every day, continuous learning.
- Explore segmentation mapping to ensure services are responsive to the needs of all customer groups, including those who are hard to reach or particularly disadvantaged or vulnerable.

A strong, engaged, influential tenant voice

- Launch our refreshed engagement framework, collaborate with community partners to expand opportunities for customers to participate in shaping services, including digital and in-person engagement, with a focus on accessibility and inclusion.
- Continue to identify and engage with hard-to-reach and disadvantaged groups, including specific approaches to support homeless customers, New Scots, and those supported by our charity partner, the Wheatley Foundation.



Deliver seamless services to meet customer needs

| | |
|--|--|
| <p>Joined up services that are reliable and easy to access, with a particular focus on repairs and wraparound support.</p> | <ul style="list-style-type: none">➤ Prioritise enhancing repairs experience to deliver first-time completion, accurate and flexible appointments, and clear communication.➤ Explore customer reporting channels for example through our Customer First Centre platform and web self-service, and the introduction of photo or video sharing technologies.➤ Consider the needs of different customer groups, such as those in mixed tenure blocks, and working with our partner Lowther Homes and others to develop models to better meet their needs. |
| <p>Evolve our working arrangements to ensure there are clear lines of accountability around quality of service and to improve the customer journey and service.</p> | <ul style="list-style-type: none">➤ Standardise and enhance repairs processes across Wheatley Homes East, complementing the approaches and systems of our wider Wheatley Group partners.➤ Enhance repairs diagnostic accuracy and optimise parts availability to increase first-time repair completion➤ Introduce new ways to monitor that repairs are completed properly and to a high standard➤ Keep customers informed about what will happen next and indicate the likely overall time to achieve completion before we leave their home.➤ Further embed customer focus and a commitment to excellence among all staff who provide our repairs service. |
| <p>Minimise hand-offs through well defined processes and ensure staff take ownership of outcomes so service feels seamless for customers.</p> | <ul style="list-style-type: none">➤ Empower staff to resolve issues at the first point of contact, supported by training and clear escalation routes.➤ Strengthen collaboration including with colleagues within the Group, including the Wheatley Foundation and Safeguarding teams to deliver our range of wraparound support and signpost customers to support achieving sustainable, long term solutions➤ Use predictive analytics and enhance use of data to identify potential issues and resolve them before they impact the customer or lead to dissatisfaction.➤ Innovate and trial new approaches, using technology and partnerships to improve efficiency and customer experience, allowing staff to deliver services with all the information they need at their fingertips through a single view of the customer |

Outcomes:

| | |
|---|--|
| Customer priorities met: | Transform Communication and Customer Contact Continue to improve the Repairs Experience |
| Outcomes:  | Strategic result: 90% of customer satisfaction with how we communicate with them We will measure success through: <ul style="list-style-type: none">▪ 100% collection and use of customer contact preferences and used in 90%+ corporate communication;▪ Over 90% of customers agree it is easy to get in touch.▪ 90% first contact resolution at Customer First Centre. |
|  | Strategic result: 90%+ customer satisfaction with listening to views and acting upon them. We will measure success through: <ul style="list-style-type: none">▪ 90%+ of customers agree there are clear opportunities to participate.▪ 100% of customer-facing policies and strategic projects informed by customer insight.▪ 10% reduction in complaints escalated to stage 2 from a 2026 baseline▪ |
|  | Strategic result: 90%+ overall customer satisfaction in key services including repairs, allocations, Customer First Centre and the Wheatley Foundation. We will measure success through: <ul style="list-style-type: none">▪ Over 90% of customers feel treated fairly and with respect.▪ Over 90% customer satisfaction with repairs experience.▪ 100% receive an Annual Tenant Visit |

Theme 3: Better Lives

We play a leading role in addressing Scotland's housing crisis, having, during our last strategy period, exceeded targets for new homes and support for homeless households, and maintained high tenancy sustainment. We are not just a landlord; we provide wraparound support from the outset, incentivise downsizing, and deliver targeted help for vulnerable groups.

Through the Wheatley Foundation and external partnerships, we prioritise initiatives that tackle poverty, improve wellbeing, and create opportunities such as jobs, training, community larders, and education bursaries.

Customer engagement has highlighted affordability as a key priority, reinforcing our commitment to sustainable support that genuinely improves lives.

In 2031: Through our strengthened role as a collaborative leader—working with partners to tackle homelessness, alleviate poverty, and drive social mobility, we embed responsible business practices across all we do. Our approach is underpinned by measurable outcomes, continuous improvement, and a commitment to building trust.

Our objectives over the next 5 years:

| | |
|---|---|
|  | Make the largest contribution to ending homelessness of any Scottish landlord; |
|  | Shape powerful partnerships to alleviate poverty and open doors to new opportunities |

Our roadmap to achieving our objectives and the outcomes delivered



Make the largest contribution to ending homelessness of any Scottish landlord

| | |
|--|--|
| <p>Work with national and local government to deliver solutions to homelessness</p> | <ul style="list-style-type: none"> ➤ In collaboration with sector partners, influence national funding and policy and implement the next phase of Housing First. ➤ Bring empty homes back into use and expand housing options, while delivering value for money. ➤ Support customers to downsize and develop resettlement initiatives to meet demand for larger family homes. |
| <p>Enhance wraparound services with a focus on prevention, early intervention, and sustaining tenancies</p> | <ul style="list-style-type: none"> ➤ Review our homelessness and allocations policies, informed by customer insight. ➤ Work with our partner, the Wheatley Foundation to support funding models for enhanced wraparound support, pilot advocacy and enhance financial wellbeing services, using data and co-production to target support. ➤ Collaborate internally and externally to expand wraparound support and build enhanced services to support tenancy sustainment, including with the Wheatley Foundation and Health & Social Care Partnership. |
| <p>Emphasise on community resilience</p> | <ul style="list-style-type: none"> ➤ Promote our Stronger Voices engagement programme to boost neighbourhood connections. ➤ Build staff capacity and local networks to foster neighbourhood connections and resilient communities. |



Shape powerful partnerships to alleviate poverty and open doors to new opportunities

| | |
|---|--|
| Break cycles of poverty | <ul style="list-style-type: none">➤ Work with Local Authorities and partners to better understand root cause of family poverty and commit to their programme of 'demonstration of change' to target solutions across the East of Scotland.➤ Ensure active representation on key forums and direct stakeholder engagement to drive progress with strategic ambitions.➤ Enhance tenancy sustainment efforts using insights from annual tenant visits to understand how customers live and use this to shape the support we receive from the Wheatley Foundation's around tackling poverty, particularly for families.➤ Work with the Wheatley Foundation to leverage data to underpin the development of an anti-poverty strategy and pilot 'crisis support' approach.➤ Utilise the 'single view of the customer' and enhanced socio-economic data to tailor resources and monitor outcomes. |
| Focus on employability, income, and social mobility, ensuring support is accessible, person-centred, and impactful | <ul style="list-style-type: none">➤ Strategically track employability and income outcomes to inform our social mobility support.➤ Collaborate with the Wheatley Foundation and explore new external partners to deliver skills, jobs, and training.➤ Engage with decision makers to influence policy on social mobility, education, and skills.➤ Further embed use of community benefit in procurement and strengthen monitoring of supplier contributions.➤ Promote our work through customer testimonies and work together with the Wheatley Foundation to explore digital initiatives to help customers get online and build digital skills and confidence.➤ Benchmark and communicate social impact through storytelling and performance management. |
| Build and sustain the strategic partnerships we need to deliver for our customers | <ul style="list-style-type: none">➤ Make the most of our partnerships with Local Authorities to align our efforts for the benefit of our tenants and East of Scotland citizens.➤ Further develop our existing partnership with Scottish Fire and Rescue as part of continuing to reduce fire risk in our homes.➤ Work with Wheatley Care as a strategic partner to ensure care and support needs of our customers are met.➤ Continue to foster closer, and new, partnership working arrangements with organisations who have an interest in benefiting our customers and neighbourhoods. |

Outcomes:

| | |
|---|---|
| Customer priorities met: | Create Pride in Place Keep Rent Fair and Transparent |
| Outcomes:  | Strategic result: Housing at least 1750 homeless households by 2031 We will measure success through: <ul style="list-style-type: none">▪ Over 90% tenancy sustainment |
|  | Strategic result: Reduce the number of families in poverty We will measure success through: <ul style="list-style-type: none">▪ Reduce the value of arrears and number of customers in debt with us▪ On average, keeping our rent levels below 30% of disposable income; and▪ Number of jobs, apprentice and training places created for our customers |

Theme 4: Delivering sustainable value

We are committed to delivering exceptional services, empowering our people and communities, and driving innovation through a strong financial and cultural foundation. Through our last strategy, we introduced flexible, home-based models for key teams while maintaining strong community presence. We support a diverse workforce through digital, remote, and in-person networks. We have broadened our focus to become a responsible, ethical business, embedding sustainability, equity, diversity, inclusion (EDI), and social mobility into our operations.

Our "Think Yes" ethos encourages staff to make decisions that best serve individuals and communities. As a platinum-accredited Investors in People organisation, we prioritise staff development, nurturing skills, and people-centred support.

We are embracing technology and data to enhance service delivery. With the launch of our data strategy and integration of Artificial Intelligence tools like CoPilot and Large Language Models, we've improved decision-making, streamlined operations, and supported staff development. These innovations position us to deliver smarter, more efficient services while maintaining a human touch.

Financial efficiency underpins our ability to build trust, deliver strategic goals and promises, and maintain affordability for customers. We prioritise value for money to meet customer needs, and remain resilient in the face of change.

In 2031: We've deepened our Think Yes culture by investing in workforce skills, dynamic learning, and strong internal relationships, and reinforced our leadership principles so these drive our behaviours. Strengthened change management ensures staff understand their impact and the importance of action that realises benefits. We fully leverage secure digital platforms and automation to enhance efficiency and experiences. A strong culture of utilising supports impactful transformation, while advanced analytics improve forecasting and strategic planning. Our A+ credit rating continues to unlock investment potential—particularly in new build development—and reassure our partners and stakeholders that we are financially stable, and committed to equity and sustainability.

Our objectives over the next 5 years:

| | |
|---|---|
|  | Nurture and invest in our people, recognising their contribution |
|  | Drive effective solutions, harnessing digital capabilities and data assets |
|  | Ensure financial efficiency today, prepared for tomorrow |
|  | Grow our reputation as an ethical, trusted business |

Our roadmap to achieving our objectives



Nurture and invest in our people, recognising their contribution

| | |
|---|--|
| <p>Enable growth through our development, ensuring people are equipped, empowered, and celebrated for the vital role they play</p> | <ul style="list-style-type: none"> ➤ Implement a refreshed people strategy that integrates learning and development, strategic workforce planning, reward and recognition, and leadership development. ➤ Enhance our approach to learning by refocusing annual reviews to support the right conversations at the right time between managers and staff, ensuring meaningful interactions. Improved reporting will inform development plans across Wheatley Homes East and the wider Group, embedding a culture of 360-degree feedback and continuous improvement. ➤ Conduct a comprehensive analysis of learning needs and training methods, developing a roadmap to strengthen organisational capability. Prioritise skills essential to our strategy, including stock condition assessment and data-informed decision-making, while exploring new learning opportunities through external networks, funding, and contractor partnerships. |
| <p>Building leadership at every level, and embedding Think Yes</p> | <ul style="list-style-type: none"> ➤ Embed a renewed, values-driven framework aligned with our Think Yes culture, supporting leaders at all levels to model behaviours that drive change, remove barriers and foster innovation. ➤ Nurture internal talent and attract external expertise to enrich our leadership pipeline and strengthen succession planning. ➤ Reinforce our Think Yes ethos through cross-functional learning and revamped induction programmes at both corporate and local levels. Staff will feel trusted and empowered to make decisions that deliver better outcomes. ➤ Strengthen Different Together, our EDI brand, ensuring leaders champion it internally and externally. Leaders will foster connection across teams to build capability and reduce social isolation. ➤ Think Yes will be visible in our branding and communications, supported by consistent leadership messaging |
| <p>Amplifying staff voice and innovation, supported by diverse learning and opportunities</p> | <ul style="list-style-type: none"> ➤ Diversify training methods such as through mentoring, shadowing, development days, and bitesize learning to build confidence, clarify roles, and encourage innovation. ➤ Enhance people functions and increase staff self-service, supported by data and automation, to help staff access knowledge and apply Think Yes in real time. |

- Expand opportunities for staff to contribute to decision-making and service design through refreshed Communities of Excellence and strategic staff networks. These platforms will ensure diverse voices shape innovation and drive customer satisfaction.
- Promote intrapreneurship and evaluate engagement with our customer-focused culture
- Health and wellbeing of our people will remain a priority. Staff will help shape benefits that support them to deliver meaningful customer outcomes and meet diverse needs.
- We will innovate in wellbeing support, addressing both physical and mental health through our Different Together approach. Continue to evolve our support for staff, placing employee experience at the centre of our emotionally intelligent organisation.





Drive effective solutions, harnessing digital capabilities and data assets

Building single view of customer and home, consolidating systems and streamlining processes

- Prioritise the development of integrated data and technology platforms that enable a unified view of our customers and assets to support smarter decision-making and allow staff to deliver services more efficiently and effectively.
- Bespoke digital and data roadmaps will be co-developed for each major service area, setting out clear pathways to better data accessibility and stronger, digitally enabled processes. These will be delivered through robust project and change management programmes to ensure lasting transformation.
- Actively consolidate our technology platforms to establish a single source of core data and consistent ways of working.
- A comprehensive view of our assets and customers and overarching data analytics platform will lay the foundation for enhanced predictive analytics and Artificial Intelligence integration.

Embedding Artificial Intelligence ethically and sustainably, focussing on enhanced experiences

- Adopt Artificial Intelligence selectively and ethically, targeting manual workflows that can be automated to free up staff for customer-focused, value-added work. Initial focus areas will include teams that support us in Wheatley Solutions and the Customer First Centre, with learning shared across the wider Group.
- Artificial Intelligence will be limited in areas requiring significant human judgment until we are confident there is low risk; smart data applications such as in-home sensors, diagnostic tools, and real-time communications will be explored to manage our portfolio more effectively.
- Working with external partners we will deliver our digital maturity roadmap aligned with the Group's data strategy. This will focus not only on systems but also on developing staff skills and fostering a culture of data ownership, stewardship, and literacy.
- Enhanced data capability and understanding of our customers will inform and influence the activities of our charity partner of choice, the Wheatley Foundation, to support our communities and better equip us to measure impact.

| | |
|---|--|
| <p>Safely cultivating innovation, for the benefit of our communities</p> | <ul style="list-style-type: none"> ➤ Develop programmes to encourage and support innovation thinking and approaches, as part of developing and improving the services we provide ➤ Collaborate with acknowledged leaders, including from industry and academia, in the field of emerging technologies and innovation to develop new solutions that meet our and our customers' needs ➤ Embed accountability for innovation in the responsibilities of our senior staff ➤ Take an open and ambitious approach to exploring new ways of working, while also applying robust frameworks to ensure there is evidence that such innovation will deliver benefits for our customers and our business before large-scale deployment. ➤ Prioritise strong data governance to ensure ethical use including as new technologies including Artificial Intelligence evolve. ➤ Support customers who may be disadvantaged by the increasing shift to digitisation, such as through the potential introduction of digital identities in welfare and public services. ➤ Achieve Cyber Essentials accreditation across Wheatley Homes East, demonstrating our commitment to safeguarding systems, protecting customer data, and maintaining business continuity |
|---|--|



Ensure financial efficiency today, prepared for tomorrow

| | |
|--|--|
| <p>Maintaining financial strength and flexibility</p> | <ul style="list-style-type: none"> ➤ Retain our externally accredited A+ credit rating and adhere to our financial 'Golden Rules', ensuring Wheatley Homes East remains a trusted organisation in the eyes of funders, stakeholders, and customers. ➤ Negotiate funding arrangements through making best use of our financial and asset strength to reduce the cost of funds and maximising capacity for new build ➤ Evaluate governance and funding models to unlock new capacity—particularly for new build development—through a housing bond and innovative funding approaches. ➤ Maintain flexibility to allow us to respond quickly to emerging opportunities and adapt our financial strategy to meet changing market conditions through to 2031. |
| <p>Championing transparency and customer trust</p> | <ul style="list-style-type: none"> ➤ Demonstrate financial transparency by publishing clearer information on how rent is spent, including through our annual rent consultation. Customer feedback will continue to shape decisions on rent increases. ➤ Explore expanding financial support for tenants, tailoring assistance to meet diverse needs and helping customers navigate the cost-of-living crisis. |

| | |
|--|--|
| <p>Future proofing through data and insight</p> | <ul style="list-style-type: none"> ➤ Increase our use of predictive analytics to support business continuity planning, improve supply chain resilience, and anticipate future risks. ➤ Our data-driven finance approach will help us make informed decisions, optimise resource allocation, and ensure long-term sustainability. |
|--|--|

| | |
|---|---|
|  <p>Grow our reputation as an ethical, trusted business</p> | |
| <p>Be recognised as a responsible, ethical leader—embedding sustainability, equity, diversity, and inclusion (EDI)</p> | <ul style="list-style-type: none"> ➤ Refresh and deliver our EDI action plan, supporting our staff and customers to feel respected and included. ➤ Benchmark and improve our Onvero ‘Talent Inclusion and Diversity Evaluation’ rating. ➤ Refresh our Group Sustainability Framework, focusing on net zero, understanding climate impacts on our business, and work with partners to deliver a just transition and value for money for customers. |
| <p>Embed continuous improvement across our organisation and value chain.</p> | <ul style="list-style-type: none"> ➤ Adopt the Business in the Community ‘Responsible Business Health Check’ to drive change and support thriving communities and workplace. ➤ Engage leaders in responsible business and systems thinking to pilot new approaches and measure impact with leading and lagging indicators. ➤ Adopt and implement an organisation-wide approach to continuous improvement, such as EFQM, that can provide us with opportunities for independent assurance, assessment and benchmarking |
| <p>Deepen stakeholder collaboration with networks and partners,</p> | <ul style="list-style-type: none"> ➤ Embed a comprehensive stakeholder engagement and communication plan reflecting preferences and influence to help us focus efforts on the most pressing social and environmental challenges for our customers. ➤ Undertake stakeholder engagement that is dynamic and inclusive, seeking input from our broad ecosystem to inform decisions. ➤ Deepen collaboration on national and international forums to identify gaps and share best practice. Utilise memberships, undertake joint studies and research to demonstrate value beyond our workplace, particularly in EDI, sustainability, and social impact. ➤ Where appropriate, challenge existing best practices to develop innovative solutions. ➤ Leverage our scale as part of the Wheatley Group to build strategic procurement partnerships, attract private sector expertise into the public domain, and support local businesses and create job and training opportunities for our customers. Reinvest financial efficiency from purpose driven procurement into communities. |

Outcomes:

| | |
|---|---|
| <p>Customer priorities met:</p> | <p>All</p> |
| <p>Outcomes:</p>  | <p>Strategic result: Retain platinum IIP accreditation</p> <p>Measure progress through:</p> <ul style="list-style-type: none"> ▪ Over 90% Staff satisfaction that Wheatley is a good employer ▪ 90% of staff are satisfied with the development opportunities available to them; and ▪ Increasing the diversity of our workforce; |
|  | <p>Strategic result: Increase our data maturity score</p> <p>Measure progress through:</p> <ul style="list-style-type: none"> ▪ Achieve Cyber Essentials accreditation; and ▪ 90% of staff are confident using data and AI as it relates to their role ▪ Number of staff who engage with our innovation activities increases annually from 2026 baseline |
|  | <p>Strategic result: Maintaining our A+ credit rating</p> <p>Measure progress through:</p> <ul style="list-style-type: none"> ▪ Raising £1.2 bn of private finance to invest in new homes ▪ Launch Scotland’s first Housing Bond programme; and ▪ We will comply with our “Golden Rules” |
|  | <p>Strategic result: recognised by the EFQM as a top organisation, achieving 6 stars or above.</p> <p>We will measure success through:</p> <ul style="list-style-type: none"> ▪ Retaining our Customer Service Excellence accreditation ▪ Improving our Business In The Community ‘Responsible Business’ and Overo Talent Inclusion and Diversity Evaluation’ ratings ▪ Reducing harmful emissions from our homes and businesses |

Report

To: Wheatley Homes East Board

By: Laura Henderson, Managing Director

Approved By: Alan Glasgow, Group Director of Housing

Subject: Risk Register

Date of Meeting: 27 November 2025

1. Purpose

1.1 This report asks the Board to consider and approve the proposed changes to the Risk Register.

2. Authorising and strategic context

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

3. Background

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

- A. Risks outwith risk appetite;
- B. Risks with a residual risk score of 12 or more or an inherent risk score of 20 or more, for which the Board has not received an update on the operation of the controls in the last 6 months; and
- C. Risks highlighted for consideration. This will include new risks, risks to be removed from the Risk Register, or risks with a significant change in scoring. It also includes brief details of any significant changes to the external environment that may impact on the Board's risk profile ("horizon-scanning").

4. Discussion

4.1 The chart on the next page shows all risks within the Risk Register. These are colour-coded as follows:

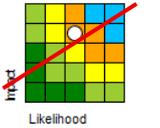
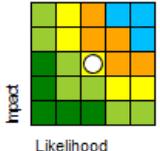
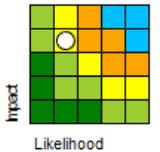
- Red font – risks highlighted for Member consideration (as set out in paragraph 3.1) and discussed further below;
- Purple font – risks with a high residual risk or inherent risk score where Boards have received an update on the operation of the controls in the last 6 months;
- Black font – lower scoring risks that have remained stable within the current period.

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

The remainder of this section provides additional commentary on those risks highlighted in red font. A full description of each of these risks, and associated controls, is set out in Appendix 2.

Section A - Risks outwith risk appetite

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

| Risk | Residual Risk Score | Risk Appetite Level | Commentary |
|--|---|---------------------|---|
| [Redacted] | [Redacted] | [Redacted] | [Redacted] |
| [Redacted] | [Redacted] | [Redacted] | [Redacted] |
| RISK 020 - Radio Teleswitch switch off |  <p>Revised score:</p>  | Minimal | The scoring of this risk has reduced again, reflecting the continuing reduction in the number of the Group's customers affected (c3500) and the staged approach to switching adopted by the energy companies. Overall, it remains outwith risk appetite because the Group is unable to directly resolve this issue on behalf of its customers. Engagement with third parties and awareness-raising communications to customers and staff continue. |
| RISK 089 – Fire Event |  | Minimal | This is focused on the risk of a fire within a customer's property. It is outwith risk appetite due to the limited control the Group has over the actions of third parties to minimise fire risk. Despite best efforts, we cannot eliminate all risk of accidental dwelling fires. We have reduced these year-on-year, through proactive engagement with our customers and rigorous fire safety inspections of our assets on a rolling programme basis and mitigating measures, but we will continue to experience accidental dwelling fires. |

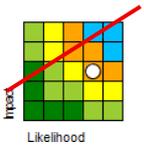
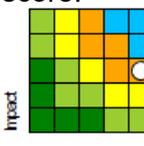
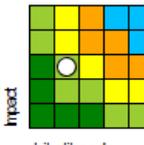
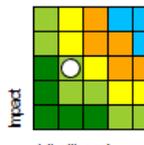
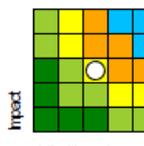
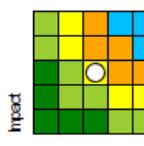
4.3 The implementation of any identified actions will be monitored and residual risk scores will be reviewed as part of the scheduled quarterly review of all risks.

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

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

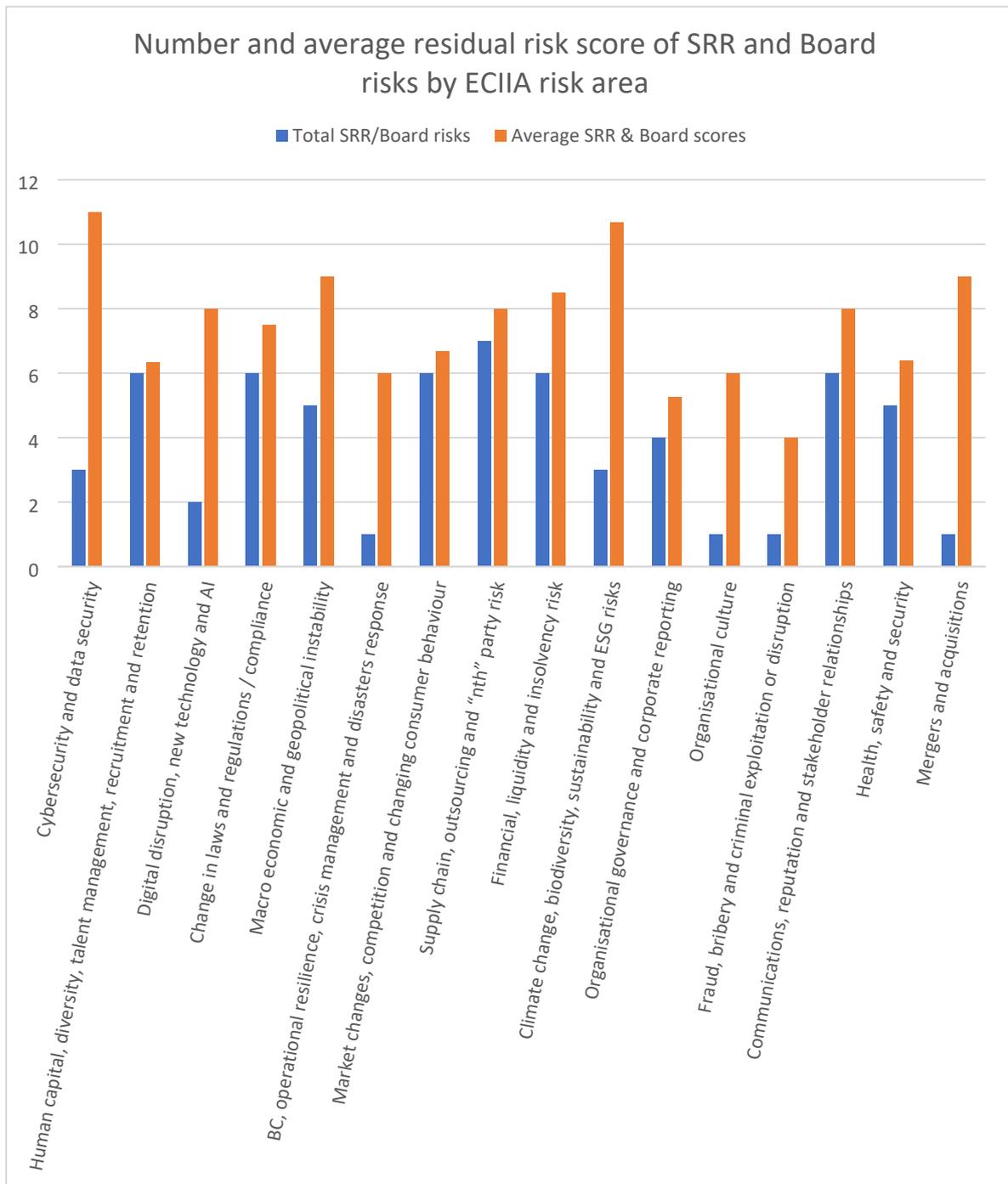
Section C- Horizon Scanning

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

| Risk | Residual Risk Score | Risk Appetite | Commentary |
|---|---|---------------|--|
| RISK137 – Climate change impact on Group customers, assets and activities |  <p>Revised score:</p>  | Open | The inherent and residual risk scores have been increased to reflect increasing evidence of weather-related incidents that require an escalated response. |
| RISK183 – Underperformance of Inhouse Repairs Service |  | Open | The risk description and controls have been updated to consolidate it with an operational level risk related to repairs customer satisfaction. |
| RISK053 – Damp and mould |  | Minimal | The description and controls for this risk have been updated, to focus on the requirement to comply with legislation in this area, and to outline updated controls that have been recently introduced. |
| NEW RISK: RISK052 - Responsibilities under Awaab’s Law |  | Open | This new risk has been added to the register, to reflect the potential for reputational damage due to stakeholders’ differing knowledge and understanding of the law’s scope and the requirements it places on social landlords. |
| NEW RISK: RISK052 - Impact of CBG consolidation on Group |  | Cautious | This new risk relates to the potential impact on the Group’s ability to prepare consolidated accounts arising from delays to the implementation of CBG change management programme. |

4.6 In addition to the information presented in relation to existing risks, the Internal Audit team has also reviewed the Group’s Strategic Risk Register and Subsidiary Board Risk Registers against the European Confederation of Institutes of Internal Auditing’s (“**ECIIA’s**”) annual publication “*Risk in Focus 2026*”. This publication summarises the results of a survey of Chief Audit Executives (“**CAEs**”) in which they are asked to rank the risks that are of most concern to their organisation.

4.7 The chart below shows the ECIIA’s 16 risk categories in order of descending risk when read from left to right. The chart also shows the total number of risks within either the Strategic Risk Register or Subsidiary Board Risk Registers (in blue) and the average residual risk score of those risks (coloured to align with the risk heat-map location).



4.8 This demonstrates that the Group has risks in all categories assessed by the ECIIA, and that the Group's highest scoring Board level risks are related to cyber and data security, and climate change, sustainability and ESG. The risk category with the highest number of risks is "supply chain, outsourcing and "nth" party risk", reflecting the importance of the Group's partners and suppliers.

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

5. Customer Engagement

5.1 No customer engagement implications arise directly from this report.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

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

11. Equalities implications

11.1 This report does not require an equalities impact assessment.

12. Key issues and conclusions

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

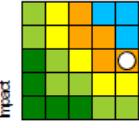
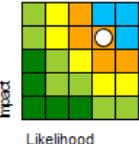
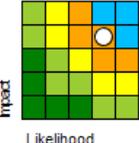
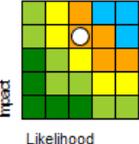
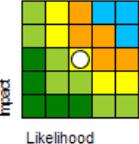
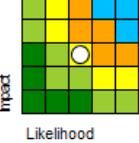
13. Recommendations

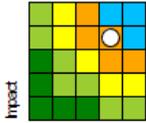
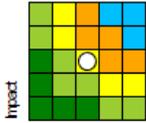
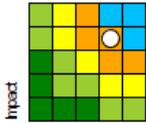
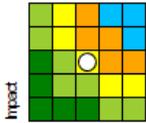
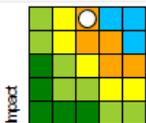
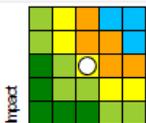
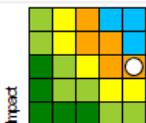
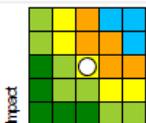
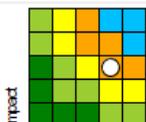
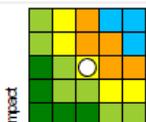
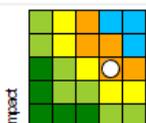
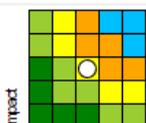
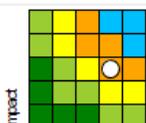
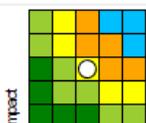
- 13.1 The Board is asked to:
- 1) Approve the proposed changes to the Risk Register; and
 - 2) Identify any further changes required to the Risk Register.

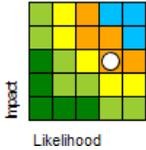
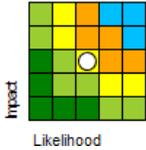
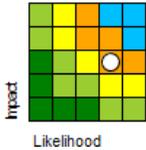
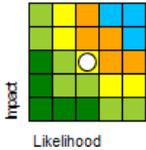
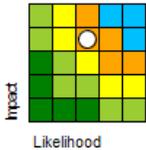
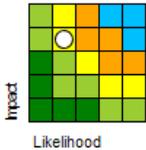
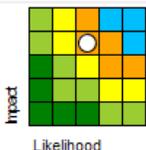
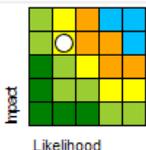
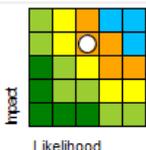
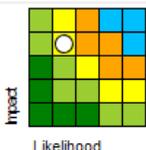
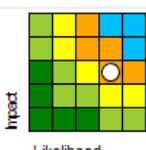
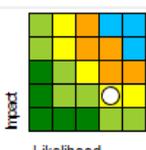
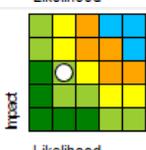
LIST OF APPENDICES:

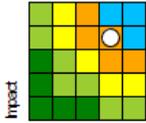
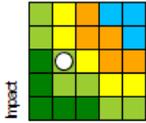
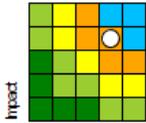
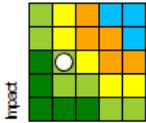
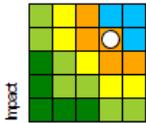
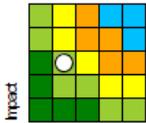
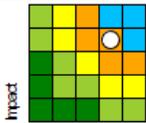
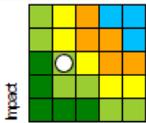
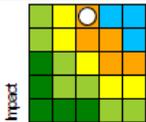
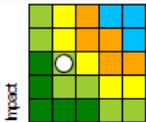
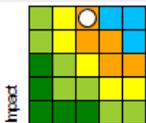
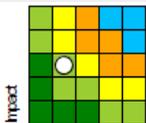
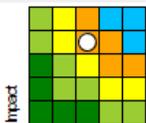
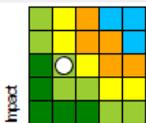
- Appendix 1: WH-East Summary Risk Register
Appendix 2: Risks flagged for Board attention

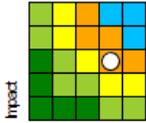
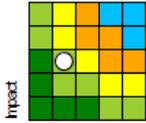
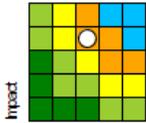
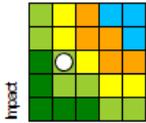
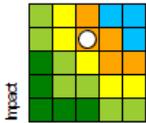
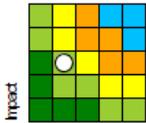
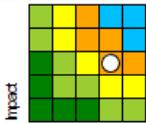
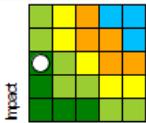
Appendix 1 – WH-East Risk Register

| Code | Title | Original Score | Risk Appetite | Current Risk Score | Owner | Strategic Outcome | Ref to Appendix 2 |
|--------------|--|---|---|---|---|--|--------------------------------|
| RISK 023 | Climate change impact on Group customers, assets and services |  Impact Likelihood | Risk Appetite is OPEN (Orange) |  Impact Likelihood | Group Director of Assets and Development | Setting the benchmark for sustainability and reducing carbon footprint | Page 13 Amended risk |
| RISK 019.2 F | Delayed recovery in the event of a cyber attack |  Impact Likelihood | Risk Appetite is CAUTIOUS (Yellow) |  Impact Likelihood | Group Director of Governance and Business Solutions | Maintaining a strong credit rating and managing financial risk | Page 14 Above risk appetite |
| RISK 019.3 F | Disruption following a cyber attack on a key system provider |  Impact Likelihood | Risk Appetite is CAUTIOUS (Yellow) |  Impact Likelihood | Group Director of Governance and Business Solutions | Maintaining a strong credit rating and managing financial risk | Page 15 Above risk appetite |
| RISK 021 | Reduced availability of financial support from Scottish Government and / or local government |  Impact Likelihood | Risk Appetite is OPEN (Orange) |  Impact Likelihood | Group Director of Finance | Raising the funding to support our ambitions | N/A |
| RISK 001 | Impact on our customers of reduced public funding |  Impact Likelihood | Risk Appetite is OPEN (Orange) |  Impact Likelihood | Group Director of Communities | Supporting economic resilience in our communities | N/A |
| RISK 016 | Laws and Regulations |  Impact Likelihood | Risk Appetite is CAUTIOUS (Yellow) |  Impact Likelihood | Group Director of Governance and Business Solutions | Progressing from Excellent to Outstanding | N/A |

| Code | Title | Original Score | Risk Appetite | Current Risk Score | Owner | Strategic Outcome | Ref to Appendix 2 |
|--------------|---|---|---|---|---|---|-----------------------------|
| RISK 019.1 F | Staff behaviour enables a cyber-attack |  | Risk Appetite is CAUTIOUS (Yellow) |  | Group Director of Governance and Business Solutions | Maintaining a strong credit rating and managing financial risk | N/A |
| RISK 020 | Radio Teleswitch switch off |  | Risk Appetite is MINIMAL (Light Green) |  | Group Director of Assets and Development | Progressing from Excellence to Outstanding | Page 16 Above risk appetite |
| RISK 008 | Compliance with funders' requirements |  | Risk Appetite is OPEN (Orange) |  | Group Director of Finance | Raising the funding to support our ambitions | N/A |
| RISK 018 | Repairs supply chain disruption |  | Risk Appetite is OPEN (Orange) |  | Group Director of Governance and Business Solutions | Investing in existing homes and environments | N/A |
| RISK 002 | Impact of CBG consolidation on Group |  | Risk Appetite is CAUTIOUS (Yellow) |  | Group Director of Finance | Maintaining a strong credit rating and managing financial risks | Page 17 New Risk |
| RISK 011 | Securing new funding and adverse market changes |  | Risk Appetite is OPEN (Orange) |  | Group Director of Finance | Raising the funding to support our ambitions | N/A |
| RISK 014 | Political and Policy changes impact on strategic key partnerships |  | Risk Appetite is OPEN (Orange) |  | Group Director of Governance and Business Solutions | Influencing locally and nationally to benefit our communities | N/A |

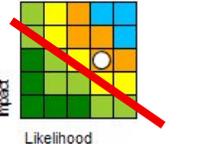
| Code | Title | Original Score | Risk Appetite | Current Risk Score | Owner | Strategic Outcome | Ref to Appendix 2 |
|----------|--|---|---|---|---|--|--------------------------------|
| RISK 052 | Responsibilities under Awaab's Law |  | Risk Appetite is OPEN (Orange) |  | Group Director of Assets and Development | Investing in existing homes and environments | Page 18 New Risk |
| RISK 137 | Non-achievement of sustainability targets |  | Risk Appetite is OPEN (Orange) |  | Group Director of Assets and Development | Setting the benchmark for sustainability and reducing carbon footprint | N/A |
| RISK 004 | Ability to meet Scottish Government legislative requirements for energy efficiency |  | Risk Appetite is CAUTIOUS (Yellow) |  | Group Director of Assets and Development | Investing in existing homes and environments | N/A |
| RISK 039 | Supplier's Financial Position, Contingency and Business Continuity Planning |  | Risk Appetite is CAUTIOUS (Yellow) |  | Group Director of Governance and Business Solutions | Maintaining a strong credit rating and managing financial risks | N/A |
| RISK 089 | Fire Event |  | Risk Appetite is MINIMAL (Light Green) |  | Group Director of Assets and Development | Developing peaceful and connected neighbourhoods | Page 19 Above risk appetite |
| RISK 090 | Monitoring H&S arrangements |  | Risk Appetite is CAUTIOUS (Yellow) |  | Group Director of Assets and Development | W.E. Work – Strengthening the skills and agility of our staff | N/A |
| RISK 005 | Care and support services |  | Risk Appetite is MINIMAL (Light Green) |  | Group Director of Communities | Shaping Care Services for the future | N/A |

| Code | Title | Original Score | Risk Appetite | Current Risk Score | Owner | Strategic Outcome | Ref to Appendix 2 |
|----------|---|---|---|---|---|---|----------------------|
| RISK 012 | Business Continuity |  | Risk Appetite is OPEN (Orange) |  | Group Director of Assets and Development | Progressing from Excellent to Outstanding | N/A |
| RISK 031 | Senior staff recruitment |  | Risk Appetite is HUNGRY (Blue) |  | Group Director of Governance and Business Solutions | W.E. Work – strengthening the skills and agility of our staff | N/A |
| RISK 032 | Staff development and succession planning |  | Risk Appetite is HUNGRY (Blue) |  | Group Director of Governance and Business Solutions | W.E. Work – strengthening the skills and agility of our staff | N/A |
| RISK 053 | Damp and Mould |  | Risk appetite is MINIMAL (Light Green) |  | Group Director of Assets and Development | Investing in existing homes and environments | Page 20 Amended risk |
| RISK 003 | Fire Safety |  | Risk Appetite is MINIMAL (Light Green) |  | Group Director of Assets and Development | Investing in existing homes and environments | N/A |
| RISK 010 | Group Credit Rating |  | Risk Appetite is MINIMAL (Light Green) |  | Group Director of Finance | Maintaining a strong credit rating and managing financial risks | N/A |
| RISK 006 | Customer Satisfaction (tenants) |  | Risk Appetite is OPEN (Orange) |  | Group Director of Housing | Enabling customers to lead | N/A |

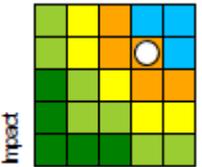
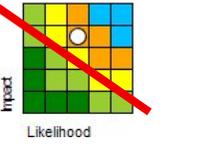
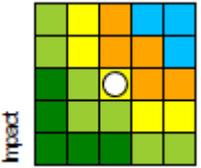
| Code | Title | Original Score | Risk Appetite | Current Risk Score | Owner | Strategic Outcome | Ref to Appendix 2 |
|----------|---|---|---|---|---|--|----------------------|
| RISK 007 | Rent Arrears management |  | Risk Appetite is OPEN (Orange) |  | Group Director of Housing | Enabling Customers to Lead | N/A |
| RISK 009 | Governance Structure |  | Risk Appetite is CAUTIOUS (Yellow) |  | Group Director of Governance and Business Solutions | W.E. Work– strengthening the skills and agility of our staff | N/A |
| RISK 183 | Underperformance of Inhouse Repairs Service |  | Risk appetite is OPEN (Orange) |  | Group Director of Assets and Development | Developing a Customer Led Repairs Service | Page 21 Amended risk |
| RISK 172 | Insufficient Group Development Programme pipeline |  | Risk Appetite is MINIMAL (Light Green) |  | Group Director of Assets and Development | Increasing the supply of new homes | N/A |

Appendix 2 – Risks flagged for Board attention

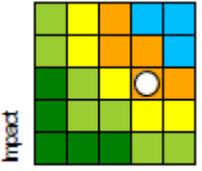
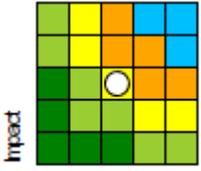
RISK 023 Climate change impact on Group customers, assets and services

| | | | | | |
|--|---|---|--|-------------------|--|
| Strategic Outcome | Setting the benchmark for sustainability and reducing carbon footprint | Risk type | Financial or VFM | Risk owner | Group Director of Assets and Development |
| Description | | Controls | | | |
| <p>There is a risk that the impact of climate change consequences on Group customers, assets and services are not anticipated resulting in damage to the value of our assets and our ability to deliver services to our customers.</p> | | <p>Further development of, and emphasis on, business continuity plans (both at Group and local level) and testing to provide for operational responses to extreme weather events such as flooding and severe winter snow (e.g “Beast from the East” type events). Group works in line with National Planning requirements, including the use of SEPA flood risk maps to assess New Build locations. Asset Management Strategy will ensure future investment maintains and improves condition of our asset including to mitigate any climate change related risks.</p> | | | |
| Inherent risk | Residual risk | Risk Appetite level: | Previous / Next detailed Board update on operation of controls listed above: | | |
|  <p>Impact</p> <p>Likelihood</p> |  <p>Impact</p> <p>Likelihood</p> | <p>Risk Appetite is OPEN (Orange)</p> | <p>Group Boards - Asset investment plans in February each year. Wheatley Solutions Board updated on sustainability related matters at its meetings. Sustainability framework update planned for Q4 2025 with subsequent Board approvals.</p> | | |

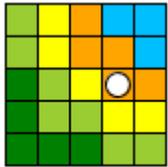
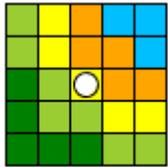
RISK 020 Radio Teleswitch switch off (Above risk appetite)

| | | | | | |
|--|---|--|---|-------------------|---|
| Strategic Outcome | Progressing from Excellence to Outstanding | Risk type | Reputation and Credibility | Risk owner | Group Director of Assets and Development |
| Description | | Controls | | | |
| <p>There is a risk that customers with Radio Teleswitch (RTS) electricity meters (c.3500 customers) do not engage with their energy suppliers to have these meters updated in advance of the RTS switch off, resulting in these customers' storage heaters being left permanently switched on or off, depending on the last signal received. Either outcome could have a negative impact on customer experience and satisfaction, particularly as the Group is unable to directly resolve this issue on the behalf of its customers.</p> | | <p>UK Government has refined the approach to Switch Off. It will now be by meter code which means it will be more cautious, with fewer (tens) of customers impacted at each code switch. Codes covering vast majority of our stock now not expected to be switched off until Spring 2026 at earliest.</p> <p>Continuing to engage with SFHA, OFGEM, Scottish and UK Government and energy companies to raise awareness of the issue from an RSL perspective;</p> <p>Continuing to work with Scottish Power including through regular updates that allow progress to be tracked, data sharing to support proactive contact with affected RTS customers to encourage switching and meetings with senior staff to address issues identified;</p> <p>Communications campaign including: letters to customers, at various times, to encourage contact with their energy company to arrange to switch; posters in MSF blocks; outbound calling from CFC and engagement with impacted customers through housing staff.</p> <p>Staff awareness campaign;</p> <p>Internal project team formed to monitor progress with switching and coordinate the listed control activities.</p> <p>Business continuity arrangements to provide any impacted customer with temporary heating and support to switch.</p> | | | |
| Inherent risk | Residual risk | Risk Appetite level: | Previous / Next detailed Board update on operation of controls listed above: | | |
|  |   | <p>Risk Appetite is MINIMAL (Light Green)</p> | <p>RSL Board updates at every meeting until not required.</p> | | |

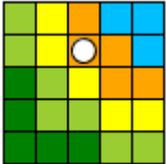
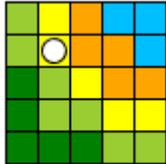
RISK 002 Impact of CBG consolidation on Group (New Risk)

| | | | | | | |
|---|--|--|--|-----------------------------|-------------------|----------------------------------|
| Strategic Outcome | | Maintaining a strong credit rating and managing financial risks | Risk type | Operational Delivery | Risk owner | Group Director of Finance |
| Description | | | Controls | | | |
| <p>There is a risk that delays to implementation of CBG change management programme adversely affect the Group’s ability to consolidate CBG within the Group accounts, resulting in potential delays to Group accounts and reputational damage.</p> | | | <p>Regular meetings with CBG Senior Management Team. Oversight of CBG internal control framework through membership of CBG Board. CBG management attend Group joint management meetings.</p> | | | |
| Inherent risk | Residual risk | Risk Appetite level: | Previous / Next detailed Board update on operation of controls listed above: | | | |
|  <p>Likelihood</p> |  <p>Likelihood</p> | <p>Risk Appetite is CAUTIOUS (Yellow)</p> | <p>GCC internal audit provide quarterly updates to Group Audit Committee. Updates to Group Board from CBG Board attendees</p> | | | |

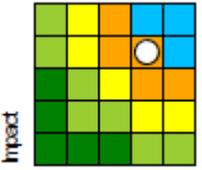
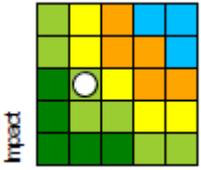
RISK 052 Responsibilities under Awaab's Law (New Risk)

| Strategic Outcome | Investing in existing homes and environments | Risk type | Reputation and Credibility | Risk owner | Group Director of Assets and Development |
|--|--|--|----------------------------|--|--|
| Description | | Controls | | | |
| <p>There is a risk that we face criticism or challenge about our response to and compliance with Awaab's Law, due to stakeholders' differing knowledge and understanding of the law's scope and the requirements it places on social landlords, resulting in customer dissatisfaction and reputational damage.</p> | | <p>Satisfaction surveys are used to monitor and assess customer satisfaction with damp and mould repairs.</p> <p>Planned controls Engagement with 'critical friend' RSLs and relevant bodies to learn from how English bodies have responded to Awaab's law. Damp and Mould policy being revised to set out the tenant's right to an independent assessment if they are not happy with the Group's response to reports of suspected damp and mould in their home. It will also reflect changes to how we manage stage 2 complaints related to Damp and Mould.</p> | | | |
| Inherent risk | Residual risk | Risk Appetite level: | | Previous / Next detailed Board update on operation of controls listed above: | |
|  <p>Likelihood</p> |  <p>Likelihood</p> | <p>Risk Appetite is OPEN (Orange)</p> | | <p>Damp and Mould update to Group Board in November 2025 to include changes to Policy.</p> | |

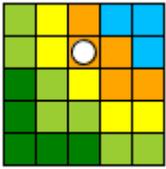
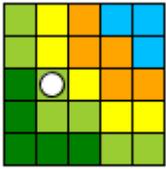
RISK 089 Fire Event (Above risk appetite)

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

RISK 053 Damp and Mould

| | | | | | | |
|--|---|--|------------------|--|-------------------|---|
| Strategic Outcome | | Investing in existing homes and environments | Risk type | Compliance - Legal / Regulatory | Risk owner | Group Director of Assets and Development |
| Description | | Controls | | | | |
| <p>There is a risk that housing stock is in a poor quality condition as a result of damp and mould, resulting in harm to tenants' health.</p> <p>There is a risk that we do not address all damp and mould hazards that present a significant risk of harm to tenants within legislative timeframes because either we do not identify the hazards, or we do not take appropriate action to triage, investigate and complete relevant safety work to make the property safe, resulting in harm to tenants' health, property damage and reputational damage.</p> | | <p>The Group has a Damp and Mould Policy, which is supported by detailed procedures. Information about reporting signs of mould and damp, factsheets and guidance videos are available to tenants on Group websites. All frontline staff who work with tenants or have reason to visit customer homes (including housing, wraparound services, CFC and care staff, and CBG trade operatives) are trained to recognise signs of damp and mould and raise repair jobs to address any issues identified. CFC staff have specific script for probing when someone raises concern about damp or mould to help clarify the extent of the issue. Trades staff are trained to identify condensation and its causes, and in the application of products to manage it. Annual Tenant visit process in place for RSLs and annual visits to properties as part of technical compliance programme, with those in attendance required to report any issues noted while in a property, including damp and mould. Specialist teams are in place for mould repairs with arrangements in place to provide specialist external support to this team as and when required. There are specific work order descriptions for mould and damp, with agreed timescales for completion of the works. All damp and mould jobs include a full inspection within target of 2 working days. Where mould or damp is found, jobs are categorised as mild, moderate or severe. No Access Policy enables us to force access where repeated issues of damp and mould are raised but access is refused. A process is in place to contact tenants with completed mould and damp jobs to determine whether the reported issue has been resolved.</p> <p>Planned control Introduce a right for tenants to request a report by an independent expert to verify that the damp and mould has been effectively treated.</p> | | | | |
| Inherent risk | Residual risk | Risk Appetite level: | | Previous / Next detailed Board update on operation of controls listed above: | | |
|  <p>Likelihood</p> |  <p>Likelihood</p> | <p>Risk appetite is MINIMAL (Light Green)</p> | | <p>Damp and Mould measures included in regular performance reporting to RSL and Group Boards. From 2025/26, ARC measures on damp and mould will be reported to RSL and Group Boards as part of established ARC reporting before submission to SHR. Damp and Mould update to Group Board in November 2025 to include changes to Policy.</p> | | |

RISK 183 Underperformance of Inhouse Repairs Service

| | | | | | |
|--|---|---|-----------------------------------|---|---|
| Strategic Outcome | Developing a Customer Led Repairs Service | Risk type | Reputation and Credibility | Risk owner | Group Director of Assets and Development Housing |
| Description | | Controls | | | |
| <p>Failure within the supply chain, repairs service and/or by contractors results in interruption of services to customers with potential consequences as follows:</p> <ul style="list-style-type: none"> -Loss of key personnel; -Financial objectives are not achieved; -Reduced customer satisfaction; -Reputational damage; -Lack of ability to attract and retain skilled workforce; -Lack of opportunity to plan for succession; -Inability to maintain stock. <p>There is a risk that the Group's repairs delivery teams in the East and South do not meet agreed delivery standards due to factors such as missed/late appointments, poor quality repair work and/or poor service delivery, resulting in increased complaints and customer dissatisfaction.</p> | | <p>WHS and WHE repairs services are delivered in house. Using Book it, Track it Rate it., My Voice scores, and customer voice panels to obtain feedback on service delivery. Maintain good employee relationships with unions. Annual business planning. Monitoring performance internally with partners. Focussed activity for materials supply chain with detailed action plans in place. Procurement strategy. Third party contractor framework. Support from Group Health and Safety. Management support from Wheatley Director of Investment, Repairs and Compliance.</p> <p>Performance in the delivery of the repairs service is routinely monitored between operational delivery and management teams. WH-S and WH-E repairs managers are part of the RSL senior management teams to ensure that this is achieved. Service levels and efficiency are measured against agreed targets and where issues are identified as part of this monitoring, improvement actions are then agreed and their effect monitored. Management reports cover areas including customer feedback, complaints monitoring, lessons learned, and training. Repairs performance is discussed at DMTs. My Voice scores and customer voice panels to obtain feedback on service delivery. Feedback from customers is monitored and used to deliver service improvement activities.</p> | | | |
| Inherent risk | Residual risk | Risk Appetite level: | | Previous / Next detailed Board update on operation of controls listed above: | |
|  <p>Likelihood</p> |  <p>Likelihood</p> | <p>Risk appetite is OPEN (Orange)</p> | | <p>Repairs Performance update to Board (Quarterly)</p> | |

Report

To: Wheatley Homes East Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: 2026/27 Rent setting and service charges

Date of Meeting: 27 November 2025

1. Purpose

1.1 This report:

- Seeks agreement for the range for the 2026-27 rent and general service charge increases for initial consultation with tenant focus groups;
- Sets out the proposed timetable for Board approvals and the full tenant consultation; and
- Provides the Board with a mid-year update on the financial projections and key financial indicators.

2. Authorising and strategic context

2.1 Under the Group Standing Orders, the Group Board is responsible for the Group rent setting framework. Subsidiary Boards approve their own rent increases within this framework.

3. Background

Economic context

3.1 The UK economy continues to face challenges with weak growth and persistent inflationary pressures. General CPI inflation is at 3.8% at September 2025, above the Bank of England's 2.0% target. In addition, cost inflation is continuing to run higher than general CPI for key areas of housing expenditure such as repairs, driven by increased labour costs, material prices and service demand. The persistence of core inflation indicates that underlying inflationary pressures have not yet fully unwound with longer term forecasts suggesting it will be Summer 2027 at the earliest before rates return nearer to the 2% target.

3.2 This higher inflation has put pressure on the gilt market and, together with the level of Government borrowing, has meant the cost of debt continues to rise. Long-term gilt yields have increased significantly over the past year, rising from around 4.5% at September 2024 to over 5.7% at September 2025.

- 3.3 This means that the return investors demand for lending to the government for 30 years is substantially higher, with recent yields at their highest level since 1998. As a result, the Bank of England has taken a cautious approach to rate reductions with the base rate at 4.00% at September 2025. With inflation remaining higher, market expectations for further interest rate cuts remain but are spread over a longer period.
- 3.4 Our rent increases implemented over the past couple of years along with assumed future rent increases have focused on growing the financial capacity in our business plan to ensure sufficient funding is available to meet investment in lifecycle replacements and our legislative obligations in our homes.
- 3.5 In addition, our rent assumptions in our 2025/26 Business Plan, informed through our tenant engagement, Group Asset Strategy and our more detailed Strategic Asset Investment and Management Plans, looked at the level of funding required to increase investment in our homes and neighbourhoods. We have a requirement beyond compliance and lifecycle replacements to start to create more capacity to fund energy efficiency improvements in our homes which will be needed to meet the new Scottish Housing Net Zero Standard (“**SHNZS**”).

4. Discussion

- 4.1 The rent increase assumptions in our financial projections are subject to ongoing review. The annual review takes into account the key principles set out in our Group rent setting framework:
- Keeping rents affordable;
 - Comparability with other social landlords;
 - Financial viability; and
 - Consultation with tenants and service users.

Affordability

- 4.2 Our average rents for 2025/26 are shown in Table 1 below, alongside the Group average. As with previous years, to allow as “like for like” a comparison as possible, these rates are based on the latest available information via the 2024/25 Annual Return on the [Scottish Social Housing] Charter (“**the ARC**”) to the Scottish Housing Regulator (“**SHR**”) with the 2025/26 rent increase applied.

Table 1: *Average Weekly Rents – March 2025 ARC Return + 25/26 rent increase*

| RSL | Average Weekly Rent | | | | | Total Lettable Units | Overall Average Weekly Rent |
|---------|---------------------|---------|---------|---------|---------|----------------------|-----------------------------|
| | 1 Apt | 2 Apt | 3 Apt | 4 Apt | 5 Apt | | |
| WH East | £106.13 | £116.40 | £125.85 | £135.36 | £148.00 | 6765 | £124.99 |
| GROUP | £89.91 | £104.07 | £109.62 | £123.64 | £136.65 | 61646 | £111.11 |

- 4.3 We have again used the joint Scottish Federation of Housing Associations (“SFHA”) / Housemark Rent Affordability Tool as one measure to consider affordability. This tool allows us to calculate the rent as a percentage of income for different customer groups, most associated with different property sizes.
- 4.4 While the results are subject to the inherent limitations of the assumptions used in this Tool and are necessarily generalised based on an assumption that no individual earns more than the UK government minimum wage, it provides a useful and prudent assessment of our position in each RSL and each part of the country. To correspond with the Tool’s use of the minimum (living) wage from 1 April 2026 of £13.45, the analysis uses average rents from Table 1.
- 4.5 There is no universally agreed threshold for what proportion of income for housing costs is ‘affordable’, with different research proposing different levels from 25% to 40% or a range, such as 30-40%. A recent Scottish Government publication, “Towards a shared understanding of housing affordability: short life working group, 2022-24” made a number of recommendations, including that by 2040 a maximum of 30% of net income should be accounted for by rent and service charges.
- 4.6 Our affordability analysis has consistently assessed rents, as one element of understanding affordability, relative to a 30% threshold. **Nearly all relevant customer groups and property size combinations are below a 30% rent to income ratio** relative to the national minimum (living) wage as shown in Table 2 below.

Table 2: Average Rents as a percentage of income

| Customer Group | 1 Apt | 2 Apt | 3 Apt | 4 Apt |
|-------------------------------------|-------|-------|-------|-------|
| Single Person | 28.2% | 31.0% | | |
| Couple 1PT 1FT/ Pensioner couple | | 20.6% | | |
| Couple 2FT | | 15.5% | | |
| Single parent (2 Children) | | | 20.9% | 22.5% |
| Small family (2 Children) | | | 15.9% | 17.1% |

NB: The tool does not provide an appropriate customer group against which to assess 5 Apt rents

- 4.7 This shows that consistent with previous years, one-bedroom properties occupied by single people appear to have higher rent to income ratios marginally above 30%.
- 4.8 For many supported tenancies, this is because service charges are in place to fund the housing support costs. These are paid for in almost all cases by housing benefit and for tenants not in receipt of benefits we will continue to have funding available in 2026/27 to support those experiencing financial difficulties and will make this clear throughout our consultation.

Comparability

- 4.9 A core element of our rent setting framework is consideration of the comparability of rents. We have compared our 2025/26 rents in the tables below uplifting the comparator RSLs by their published 2025/26 increase.

- 4.10 A number of Local Authorities have commenced their rent setting consultation with tenants, details of which are set out below:

| Local Authority | Rent proposal |
|----------------------------|--|
| Edinburgh | 7% linked to 5 year plan 2024-2028 (at 7% each year) |
| Aberdeen | 12% (7.5% in 2025) |
| East Lothian | Three options - 7%,8%, or an unspecified additional increase over 7% capped at £8 per week |
| Dundee City | Three proposed rent increases between 8 and 8.5% |
| South Ayrshire | 4.5% |
| West Dunbartonshire | Four options – 6.7%, 6.95%,7.2%, or 7.45% |
| West Lothian | 3.5% (each year from 2025/26 to 2027/28) |
| Perth and Kinross | Three options - 6.5%, 7.5% and 8.5% |

- 4.11 The rent consultations, as expected, reference the same drivers and financial pressures being faced as we and the wider sector do and the level of proposed increases reflects this.
- 4.12 Indicatively, we understand that housing associations in the area are considering rent increases between 4 - 6.8%.
- 4.13 We will provide a further update on the latest information available on comparator RSL and Local Authority rent proposals for 2026/27 to the Group Board at their December meeting.
- 4.14 Table 3 below shows the most recent available comparison of RSL rents the ARC published data with the 2025/26 increase applied.
- 4.15 Our rents reflect the higher rent profile of the Edinburgh market, where we are seeing landlords such as the City of Edinburgh Council, which has a 5-year plan with an annual increase of 7% per annum, implementing higher rent increases to reflect the need for rental levels to support stock investment.

Table 3: WH-East RSL average rents + service charges at March 2025 with 25/26 increase applied (Source ARC 2025/26)

| Edinburgh, the Lothians and Fife | Average weekly rent by House Size | | | | |
|----------------------------------|-----------------------------------|----------------|----------------|----------------|----------------|
| | Social Landlord | 1 Apt | 2 Apt | 3 Apt | 4 Apt |
| Prospect Community Housing | | £95.77 | £104.19 | £119.11 | £136.64 |
| Link Group Ltd. | £87.41 | £101.68 | £114.88 | £120.54 | £135.88 |
| City of Edinburgh Council | £93.36 | £104.45 | £120.79 | £138.57 | £150.05 |
| Harbour Homes | £88.64 | £108.19 | £121.82 | £136.45 | £148.61 |
| Castle Rock Edinvar HA | £81.02 | £93.55 | £118.99 | £144.16 | £172.08 |
| WH East (all stock) | £106.13 | £116.40 | £125.85 | £135.36 | £148.00 |
| Manor Estates HA | £0.00 | £124.25 | £122.44 | £128.67 | £150.55 |
| Viewpoint HA | £127.81 | £147.22 | £153.47 | £192.34 | |
| MMR rents | - | £142.15 | £168.00 | £191.54 | £228.23 |
| Private rent - Edinburgh | - | £253.15 | £330.00 | £482.08 | £676.85 |

- 4.16 In West Lothian we recognised that our rents were comparatively higher and this was a major factor in the creation of Wheatley Homes East and committing to a 2.5% increase for three years until 2024/25. This impact is evident as 3, 4 and 5 apartments compare favourably to comparators – 3 apartments represent the biggest proportion of our stock in West Lothian.
- 4.17 In our latest independent tenant satisfaction survey, undertaken in 2023/24, 96% of the 362 tenants surveyed said that they agreed that rent represented good value for money. This compares to a Scottish average for 2023/24 and 2024/25 of 82%.

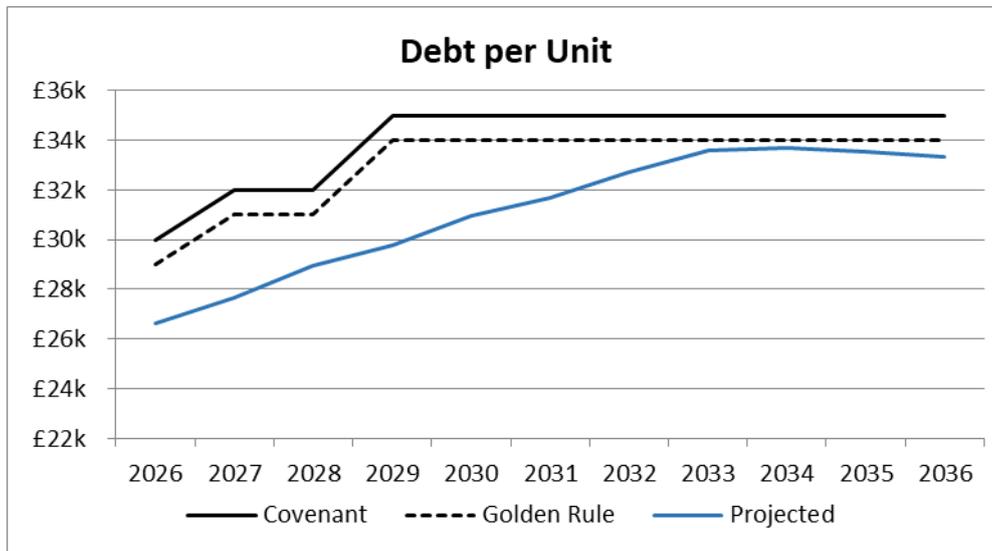
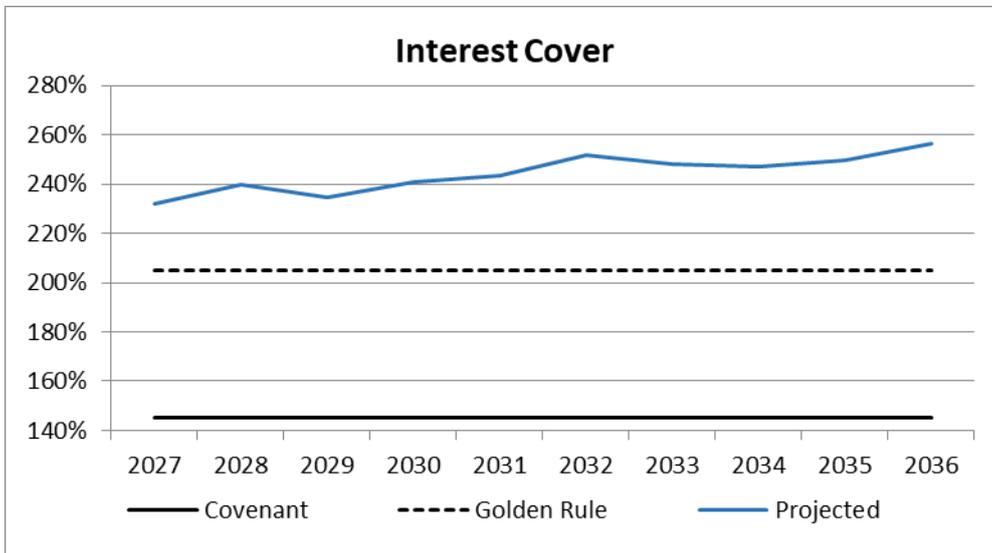
Table 4: WH-East RSL average rents + service charges at March 2025 with 25/26 increase applied (Source ARC 2023/24)

| West Lothian | Average weekly rent by House Size | | | | |
|------------------------------------|--|--------------|--------------|--------------|---------------|
| Social Landlord | 1 Apt | 2 Apt | 3 Apt | 4 Apt | 5+ Apt |
| Almond HA | £71.53 | £90.53 | £103.47 | £114.80 | £134.21 |
| Castle Rock Edinvar HA (all stock) | £81.02 | £93.55 | £118.99 | £144.16 | £172.08 |
| West Lothian Council | £84.99 | £85.43 | £90.38 | £95.34 | £102.62 |
| WH East (West Lothian only) | | £99.34 | £99.49 | £104.94 | £108.71 |
| MMR rents | - | £142.15 | £168.00 | £191.54 | £228.23 |
| Private rent – West Lothian | - | £160.38 | £207.92 | £264.00 | - |

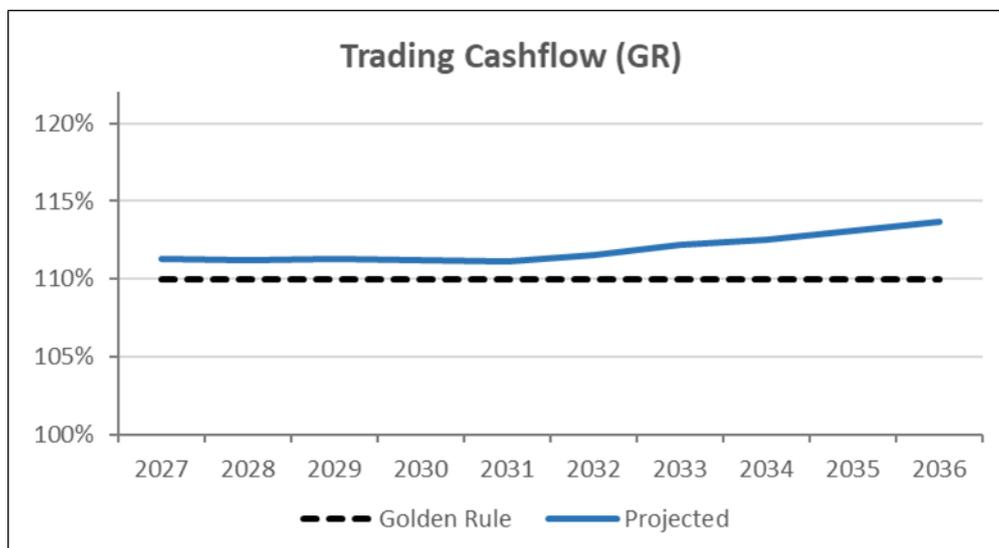
Financial Viability - RSLs

- 4.18 We and our Group partner RSLs together form a borrowing group and we assess the key financial indicators of the RSLs aggregated together. Over recent years, the financial capacity within our business plan has been subject to external pressures such as general cost inflation, specific rates of higher inflation for repairs, employers' national insurance increases and interest rate increases.
- 4.19 This has been coupled with a sustained increase in demand for repairs, additional legislative compliance obligations including fire remediation preventative works and our commitment to increase investment in our homes and neighbourhoods beyond core compliance and lifecycle replacements.
- 4.20 Scottish legislation for social housing includes the Housing (Scotland) Act 2014 and the recently passed Housing (Scotland) Bill which introduces new statutory duties for landlords across the social rented sector.
- 4.21 This includes new powers for Ministers to set enforceable expectations around damp and mould remediation (Awaab's Law provisions), a clearer responsibility for social landlords to help prevent homelessness and strengthens tenants' rights against eviction for rent arrears. For social landlords, these changes represent a move from discretionary good practice to mandatory compliance.
- 4.22 Our business plan requires us to strike the right balance between keeping our rents affordable, maintaining the standard of our homes, investing in our services, meeting all our legislative obligations and ensuring the organisation remains financially viable.

- 4.23 With our financial projections having been subject to notable prolonged external pressures outlined above, cost efficiencies and rent increases are key drivers in growing the financial capacity within the business. Driving overhead efficiencies from our Group structure we have provided real savings at a Group level in staff and running costs of £13.0m after adjusting for the effects of inflation over the four completed years of our 2021-2026 strategy. For WH East, we have achieved a real reduction in overhead costs of over £1.0m since 2021/22.
- 4.24 Our financial projections which were approved in February 2025 and included an assumed rent increase of 5.0% for 2026/27. Since then, several key financial pressures have emerged namely:
- Higher interest rates increase the longer term cost of borrowing; and
 - Persistent higher levels of general inflation across our cost base, most notably driving higher wage inflation with the previously assumed cost of living increase of 2.5% not likely to be achievable with inflation forecast to remain above 3.5% in Q1 2026.
- 4.25 Taking these factors into account, a rent increase of 6.9% is needed to preserve the investment programme which was agreed as part of our asset strategy and to allow us to:
- Continue to fulfil and grow the planned funding for our legislation and lifecycle replacement investment programme in 2026/27;
 - Start to create additional capacity for more investment to deliver planned improvements more quickly and to develop specific approaches to key stock types to extend their useful lives;
 - Maintain the delivery of our neighbourhood plans and a programme of environmental improvements; and
 - Continue to build capacity to fund a programme of energy efficiency improvements to meet the zero targets in the new SHNZS.
- 4.26 The additional funding from the rent increase is supplemented by cost efficiency targets for Group savings of £3.8m over the next 5 years. This proposal allows us to maintain a prudent financial approach to protect long-term viability and all loan covenant commitments are met.
- 4.27 We would continue with the Helping Hand Fund which assists tenants experiencing difficulties in keeping their rent accounts up to date and have assumed a provision of £100k for a 2026/27 Helping Hand Fund.
- 4.28 Our key indicators of interest cover, which measures the extent to which our operating surplus after deducting grant income on new build covers our interest costs, and debt per unit which relates to our borrowing capacity, are both covenant measures in our loan agreements.
- 4.29 Taking the rent increase of 6.9% and associated changes to running costs and investment spend, the charts below show that we continue to maintain our minimum headroom in line with our Golden Rules of 60% to the interest cover covenant and £1,000 of debt per unit and remain fully compliant with loan covenants.



4.30 Our projected position against our trading cashflow golden rule is shown below. While this is not a covenant in our loan agreements it is set so that trading cashflow including investment in existing homes is sufficient to cover 110% of interest costs. This ensures that we do not borrow for day-to-day expenditure, interest costs or investment in existing homes. The trading cashflow is our tightest measure with headroom of £1.0m to the golden rule target in 2026/27, and set deliberately to maximise capital investment in our homes over the next 5 years.



Consultation and approval – timing and approach

- 4.31 The consultation with tenants has in the previous two years provided proposals including two options for the increase, considering feedback from initial focus groups to simplify the consultation. This is followed by writing to all tenants to confirm the increase at least 28 days before this is applied.
- 4.32 It is proposed that the focus groups would again be independently facilitated discussions on:
- Two options of 6.9% and 7.4% and why the base level is necessary;
 - The proposed approach to the options – with a higher level of community investment with the additional money from the higher rent option; and
 - The draft rent brochure and how well it explains the above.
- 4.33 The key outcomes we will be seeking from the focus groups would be:
- Qualitative feedback on the proposed rent increase range;
 - Clear messaging in the final brochure on why the base level is what it is; and
 - Clear, specific proposals in the final brochure on how additional options would be deployed in practice.
- 4.34 It is intended that we will seek to engage at least 18 tenants through three focus groups. The focus groups will be a mix of in person, online and daytime and evening to allow more opportunities to participate. The attendees will be drawn from our Customer Voices, with priority given to those who have not previously attended.
- 4.35 A draft rent consultation booklet is attached in Appendix 1. Based on feedback from last year, we have continued to reduce the amount of text whilst retaining the key messages and tailored, geographical information and imagery. This helps bring the proposals to life for customers and demonstrates clearly and transparently how we spend rent to improve our communities. We know from customer engagement that perception of value for money and evidencing investment and improvements is important to ensure a meaningful consultation.
- 4.36 Last year, we provided more information than ever about investment proposals and this was well received. We will continue to do this and provide examples of how we have delivered on investment promises in the last year.
- 4.37 In terms of the formal consultation and when and how we agree where within the 6.9%-7.4% range we consult the proposed approach is as follows:

| Key action | Timescale |
|--|-------------|
| Group Board approves rent increase range | 12/11 |
| Our Board approve the rent increase range and delegate authority to the Chair to agree final level (between 6.9% and 7.4%) | 27/11 |
| Independently facilitated rent Focus Groups | 1/12 – 5/12 |
| Group Board approve final consultation levels – taking into account focus group feedback and available comparability data | 17/12 |
| Chair confirm to our Board the consultation increase options | 17/12 |
| Consultation with tenants (subject to mail drops but a minimum of 2 weeks) | 12-26/01/26 |

- 4.38 As with previous years have engaged with Civica electoral services to independently administer the consultation process and verify the results. Following the continued high uptake levels in previous years we will again offer the option to respond online or via text message as well as by post. As we always do, we will consider not only the quantitative results but also the qualitative feedback to inform our decisions around rent setting and help prioritise our investment plans. We will also publish these results to demonstrate transparency and build trust. This helps ensure a meaningful, non-tokenistic consultation.
- 4.39 Again, as with previous years, in order to allow us to ensure that the final notification to tenants on the rent increase arrives in time RSL Boards are delegated authority to approve the increase at our February meeting where it is within the agreed range i.e. the Group Board agreed range in December.
- 4.40 This will mitigate the risk that the letters are delayed awaiting Group Board approval and do not arrive in time to give sufficient, including a legal minimum of four weeks, notice to tenants. This will also allow us longer to engage with tenants once they receive the notification, particularly those who are required to update their Universal Credit portal with the 2026/27 rent levels.

5. Customer Engagement

- 5.1 The rent focus groups will seek customer feedback on the main mechanism for customer engagement, the rent consultation booklet. Thereafter, every tenant will be formally consulted as part of the rent setting process.
- 5.2 We consider customer insight throughout the year to inform decisions around spending and investment priorities. Our recent customer strategy survey, which received over 710 responses, re-emphasised keeping rents fair and transparent as a top priority for customers with 90% of responses agreeing that our proposals for our next strategy meet customer expectations around this theme. Within this, affordability, visible improvements and value for money and transparent communication are important to customers.

6. Environmental and sustainability implications

- 6.1 No implications noted.

7. Digital transformation alignment

- 7.1 Tenants will once again be able to participate in the consultation through a wide range of means, both in person and digital. Responses will also be able to be emailed to the independent provider Civica. We will use a wide variety of digital and social media approaches to publicise the consultation.

8. Financial and value for money implications

- 8.1 We consider a rent increase range of between 6.9% and 7.4% provides an appropriate balance between affordability for our tenants and the preservation of appropriate levels of investment in our homes and neighbourhoods. The proposed increase supports our agreed objective of growing our financial capacity over the next 5 years to increase the amount we can invest in our tenants' homes. This will allow us to carry out the investment needed more quickly, invest in works that go beyond the basic standard to drive a sustained improvement in stock quality and to extend our asset strategy to address works needed in particular stock types.

9. Legal, regulatory and charitable implications

- 9.1 Consultation with tenants on any increases in rent or service charges is a requirement of the Housing (Scotland) Act 2001. The approach set out in this paper will meet our requirement to consult under the Act.

10. Risk Appetite and assessment

- 10.1 The Group's risk appetite in relation to business planning assumptions such as rent increases is open. This is defined as "*willing to choose the one that is most likely to result in successful delivery while also providing an acceptable level of reward*". In relation to the statutory requirement in consulting and engaging tenants on any rent increase, our risk appetite is averse, that is "avoidance of risk and uncertainty is a key organisational objective".
- 10.2 The proposed approach to consultation includes writing to all tenants and this mitigates the risk that we do not meet our statutory obligation in relation to consultation.

11. Equalities implications

- 11.1 As part of both the tenant focus groups and the consultation process, we will take into account tenant communication preferences and needs as appropriate. This includes, for example, where we need to provide the consultation documentation in a different way for tenants who may be blind, deaf or not read English.

12. Key issues and conclusions

- 12.1 As we set out rents for 2026/27, we must strike the right balance to respond to the continued economic challenges and cost pressures faced by both the organisation and our tenants, our ongoing and future obligations in relation to building compliance and the funding needed to deliver the increased investment in their homes that tenants continue to tell us they want.
- 12.2 Taking this into account, it is proposed that we agree on a range of between 6.9% and 7.4% for the 2026/27 rent increase for discussion with rent focus groups with the ability to finalise where within this range the Group Board will consult more widely at their December meeting. This will allow us to consult based on the most up-to-date information on the economic climate, the initial feedback from the tenant focus groups and the conditions of our wider operating environment.

13. Recommendations

13.1 The Board is asked to:

- 1) Agree that we undertake an initial consultation with rent focus groups on a 6.9% increase with an additional option of 7.4% for the 2026/27 rent and service charge increase;
- 2) Note that the final approval of the rent increase for consultation with all tenants will be presented for approval at the Group Board December 2025 meeting; and
- 3) Note this Board has delegated authority to agree the 2026/27 rent and service charge increase where it is within the agreed range.

LIST OF APPENDICES:

Appendix 1: Draft rent consultation booklet

Investing in your community

Consultation on rent and service charges
for Wheatley Homes East 2026-27



DRAFT



Rent consultation

We reinvest rent money every year in delivering services, improving homes and communities, and supporting our tenants.

As a Registered Social Landlord, we have a legal duty to consult with tenants about rents and any service charges you pay. We want to hear your views on our proposals, and we will use your feedback to help decide rent and service charges for 2026-27.

This rent and service charge consultation booklet will:

- explain why we propose to increase rent and service charges;
- show you the proposed rent and service charges increase for 2026-27;
- outline what your rent and service charges pay for; and
- explain how you can have your say on the proposals.

We would ask you to take the time to read this booklet and let us know what you think about our proposals. Please note, when we refer to rents in this brochure, we mean rents and any service charges you pay.



You have until **26 January 2026** to give us your feedback

Message from the Chair



At Wheatley Homes East, we are here to deliver outstanding services for our tenants.

We know how important it is to invest in our homes to make them warm, safe, and energy efficient. We also know how important it is for us to continue investing in our neighbourhoods and to help create communities people are proud of.

As part of our ongoing investment programme, we want to continue to invest in areas which are priorities for tenants.

We are delighted that 95.8% of tenants who took part in our latest satisfaction survey said their rent represented good value for money, above the Scottish average of 81.7%. Delivering value for money is always important to us, and a key element of this is our annual rent setting and the proposals we present to tenants through our rent consultation.

In addition to feedback from our tenants, we asked independent customer insight organisation Research Resource to hold focus groups with our Customer Voices. Their views were central to the contents of this brochure and the rent setting proposals for 2026-27. We understand the difficult economic circumstances our tenants face, with energy costs and food prices continuing to rise. At the same time, the average cost of repairs and maintenance rose by 6.3% in the past 12 months.

That's why we are doing as much as we can to keep our rents and service charges as low as possible. Our rent levels reflect the services tenants tell us you want and the improvements you want to see in homes and communities.

Please take the time to read our proposals for rent and service charges for 2026-27 and the money we plan to invest in your community on page 5 and page 7. The proposed rent increase will allow us to deliver these improvements.

It is really important you have your say. Remember, if you are worried about rent, please don't hesitate to get in touch. We are here to help.

Kenneth Barclay
Chair, Wheatley Homes East

We're here for you

There are lots of ways we can support tenants who may be struggling.

We can help with benefits, managing your income, jobs and training, education bursaries, free furniture, support to get online and much more.

If you are worried about your rent, please get in touch. We are here to support you. Call us on **0800 561 0088**.



Financial challenges ahead

We are doing all we can to deliver the services you want, invest in your home and community, and provide value for money in everything we do.

But, like all social landlords in Scotland, we also face challenges in meeting our legal requirements, delivering our tenants' priorities and improving the quality of homes, all while keeping rent affordable.

Here are some of the challenges we face.

Investing to improve your home and community

Tenants have told us they want to see more investment in their homes. Without the proposed minimum increase for 2026-27, we will not be able to keep our communities clean and tidy, and it would be very difficult for us to improve the quality of our homes. You'll find more about our investment in your area over the next two years, based on the proposed increase, on page 7.

Legislation

We are legally obliged to comply with Scottish Government requirements for retrofitting as well as legislation on energy efficiency standards, such as insulation, for all homes. This means we must make significant extra investment in our homes, alongside delivering other priority investment such as kitchens and bathrooms. Also, the average cost of building a home for social rent increased by around 30% between 2019-2023.

Repairs and maintenance

We are doing everything we can to make our repairs and maintenance service more efficient but it makes up one of the biggest parts of our spending. Costs, such as materials, are increasing. Over the past 12 months, the annual average rate of inflation for repairs was 6.3%.

Interest rates

Long term interest rates have risen by 1% in the last year. This has increased the cost of funding and made it more expensive for us to carry out investment work.

Rent options for 2026-27



Our proposed increases are similar to several social landlords and councils across the country.

Local councils are consulting tenants on proposed rent increases, with Aberdeen considering a 12% rise, Dundee between 8% and 8.5%, East Lothian between 7% and 8%, Renfrewshire at 7.5%, Falkirk at 9.5%, and West Dunbartonshire between 6.7% and 7.45%.

Here are the options for your proposed rent levels, as well as what these would mean for services and investment.

In the last five years, our overall rent increases have matched inflation, but our costs have increased faster in areas such as insurance and repairs.

Option 1 6.9%

This would allow us to keep repairs and building safety spending at current levels and invest more money to improve your home and neighbourhood. Details of our three-year investment plans in your local area are shown on page seven.

As an example, this option would mean an average increase of £8.03 per week on an average one-bedroom home.

Option 2 7.4%

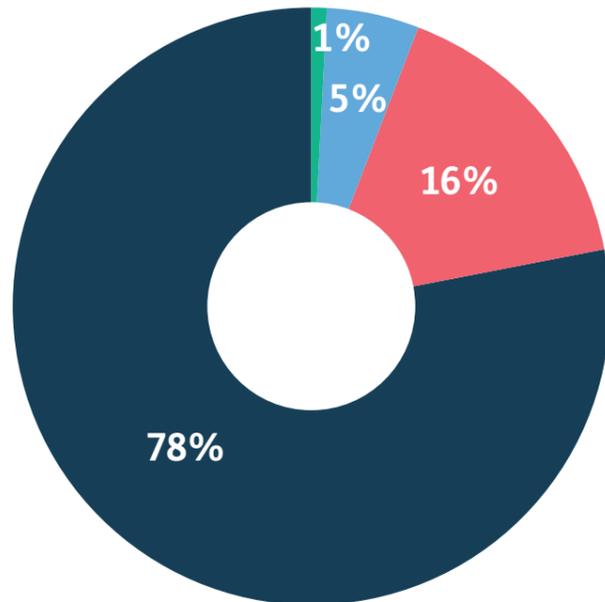
This option would deliver all of Option 1 and fund further investment of £230,000 each year in homes and neighbourhoods in your local area.

As an example, this option would mean an average increase of £8.61 per week on an average one-bedroom home.

What your money pays for

We continue to work hard to keep our overheads low and provide you with value for money.

Check out the pie chart below to see how income was spent in the financial year 2024-25.



- Activities supporting communities
- Business loan repayments
- Staffing and administration costs
- Investment, repairs and maintenance

Investment and maintenance

Around half of our overall costs, such as repairs and meeting our legal requirements in areas such as fire safety and building safety, are unavoidable.

These costs include renewing fire doors, smoke and heat detectors, gas and electrical testing and everyday repairs.

The remaining money allows us to focus on tenants' priorities, including making homes warmer, continuing to improve our repairs service, and keeping neighbourhoods clean and tidy. Rent is not used to fund new-build homes.

In 2024-25, across our communities, we:

- carried out **32,705** repairs
- spent **£7.3m** improving existing homes
- spent **£13.9m** on repairs and maintenance

Staffing and admin costs

This money paid for housing officers to be out in communities, 24/7 services available through our Customer First Centre (CFC) and Neighbourhood Environmental Teams keeping communities clean and tidy. This also includes support staff, such as those providing engagement activities and welfare

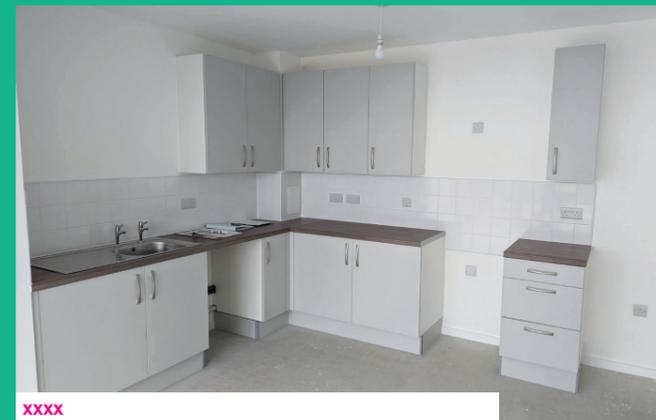
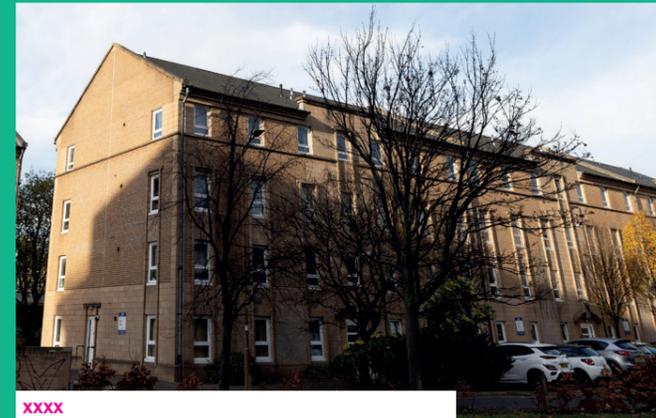
benefits advice, as well as the cost of running our offices and depots. Last year we:

- had **302** tenants involved in 'Stronger Voices' projects
- handled **69,151** calls at the CFC

Investing in your community across the East

Our three-year investment programme continues from 2025-2028 to transform homes for the better. You can see below some of the improvements we've made over the past year.

Your rent money allows us to invest further in your area and neighbourhoods. We use tenant feedback to help prioritise how this money is spent. For example, tenants have told us they want more money invested in making homes warmer, drier, and cheaper to run.



Over the three-year period, we will invest around £21.7m in your area. This will include £16.2m in Edinburgh, £4.4m in West Lothian and £1.1m in other areas to deliver:

- new kitchens in almost **500** homes and new bathrooms in **250** properties;
- new pitched roof coverings in over **30** homes;
- nearly **350** new front or back doors;
- over **90** new close doors;
- new windows in nearly **40** closes;
- extra energy efficiency improvements, including nearly **50** new electric heating systems and over **450** new gas boilers;
- environmental improvement works to closes and other common areas such as external insulation, upgraded paths, external painting and gutter replacements in **460** homes; and
- loft, wall or floor insulation improvements in over **330** homes.

*An example of a new Wheatley Homes East kitchen.



Have your say

We really want to hear your views on our proposals for rent and service changes for 2026-27. Please take the time to give us your feedback.

You can contact us by text, online, phone or post. The quickest and easiest way is online. We've included a consultation response sheet with a unique code for you to submit your response. This unique code can't be used to identify you.

The consultation closes on 26 January 2026.

You can also contact TPAS (Tenant Participation Advisory Service) for independent advice by emailing eveline.armour@tpasscotland.org.uk or calling 0800 915 9551.

What happens next?

All feedback received through the consultation will be independently checked by Civica, an independent organisation which specialises in verifying the results of consultations.

The Board will then consider all the feedback before making a final decision on rent and service charge levels for 2026-27.

We will let you know the results of the consultation and the final decisions on rent and service charge levels on our website.

We will also write to you to let you know your rent and service charges for 2026-27.

We can produce information on request in other languages, large print, Braille and audio formats.

Visit www.wheatleyhomes-east.com or phone us on 0800 561 0088.

Report

To: Wheatley Homes East Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: Performance Report

Date of Meeting: 27 November 2025

1 Purpose

- 1.1 The purpose of this report is to provide an update on:
- Sector comparisons for Annual Return on the Charter (“**ARC**”) indicators following the publication of 2024/25 sector-wide data by the Scottish Housing Regulator (“**SHR**”);
 - Performance against targets and strategic projects for 2025/26 to the end of quarter two; and
 - The proposed addition of a new opportunity at New Town Quarter, Edinburgh to be added to the WHE 5 Year Development Business Plan.

2 Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for monitoring performance against agreed targets. We measure progress with the implementation of our five-year strategy via the Group Performance Management Framework.
- 2.2 The Group Board agreed to an updated programme of strategic projects and performance measures and targets at its meeting in April 2025. Our Board subsequently agreed on our specific performance measures and targets at our meeting on 19 May 2025.
- 2.3 Under the Group Standing Orders, WHE are responsible for approving their own 5-year development programme. Where projects are included in the WHE development programme and meet the agreed development criteria then responsibility for individual projects rests with Wheatley Development Scotland Ltd (“**WDSL**”).
- 2.4 WDSL are the delivery vehicle for RSL new build development projects. This means WDSL is responsible for procuring the new build developments under the terms of a Development Services Agreement which is entered into with WHE.

2.5 New Town Quarter is a new opportunity and was not included within the 5-year WHE development programme, approved in February 2025. At that time, the project was identified as a longer-term opportunity, as negotiations around our potential involvement had not advanced sufficiently. Since the programme was finalised, the project has progressed significantly, with an opportunity now emerging for us to secure the site. Approval to include the site in WHE’s 5-Year programme is sought as part of this paper. WDSL approval at its November Board will be subject to approval being received from WHE for the inclusion of the site in the 5-year plan. WHE received an update on the project and its potential inclusion in the 5-year plan in September 2025.

3 Background

3.1 This report outlines our performance against targets and strategic projects for 2025/26. Unless specified otherwise, results for all measures are based on year-to-date figures. This includes progress with those measures that will be reportable to the SHR as part of the ARC 2025/26.

4 Discussion

 **Charter 2024/25 Sector Comparison**

4.1 The SHR published the national report including Scottish averages for 2024/25 in late August 2025. The comparison with our performance provides a very positive picture of 2024/25, with 86% (25) of the total number of tenant-related indicators (29) across our RSL better than the Scottish average and the highest in Group.

4.2 The position by RSL across the Charter performance indicators considered is summarised as follows:

Table 1

| | Number of ARC indicators above Scottish average | % above Scottish average |
|-----|---|--------------------------|
| WHE | 25 | 86% |

4.3 Highlights from these comparisons are:

- The Scottish average time to re-let properties increased from 56.7 days to 60.6 days, on average 42 days longer than our results;
- We responded to Stage Two complaints, on average, 6 days more quickly than the Scottish average, which has increased from 17.5 days to 21.3 days;
- Our performance from the time taken to complete emergency repairs remains better than the Scottish average at 3.80 hours, whilst the Scottish average reduced from 4 hours to 3.9 hours; and
- While SHR acknowledged the financial challenge for tenants, the Scottish average Gross Rent arrears reduced from 6.7% to 6.2%, we are significantly lower than this at 4.98% at the end of 2024/25.

4.4 There were areas we are already focused on driving improvement that were below the Scottish average, in particular rent collection and owner satisfaction. There were also areas where we improved performance from below the Scottish average to exceed it, particularly non-emergency repair timescales.

- 4.5 Several of these Scottish average 2024/25 comparisons are referenced through this paper for the relevant Charter indicators, alongside an update to quarter two.
- 4.6 The following sections present a summary of key measures and strategic projects. Strategic and Other key measures can be found in Appendices 1 and 2 respectively, strategic projects are found in Appendix 3 and SPSO and ARC results in Appendix 4.

 **Delivering Exceptional Customer Experience**

Customer First Centre (“CFC”)

- 4.7 Year-to-date results as of the end of quarter two for our core CFC measures are presented in Table 1:

Table 2

| Measure | 2024/25 | | |
|--|-----------|--------|---|
| | Value YTD | Target | Status |
| CSAT score (customer satisfaction) | 4.27 | 4.50 |  |
| Call abandonment rate - those waited over 30secs and abandoned | 8.67% | 5% |  |
| Group - % of contacts to CFC resolved within CFC | 89.67% | 95% |  |

- 4.8 Customer satisfaction with the CFC (known as “**CFC CSAT**”) remains the key measure, ensuring we place our customers’ voices at the heart of performance management. Our overall CFC CSAT score was 4.27 at the end of quarter two, an improvement from the 4.23 at the end of quarter one.
- 4.9 In quarter performance was 4.35/5 in quarter two, improved from in quarter performance of 4.30/5 in quarter one.
- 4.10 The call abandonment rate after 30 seconds, whereby our customers waited over 30 seconds and then abandoned their call improved from the quarter one position of 10.44% to 8.67% in quarter two but still over the 5% target. However, in month performance in September improved to 5.46% which is the lowest this measure has had since January 2025.
- 4.11 The introduction of a new IVR callback option in late August has had an immediate and significant effect, reducing abandonment rates to well within target. Customers can now opt for a callback earlier in their journey, minimising frustration and reducing the “hang up and try again” behaviour. Early indications suggest this improvement is sustainable, but we will continue to triangulate callback SLAs, MyVoice feedback, and primary queue metrics to ensure there are no unintended consequences.

- 4.12 The percentage of contacts to the CFC resolved within the CFC, without the need to be passed to either Housing Teams or MyRepairs Team, was 89.67% against a 95% target at the end of quarter two. Performance has improved since quarter one when it was 89.47%. This includes resolution on the phone, and cases resolved by the CFC specialist teams and via digital contact.
- 4.13 The proportion of contacts resolved within the CFC continues to rise, reflecting stronger ownership by colleagues and more effective warm transfers to the Housing Specialist Team (“HST”) when specialist input is required.

Repairs satisfaction

- 4.14 Tenant satisfaction with our repairs service and individual repair experiences continues to be a key driver when it comes to overall customer satisfaction. In addition to our independent satisfaction surveys undertaken at least every three years, we also use in-house surveys on an ongoing basis throughout the year to assess and monitor how well we are doing.
- 4.15 “Book It, Track It, Rate It” was introduced in June 2023 to improve visibility and communication through the Book It, Track It element, with the Rate It element an opportunity for customer feedback on their experience on the day of a repair. For quarter two the Rate It score – which provides tenants an opportunity to rate their experience of the repair appointment - is 4.5/5 (from 1,111 customer responses, representing 15.56% of feedback links shared with customers).
- 4.16 Repairs feedback through digital surveys using MyVoice is now operational as of this month. We gauge customer satisfaction 1-2 weeks after the repairs have been completed (known as “Repairs CSAT”). The benefit of MyVoice repairs surveys over Rate It is therefore that it provides a more rounded assessment of the customer experience through our repairs service journey.
- 4.17 MyVoice has been in place for the West since last year and will provide us with a harmonised method to monitor, measure and respond to actions required. Our analysis of the feedback from Rate It and our My Voice survey has indicated that there is no clear benefit to having both and that the My Voice survey gives us a greater level of actionable customer insight. Based on this, we will transition to only undertaking the My Voice survey this month.
- 4.18 Feedback will be monitored and we will contact customers with low satisfaction scores and discuss how to resolve their issues and actions will be taken to address them.

Volume of Emergency Repairs

- 4.19 The table below shows our position against the strategic result to reduce the volume of emergency repairs by 10% by 2026 compared to the updated baseline year of 2021/22. The target for 2025/26 is a reduction of 3.34%.

Table 3

| Completed repairs | emergency | YTD 24/25 | YTD 25/26 | Variance |
|-------------------|-----------|-----------|-----------|----------|
| WHE | | 4,130 | 4,574 | 10.75% |

- 4.20 We have carried out 444 emergency repairs more than the same point last year, a variance of 10.75%.
- 4.21 We continue to review the raising of emergency repairs volumes as these are a consequence of customer reports and are affected by external factors such as weather conditions to ensure these being raised appropriately and diagnosed at the CFC as emergencies.

Repairs Timescales and Right First Time

- 4.22 Our average time taken for emergency repairs is within target at 2.87 hours at the end of quarter two, an improvement on 3.16 hours last quarter. Our average time taken for non-emergency repairs is 8.83 days, above this year’s target of 7.5 days. Though this is a slight increase on 8.76 days last quarter, we have remained below 9 days all of quarter two.
- 4.23 The 2024/25 Scottish average for emergency repair timescales is 3.9 hours and 9.1 working days for non-emergency timescales, we are ahead of both benchmarks.

Table 4

| Repairs completion timescales (Charter) | Emergency (hours) | | Non-emergency (days) | |
|---|-------------------|-----------|----------------------|-----------|
| | Target | YTD Value | Target | YTD Value |
| WHE | 3.00 | 2.87 | 7.5 | 8.83 |

- 4.24 As previously advised, the Right First Time indicator was subject to a change in recording guidance from the SHR. Previously, repairs which were overdue were not considered as Right First Time, however, this is no longer the case. Under the guidance, the only repairs which are now not Right First Time are those repairs completed during the reporting year where the repair is ‘reported again’ within the same reporting year.
- 4.25 This change in methodology has led to an improvement in the reported statistic, given that overdue repairs are now excluded. Our performance year to date is 98.66% completed right first time with 98 repairs out of 7,305 reported again by customers. This is in comparison to performance of 89.49% at the end of 2024/25.
- 4.26 While we have to report according to the SHR’s definition, we recognise this is not a realistic measure of the quality of our repairs service, since it does not capture those cases where a tenant is dissatisfied and does not consider the repair was right first time, but does not report this again. Our in-house surveys and independent doorstep satisfaction surveys being a better indicator.
- 4.27 We have reaffirmed our process for identifying a repair that was ‘reported again’ with the CFC, and repairs teams to ensure this measure is accurately recorded. Our main focus remains on achieving high customer satisfaction, identifying any issues at an early stage will be through monitoring My Voice customer feedback, including any repair a customer reports as not right first time, and addressing those issues.

Damp and mould

- 4.28 It remains our priority to respond quickly to reports of damp or mould and ensure that issues are resolved by our staff teams, in close collaboration with the customer.
- 4.29 We have completed 69.84% of all inspections within two working days year-to-date. Those over two working days are due to the customer's choice to request an inspection outside this timescale, and some inspections which require further specialised equipment work. Both instances impact the average time slightly, at 2.76 days.
- 4.30 32% of inspections record no mould. Where mould is found, 90.18% had the lowest severity rating of Category three, where the mould can ordinarily be treated in a single visit.

Table 5

| By Severity Category | | |
|-----------------------------|-------------------------|-----------------------|
| Cat 3 – Mild | Cat 2 – Moderate | Cat 3 – Severe |
| 90.18% | 9.82% | 0.00% |

- 4.31 Where required, we have completed 86% of all damp and mould remedial works within 15 days, at an average of 8.59 days. Remedial works which take longer than this average are impacted by customer choice on appointment dates and where we are unable to gain access.
- 4.32 In terms of end-to-end damp and/or mould cases required to be submitted to SHR for the first time in the ARC 2025/26, we have completed 233 damp and/or mould cases to the end of quarter two. These have an average end to end time, from the customer reporting it through the inspection and remedial repair(s) being completed, of 3.87 days, below our target of 17 days.
- 4.33 We report these damp and/or mould cases to SHR broken down by causation, shown below.
- 4.34 Condensation is our largest causation reason, with 71% of cases categorised as being caused by condensation. Of those categorised as 'Other', this has included issues caused by leaks, external flooding, or where additional technical support may be required to understand the issue. The full breakdown is shown in the table below.

Table 6

| By Causation Category | | |
|------------------------------|-------------------|--------------|
| Causation | Structural | Other |
| 70.82% | 8.58% | 19.31% |

4.35 Structural cases in damp and mould are a small proportion of overall cases and have often had an easily identifiable cause that can be rectified quickly, such as a missing roof tile, and therefore have quicker resolution times. In contrast, cases caused by condensation require more extensive investigations to determine the underlying cause and may need the development of a comprehensive ventilation strategy, such as installation of additional ventilation fans.

Introduction of Awaab’s Law

4.36 Our Group Healthy Homes team is actively progressing work to ensure full alignment with Awaab’s Law. This includes close engagement with the Scottish Government policy team as they develop equivalent legislation for Scotland, following the law’s implementation in England on 27 October 2025.

4.37 To strengthen our approach, we have undertaken learning visits to other Housing Associations across the UK to understand their responses to Awaab’s Law. We will continue these sector-wide conversations to stay ahead of emerging challenges and best practice.

Tenancy Sustainment

4.38 Tenancy sustainment is the measure of new tenancies commenced in the previous reporting year where the customer remains in their home for more than a year. We continue to support our new customers to sustain their tenancies with our RSL improving in both the Charter and revised measures (the revised measure excludes deaths and transfers to other homes within the Group). As well as new customers benefiting from remaining in their new tenancy for longer, an improvement in this measure reduces lost rent and resources required for re-letting. We work closely with local authorities to support new customers referred by them.

4.39 We continue to support our new customers to sustain their tenancies and to exceed targets in both the Charter and revised measures (the revised measure excludes deaths and transfers to other homes within the Group).

4.40 Our Charter tenancy sustainment at 94.04% continues to be high and surpasses the Scottish average of 91.2% for 2023/24.

Table 7

| Tenancy Sustainment | Charter All lets | – 2025/26 Target Charter | – | Charter Homeless Lets | – Revised | 2025/26 Target Revised | – |
|---------------------|------------------|--------------------------|---|-----------------------|-----------|------------------------|---|
| WHE | 94.24% | 90% |  | 92.96% | 96.83% | 91% |  |

Allocations CSAT

4.41 Our Allocations MyVoice survey measures customer satisfaction with the process of getting their new home.

4.42 Our score for the rolling year is 4.6, an improvement from 4.5 reported at the end of June and we remain ahead of the 4.5 target.

- 4.43 Positive feedback from our customers recognises housing officers as supportive and professional, appreciating how clearly the process was explained and sign up managed quickly and smoothly. Satisfied customers found staff approachable and reassuring.

Table 8

| Allocations CSAT | 2025/26 – Rolling year | 2025/26 Target |
|------------------|------------------------|----------------|
| WHE | 4.6 | 4.5 |



Making the Most of Our Homes and Assets

Development Programme

- 4.44 Our target is to deliver a total of 339 new homes in 2025/26 (232 social and 107 Mid-Market homes (“**MMR**”) homes).
- 4.45 We have had 231 handovers to the end of quarter two, comprised of 196 social housing homes against a target of 171 year to date and 35 MMR properties.

Table 9

| Sites | Handovers (YTD) | Target (YTD) | Difference and handovers to 30 th June |
|--------------------------------------|-----------------|--------------|---|
| Dalhousie South (Ph 1) (Social) | 18 | 0 | 18 |
| West Craigs (Ph1) (Plot 4) (Social) | 65 | 59 | 6 |
| West Craigs (Ph2) (Plot 5) (Social) | 41 | 22 | 19 |
| West Craigs (Ph3) (Plot 13) (Social) | 26 | 34 | (8) |
| Bullyeon Road (Ph3a) (Social) | 23 | 0 | 23 |
| Sibbalds Brae (Social) | 4 | 10 | (6) |
| Winchburgh BB (Social) | 19 | 46 | (27) |
| Winchburgh BB (MMR) | 0 | 24 | (24) |
| West Craigs Ph3 (Plot 13) (MMR) | 35 | 42 | (7) |
| Totals | 231 | 237 | 6 |

Medical Adaptations

- 4.46 Time to complete medical adaptations remains well within the 25-day target at an average of 18.56 days year to date. We have completed 71 adaptations and currently have 12 households waiting.

Table 10

| Medical Adaptations (Charter) | Current Households Waiting | Number Completed YTD | Average Days to Complete YTD | Target |
|-------------------------------|----------------------------|----------------------|------------------------------|--------|
| WHE | 12 | 71 | 18.56 | 25 |

Gas Safety

- 4.47 We continue to be 100% compliant for gas safety, with no expired gas certificates.

Compliance

- 4.48 We have made good progress with our compliance programmes in quarter two. All our relevant properties (56) are compliant with Legionella assessment requirements. We have carried out safety inspections on all our passenger and domestic lifts.
- 4.49 At the end of quarter two, 99.87% of all properties have a valid Electrical Installation Condition Report (“**EICR**”) compared to 99.7% at end of last year. All overdue properties are now at an advanced appointment stage and full compliance is expected at year end with more resources being assigned to this programme to ensure 100% completion by year end.

Health and Safety

- 4.50 There have been no reportable incidents in quarter 2. Year to date we have had one HSE reportable incident, a full incident investigation report was carried out by our H&S Team and improvement actions implemented.
- 4.51 We have no Health and Safety Executive or local authority environmental team interventions this year, the same position that we have maintained since the measure started in 2021.
- 4.52 We have received no new employee liability claims during quarter two.

Workplace Fires

- 4.53 We have not had any workplace fires in quarter two and have not recorded any since the measure started in 2021.



Changing Lives and Communities

Peaceful Neighbourhoods

- 4.54 Our strategic measure is for over 80% of customers across our Group to live in neighbourhoods categorised as peaceful by the end of the strategy period. At the end of quarter two, the Group-wide percentage of tenancies categorised as Peaceful was 73.30%.

Anti-Social Behaviour (“**ASB**”) Resolved

- 4.55 By the end of quarter one, the resolution rate for WHE ASB cases was 94.53%, and an increase from quarter one results of 93.39%. Though we are below the target of 100%, we have made strong progress in this indicator, with 97.14% in month performance in September. Live cases and timescales are being discussed at team meetings as well as the importance of adhering to these timescales.

Table 11

| ASB Resolution Rate | YTD | 2025/26 Target |
|---------------------|--------|----------------|
| WHE | 94.53% | 100% |

Repeat Anti-Social Behaviour cases – number of repeat addresses

- 4.56 Year-to-date to the end of quarter two, ASB was recorded at 102 of our repeat addresses. This compares to 92 at the same time last year. Less than 1% of our properties have issues with repeat incidences of ASB.
- 4.57 The CIP team meet monthly to discuss Prevention and Solutions activity as well as conduct analysis and make observations to facilitate further discussion around targeted activity. This helps to identify areas of concern around increased and/or persistent offending, allowing for a more proactive approach. Our Housing Officers and Anti-Social Behaviour working closely to resolve and offer support to customers in high impact areas.

Accidental Dwelling Fires (“ADFs”)

- 4.58 This year to the end of quarter two, we have had ten minor accidental dwelling fires compared to the 13 we had to the same period last year and 22 by the end of 2024/25.

Table 12

| Number of recorded accidental dwelling fires | 2025/26 YTD | 2024/25 |
|--|-------------|---------|
| WHE | 10 | 22 |

- 4.59 Group’s Strategic result is to reduce RSL ADFs by 10% by 2025/26, against the baseline of 215 ADFs in 2020/21. We achieved this target in each year of the strategy to 2024/25 and to the end of quarter two across the group we have had 54 accidental dwelling fires.
- 4.60 Our additional strategy measure aims to ensure 100% of applicable properties have a current fire risk assessment in place. This continues to be achieved.

Table 13

| Fire Risk Assessments | 2025/26 YTD | Target |
|--|-------------|--------|
| The percentage of relevant premises - HMOs that have a current fire risk assessment in place | 100% | 100% |

- 4.61 As at the end of quarter two, we had seven outstanding overdue mandatory action, which are all now complete.

Reducing Homelessness

- 4.62 We have provided 212 homes to homeless households in the first half of this year. Our percentage of relevant lets made to homeless applicants is 58.46% (relevant lets exclude LivingWell and sheltered properties, nominations and social work referrals which we are limited to let to homeless applicants).

Table 14

| Reducing Homelessness | 2025/26 Number of lets to homeless applicants (ARC) – YTD | 2024/25 Number of lets to homeless applicants (ARC) – full year |
|-----------------------|--|--|
| WHE | 212 | 412 |

Jobs and Opportunities

Table 15

| | Target YTD | 2025/26 YTD | | 2024/25 | |
|--|---------------|----------------|---|---------|---|
| Number of children and young people benefiting from targeted Foundation programmes in Wheatley Communities | 57 | 168 | ■ | 469 | ■ |
| Total number of jobs, training places or apprenticeships created for customers and communities | 51 | 74 | ■ | 216 | ■ |
| Number of people accessing services which help alleviate poverty in Wheatley Communities | 577 | 804 | ■ | 1,316 | ■ |

- 4.63 So far this year, 168 children and young people have been supported from our homes and communities. This exceeds the year-to-date target of 57. Support has included free monthly books through the Imagination Library and digital devices distributed via Techshare. The Friday Night Lights sessions in Niddrie continue to engage around 60 young people each week, offering sport, social connection, and a warm meal.
- 4.64 Year to date, the Wheatley Works staff have supported 74 training and employment opportunities for people in our homes and communities, exceeding the YTD target of 51. Opportunities have been supported by our Moving Forward service, in partnership with Street League, Impact Arts, and Gateway to Health & Social Care. Customers have also progressed into roles with employers including Tesco, City of Edinburgh Council, and Sodexo.
- 4.65 Over 804 people from our homes and communities have been supported to access projects to alleviate the impacts of poverty so far this year exceeding the target of 577. This includes 595 households supported by our Financial Wellbeing service, securing more than £2m in Client Financial Gain.
- 4.66 Percentage of planned jobs, training places or apprenticeships created which are secured by our customers across the Group YTD is at 73.90% (552/747) exceeding the 60% target.
- 4.67 To quarter two 2025/26 there have been 32 Community Benefit jobs and training opportunities arising through the spend associated with new home construction

and our investment programme that have been secured by our customers. This equates to 57.14% (32/56) and exceeding the target for 2025/26 of 30%.



Developing our Shared Capability

Sickness Absence

- 4.68 As the table below shows, our sickness performance is better than the 3% target for housing staff at 2.17% year to date to the end of quarter two and an improvement on the 2.53% for quarter one. For repairs staff, sickness rates are currently well below the 5% target at 2.8% year to date.
- 4.69 Our combined rate for is currently 2.63% which is better than the 3% target.

Table 16

| Sickness Rate | Target | 2025/26 YTD | 2024/25 |
|---------------------|--------|-------------|---------|
| WHE - Housing staff | 3% | 2.17% | 2.79% |
| WHE – Repairs staff | 5% | 2.80% | 4.87% |
| WHE – Total | 3% | 2.63% | 4.24% |

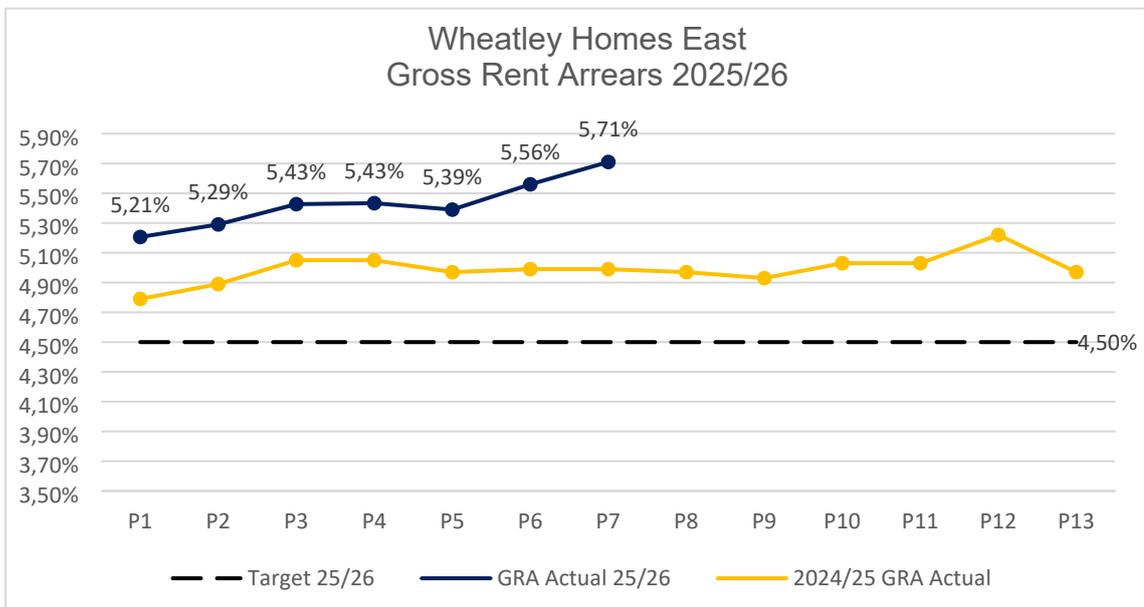


Enabling our Ambitions

Gross Rent Arrears (“GRA”)

- 4.70 Our GRA was 5.71% at the end of quarter two. We continue to prioritise collection of income and escalation. Our arrears performance this year continues to be impacted by the Department of Work and Pensions’ (“DWP”) accelerated programme of migrating our customers onto Universal Credit (“UC”). At this time last year we had 2,306 UC customers, this has now increased by 51% to 3,483, almost 44% of our customers.
- 4.71 We have recently launched our rent campaign with a strong focus on UC arrears along with non-payers. To support customers, we are using a variety of support methods, including our Housing Officers conducting patch action days that are supported by the wider team. We will continue to utilise our Wrap Around Services and funding from Discretionary Housing Payments along with Managed Payments to Landlord for UC customers. Teams are also continuing to use localised support agencies to assist customers in financial hardship.
- 4.72 We continue to work with the City of Edinburgh Council to reduce historic Intensive Housing Management arrears which the majority of has now been paid, however we are being impacted with agencies pulling away from these services and as a result, some of our most vulnerable customers are having to apply for Universal Credit to pay rent.
- 4.73 The recently published Scottish average for GRA in 2024/25 is 6.20%, the second consecutive improvement recorded for the sector from the high of 6.9% in 2022/23. We continue to perform favourably against this benchmark.

Chart 1



Average Days to Re-Let (Charter and revised)

- 4.74 Our average days to re-let for the Charter has improved in quarter two with our year-to-date result now at 18.86 days compared to 21.82 days at the end of quarter one. Note that from 2025/26, our Charter performance includes days lost to health and safety related meter issues where we consider the property unsafe/unfit to occupy.
- 4.75 Meter issues include, for example, where a tampered meter results in a property having no power or where the supply has been cut off and we are awaiting reconnection (energy companies are not prioritising this work due to the property being void); both issues mean we cannot undertake crucial safety checks prior to letting.
- 4.76 Excluding meter issues, our re-letting times improve to better than target performance at 11.94 days for the current year-to-date.
- 4.77 As reported by the Regulator at the end of August 2025, the Scottish average for 2024/25 for the Charter average days to re-let has risen for the third year in a row to 60.6 days. We continue to perform significantly better than this benchmark.

Table 17

| Average days to re-let | ARC 2025/26 YTD (including meter issues) | 2025/26 Target | 2024/25 (including meter issues) | Revised 2025/26 YTD (excluding meter issues) | Revised 2024/25 (excluding meter issues) |
|------------------------|--|----------------|----------------------------------|--|--|
| WHE | 18.86 | 16 | 17.56 | 11.94 | 14.20 |

Invoice Payments

- 4.78 By the end of quarter two, 92.63% of invoices were paid in 30 days or fewer, a decline from the end of quarter one which was 96.56% and below the target of 96%. Discussions are being held to address any payment delays and to ensure that the 96% target is consistently achieved going forward.



Summary of Strategic Project Delivery

4.79 A full update on progress with strategic projects is attached at Appendix 2. The following table summarises the current status of projects.

Table 18

| Complete | On track | Slippage | Overdue |
|----------|----------|----------|---------|
| 0 | 5 | 0 | 0 |

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

4.85 [Redacted]

[Redacted]

[Redacted]

[Redacted text block]

| [Redacted] | [Redacted] | [Redacted] | [Redacted] |
|------------|------------|------------|------------|
| [Redacted] | [Redacted] | [Redacted] | [Redacted] |
| [Redacted] | [Redacted] | [Redacted] | [Redacted] |
| [Redacted] | [Redacted] | [Redacted] | [Redacted] |

[Redacted text block]

[Redacted text block]

[Redacted text block]

5 Customer engagement

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

6 Environmental and sustainability implications

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

7 Digital transformation alignment

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

8 Financial and value for money implications

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

9 Legal, regulatory and charitable implications

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

10 Risk appetite and assessment

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

11 Equalities implications

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

12 Key issues and conclusions

- 12.1 We have strong performance against our targets for 2025/26 in several key areas including tenancy sustainment, allocation customer satisfaction, emergency repair timescales, reactive repairs completed right first time, medical adaptation timescales, new build social housing completions, the number of jobs, training places or apprenticeships created for customers and communities, the number of children and young people benefiting from targeted Foundation programmes, the number of people accessing services which help alleviate poverty, communities classified as peaceful, sickness absence, and average days to re-let when meter issues are excluded.
- 12.2 Areas for continued focus include non-emergency completion timescales, gross rent arrears and average days to re-let including meter issues.

13 Recommendations

- 13.1 The Board is asked to
- 1) Approve the addition of New Town Quarter, Edinburgh to our 5-year development programme and note that the approval of the project will be considered by WDSL in line with the Group Standing Orders; and
 - 2) Note the remainder of this report.

LIST OF APPENDICES:

- Appendix 1: Strategic Results Dashboard
- Appendix 2: Strategic Projects Dashboard
- Appendix 3: SPSO and ARC Complaints

Appendix 1 - WHE Board - Delivery Plan 25/26 - Strategic Measures

1. Delivering Exceptional Customer Experience

| Measure | 2024/25 | YTD 2025/26 | | |
|---|---------|-------------|------------|--|
| | 2024 | 2025 | | |
| | Value | Value | Target | Status |
| % Annual Tenant Visits | 69.87% | 70.32% | 100% |  |
| % new tenancies sustained for more than a year - overall | 94.42% | 94.24% | 90% |  |
| % new tenancies sustained for more than a year - homeless | 93.07% | 92.96% | Contextual | |
| % new tenancies sustained for more than a year - revised | 96.15% | 96.83% | 91% |  |
| Group - % of contacts to CFC resolved within CFC | 89.79% | 89.67% | 95% |  |
| CFC CSAT | 4.2 | 4.27 | 4.5 |  |
| Allocations CSAT | 4.6 | 4.6 | 4.5 |  |
| Call abandonment rate after 30 secs | 6.09% | 8.67% | 5% |  |

2. Making the Most of Our Homes and Assets

| Measure | 2024/25 | YTD 2025/26 | | |
|--|---------|-------------|--------|---|
| | 2024 | 2025 | | |
| | Value | Value | Target | Status |
| Average time taken to complete emergency repairs (hours) – make safe | 3.8 | 2.87 | 3 |  |

| Measure | 2024/25 | YTD 2025/26 | | |
|---|---------|-------------|------------|---|
| | 2024 | 2025 | | |
| | Value | Value | Target | Status |
| Average time taken to complete non-emergency repairs (working days) | 9.97 | 8.83 | 7.5 |  |
| % reactive repairs completed right first time | 88.11% | 98.66% | 90% |  |
| Gas safety checks not met | 0 | 0 | 0 |  |
| Average time to complete approved applications for medical adaptations (calendar days) | 20.15 | 18.56 | 25 |  |
| Legionella - percentage of applicable properties with a valid risk assessment in place | 100% | 100% | 100% |  |
| Number of electrical installation inspections completed and number due to be completed | 98.7% | 97.57% | 100% |  |
| Percentage of properties with an EICR certificate up to 5 years old | 99.7% | 99.87% | 100% |  |
| Number of domestic stair and through floor lifts with a completed annual inspection and test against the number due to be completed | 100% | 100% | 100% |  |
| Number of passenger lifts with a completed six-month inspection and test against the number due to be completed | 100% | 100% | 100% |  |
| New build completions - Social Housing | 312 | 196 | 171 |  |
| New build completions - Mid-market | 138 | 35 | 66 |  |
| Number of RIDDOR | 1 | 1 | Contextual | |
| Number of HSE or LA environmental team interventions | 0 | 0 | 0 |  |
| Number of accidental dwelling fires recorded by Scottish Fire and Rescue | 22 | 10 | Contextual | |
| Number of new employee liability claims received | 0 | 0 | Contextual | |
| Group - Number of open employee liability claims | 10 | 10 | Contextual | |
| Number of days lost due to work related accidents | 20 | 17 | Contextual | |

3. Changing Lives and Communities

| Measure | 2024/25 | YTD 2025/26 | | |
|--|---------|-------------|------------|---|
| | 2024 | 2025 | | Status |
| | Value | Value | Target | |
| % ASB resolved | 100% | 94.53% | 100% |  |
| % Lets Homeless Applicants - overall (ARC) | 57.38% | 50.96% | Contextual | |
| % Relevant lets to Homeless Applicants | 65.55% | 58.46% | Contextual | |
| Group - Percentage of Community Benefit job and training opportunities arising through the spend associated with new home construction and our investment programme that have been secured by Wheatley customers | 69.77% | 57.14% | 30% |  |
| Group - % planned jobs, training places or apprenticeships created which are secured by our customers | 73.19% | 63.46% | 60% |  |
| Total number of jobs, training places or apprenticeships created for customers and communities | 216 | 74 | 51 |  |
| Number of children and young people benefiting from targeted Foundation programmes in Wheatley Communities | 469 | 168 | 57 |  |
| Number of people accessing services which help alleviate poverty in Wheatley Communities | 1,316 | 804 | 577 |  |
| Group - % of Communities Classified as Peaceful | 74.05% | 73.3% | 75% |  |
| WHE - % of Communities Classified as Peaceful | 87.84% | 87.36% | 75% |  |
| Group - Repeat antisocial behaviour cases in period – number of repeat addresses | 935 | 505 | 447 |  |
| Group - The percentage of HMOs that have a current fire risk assessment in place | 100% | 100% | 100% |  |
| Number of accidental fires in workplace | 0 | 0 | 0 |  |
| Group RSLs - Number of accidental dwelling fires (reduce by 10% by 2025/26) (Upper limit 195 for 2024/25) | 95 | 54 | 195 |  |

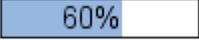
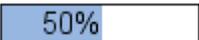
4. Developing Our Shared Capacity

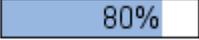
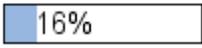
| Measure | 2024/25 | YTD 2025/26 | | |
|---------------------------------|---------|-------------|--------|---|
| | 2024 | 2025 | | |
| | Value | Value | Target | Status |
| WHE (Housing) - % Sickness rate | 2.79% | 2.17% | 3% |  |
| WHE (Repairs) - % Sickness rate | 4.87% | 2.8% | 5% |  |
| Sickness Rate | 4.24% | 2.63% | 3% |  |

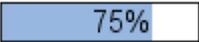
5. Enabling Our Ambitions

| Measure | 2024/25 | YTD 2025/26 | | |
|--|---------|-------------|------------|---|
| | 2024 | 2025 | | |
| | Value | Value | Target | Status |
| % lettable houses that became vacant | 6.31% | 6.98% | 8% |  |
| Average time to re-let properties (ARC) | 17.56 | 18.86 | 16 |  |
| Average time to re-let properties (excluding meter issues) | 14.2 | 11.94 | 16 |  |
| WHE C - Gross rent arrears (all tenants) as a % of rent due | 4.98% | 5.71% | 4.5% |  |
| WHE B - Gross rent arrears (all tenants) as a % of rent due | 5.78% | 7% | Contextual | |
| WHE A - Gross rent arrears (all tenants) as a % of rent due | 4.88% | 5.54% | Contextual | |
| % of payments made within the reporting period which were paid in 30 days or fewer (from the date the business receives a valid invoice) | 94.99% | 92.63% | 96% |  |
| % of contracted expenditure compliant with procurement rules | 88.82% | 86.39% | 99% |  |

Appendix 2 - WHE Board - Delivery Plan 25/26 - Strategic Projects

| Delivery Plan Project | Delivery Date | Status | % Progress | Milestone | Due Date | Completed | Progress Note |
|---|---------------|---|--|--|---------------|-----------|---|
| Asset Compliance and Data Strategy Programme (b) | 30-Nov-2025 |  |  | 01. PIMSS Platform - Architecture and SAAS review | 31-May-2025 | Yes | A 3 to 5 year road map has been agreed within the project with the roadmap with the vendor for costs and contract negotiation. It is expected this will be finalised across quarter 4. |
| | | | | 02. 2 (FRA + Lifts) - process map and to-be design | 30-Jun-2025 | Yes | |
| | | | | 03. PIMMS/Group 3 year roadmap - review and define with vendor input | 31-Aug-2025 | Yes | |
| | | | | 04. Group business and Assurance approach review | 31-March 2026 | No | |
| | | | | 05. ET end of Q2 Programme Update | 30-March 2026 | No | |
| Providing safe, secure tenancies to support independent living (external interdependency) (b) | 28-Feb-2026 |  |  | 01. Complete the build and allocation of the 19 West Craigs properties | 31-Jul-2025 | Yes | The Deputy Head of Strategic Planning and Commissioning for the NHS visited West Craigs, Fullarton Care Home and Marfield in late October. Planning is underway with GHSPC to visit West Craigs to discuss the model with them. |
| | | | | 02. Engage with Glasgow and Dumfries and Galloway Health and Social Care Partnerships to showcase the potential for new build supporting hospital discharges into independent living | 31-Oct-2025 | Yes | |
| | | | | 03. Engage with Glasgow and Dumfries and Galloway Health and Social Care Partnerships and Councils to explore the potential for a similar approach | 31-Jan-2026 | No | |
| | | | | 04. Update to the Group Board on the engagement and | 28-Feb-2026 | No | |

| Delivery Plan Project | Delivery Date | Status | % Progress | Milestone | Due Date | Completed | Progress Note |
|--|---------------|---|--|---|-------------|-----------|---|
| | | | | any associated implications for our future development programme | | | |
| Engagement 2.0: Maturing customer engagement and performance measures as part of our customer insight approach (b) | 31-Dec-2025 |  |  | 01. Trial a new method of managing engagement - MS Dynamics in WHG South area - and evaluate its impact | 30-Jun-2025 | Yes | Phase two customer engagement on our strategy development launched w/c 1 September for six weeks. A high response and strong support for how we propose to respond to customer priorities has been recorded, as have preferred ways to engage in the future. Our Stronger Voices Community of Excellence considered this feedback and the emerging strategy on 29 October; alongside staff experience and insight, this has further informed our future approach. |
| | | | | 02. Undertake a review of the existing Stronger Voices framework and operation of the existing structures | 31-Jul-2025 | Yes | |
| | | | | 03. Gather customer perspective and ideas on how our approach to engagement could evolve through the 2026-31 strategy development phase 2 | 30-Sep-2025 | Yes | |
| | | | | 04. Review the existing framework based on the review of its effectiveness to date and feedback from customers | 31-Oct-2025 | Yes | |
| | | | | 05. Recommendations for Stronger Voices Framework 2.0 in support of our emerging Strategy 2026-31 agreed by RSL and Group Boards | 31-Dec-2025 | No | |
| Tenant Web Self-Service | 31-Mar-2027 |  |  | 01. Business Case development and approved by the Executive Team | 31-May-2025 | Yes | Discussions are underway around commercials and pre contract agreements, with scopes being completed by project team. Agreed with Lowther being |
| | | | | 02. Preferred vendor engagement pre contract | 30-Nov-2025 | No | |
| | | | | 03. Contract award | 31-Jan-2026 | No | |

| Delivery Plan Project | Delivery Date | Status | % Progress | Milestone | Due Date | Completed | Progress Note |
|-------------------------------------|---------------|---|--|---|-------------|-----------|--|
| | | | | 04. Project commencement | 31-Mar-2026 | No | priority WSS, contract will be agreed however project will re-commence in April 26. This was approved by the Wheatley Solutions Board. |
| | | | | 05. NEC Project Plan approved | 30-Jun-2026 | No | |
| Lowther letting growth strategy (b) | 31-Dec-2025 |  |  | 01. Board strategy workshop - Lowther Homes Board agree principles of an asset growth strategy | 31-May-2025 | Yes | Paper is complete on the corporate structure options and it's well progressed and going to relevant Boards for approval. |
| | | | | 02. Explore financial models to support agreed options | 31-May-2025 | Yes | |
| | | | | 03. Explore potential alternative corporate structure options to support growth e.g. equity models or Joint Ventures | 31-Oct-2025 | Yes | |
| | | | | 04. Agree preferred option(s) with the Lowther Homes Board, for onward recommendation to the Group Board where applicable | 31-Dec-2025 | No | |

Appendix 3 – Q2 2025/26 - ARC and SPSO measures

- 1.1 This appendix provides ARC and SPSO measures up to Q2 2025/26.
- 1.2 For Group RSLs, ARC measures include complaints received from all customers who receive a service provided by the Group RSL or on their behalf. This includes factoring services delivered by Lowther Homes on behalf of RSLs.
- 1.3 For Group RSLs, SPSO measures include all complaints relating to the RSL, irrespective of the source of the complaint.

Charter (ARC) Measures

- 1.4 ARC measures are reported to SHR for each Registered Social Landlord (RSLs) in the Group. Performance is for all RSL customers, including those factored owners who receive a service from Lowther Homes on behalf of RSLs.
- 1.5 WHE - number of complaints received:

| WHE – complaints received | | | | | | |
|-------------------------------------|----------|---------|-------|-------------|---------|-----|
| * excluding complaints carried over | | | | | | |
| | *2024/25 | | | 2025/26 YTD | | |
| | Stage 1 | Stage 2 | All | Stage 1 | Stage 2 | All |
| WHE | 929 | 142 | 1,071 | 478 | 68 | 545 |

- 1.6 The table below outlines the average time for a full response (working days) for Stage 1 and Stage 2 complaints. All targets are being met for this measure. Performance for WHE is better than the 2024/25 SHR Scottish average of 5.4 days for S1 complaints and the SHR average of 21.3 days for S2 complaints. Performance is for all RSLs, (including Lowther Factored homeowners) who receive a factoring service from Lowther on behalf of that RSL.

| Charter - average time for a full response to complaints (working days) | | | | |
|---|--|--|--|---|
| Subsidiary | 2024/25 Stage 1 - 5-day target, Stage 2 – 20-day target | | 2025/26 – YTD Stage 1 - 5-day target, Stage 2 – 20-day target | |
| | Stage 1 | Stage 2 | Stage 1 | Stage 2 |
| WHE | 3.89  | 15.35  | 3.81  | 15.49  |

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

| Charter - average time for a full response to complaints (working days) | | |
|---|-------------------------------|--|
| Subsidiary | 2024/25 Target – not targeted | YTD 2025/26 – 6 days |
| WHE | 5.42 | 5.41  |

SPSO Measures

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

1.9 Stages of complaints are defined as:

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

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

Indicator 1 - total number of complaints received.

1.11 Stage 1 numbers have increased, and Stage 2 numbers have decreased compared to the same period in 2024/25. Year to date to the end of Q2 2024/25 WHE had received 428 Stage 1 and six Stage 2 complaints. In Q2 2025/26 WHE has received 478 Stage 1 complaints (11.68% increase) and two Stage 2 complaints (66.67% decrease).

1.12 Escalated complaints are not counted in the number received but do impact the service, in that they still must be dealt with as a Stage 2 complaint.

| SPSO Indicator 1 - total number of complaints received - YTD | | | | | | |
|--|--------------------------|------------------|----------------------|-------------|------------------|----------------------|
| | 2024/25 YTD to September | | | 2025/26 YTD | | |
| | Stage 1 | Stage 2 (Direct) | Escalated Complaints | Stage 1 | Stage 2 (Direct) | Escalated Complaints |
| WHE | 929 | 12 | 130 | 478 | 2 | 66 |

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

1.13 WHE is achieving target of 95% for stage 1 and 100% for stage 2 for quarter 2.

| SPSO Indicator 2 - number and % of complaints at each stage that were fully closed within timescales of 5 and 20 working days | | | | | | |
|---|--|-------------|---|-------------|--|-------------|
| Subsidiary | Stage 1 - responded to within 5 working days | | Stage 2 - responded to within 20 working days | | Escalated complaints - responded to within 20 working days | |
| | 2024/25 | YTD 2025/26 | 2024/25 | YTD 2025/26 | 2024/25 | YTD 2025/26 |
| WHE | 97.35% | 96.26% | 100.00% | 100.00% | 100.00% | 100.00% |

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

1.14 WHE is achieving target of 5 days for stage 1 and 20 days for stage 2 for quarter 2.

| SPSO Indicator 3 - the average time in working days for a full response to the complaints at each stage – YTD 2025/26 | | | |
|---|--|--|---|
| Subsidiary | Stage 1 - responded to within 5 working days | Stage 2 - average time in working days to respond to complaint | Escalated complaints - Average time to respond to complaints after escalation from Stage 1 to Stage 2 |
| WHE | 3.81 | 14.75 | 15.53 |

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

| SPSO Indicator 4 - the outcome of complaints as a % of overall complaints YTD 2025/26 | | | | |
|---|-------------------------------|---|-----------------------------------|---------------------------------|
| Subsidiary | Stage 1 - upheld | Stage 1 - partially upheld | Stage 1 - not upheld | Stage 1 - resolved |
| WHE | 45.81% | 14.98% | 26.87% | 12.33% |
| | Stage 2 - upheld | Stage 2 - partially upheld | Stage 2 - not upheld | Stage 2 - resolved |
| WHE | 25.00% | 50.00% | 25.00% | 0.00% |
| | Escalated complaints - upheld | Escalated complaints - partially upheld | Escalated complaints - not upheld | Escalated complaints - resolved |
| WHE | 60.29% | 30.88% | 8.82% | 0.00% |

Report

To: Wheatley Homes East Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: Housing (Scotland) Bill 2025

Date of meeting: 27 November 2025

1. Purpose

1.1 To provide the Board with an update on the implications of the Housing (Scotland) Bill 2025 (“**the Bill**”) and the steps we are taking, or already have in place, to comply with statutory duties and compliance requirements for Registered Social Landlords (“**RSLs**”).

2. Authorising and strategic context

2.1 The Group Board has overall responsibility for the Group’s compliance with legal and regulatory requirements and is required to confirm our compliance as part of the Annual Assurance Statement to the Scottish Housing Regulator (“**SHR**”).

2.2 The Group Board discharges this responsibility through a combination of direct oversight, compliance monitoring through its Committees, this Board and Boards, independent assurance, formal compliance reporting and our policy framework. For housing related matters this Board has responsibility for oversight and scrutiny as well as approving any Wheatley Homes East specific policy arrangements.

3. Background

3.1 On 30 September 2025, the Scottish Parliament voted to pass the Bill and it is awaiting Royal Assent before coming into effect. The Bill was the result of an extensive consultation process with key stakeholders, with tenants, landlords and investors having provided feedback.

3.2 The Bill seeks to support addressing the Housing Emergency declared by the Scottish Government in May 2024. It aims to strengthen housing standards, homelessness prevention, and tenant protections.

4. Discussion

4.1. The Bill introduces a range of requirements for RSLs, private sector landlords and Local Authorities, which will directly impact us. It should be noted that a number of the key measures will require further consultation, secondary legislation and as such, in practical terms do not require immediate full compliance upon Royal Assent being granted.

4.2. A summary of the requirements and implications for us is set out below:

Statutory Duties for Homelessness Prevention

4.3. The timescale associated with being threatened with homelessness has been extended from two to six months. Section 41 of the Bill confers on relevant bodies a responsibility to ‘ask’ a person about their housing situation when they are carrying out their normal business and to ‘act’ if the person is homeless or at risk of homelessness.

4.4. The ‘Ask and Act’ approach is aimed at shifting focus from crisis intervention to early prevention, preventing the trauma and disruption that homelessness can cause and ensuring that people receive help before they reach a crisis point.

4.5. Alongside RSLs and Local Authorities, the Bill will require bodies such as health boards, the police and the prison service to take reasonable steps to prevent homelessness. At this early stage, it is unclear what the implications of the requirements on these bodies might have for us, for example, in terms of collaboration and information sharing.

4.6. To support the implementation of these new duties, the Scottish Government has established a *Test and Learn Prevention Pilot Fund*, providing up to £4 million in funding. The Fund will be administered by Advice Direct Scotland (“**ADS**”) and the pilots will ‘develop, test, scale and cost the new prevention duties in real-world settings’. ADS have set out the types of approaches it is seeking to support via the fund as follows:

- Early intervention and targeted prevention activity;
- Multi-agency approaches to support people navigating housing, health and social care services;
- Partnership models and processes that can be replicated and scaled;
- Collaborations involving shared resources, data and transitional or referred services;
- Initiatives that centre people at risk of homelessness and/or people with direct experience of homelessness in the design and delivery of the service; and
- Initiatives that target groups at risk of homelessness at critical points in service pathways that have been identified as leading to homelessness.

4.7. In addition to closely monitoring the pilot, we are reviewing how the range of activity we currently undertake to support preventing homelessness, such as through housing options and more general tenancy management advice, wraparound services in areas such as financial management and welfare benefit advice are documented to allow us to evidence our compliance with the ‘ask’ and ‘act’ elements. We are also exploring how we could further refine our approach to tenancy sustainment support.

Domestic Abuse

- 4.8. The Bill has a specific focus on those tenants affected by domestic abuse. The measures within the Bill are designed to reduce homelessness amongst women and children who are disproportionately affected by domestic abuse.
- 4.9. The definition of domestic abuse in housing legislation has been updated to align with the definition set out in the Domestic Abuse (Scotland) Act 2018 and the Protection from Abuse (Scotland) Act 2021. The updated definition recognises other forms of harm such as domestic abuse, including financial abuse, psychological harm and coercive control.
- 4.10. Where previously considered best practice RSLs will now be required to develop and implement a domestic abuse policy and ensure that the policy explicitly sets out how tenants will be supported where they are at risk of homelessness because of domestic abuse. This includes the requirement of RSLs to consider domestic abuse before initiating eviction due to rent arrears.
- 4.11. Where domestic abuse is a contributing factor in tenant arrears, we will be required to demonstrate that we have taken reasonable steps to support the tenant, that we have provided information on how to access domestic abuse support and confirm to the courts that these steps were taken before eviction proceedings began.
- 4.12. The most significant change is the empowerment of RSLs to end joint tenancies with perpetrators if the survivor of domestic abuse wishes to remain in their home.
- 4.13. Our Group Domestic Abuse Policy was first implemented in 2019. It was reviewed in 2022, at which time we reflected the most up-to-date relevant legislation. The definition within our policy aligns with the definition set out in the Bill.
- 4.14. Our current approach to rent arrears and eviction ensures that we understand the individuals' circumstances and offer help and signposting where relevant. This includes taking into consideration an individual's personal circumstances, such as being a victim of domestic abuse. While we have a strong and supportive approach, we will review our processes and documents to ensure that we can sufficiently demonstrate our approaches and the requirements of the Bill.
- 4.15. We are assessing what changes we may need to make to policies and business processes in respect of the new right to end joint tenancies with a perpetrator. It will also take into account guidance currently being drafted by the Scottish Government. There are a number of areas for us to explore, such as the action we can take when the victim of domestic abuse is a household member rather than a joint tenant and our obligations to the perpetrator in terms of tenancy sustainment and preventing homelessness. We anticipate guidance will be issued in December which will support us in establishing our new approach by the end of March 2026.

Awaab's Law

- 4.16. The Bill includes provisions to implement Awaab's Law, aimed at protecting tenants from health hazards like damp and mould. The bill gives Scottish Ministers the authority to set legally binding timeframes for social landlords to:
- Investigate reports of disrepair (especially damp and mould); and
 - Begin and complete necessary repairs.
- 4.17. We expect Awaab's Law to be effective from March 2026, subject to parliamentary approval. The Scottish Government is expected to also seek to extend Awaab's law to the private rented sector, which we expect would cover all of Lowther Homes' rental properties.
- 4.18. As previously reported, we attended a Scottish Government stakeholder engagement roundtable discussion on 22 September on their proposed approach for implementing an equivalent of Awaab's law in Scotland. We subsequently also received a delegation from the Scottish Government, who spent time with our Healthy Homes team to understand what is involved in managing damp and mould cases.
- 4.19. We understand the Scottish Government is, at this stage, still minded to mirror the key requirements from England, which are as follows:
- Investigate any potential hazards within 10 working days of becoming aware of them;
 - Produce a written summary of investigation findings and provide this to tenants within 3 working days of the investigation;
 - Take action to make the home safe (using temporary measures if necessary) within 5 working days of the end of the investigation;
 - Begin, or take steps to begin, any further required works within 5 working days of the investigation concluding, if the investigation identifies a significant or emergency hazard. If steps cannot be taken to begin work within 5 working days, this must be done as soon as possible, and work must be physically started within 12 weeks;
 - Satisfactorily complete repairs within a reasonable time period, without unreasonable delays;
 - Investigate and act on all emergency hazards as soon as possible and within 24 hours; and
 - Provide suitable alternative accommodation if the landlord is unable to complete work to make the home safe within 5 working days, or 24 hours in emergency situations.
- 4.20. We are currently undertaking a detailed review of our damp and mould processes, supported by a recent review by Internal Audit alongside preparing for the expected requirements of Awaab's Law. As part of this, we are engaging with a number of large English Housing Associations to identify any lessons or good practice for their preparation for the English equivalent, the first phase of which is in effect.

- 4.21. We will update our policy in early 2026 to reflect the requirements of Awaab's Law and this will be presented to the Board for approval at its February meeting. It should however be noted that our existing approach significantly exceeds the requirements of the expected requirements of Awaab's Law, for example:
- Inspections undertaken within two working days or within three hours for emergencies;
 - A report left with tenants after the inspection;
 - Making the home safe or initiating a decant at the inspection stage; and
 - A target for repairs to be completed within 15 days.

Rent controls

- 4.22. The Bill does not contain any rent controls in relation to social housing but introduces a permanent rent control framework for the private rented sector, with caps at CPI + 1% (max 6%) in designated Rent Control Areas. Mid-Market Rent ("MMR") and Build-to-Rent homes are, however, expected to be exempt through future regulations.
- 4.23. We have an interest in rent controls in relation to MMR as this could impact both the valuation of our MMR properties and what we can seek by way of a lease payment from Lowther Homes. The exemption is therefore welcome as we continue to have MMR as part of our existing property assets and development programme.

Evictions

- 4.24. The Bill introduces a new duty for the court to consider whether it is reasonable to delay eviction for certain Scottish secure tenancies and short Scottish secure tenancies.
- 4.25. The Bill sets out the types of issues the court may consider, including:
- Cause the tenant or a member of the tenant's household to experience financial hardship;
 - Have a detrimental effect on the health of the tenant or a member of the tenant's household;
 - Have another detrimental effect on the tenant or a member of the tenant's household due to the tenant or the member of the tenant's household having a disability or terminal illness; and
 - Whether a seasonal factor would contribute to any financial hardship or detrimental effect.
- 4.26. The Bill does state that the Court must give the tenant and the landlord an opportunity to make representations about whether it would be reasonable to delay. The duty does not apply where the eviction is on the basis of factors such as anti-social behaviour or a relevant conviction.

Pets

- 4.27. The Bill strengthens tenants' rights in relation to keeping a pet. This is currently at the discretion of landlords; however, measures in the Bill will allow a tenant to make a request to keep a pet in their home and for that to not be unreasonably refused by their landlord.

- 4.28. Our current approach does in some cases mean we do not grant permission based on property type or circumstance rather than on a case-by-case basis.
- 4.29. We have commenced a review of our approach with a view to moving towards a single approach across the Group as well as reflecting the requirements of the legislation. This will include having clearly documented guidance for how we assess an application to keep a pet and demonstrating that any refusal is reasonable.

Other changes

- 4.30. Other relatively straightforward changes introduced in the Bill included:
- Reducing the qualifying period for succession from 12 months to 6 months;
 - The creation of an independent appeals process for decisions by the Scottish Housing Regulator to the First-tier Tribunal for Scotland; and
 - Extended Occupancy Period: Joint tenants who qualify to succeed a Scottish Secure Tenancy after the death of a tenant can now remain in the property for up to 6 months, up from the previous 3-month limit.

5. Customer Engagement

- 5.1 As this relates to legislative changes there are no direct customer engagement implications.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

- 9.1 The key legal and regulatory implications are set out in the body of the report.

10. Risk Appetite and assessment

- 10.1 Our risk appetite in relation to legislative compliance is adverse. We are mitigating this risk through an early, proactive assessment of the implications of the legal changes and putting into effect updates to our policies and procedures to comply with them.

11. Equalities implications

- 11.1 As part of the implementation of any changes associated with the Bill, we will undertake an Equality Impact Assessment where appropriate.

12. Key issues and conclusions

- 12.1 The Bill introduces new statutory duties for RSLs, particularly around homelessness prevention and housing standards. Key changes include the 'Ask and Act' duty to identify and support those at risk of homelessness earlier, and the introduction of Awaab's Law, which sets strict timelines for addressing hazards like damp and mould. Work is underway to review and standardise our approach to pet ownership.
- 12.3 While many provisions require further consultation, we are proactively reviewing current practices, engaging with stakeholders, and preparing to update processes and policies to ensure compliance. Our existing approach to damp and mould already exceeds expected standards.

13. Recommendations

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

LIST OF APPENDICES:

None

Report

To: Wheatley Homes East Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: Group Unacceptable Actions Policy update

Date of meeting: 27 November 2025

1. Purpose

1.1 The purpose of this report is to provide an update on the revised Group Unacceptable Actions Policy (“**the Policy**”).

2. Authorising and strategic context

2.1 Under the Group Standing Orders, the approval of Group policies is reserved to the Group Board. Under our Terms of Reference we are required to implement and comply with Group-wide policies.

3. Background

3.1 The vast majority of our policies are subject to review at least every three years, unless otherwise defined or circumstances necessitate an acceleration of the review.

4. Discussion

4.1 The Policy confirms to our staff and contractors that, as an organisation, we will not tolerate unreasonable behaviours towards them or unreasonable demands of the organisation. It also affirms our commitment to protect them from harm, harassment, or aggressive/abusive behaviour.

4.2 The Policy clearly defines the type of behaviour and conduct towards staff and our contractors that we consider to be unacceptable. It sets out the approach we will take in response to such behaviour and explains the potential consequences for people who carry out unacceptable behaviour towards staff and contractors.

4.3 The Policy can apply to anyone who engages with our services including tenants, factored owners and members of the public.

4.4 There are currently 11 recorded cases with unacceptable actions in place, which are managed in line with the existing Policy.

Staff and stakeholder engagement

- 4.5 Given the direct relevance to our staff, the review process involved a wide range of engagement with our staff. This was bolstered by engagement with our Trade Union partners and stakeholders. The key feedback from our staff included:
- A need for the language in the Policy to be clearer and simpler;
 - Greater clarity around the consequences of unacceptable behaviour;
 - Clearer language of the zero-tolerance approach to unacceptable behaviour;
 - Clearer definitions of who is considered a customer, and to whom the Policy applies; and
 - Clarity on the use of social media when it comes to unacceptable actions.

Customer engagement

- 4.6 Alongside staff and stakeholder engagement, we undertook a digital survey to seek customer feedback. We received 185 responses from customers across group, with the key feedback as follows:
- 46% of customers knew about the Policy;
 - 63% agreed it's reasonable to restrict contact for unacceptable behaviour; and
 - 54% thought reviewing restrictions after six months is appropriate.
- 4.7 Customers indicated through the survey that incidents and individual circumstances should be evaluated independently. In particular, respondents expressed a view that vulnerabilities should be taken into account when applying the Policy.

Policy benchmarking

- 4.8 We also undertook a benchmarking exercise to compare our policy with those of similarly sized RSLs and partner organisations. The exercise found that our current Policy was in alignment with these policies, with a common focus on the repercussions of unacceptable behaviour being proportionate and considered on a case-by-case basis.

Key changes to policy

- 4.9 Based on our internal review and the feedback from staff, stakeholders, customers and benchmarking a number of changes are proposed to the Policy. The revised Policy is attached at Appendix 1, with the key proposed changes set out below:
- Definition of which groups are considered customers and to whom the Policy applies;
 - Emphasising zero tolerance for unacceptable behaviour towards staff;
 - Clarifying consequences for such actions, including possible eviction;
 - Providing details on support for affected staff;
 - Adding information on the Right of Appeal; and
 - Covering unacceptable behaviour on social media.

Implementation

- 4.10 It was proposed that the implementation of the Policy could be facilitated by providing various supplementary materials, such as better promotion of staff support; improved staff guidance with detailed flowcharts; standardised template letters; both internal and external communication initiatives; and additional training, including face-to-face conflict resolution sessions.

5. Customer Engagement

- 5.1 As set out above, customers have been engaged as part of the review of the Group Unacceptable Actions Policy.

6. Environmental and sustainability implications

- 6.1 There are no specific environmental and sustainability implications from the Policy.

7. Digital transformation alignment

- 7.1 Based on staff feedback, we will seek to enhance the use of our digital platforms to enhance the visibility of alerts for the Policy. This will take place in the coming months.

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

- 9.1 There are no current legal, regulatory or charitable implications for this report. The Employment Rights Bill is moving through the UK Government's policymaking process and is likely to receive Royal Assent later this year. Under the Bill, employers could be held responsible for 'third-party harassment' unless they can show that reasonable measures were taken to prevent it.
- 9.2 Additionally, should we decide to restrict a customer's contact, we must be careful to follow the process set out in our Policy to minimise any restrictions on a customer's access to the complaints process. This should be a last resort, as we are required to signpost the customer to the Scottish Public Services Ombudsman in these instances.

10. Risk Appetite and assessment

- 10.1 Our agreed risk appetite in the application of this Policy is cautious. Each instance of unacceptable behaviour towards our staff or contractors is assessed on a case-by-case basis by a senior manager.

11. Equalities implications

- 11.1 The Group Unacceptable Actions Policy is closely linked to the Group Equity, Diversity and Inclusion ("EDI") Policy, and reasonable adjustments will be provided for customers whose unacceptable actions are attributable to a disability or another protected characteristic.

12. Key issues and conclusions

- 12.1 The Policy is a key mechanism to ensure that we are clear with customers the types of behaviour we will not tolerate and what actions we will take to protect our staff, stakeholders and the organisation as part of a zero-tolerance approach.

13. Recommendations

- 13.1 The Board is asked to note the revised Unacceptable Actions Policy, as attached in Appendix 1.

LIST OF APPENDICES:

Appendix 1: Wheatley Group Unacceptable Actions Policy

Group Unacceptable Actions Policy

We can produce information on request at no cost in large print, in Braille, on tape or in another non-written format. We can also translate this into other languages. If you need information in any of these formats please call us on 0800 479 7979 or email info@wheatley-group.com

Możemy, na życzenie, bezpłatnie przygotować informacje dużą czcionką, w alfabecie Braille'a, na taśmie lub w innym niepisanym formacie. Możemy je również przetłumaczyć na inne języki. Jeśli potrzebujesz informacji w którymkolwiek z tych formatów, zadzwoń do nas pod numer 0800 479 7979 lub wyślij e-mail na adres info@wheatley-group.com

Podemos produzir informações mediante solicitação e sem custos, em impressão grande, Braille, cassete ou noutro formato não descrito. Também podemos traduzilas em outros idiomas. Se precisar de informações em qualquer um destes formatos, contacte-nos através do número 0800 479 7979 ou envie um e-mail para: info@wheatley-group.com

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

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

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

| | |
|--|------------------------------------|
| Approval body | <i>Group Board</i> |
| Date of approval | <i>28th August 2025</i> |
| Review Year | <i>2028</i> |
| Customer engagement required | <i>Yes</i> |
| Trade union engagement required | <i>Yes</i> |
| Equality Impact Assessment | <i>No</i> |

CONTENTS

| Section | Page Number |
|---|--------------------|
| 1. Introduction | 4 |
| 2. Definitions: Unacceptable Behaviour | 4 |
| 3. Managing Unacceptable Actions | 7 |
| 4. Review Period | 12 |
| 5. Right of Appeal | 12 |
| 6. Policy Review | 12 |
| 7. Other Related Policies | 12 |

1. Introduction

All our customers have the right to be heard, understood and respected. Our staff have the same right to be heard, understood and respected, and also protected against any form of unacceptable behaviour. For the purpose of this policy, we consider “customers” to be tenants of our Registered Social Landlord (RSL) subsidiary organisations, people we work for within Wheatley Care, Lowther tenants and owners, as well as non-factored owners and members of the public.

We take a zero-tolerance approach towards unacceptable actions against our staff. Aggressive, abusive, or unacceptable behaviour of any kind will not be tolerated from customers and serious consequences will apply should this behaviour be displayed and/or persist. Our ambition is to create a safe environment for our staff to conduct the full range of their duties and are committed to tackling any behaviours that compromise this in a robust and timely manner.

Our ambition is for the prevention and/or recurrence of unacceptable behaviour against our staff.

To achieve this, as a responsible employer we will:

- Provide an accessible service for our customers with an understanding of their unique personal circumstances, including any vulnerabilities, whilst retaining the right to restrict or change access to our service if we consider their actions to be unacceptable;
- Make sure our staff, do not suffer any disadvantage from customers who act in an unacceptable manner;
- Ensure that any staff member reporting unacceptable behaviour or who has witnessed an incident of unacceptable behaviour, are fully supported and have access to support from their line manager and our range of employee wellbeing services; and
- Provide the staff member(s) concerned, with regular updates on any outcome and actions taken against the perpetrator.

2. Definitions: Unacceptable Actions

There may be times where a customer feels as though our levels of service have not met their expectations. Whilst we expect our staff members to be empathetic and strive towards achieving an agreeable resolution for our customers, this does not justify unacceptable actions or behaviour being exhibited.

Unacceptable actions and behaviour can be perceived, and tolerated, differently by our staff members. We consider the following types of behaviour to be unacceptable:

- Aggressive or abusive behaviour (verbal or physical);
- Unreasonable demands;
- Unreasonable persistence;
- Vexatious behaviour; and
- Inappropriate use of social media.

Please note that this list is not exhaustive and that we will always treat certain behaviours as unacceptable when they have made staff feel unsafe, threatened, afraid or abused. In such cases we may also have cause to contact Police Scotland to further address and report the behaviour and provide support to our staff.

Aggressive or abusive behaviour (verbal or physical)

Aggressive or abusive behaviour can be conducted face to face, by written or spoken communication and in the public domain, by for example, use of social media. Examples of this type of behaviour can include, but not limited to the following:

- Language (spoken, written or electronic communication) that may cause staff to feel upset, afraid, threatened or abused;
- Aggression that may result in physical harm;
- Any form of discrimination;
- Threats;
- Sexual harassment;
- Physical violence;
- Personal verbal abuse;
- Shouting;
- Swearing;
- Derogatory remarks;
- Rudeness;
- Inflammatory statements;
- Unsubstantiated allegations;
- Using or threatening to use an animal to inflict physical or psychological harm; Using audio or video recordings within the public domain for the purpose of harassment, victimisation, slander or stalking; and
- Vandalism or damage to personal or work property.

We recognise that the list above is not exhaustive and any form of engagement that makes a staff member feel threatened or abused will be taken into consideration.

We recognise that a customer may wish to record an interaction (audio and/or video) in connection with and in support of a concern or issue they have with Wheatley Group and may be able to legitimately do so.

We consider this behaviour to be unacceptable if the recordings are used in the public domain for the purpose of harassment, victimisation, slander or stalking. We will remove any content of this nature on our social media sites if it is within our power to do so. If the recordings are on a private site, we will seek to contact the provider to explore the potential to remove the content if it is felt appropriate and proportionate to do so.

Where a staff member is concerned with the nature of any recording, feels threatened, uncomfortable or does not want to participate in recorded communications, they shall be entitled to end the engagement and consider other forms of communication moving forward with the customer e.g., written communication or escalation to their Line Manager to explore alternative options.

Unreasonable Demands

What amounts to unreasonable demands depends on the issues presented by the customer and the manner and behaviours they exhibit in doing so. This might include:

- The amount of information sought;
- The nature and scale of service expected; and
- The number of approaches made.

Examples of this type of behaviour include, but are not limited to the following:

- Demanding responses within an unreasonable timescale;
- Insisting on seeing or speaking to a particular member of staff;
- Excessive contact, including phone calls, letters, digital messages or emails; and
- Repeatedly changing the substance of a complaint or raising unrelated concerns.

Unreasonable Persistence

We will always try and encourage customers to use existing arrangements, such as our Complaints Policy, where appropriate. Customers will be advised on how they can progress a complaint following response and review if applicable, including the appeal process.

Vexatious Behaviour

Vexatious behaviour usually applies when a final decision has been delivered on a matter at the end of the process or when a customer does not pursue the matter through the relevant procedure and continues to raise it.

Examples of vexatious behaviour include, but are not limited to:

- Failure to accept that we are unable to assist the customer further or provide a level of service other than that provided already;
- Persistence in disagreeing with action or decision taken; and
- Contacting staff persistently about the same issue.

Examples of this type of behaviour include, but are not limited to:

- Persistent refusal to accept a decision made;
- Persistent refusal to accept explanations in relation to our decisions or actions;
- Persistent refusal to follow relevant procedures; and
- Continuing to pursue an issue that Wheatley Group and subsidiaries consider resolved or closed, without presenting any new information.

Excessive and unreasonable demands and persistence are considered unreasonable if they have a substantial impact on the work of the officer and our ability to provide a service, such as taking up a disproportionate amount of staff time and/or resources to the disadvantage of other customers or functions.

Inappropriate use of social media

It is unacceptable to use social media to abuse, insult or harass our staff members on social media sites.

We will remove any posts or comments containing unacceptable communications from Wheatley social media sites, where we have the ability and functionality to do so.

Where we are unable to remove this content, we will report this to the social media company and/or the owners of other social media pages and request its removal by them.

If there is anything of a criminal nature contained within the post(s) (e.g., threatening behaviour) then we will contact Police Scotland to report this and seek further advice and support on this.

3. Managing unacceptable actions

Any action taken under this policy will always require to be substantiated by sufficient information and evidence.

We are committed to ensuring that any and all actions taken are in line with our Equality, Diversity and Human Rights Policy and our Equal Opportunity Policy.

Where a customer has a disclosed and/or known vulnerability that may impact their actions or behaviour, this will be considered, in assessing the proportionality of action to be taken. We will also consider any reasonable adjustments that are in place and/or required by the customer when determining the most appropriate course of action to be taken.

Our response to unacceptable behaviour will be reasonable and proportionate. In most cases, we will give our customers the opportunity to consider, acknowledge and rectify their behaviour in the first instance.

However, in cases where serious unacceptable behaviour has been displayed or threats of such have been made, such as physical or verbal violence, assault or sexually motivated conduct or violence, then we will take immediate action. As part of this action, we will also contact Police Scotland to report this conduct and seek advice and information to best support our staff member(s) impacted by the behaviour.

The consequences of unacceptable behaviour will be considered on a case-by-case basis. In most cases, customers will receive a warning letter for the behaviour to desist. However, should this behaviour continue, we could restrict contact with a customer.

In cases where behaviour continues after we restrict contact with a customer, this could lead to further consequences, such as issuing of a tenancy warning. In extreme circumstances, for RSL and Lowther tenants, we may pursue action at court, which can include activity up to and including obtaining an antisocial behaviour order (ASBO) and/or seeking to end a customer's tenancy.

Informing the customer

In all cases, we will contact the customer to explain what actions we consider unacceptable and why. Wherever possible, we will ask the customer to modify their behaviour and explain what actions we may take if they do not.

We may offer to meet the customer to discuss the unacceptable actions and agree a way forward. It may be appropriate in some cases to engage a third party, for example independent mediators, to assist us in resolving a situation.

Decisions to restrict contact will only be taken after careful consideration of the situation and circumstances by a relevant Manager, Director or Senior Wheatley Group Service Leader.

In cases of exceptional circumstances which require immediate action, the relevant Manager, Director or Senior Wheatley Group Service Leader will have the authority to deal with that behaviour immediately in a manner they consider appropriate.

This can include an immediate safety alert being placed on our customer(s) record and or customer address, in addition to contacting Police Scotland to report the incident(s).

Where we take direct action, we will notify the customer in writing what action we are taking and why, the details of the restricted contact arrangements and the length of time that the restriction will be in place.

All incidents of unacceptable actions and any decision taken to restrict customer contact are recorded on our system and we will ensure relevant employees are informed of any restrictions put in place. This may also include contractors and other statutory agencies who will engage with our customer during the course of carrying out their duties.

A review will be undertaken in advance of the restriction elapsing. Consideration will be given to determine if the restriction should be lifted or continued based on the customer's recent actions, conduct and behaviour.

Consequences of Unacceptable Actions; Restricting Contact and Services

We will restrict contact in a way that allows the customer to continue receiving a service from us and continue to progress through any processes they are currently involved in. For example, a current complaint, a housing application or an ongoing repair.

Possible actions include:

- Ending telephone calls if the caller is considered aggressive, abusive or offensive. Employees have the right to make this decision, tell the caller that the behaviour or language is unacceptable and end the call if the behaviour does not stop;
- Advising the customer that we consider the issue(s) fully responded to and that continuing correspondence on the issue(s) would serve no useful purpose. In these circumstances future correspondence relating to the issue will be noted and filed but will not be acknowledged or responded to unless it contains new significant information which we consider requiring action or response;
- Advising the customer that we can only consider a certain number of issues within a given time period and ask them to limit or focus their request accordingly;
- Restricting customer contact with specific staff members;
- Restricting contact to a named individual for all matters; and
- Restricting our service provided to customers by only responding to emergency repairs.

In some exceptional circumstances, where we consider the situation with an individual or individuals to be challenging, we may require all contact to be through a third party, such as an advocacy service, solicitor, mediator or independent representative. This decision will be made in conjunction with a Wheatley Manager, Service Lead or Managing Director.

When we receive correspondence that is abusive to staff or contains unsubstantiated allegations, we will advise the customer in writing what we consider unacceptable and why.

We will ask the tenant or customer to stop communicating in this way and advise that we will not respond to future correspondence if it continues. If this behaviour continues, we may require future contact to be through a third party and will advise the customer accordingly of the decision.

The threat or use of physical violence, verbal abuse or harassment towards staff will result in restricting or ending all direct contact with the customer and the matter being reported to Police Scotland. This includes abuse or harassment on the basis of race, sex, colour, ethnic origin, sexual orientation, physical ability, religion, mental health or other grounds.

Supporting our Staff

Where we have taken action or consider action necessary against unacceptable behaviour, the relevant manager will inform the staff member involved of the actions they have taken against the perpetrator to reduce the likelihood of the reoccurrence of unacceptable behaviour and to provide the necessary support mechanisms and assurance to staff.

Staff shall be informed of any ongoing dialogue or actions being progressed as they continue to ensure the staff member is fully informed of the action be taken against persons who have displayed unacceptable actions.

Line managers shall communicate with the staff member regularly and ensure that any employee support is maintained particularly where, Employee Advisory Resource has been advised to provide additional support and counselling.

In the event of Police Scotland involvement, staff members should be offered advice and guidance on proceedings should unacceptable behaviour result in criminal proceedings. Group Legal Team should be contacted in the first instance.

Employees can access support from PAM Wellness or, alternatively from Wheatley Group's bank of specialist counsellors. Details of both services can be obtained from the Wellbeing team #Wheatley Employee Wellbeing Employee.Wellbeing@wheatley-group.com. All enquiries will be treated as strictly private and confidential.

4. Review Period

Dependent on the nature of the behaviour displayed, cases will be reviewed by a Senior Manager six months from the application of this Policy, and every six months afterwards.

Should the behaviour continue to persist, then restrictions may continue to apply. Where incidents involve unacceptable behaviour that is physical or sexual, the restrictions will remain in place for a year without review.

5. Right to Appeal

Customers have the right to appeal against a decision to apply restrictions or consequences in alignment with our Unacceptable Actions Policy. They can do so through our Housing Appeals Process, by emailing us at housingappeals@wheatley-group.com, or writing to us at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL.

6. Policy review

The Group Unacceptable Actions Policy will be formally reviewed every three years.

7. Other related policies

- Wheatley Group Complaints Policy
- Wheatley Group Health and Safety Policy
- Wheatley Group Antisocial Behaviour Policy
- Wheatley Group Neighbourhood Management Policy
- Wheatley Group Social Media Policy
- Wheatley Group Equity, Diversity, Inclusion and Human Rights Policy
- Wheatley Group Equal Opportunities Policy

Report

To: Wheatley Homes East Board

By: Elizabeth Cuthbertson, Director of Performance and Strategy

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

Subject: EDI Action Plan update and 24/25 Annual Equalities Report

Date of Meeting: 27 November 2025

1. Purpose

1.1 This report provides an update on the implementation of our Group Equity, Diversity and Inclusion (“**EDI**”) action plan, *One Group Many Voices*, and presents our third annual equalities report for noting.

2. Authorising and strategic context

2.1 Our current 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 Wheatley Solutions Board’s Terms of Reference, EDI is within their remit to drive our Group approach, including agreeing our Action Plan and monitoring progress quarterly. This Board receives at least an annual update.

2.3 The Group’s registered social landlords are required by the Scottish Housing Regulator to collect protected characteristic data from our tenants, prospective customers, staff, Board members and applicants. Through our Group Annual Assurance Statement, we demonstrate how we meet their requirement to consider equalities within our decision making, for example through using this data within our equality impact assessments and as detailed in our annual equalities report.

3. Background

3.1 The Wheatley Solutions Board approved the updated EDI action plan on 12 February 2024, and monitor progress quarterly. The Wheatley Solutions Board also review and approve publication of our annual equalities report (Appendix 1). This was approved on the 10 November and has now been published on our Wheatley Homes East and our Group partner websites and internally promoted with staff.

- 3.2 Our current Group EDI action plan focuses on three outcomes:
- **Different Together with you** – customer and community focus;
 - **Different Together in our Group**- staff and internal culture focus; and
 - **Evolving our data** – whole journey approach and embedding into decision-making.
- 3.3 Over the last year, implementing the action plan and using Group EDI data, including from our current and prospective customers, has helped drive progress across the Group including:
- **Launch of the Customer Focus Network** in April 2024, involving staff from across the Group, including Wheatley Homes East, and shaping key projects such as enhancing our approach to personalised service; informing translation/interpretation improvements, and neuroinclusive customer service toolkit and training for staff;
 - Further embedding EDI through our approach to **engagement, social mobility and partnerships**. Our charity partner, the Wheatley Foundation, supported the opening of two community larders, supported customers whose first language is not English to access ESOL classes, and recently featured as a case study in a Business in the Community (“**BITC**”) social mobility report;
 - **Evolved use of EDI data** in the Group with the launch of MyHousing for Lowther and a pilot in Care, and increased access to Foundation programmes including through targeted promotion and enhancements to referral process; and
 - Promoting EDI through our Different Together **staff networks** including:
 - **Race** – held an event to celebrate Ramadan, promoted this through internal blogs, and published Ramadan guidance note to support awareness;
 - **Menopause** – Menopause Cafe continuing to hold expert-led talks, with 60+ members part of the network; and
 - **Age Network** – designed and hosted young people events in April, attended by nearly 100 Group staff, to engage our under 16-25s (c 10% of workforce in the Group) in the organisation and hear about career journeys from senior leaders.
- 3.4 To help measure EDI success the Group annually submit a Talent, Inclusion and Diversity Evaluation (“**TIDE**”) to Onvero (previously enei - Employers Network for Equality and Inclusion). This year for the first time, also undertook a self-assessment using **BITC’s** Responsible Business tracker.
- 3.5 This work will inform our 2026-31 strategy, as well as our Group EDI action plan and Group EDI and Human Rights policy which are both due for review in 2025 and will be updated to align with our future strategic plans. The Customer Focus Network is currently engaged through two working groups to inform the review of the policy and action plan.
- 3.6 The following sections of this report provide an update of key EDI activity over this financial year, presents our Group 2024/25 annual equalities report and updates the Board on plans for the Group EDI action plan and policy review.

4. Discussion

EDI update

4.1 Key EDI actions progressed recently include:

Outcome 1: Different together with you

- **Engagement:** Ensuring customers directly shape our service design in a key consideration in our EDI approach. Recognising the work of our Group Scrutiny Panel, we received the 'Best Practice in Involving Tenants in Shaping Service' award at the Tenant Participation Advisory Service (TPAS Scotland) National Good Practice awards in June. We were also shortlisted for and were presented with the CIH Scotland Housing Award for 'Excellence in tenant scrutiny' on 14 November. The Group Scrutiny Panel includes 6 Wheatley Homes East customers at present;
- We also engaged nearly 727 current and future customers in phase two of our **strategy engagement**, ensuring our future 2026-31 plans are shaped by more customer insight than ever from our wide reaching and diverse communities. Delivering services informed by need, providing support for vulnerable customers and supporting neighbourhoods to be thriving, cohesive and safe communities were key themes through which we must take an EDI approach. A separate agenda item provides more information;
- **Hate Crime:** The Group continue to monitor Hate Crime figures, with, at Group level, 48 reports in quarter one of 2025/26 and 45 in quarter two, and we compare these against national trends using figures published by Police Scotland. There has been a slight increase in Hate Crimes this financial year compared to previous years. We are reviewing the Group policy to align with updated legislation, informed by an updated equality impact assessment. We will be relaunching this with staff with an updated action plan and e-learning;
- To ensure we are meeting **long term housing needs**, we are working with Local Authorities to reach our Group target of flipping 500 temporary flats to permanent by end of March 2026 – we are on track to meet this with 450 completed and 21 currently in progress; and
- We are also reviewing Scottish Housing Emergency action plans to inform our own Group **Homelessness** Policy review, which is due next year to align with our updated strategy. To ensure this is informed by lived experience, we have engaged our waiting list prospective customers, as well as key stakeholders and our own staff. Leading the way nationally to eradicate homelessness will continue to be a key strategic focus for us over the next five years, which intrinsically requires a strong EDI approach to support this customer group and their specific needs.

Outcome 2: Different Together in our Group

- Representatives from our Group disability and neurodiversity network attended a **Neurodiversity in the Workplace** conference and marked Global Accessibility Day in May with accessibility software sessions led by Microsoft with 40 colleagues across the Group attending sessions. They also held MacMillan Coffee mornings in October in our Centres of Excellence;
- The **LGBTQ+** network ran events on Different Together and being your authentic self with guest speaker Zander Murray. This was well received by staff as Zander shared his story about being an openly gay professional footballer in Scotland carrying important messages on why feeling psychologically safe and a sense of belonging at work matters; and
- The Group supported over 30 young people aged 16-19 to gain experience in the world of work through our paid two-week **Summer Work Programme** in July, including our own customers. Recognising younger people is a group we see underrepresented in our engagement, some of the customers have expressed interested in getting involved in shaping our services by joining our Group Scrutiny Panel, including a Wheatley Homes East customer.

Outcome 3: Evolving our data

- As an established practice for us to demonstrate how we effectively utilise the EDI data we have in shaping our services, our 2024/25 **Annual Equalities Report** is now published, as detailed in the next section of this report;
- The Group has continued to monitor EDI data this quarter, in particular, following the improvements the Wheatley Foundation has made to the **Bursary** application process informed by EDI data analysis. From applications received this year compared to last year, we have seen a rise in applications from people of Black ethnicities, as well as white non-British backgrounds. We have also seen a small increase in individuals declaring a disability. We have compared this to EDI data for those awarded bursaries and have seen more ethnic diversity than last year, largely representative of applicants, and a more balanced gender split than last year (60% of awardees were women, compared to 74% in the previous year). We will include full comparison in our next annual equalities report;
- Our **good practice** in using EDI data has been recognised externally; in July we were invited to share our approach and insights on effective EDI data practices with the Scottish Federation of Housing Associations (“**SFHA**”) and Housing Diversity Network (“**HDN**’s”) joint EDI network. Following this, HDN approached us to host their members at a ‘study visit’ in November to share our successes and challenges, This took place on 7 November and was very well received;
- The Group also hosted HDN’s first Scottish Equality Conference on 28 August and presented a keynote speech on our approach and collection, storage and use of EDI data. At the conference Professor Paddy Gray, Chair of our partner Board, the Wheatley Foundation, was a panel member discussing the importance of allyship in support women in the housing sector; and



- Our efforts have also been acknowledged by the Scottish Housing Awards, shortlisting the Group for the ‘Marion Gibbs award for equality in housing’ recognising how we have used EDI data to inform our Different Together approach.

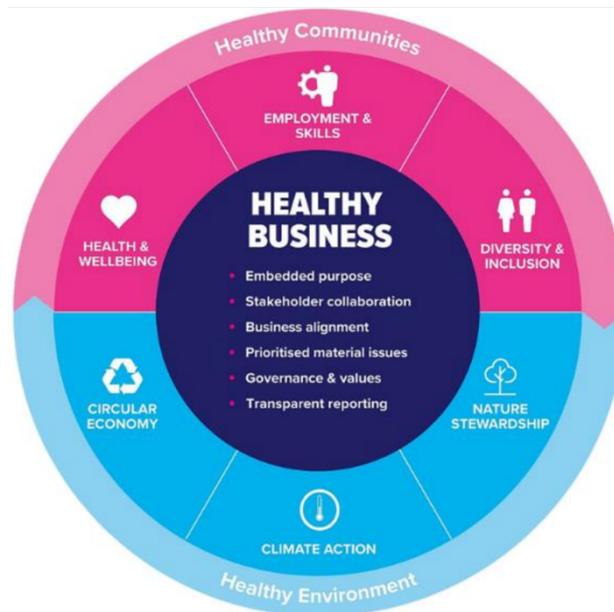
Annual Equalities Report

- 4.2 The design of our Group **Annual Equalities Report** for 2024/25, detailing the data we have collected over the year and what this has informed, has been informed by our Customer Focus Network and Different Together Community of Excellence. This has also been reviewed by our Inclusion Advisor at BITC who commented: “Overall, the report is great. I've enjoyed reading your earlier reports, and this one clearly follows suit”. **The report is attached at Appendix 1 for the Board to note.**
- 4.3 EDI data collection is an important topic within the sector, balancing the requirement to collect protected characteristic data as per the SHR, with the data protection consideration to only collect and store information on an identifiable basis if this is used specifically to inform service delivery for that individual. Information used for statistical purposes should therefore be collected on an anonymous level, however, anonymous information also has its limitations in use.
- 4.4 We last collected EDI data anonymously from tenants in 2022 and had originally committed to collecting this again in 2025. However, after scoping options and engaging staff, it was decided that this would not represent value for money for customers and we would focus instead on the work underway to enhance our approach to deliver tailored, personalised services, including the information we need to do this.

TIDE result and BITC Responsible Business

- 4.5 TIDE is Onvero’s all-in-one tool for self-assessment, evaluation and benchmarking, designed to help organisations assess and enhance their culture by focusing on progress and strategies in promoting diversity and inclusion. Using this we have seen our progress with EDI externally validated:
- 2022: Scored 56% and received Bronze accreditation;
 - 2023: Scored 72% and received Silver accreditation; and
 - 2024: Scored 81% and received Silver accreditation and social mobility award, scored 1st in sector.
- 4.6 This year, the Group achieved **85%**, are at ‘sustain’ level and following benchmarking have been awarded our first ‘Gold’ standard. This is particularly impressive as TIDE was revamped this year to bring it up to date with best practice, setting the bar higher. Onvero highlighted any improvement was a great result as many organisations have seen a decrease this year due to the increase in standard.
- 4.7 The benchmark (which previously has given the us a bronze/silver rating) confirmed us as in sector leading position as the top scorer in both the housing sector and the third sector. Our top performing category was training, with our approach landing us seventh overall out of 180 other employers.
- 4.8 We are engaged with BITC to support our ambitions to be a Responsible Business (“**RB**”). We have seen tangible impacts delivered from this partnership, for example, the Group are now working with Greggs to support employability programmes.

- 4.9 BITC have an RB tool that allows members to measure progress using a clear framework, assessing current RB maturity level and identifying how to improve. This encourages business to assess their overall RB strategy and focuses on the following six topics that BITC view as key to being a responsible business: **Health and Wellbeing, Inclusion, Employment and Skills, Circular Economy, Climate Action, Nature Stewardship**. The map below shows how BITC group these into three categories, Healthy Communities, Healthy Environment and Health Business.



- 4.10 We undertook our first RB assessment earlier this year, with results providing both our scores as well as a benchmark against all BITC members, and members specifically within our sector.
- 4.11 In summary, BITC member organisations in the housing and homelessness sector mostly scored at an 'Embedding' maturity level for 'Healthy Business' and 'Healthy Communities' areas. The sector scored lower maturity levels for 'Healthy Environment'. Comparatively, we **scored higher maturity levels across all these areas**, including the highest level of 'Transforming' for some.
- 4.12 Considering our scores, key focus areas for enhancing our approach were highlighted as the **transparent reporting** indicator within the 'Healthy Environment' and 'Healthy Communities' sections; although it should be noted that we outperformed both benchmarks for this indicator in relation to climate action, and employment and skills.
- 4.13 The Group are currently scoping how we could improve TIDE and BITC RB scores to shape our future Group EDI plans, both strategically to inform our 2026-31 strategy development, and operationally to shape our next Group EDI action plan. We are also using this insight to inform our Group Sustainability Framework review. The Customer First Network is engaged in reviewing our current action plan and Group EDI and Human Rights policy, and the Wheatley Solutions Board will be updated on how we have used these external measurement tools to support this when our updated plan and policy are presented for approval and thereafter presented to this Board for noting.

- 4.14 As we develop our next 2026-31 strategy, EDI and our RB approach are key consideration. It is proposed then that we formally adopt Onvero's TIDE and BITC's RB tools to measure our progress across Group over the next five years, as part of our wider benchmarking approach. This will allow us to:
- **Drive EDI and RB activity and measure impact**, identifying opportunities to engage with Onvero and BITC networks and initiatives;
 - **Demonstrate enhanced transparency of our organisation**, providing clear visibility into our practices, fostering trust among our people and communities; and
 - **Connect with and learn from other** organisations, providing opportunities to exchange ideas, as well as demonstrate our best practice.

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 EIAs. Ensuring a diverse range of customers informs our next five-year strategic priorities has been a key focus of our engagement.
- 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 Group Annual Equalities Report details how this data is used.

6. Environmental and sustainability implications

- 6.1 There are no direct environmental or sustainability implications arising from this report. Diversifying our engagement structures supports our Group Sustainability Framework implementation by engaging customers with our sustainability priorities, ensuring different perspectives are involved. We will also engage with customers as part of the review of the Framework this year, to ensure that diverse voices are heard.

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 EDI and Human Rights policy, and the Group 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 We already have strong EDI and RB foundations and have progressed well in these areas over the last few years. As we go into our next strategy period, these areas continue to be a focus for us as an enabler of success particularly as we consider our wider contributions and social impact.

13. Recommendations

- 13.1 The Board is asked to note the progress of the action plan as detailed in this report and note the 2024/25 Annual Equalities Report attached at Appendix 1.

LIST OF APPENDICES:

Appendix 1: 2024/25 Annual Equalities Report

One Group, Many Voices

Group Annual Equalities Report
September 2025

DRAFT

different
together



Contents

| | | |
|----|-----------------------|----|
| 1. | ➤ Foreword | 3 |
| 2. | ➤ Introduction | 4 |
| 3. | ➤ Housing applicants | 6 |
| 4. | ➤ Stronger Voices | 15 |
| 5. | ➤ Wheatley Foundation | 22 |
| 6. | ➤ Our people | 33 |
| 7. | ➤ Board members | 43 |
| 8. | ➤ Suppliers | 47 |
| 8. | ➤ Next steps | 49 |

We can produce information on request at no cost in large print, in Braille, on tape or in another non-written format. We can also translate this into other languages. If you need information in any of these formats please call us on 0800 479 7979 or email info@wheatley-group.com

Możemy, na życzenie, bezpłatnie przygotować informacje dużą czcionką, w alfabecie Braille'a, na taśmie lub w innym niepisanym formacie. Możemy je również przetłumaczyć na inne języki. Jeśli potrzebujesz informacji w którymkolwiek z tych formatów, zadzwoń do nas pod numer 0800 479 7979 lub wyślij e-mail na adres info@wheatley-group.com

Podemos produzir informações mediante solicitação e sem custos, em impressão grande, Braille, cassete ou noutro formato não descrito. Também podemos traduzi-las em outros idiomas. Se precisar de informações em qualquer um destes formatos, contacte-nos através do número 0800 479 7979 ou envie um e-mail para: info@wheatley-group.com

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

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



Foreword

Jo Armstrong, Wheatley Group (“the Group”) Chair

Equity, diversity and inclusion (EDI) continue to be a priority for us, and we consider this when designing and delivering our services. This is now our third Annual Equalities Report detailing the equality data we collected over 2024/25, what the data informed, what actions we put in place as a result and what benefits we have seen. You can view our previous reports on the [EDI page of our website](#).

We now have strong structures that help us ensure our EDI approach is embedded and sustained, including:

- ▶ **regular** collection, reporting and monitoring of equality data to inform our decision-making, for example, through Equality Impact Assessments (EIAs); and

- ▶ **establishing** our Different Together approach and six staff networks, as well as a Customer Focus network to drive EDI training, awareness-raising, support and resources.

During 2024/25, we continued to deliver our [Group EDI Action Plan](#), with a specific focus on **access and equity** for both our customers and colleagues, to support social mobility initiatives to tackle inequalities. We have a continued commitment to embrace, promote and sustain our EDI and Human Rights approach supporting our [Group EDI and Human Rights policy](#) which we updated in April 2024. Both our EDI policy and action plan will be reviewed by the end of 2025.

Our [2021-2026 strategy Your Home, Your Community, Your Future](#) sets out our desire to

increasingly tailor services to suit the needs of our customers; diversify our engagement through our Stronger Voices programme; and consider how our workforce can more closely reflect our communities. We are now developing our next five-year strategy; through this we will reinforce our commitment to being a responsible business, and weave EDI through our ambitions as an enabler of success.

In this final year of our Group strategy, delivering services in a personalised way, driven by customer-insight priorities, continues to be a key focus for us. EDI therefore continues to go to the heart of the common [values](#) shared by all members of the Group. You can read more about our EDI approach, including what EDI means for us, on [our website](#).

Introduction

We recognise the value of the diversity of our employees and communities and the benefits this can bring to the Group.

Our Group [EDI Action Plan, One Group Many Voices](#), details the practical steps we are taking to embed our Group [EDI and Human Rights Policy](#).

This report has been informed by our Customer Focus Network and externally reviewed by Business in the Community (BITC), a network of organisations committed to responsible business, which we are members of.

This report covers April 2024 – March 2025, and details what our EDI data has informed and the steps we have taken to further embed EDI. This includes data from the following groups:

- ▶ **Prospective customers** – via our housing application platforms;
- ▶ **Stronger Voices** – our customer engagement programme;
- ▶ **Employees** – via a staff survey in 2024, with nearly a 60% return rate;
- ▶ **Job applicants and employability programme referrals** – JobTrain and Foundation employability projects;
- ▶ **Board members** – upon appointment; and

- ▶ **Suppliers** – survey through contract management system.

We also have and use the following data, the results of which are detailed in our 2023 and 2024 Annual Equalities reports:

- ▶ **Customers** – anonymous survey conducted in 2022 which received responses from over 10,300 customers.

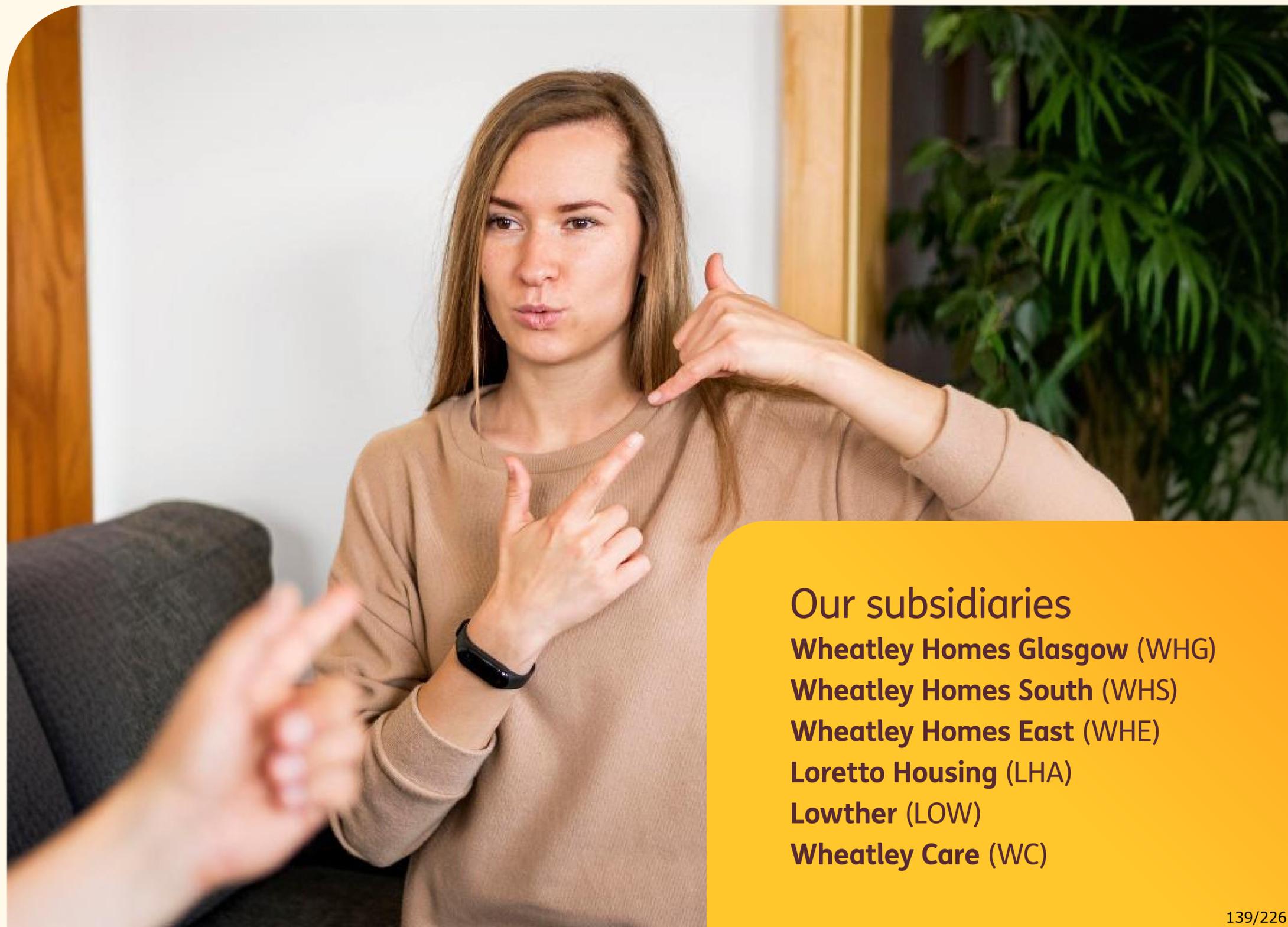
“Wheatley is committed to providing equitable, inclusive, and diverse opportunities”

– BITC Advancing Social Mobility in Scotland Report June 2025

Introduction

We previously committed to undertaking an anonymous survey in 2025 to refresh the EDI data from our current customers. We scoped the options for this and sought feedback from our Different Together Community of Excellence and Customer Focus Network. Our people were unanimous that the resource and cost implication of undertaking such a survey would not represent value for money for our customers. There are also limitations to how we can use anonymous data. Instead, we decided that it would be more beneficial to ensure information we hold on customers can help enhance our delivery of services in a personalised manner, responsive to specific support needs, and therefore linked to individuals.

Data within this report has been rounded to the nearest full percentage point.



Our subsidiaries

Wheatley Homes Glasgow (WHG)

Wheatley Homes South (WHS)

Wheatley Homes East (WHE)

Loretto Housing (LHA)

Lowther (LOW)

Wheatley Care (WC)

Housing applicants

- MyHousing and Edindex

Housing applicants

We continue to collect and analyse EDI data from our prospective customers through our allocation platform, MyHousing. This includes those who apply in Dumfries and Galloway via the Homes4D&G common housing register, and from late 2024, also customers applying to Lowther Homes. In Edinburgh, our prospective customers access our available homes via Edindex, the common housing register.

We use this data, for example, in Equality Impact Assessments (EIAs) including for our 2025/26 five-year development programme.

One outcome of our current EDI Action Plan is to 'evolve our data'. We have achieved this by now collecting and analysing the demographic data of our letting applicants for our mid-market and full market properties let by Lowther Homes.

The following section details the data collected through MyHousing from 1 April 2024 to 31 March 2025 and for those on the Edindex waiting list as of 31 March 2025. Where available, we have compared data to the 2022 Scottish Census results.

For Lowther Homes, only two quarters of data is available for inclusion in this report. However, as demonstrated in the following section, this shows a slightly different profile than our Registered Social Landlord (RSL) applications. We continue to analyse this to inform Lowther's practices.

Note we have not included 'prefer not to say' or 'unknown' answers in the following data.

Key figures

- ▶ Over 24/25 our RSLs let nearly **4000** homes (excluding new build);
- ▶ **2673** lets to homeless, surpassing our annual target of **2000**;
- ▶ At year end there were over **26,000** applications on Edindex waiting lists;
- ▶ **16,000** applications made through MyHousing for RSLs and over **2000** for Lowther between October 2024 – March 2025.

Housing applicants

Disability

From last year’s Annual Equalities Report, applications from people with a disability have decreased slightly from 26% to 25% – this is in line with the 2022 Scottish Census. The types of disabilities declared largely follow the same trend from 2023/24, and throughout our RSLs, with mental health being the highest. This year, we saw a slight decrease in the percentage of respondents declaring the top three disabilities, while neurodiversity increased from 15% to 18%. To support customers living in neurodiverse households – aligning to proposals on the [Learning Disability and Neurodiversity Bill](#) – we have introduced a neuroinclusive customer service toolkit and enhanced our training for staff, following engagement with our internal Customer Focus Network and Disability and Neurodiversity Network, as well as external experts, [Lexxic](#).

| Are you a disabled person? | Yes |
|----------------------------|-----|
| MyHousing RSL | 25% |
| Lowther | 13% |
| Edindex | 23% |

The remaining % were ‘prefer not to say’ or ‘no’

We understand that some individuals may not consider themselves to be ‘disabled’, even though they may meet the legal definition. We appreciate that not all applicants may have disclosed a disability during the application process, and that the actual figure may therefore be higher.

| Most common disabilities of those who answered ‘yes’ | MyHousing RSLs | Edindex | Lowther |
|--|----------------|---------|---------|
| Mental health condition | 61% | 100% | 56% |
| Long term illness, disease or condition | 43% | | 41% |
| Physical disability | 39% | 54% | 25% |
| Neurodiversity | 18% | | 29% |
| Learning difficulty | 10% | 26% | 8% |
| Deafness or hearing loss | 6% | 14% | 6% |
| Autoimmune disease | 5% | | 8% |
| Blindness or partial sight loss | 4% | 7% | 3% |



Table Sources - MyHousing 2024/25 (Group level) and Edindex*. Blank where no data. ‘% of those who answered ‘yes’ to being disabled. MyHousing RSLs includes WHG, WHE, WHS and LHA.

Housing applicants

Our EDI action plan included an action to ‘enhance EDI information in our digital welcome packs through [ALISS.org](https://www.aliss.org) (a local information system for Scotland), signposting to local community groups and places for support, including disability support.’ Our MyHousing digital welcome packs have been launched, and we promote ALISS as well as raising awareness with staff and on our social media.



Housing applicants

| Ethnicity | MyHousing RSLs | 2022 Scottish Census | MyHousing WHG | MyHousing WHE | Edindex WHE | MyHousing WHS | MyHousing LHA | Lowther |
|---|----------------|----------------------|---------------|---------------|-------------|---------------|---------------|---------|
| White Scottish, British | 72% | 87% | 71% | 77% | 66% | 88% | 80% | 59% |
| African Scottish, African or British African | 8% | 1% | 8% | 4% | 6% | 2% | 6% | 16% |
| Polish or any other white background | 6% | 6% | 6% | 8% | 12% | 4% | 5% | 8% |
| Arab Scottish, Arab or British Arab | 2% | <1% | 2% | 1% | - | <1% | <1% | 1% |
| Asian - Pakistani, Scottish Pakistani or British Pakistani, Indian and any other Asian background | 6% | 4% | 6% | 3% | 5% | 1% | 5% | 9% |

Table Source - MyHousing 2024/25, Edindex and 2022 Scottish Census. Not including 'other'. MyHousing RSLs includes WHG, WHE, WHS and LHA.

Ethnicity

We continue to see greater ethnic diversity in our applications compared to our 2022 customer survey, from which at Group-level 74% of respondents were people from a white Scottish or British ethnicity. Again, our applicants represent a wide range of nationalities with around 70 nationalities declared; as with last year, after British, Nigerian, Polish and Ukrainian continue to have the highest representation.

On Edindex, applicants declared they spoke over 35 different languages with Arabic being the most declared language after English, representing 2%.

Housing applicants

Looking at our language data across the Group, at the end of March 2025 Arabic was the most requested language for interpretation followed by Farsi, Kurdish, Vietnamese and Tigrinya.

At Group RSL level, the ethnicity data is largely in line with the housing applicant data reported in last year's report although we have seen a slight reduction in those individuals from a white Scottish and British ethnicity (75% last year), and slight increase from applicants from Asian ethnic groups (4% last year). At RSL level, we see largely similar results to last year, although notably WHE has seen a reduction in applicants from Polish or other white ethnic groups (14% last year), both WHS and LHA saw a reduction in applicants from white Scottish and British ethnicity (91% and 85% last year respectively), and LHA saw

an increase in applicants from Asian ethnic groups (2% last year).

Stock within Scotland's largest cities, Edinburgh and Glasgow, continue to have the most ethnically diverse applicants and see a proportionately high number of applicants from the African ethnic group. From the 2022 Census we know that 71% of Edinburgh's population was white Scottish/British, 11% Polish or other white background, 9% from an Asian ethnic group and only 2% African ethnicity. Our data sees slight variation from the Scottish 2022 Census where for Glasgow around 73% of the population were White Scottish/British; 11% Indian, Pakistani or other Asian ethnic group; 6% Polish or other white ethnic group; and 4% African ethnicity.

In 2024/25, 19% of MyHousing RSL applicants were non-UK nationals; out of this 57% were refugees (72% last year), 35% migrant workers (19% last year) and 7% asylum seekers (9% last year).



Throughout the year we housed 450 New Scots (compared to 285 New Scot customers in the previous year). We continue to support our New Scots customers and enhance our approach including by introducing a six-monthly review of [New Scots welcome pack](#). We have sent this to all New Scots customers, and it is available and translatable on our websites.

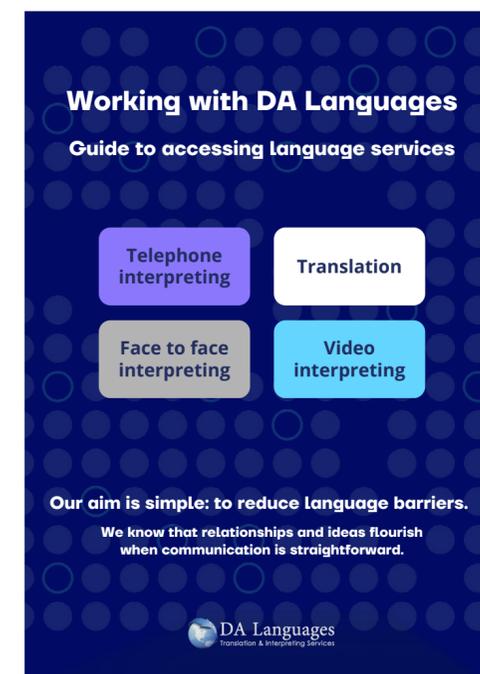
Housing applicants

Support for asylum seekers is one part of a broader focus on inclusive practice. We are working with Local Level Community (LLC) meetings with different landlords to share best practice to support refugees and asylum seekers, of which we are seeing an increase. We have undertaken partnership working with Glasgow City Council's new asylum team to support those settling into our communities.

Last year, as part of our aim to provide EDI friendly communications, we reported that we had made improvements for customers whose first language is not English to access our services.

[Click here for accessibility and translation support](#)

To improve our communications, we refreshed our translation/interpretation services in September 2024. We launched new staff guidance and training videos to support accessing this service, with tips on how to ensure an efficient experience for both staff and customers. Since the new service was launched until the end of March 2025, we have fulfilled over 5600 telephone interpretation requests.



Visit [DA Languages](#), our translation and interpretation provider

We have also continued to work in partnership with Shelter to help drive their Anti Racism and Housing network. We hosted the network meetings in November 2024 and June 2025 which brought together housing professionals, academics, and third sector partners to explore how the housing system can address structural inequalities. In summer 2025, we commenced a joint study to understand ethnic minority access to housing in Scotland. The outputs of this will be published later in the year.

Religion and belief, civil partnership and marriage, maternity/paternity, sex / trans and sexual orientation

Our MyHousing RSL data for these protected characteristics follows similar patterns to the data we reported last year.

For Lowther Homes, less than 1% of applicants considered themselves trans, 11% were LGBT+, 57% female and 39% male. Civil partnership and marriage, and maternity/paternity data was similar to our RSLs.

Housing applicants

Age

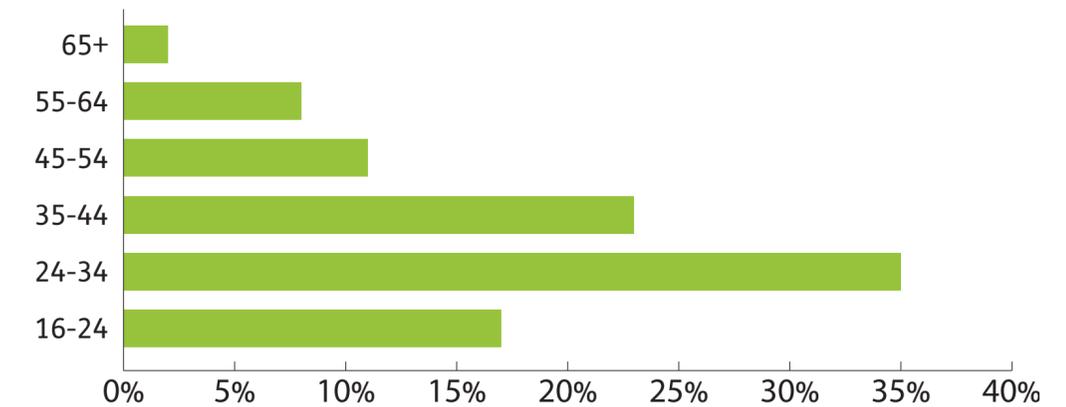
In evolving our data we have this year, for the first time, analysed the age of our housing applicants. We see representation across all age ranges, with less applicants from older age groups. This contrasts with our 2022 RSL customer data in which the number of respondents from older age groups was broadly representative of the age profile reported in the 2022 Scottish Census.

It's important that our homes are capable of being lifetime homes and can adapt to the different needs of different age groups. Recognising the need for family homes, we have launched an underoccupancy project supported by Glasgow City Council. As of the start of quarter one 2025/26, we have incentivised 10 successful moves/re-lets,

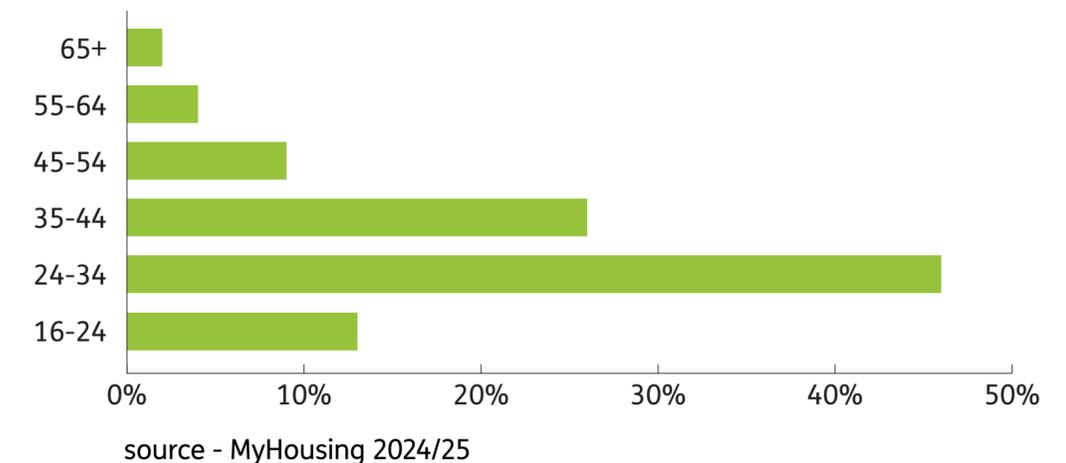
with 18 live cases in progress. This has made a number of larger homes available to homeless households and families, forming part of our response to the housing emergency.

Our customers are offered support when an offer is made to assist the transition from temporary to permanent accommodation. We have a commitment to flip 500 properties from temporary accommodation to permanent homes by March 2026 and as of July 2025, we have already delivered 430. We will also review local authority housing emergency action plans as we begin to consult and draft our new homelessness policy next year.

Age groups proportions across RSLs



Age groups proportions across Lowther



Stronger Voices

Stronger Voices



We use our Different Together approach to inform our engagement. At the end of 2024/25 we had over 1500 Customer Voices (customers registered in our Stronger Voices engagement programme). With over 58,000 pieces of feedback from customer insight received during the year, we continue to have a strong commitment to involving customers in shaping our services as outlined in our [Group Stronger Voices, Stronger Communities Framework](#) which was reviewed at the end of 2023.

Our Stronger Voices team has worked to involve underrepresented groups, recognising a lower number of young people are registered in our engagement programme. For example, this has included running 'Art and graffiti' sessions in the Glasgow South area aimed at those aged 16-23. In Dumfries, young people from a local Young Persons project attended a site visit to WHS new-build development, Curries Yard – their feedback on the site will be used to inform future developments. WHS have also engaged with Johnsonbridge primary whilst in WHG Easter activities included engagement with young people in Pollok.

In the last year, we have also engaged customer focus groups to inform the Group's Design Guide (for new-builds). To ensure diverse perspectives informed the development of the guide, engagement involved a wide range of customers, including New Scots, and particularly focused on parents and families who had young children.

In Glasgow, we worked with 'G15 Thriving Places' to support their 'Building Bridges' project to promote greater inclusivity in Drumchapel through use of music, food and cultural activities. The project aims to break down barriers, for example, our New Scots approach and Welcome Pack has been promoted with the community which includes our WHG customers.

Stronger Voices

Our Customer Focus Network has continued to inform our approach to delivering our services in a personalised, and tailored way. The network meets bi-monthly to identify and action areas of improvements in terms of inclusivity and accessibility for our customers and communities, for example:

- ▶ Shaping the learning staff feel would be beneficial to help support them deliver personalised services, highlighting the importance of learning from case studies and practical information to make it real for staff; and
- ▶ Informing the development of a Reasonable Adjustment Policy, including the internal process and data management.

This has also included informing our approach to EDI friendly communications, such as informing the development of the previously

mentioned neuroinclusive customer service toolkit and our relaunched translation/interpretation service. We have promoted this service with customers.



We have had good feedback about the use of the service. For example, at the end of last year, a deaf tenant in Glasgow praised his housing officer who arranged for a British Sign Language (BSL) interpreter to attend the annual tenant visit, after the tenant let us know that his sister, who usually interprets

for him, was unable to attend. As well as completing the annual visit, the housing officer was able to arrange extra support for tenant, with a flashing doorbell and smoke detector, and a referral to our Home Comforts service. The tenant wrote to us and said

“I have never seen a housing officer or anyone from another organisation in my home with an interpreter before. It was a really good experience.”

Stronger Voices

We are also tackling language barriers by securing funding to provide ESOL classes (English for Speakers of Other Languages). As of July 2025 we have supported 44 customers to access basic/introduction level classes, with ten customers now progressing to the advanced course. Our revised New Scots action plan includes scoping further opportunities to expand this activity, which we know provides participants with greater independence.

In March 2025, we engaged over 230 customers across the Group to inform our priorities as we develop our next five-year strategy, using our EDI data for Customer Voices to help ensure diverse representation. We plan to undertake further engagement including with current and prospective customers, as well as stakeholders, to ensure a wide range of perspectives feed into our

plans. Already, it is clear that personalisation of our services and strong communication and engagement, responsive to need, will continue to be a priority for us, with EDI informing our approach.

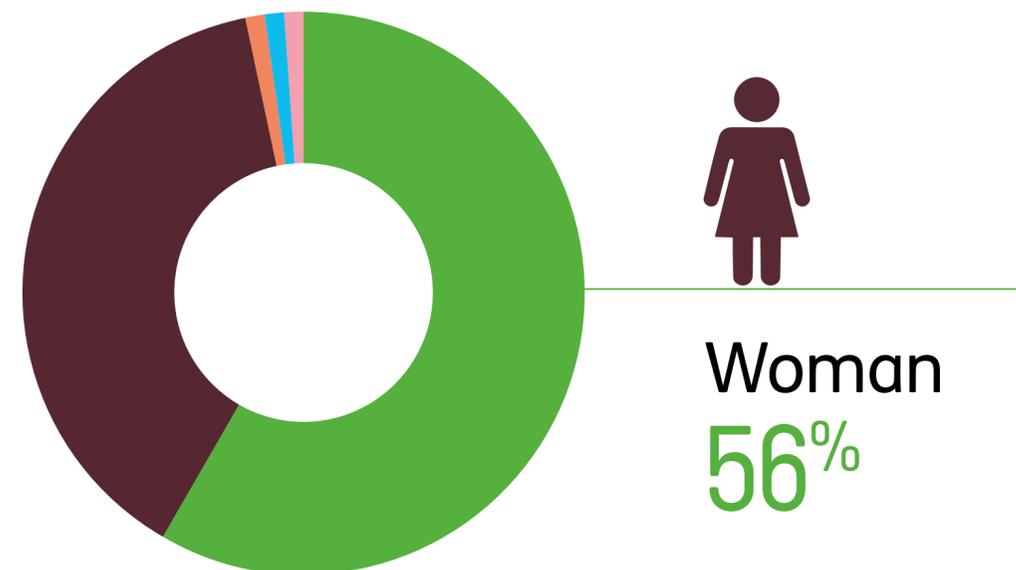
Tackling food poverty and supporting social mobility is another priority for us. In 2024/25, our Wheatley Foundation worked with our Stronger Voices team and supported the launch of two community larders (in Drumchapel and Knightswood) and supported over 830 people to access larder provision throughout our communities. We launched the Drumchapel Larder at a community event at the end of March.

Prior to launch, as part of the [Business in the Community \(BITC\) 'Seeing is Believing' visit to Drumchapel](#), our Chief Executive welcomed

senior national business leaders from Greggs, The Big Issue, Joseph Rowntree Foundation, Mott MacDonald and Skyscanner to hear firsthand and understand the challenges faced by those living and working in the area, including low social mobility, unemployment and elevated levels of food insecurity. The visit also included conversation with our customers who we have supported through [Wheatley Works](#), and an ask of the businesses to consider how they can support our activity. We have already seen positive outcomes from this, for example, we are exploring an employability partnership with Greggs. Roisin Currie, Greggs Chief Executive said: “The work Wheatley Foundation is doing and how we can connect with that, has left us feeling inspired.”

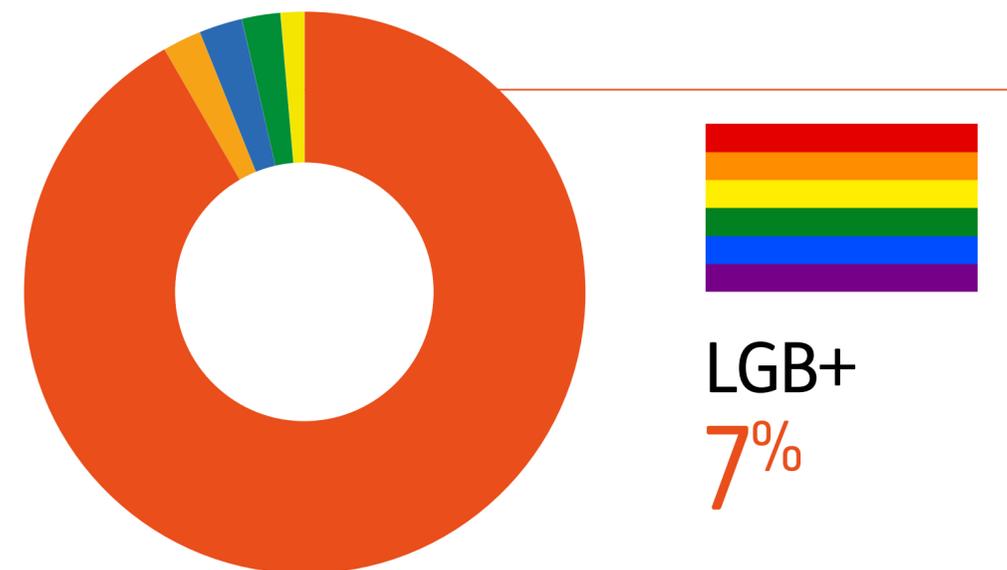
Stronger Voices

Gender identity



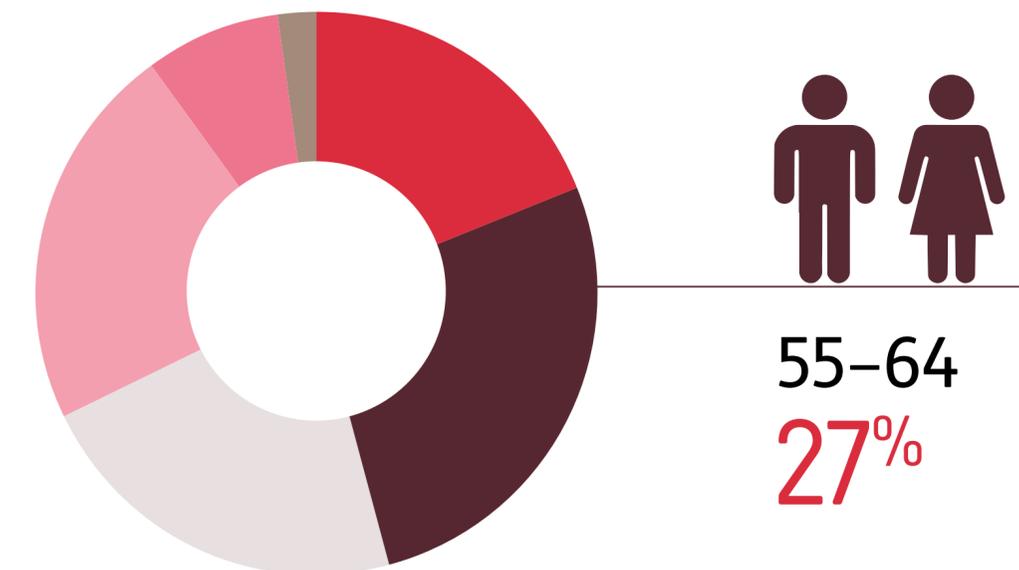
| | 23/24 | 24/25 |
|---------------|-------|-------|
| ● Woman | 59% | 56% |
| ● Man | 36% | 37% |
| ● Non-binary | >1% | >1% |
| ● Trans man | >1% | >1% |
| ● Trans woman | >1% | >1% |

Sexual orientation



| | 23/24 | 24/25 |
|------------|-------|-------|
| ● Straight | 81% | 78% |
| ● Other | 2% | 2% |
| ● Bisexual | 1% | 2% |
| ● Gay | 2% | 2% |
| ● Lesbian | 3% | >1% |

Age

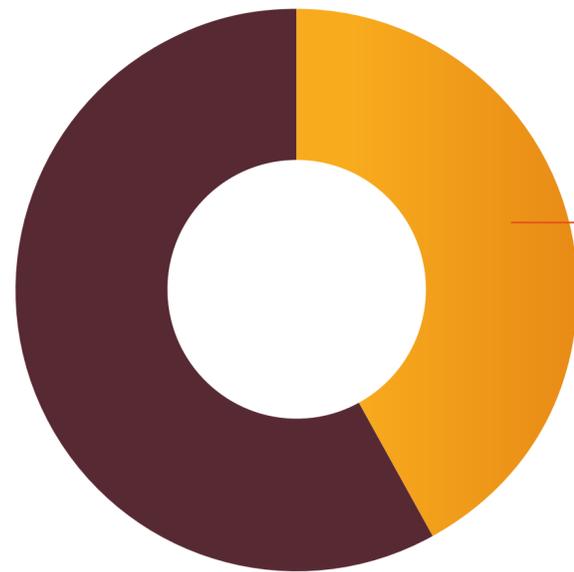


| | 23/24 | 24/25 |
|---------|-------|-------|
| ● 65+ | 20% | 19% |
| ● 55-64 | 29% | 27% |
| ● 45-54 | 22.5% | 22% |
| ● 35-44 | 16% | 22% |
| ● 25-34 | 7% | 8% |
| ● 16-24 | 2% | 2% |

Stronger Voice data at end of 2024/25, remaining % were 'prefer not to say'

Stronger Voices

Are you or is any of your household a disabled person?



Yes
42%

- Yes 42%
- No 45%

Stronger Voice data at end of 2024/25, remaining % were 'prefer not to say'

We appear to have a higher percentage of disabled customers involved in our engagement framework than the general Scottish population, which found around 24% of people declared a disability. However, this is broadly representative of our 2022 RSL customer equality data survey in which 45% of respondents said they were disabled.

In terms of the types of disabilities declared by Customer Voices, the percentage of responses has slightly shifted to last year as detailed below.

| If 'yes', most common disabilities declared | 23/24 | 24/25 |
|---|-------|-------|
| Long term illness, disease or condition | 72% | 64% |
| Physical disability | 57% | 51% |
| Mental health condition | 56% | 51% |
| Neurodiversity | 23% | 20% |
| Learning difficulty | 18% | 20% |
| Deafness or hearing loss | 22% | 16% |
| Autoimmune disease | 7% | 6% |
| Blindness or partial sight loss | 6% | 5% |



Stronger Voices

Ethnicity

The ethnic diversity of our Stronger Voice data largely aligns with our [2022 RSL customer EDI survey](#), and is similar to the Stronger Voice data reported last year.

| Ethnicity | 23/24 | 24/25 |
|---|-------|-------|
| White Scottish, British | 88% | 85% |
| African Scottish, African or British African or black British | 4% | 5% |
| White Polish or other white ethnic group | 3% | 4% |
| Other ethnicity | 5% | 5% |

Stronger Voice data at end of 2024/25, remaining % were 'prefer not to say'



Wheatley Foundation

Wheatley Foundation



The [Wheatley Foundation](#), has continued to maximise access to employment, training and learning opportunities for customers of all ages, and support customers by tackling social exclusion and alleviating the impacts of poverty – inherently we take an EDI approach in this work.

Social mobility is a theme throughout our EDI approach and the Foundation's work is central to this. We featured as a case study in BITC's social mobility report published in June 2025. Over 2024/25 we continued to monitor access to Foundation employability programmes and support services including welfare benefits and financial wellbeing. Details of the data collected over the year are on the next page.

Employability programmes

We continued to support employability programmes. This includes 'No One Left Behind' (NOLB) a Scottish Government funded programme targeted at young people, the Way Ahead (WA) programme, which provides support to those in recovery from an addiction and/or experiencing homelessness and/or with an offending background, and Progress 4 Parents (P4P), a programme based in Edinburgh and Glasgow. P4P supports parents and i.e. or primary caregivers aged 16+, and in Glasgow is targeted at those who have a disability need within their household.

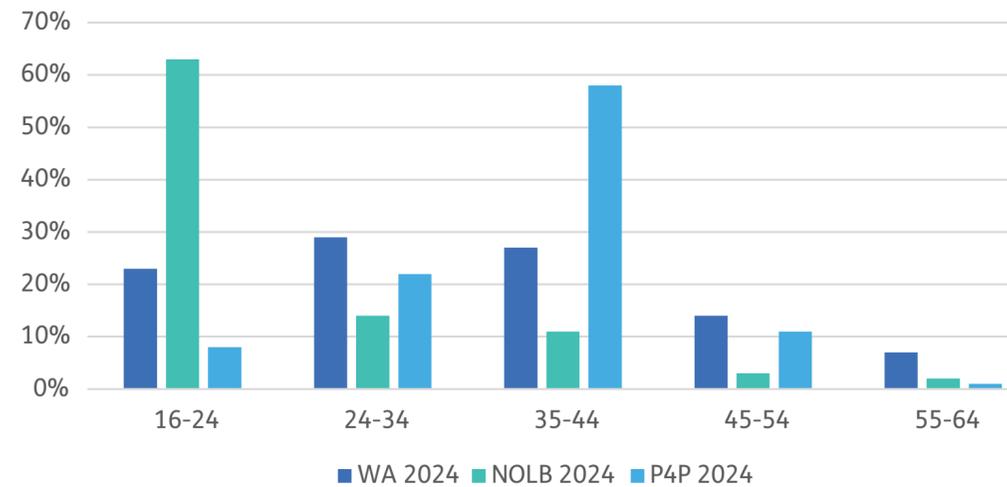
In total for 2024/25 we had 56 referrals for NOLB, 138 for WA and 104 for P4P.

Wheatley Foundation

Age

Over the year, we again saw referrals from a wide range of ages. This was particularly evident for WA as the programme is now open to all ages, whereas previously, this was targeted at over 29s. We believe this increase is due to more tailored and expanded promotion, in collaboration with different partners, leading to more young people joining the WA programme. We also witnessed a growth in the 16-24 age group for NOLB, while P4P saw a more balanced distribution across the age ranges this year.

Employability referrals 23/24 – Age



Employability referrals 24/25 – Age



Source - Wheatley Foundation employability programme data



Wheatley Foundation

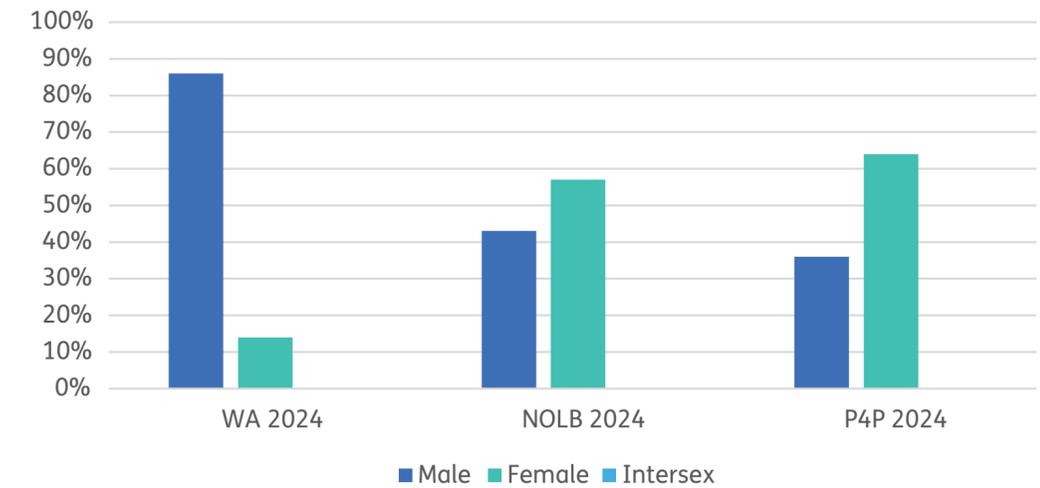
Sex

For WA we have focused on increasing referrals from women, whilst for P4P we have worked to increase referrals from men, for example, through interchanging referrals between these. We believe the imbalance here is due to the target audiences of these programmes. We also undertook a targeted promotion for P4P by proactively using our data to contact around 1600 parents with health conditions about the programme. Despite these efforts, the year end results for WA remain the same as the previous year and for P4P, less men were referred, so continuing to address this is a focus for the current year.

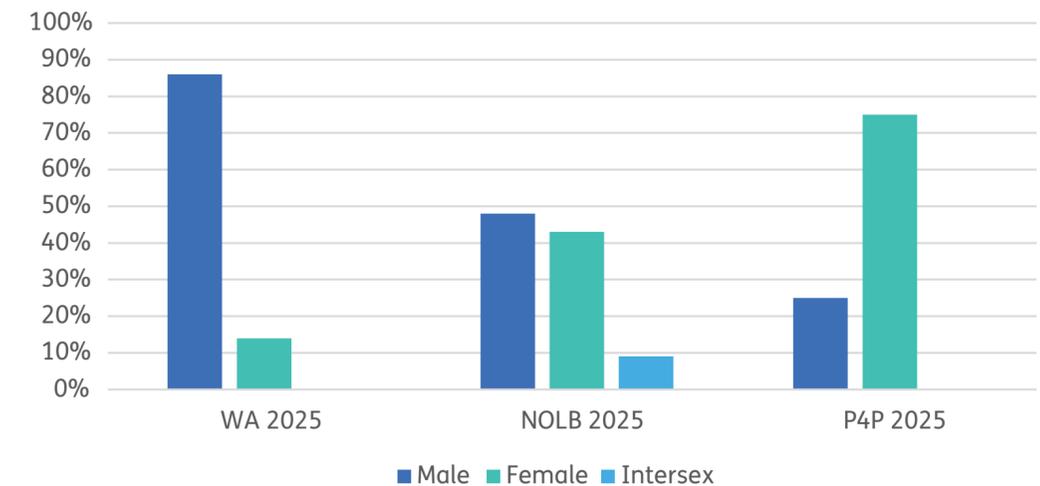
We also saw a more representative spread in sexes for NOLB, however an above average intersex response (nationally this group represents less than 2% of the population) – we believe this may be due to a misunderstanding in answering the question e.g. answering for both mixed-sex parents.



Employability referrals 23/24 – Sex



Employability referrals 24/25 – Sex

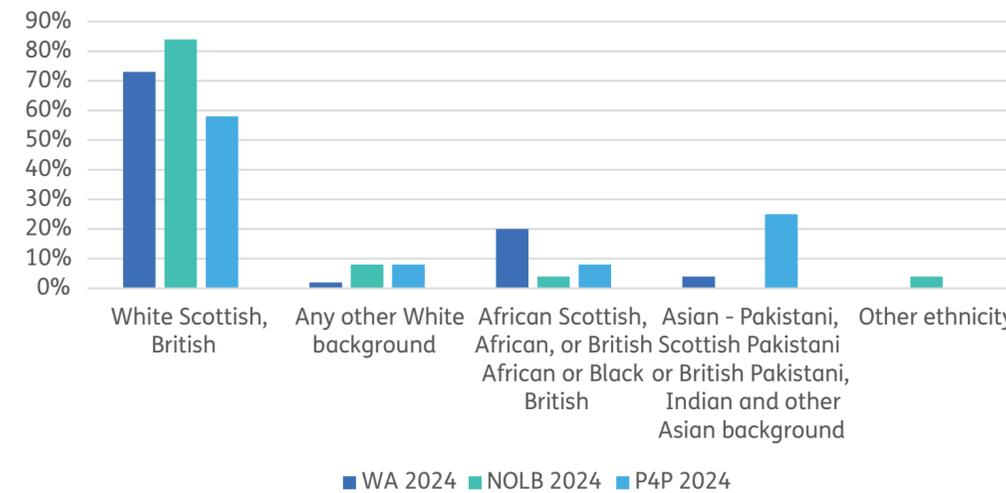


Wheatley Foundation

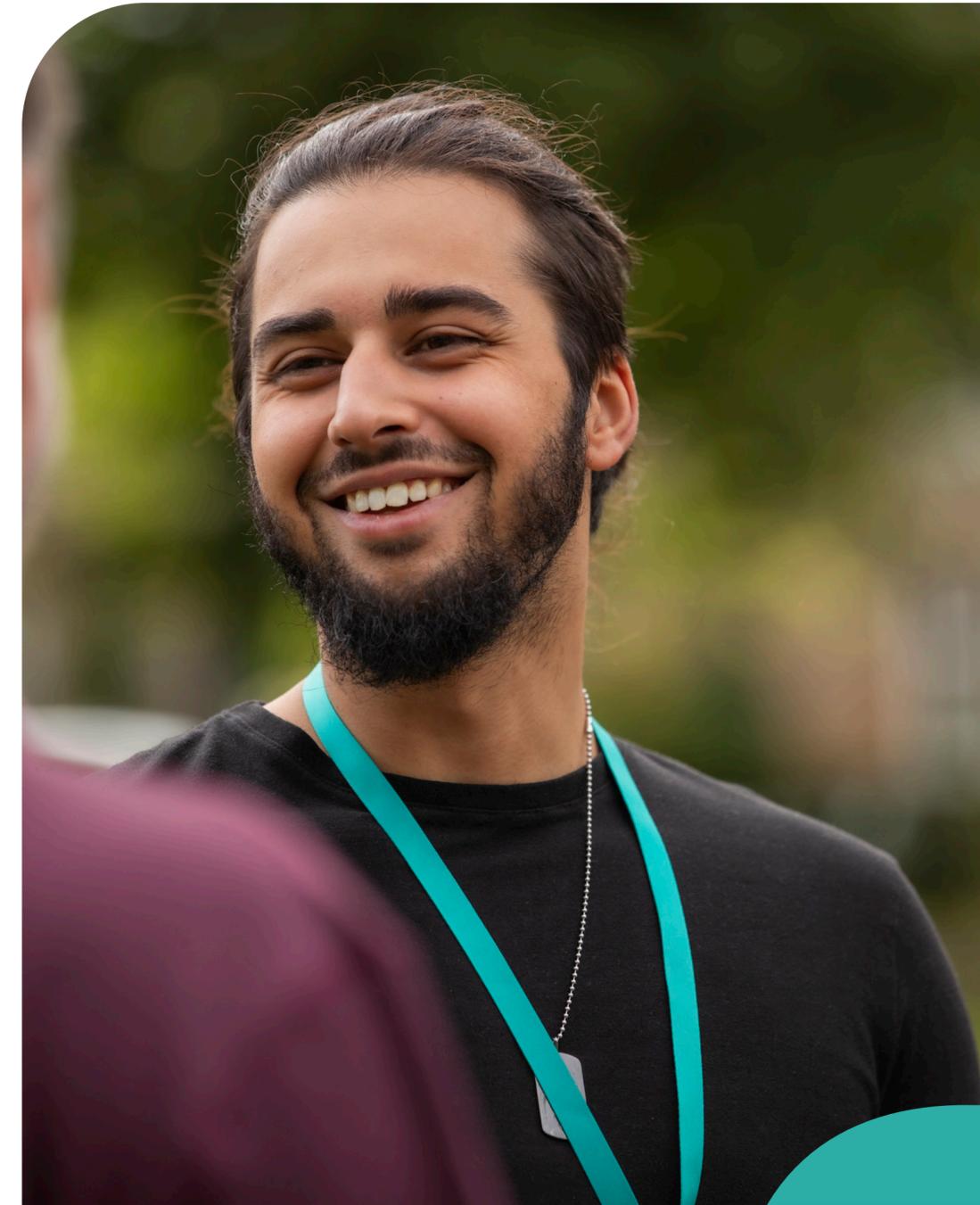
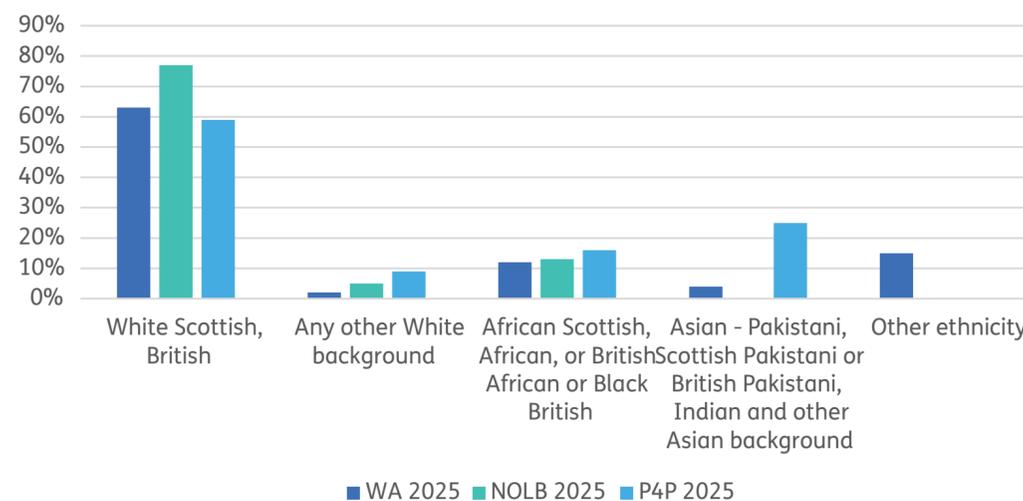
Ethnicity

In analysing the ethnic diversity of these programmes, we saw variation throughout quarters and programmes. Like last year, as primarily targeted in Scotland’s biggest cities, Glasgow and Edinburgh, these projects did see a more proportional ethnic diversity than compared to the overall 2022 Scottish Census (in which 87% of the population were from a white Scottish or British ethnicity). In particular throughout the year, we saw increased ethnic diversity for programmes with a rise in referrals from those of Asian ethnicity. We also targeted promotion of WA to reach our New Scot customers. This included dedicated ESOL programmes to address language barriers, helping our New Scots customers to access this support without long waiting lists.

Employability referrals 23/24 – Ethnicity



Employability referrals 24/25 – Ethnicity



Source - Wheatley Foundation employability programme data. Does not include 'prefer not to say' or 'unknown'

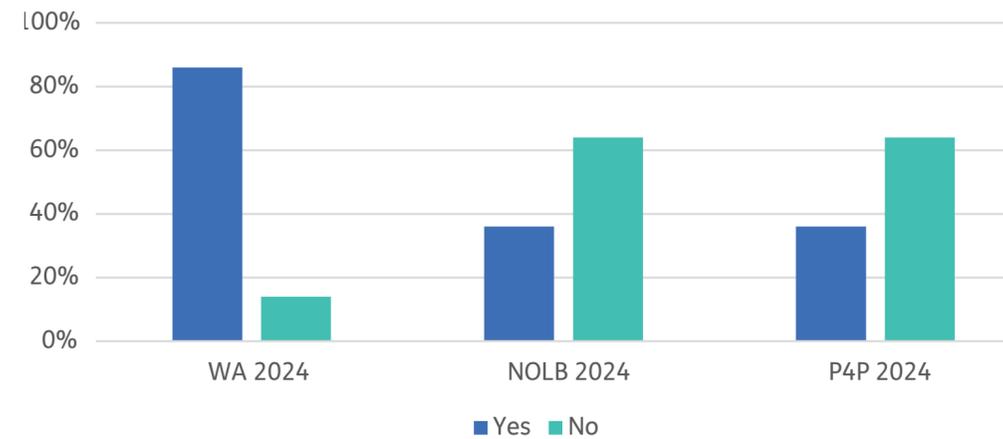
Wheatley Foundation

Disability

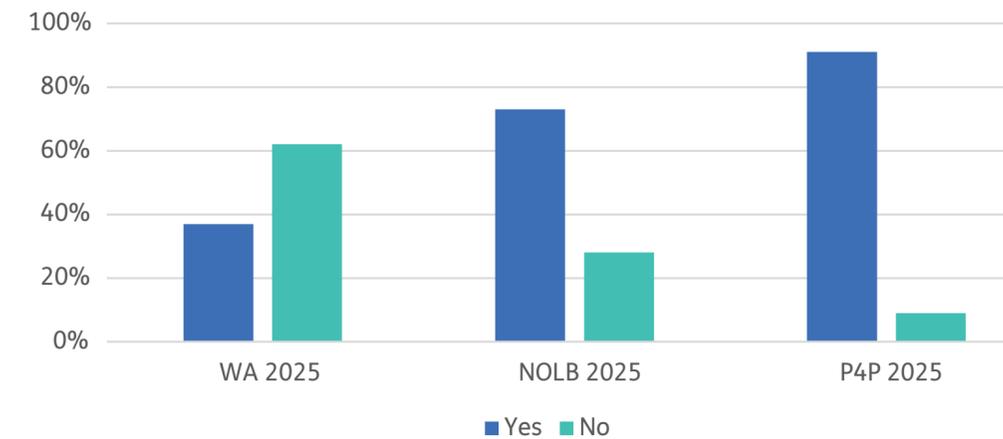
This year, for P4P and NOLB we again saw an increase in referrals from those indicating they have a disability (again we believe the impact of our targeted advertising), with mental health being particularly high and neurodiversity increasing. Although WA has seen a decrease in referrals from disabled people, this is more proportional to national averages in which about 1 in 3 people are disabled.

We have worked to ensure our process for referring to Wheatley Foundation programmes is inclusive, including to those with a disability, for example, by reviewing our processes with our staff disability and neurodiversity network and using an inclusive platform such as MS Forms.

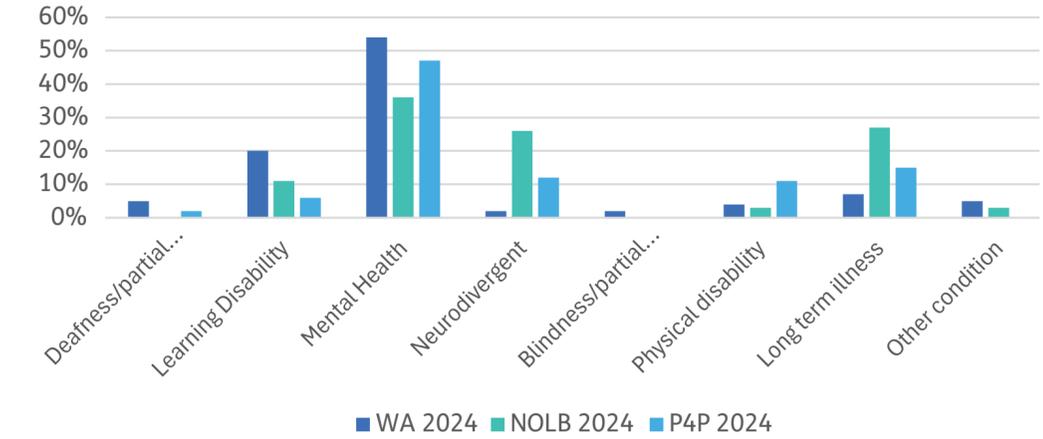
Employability referrals 23/24 - Disability



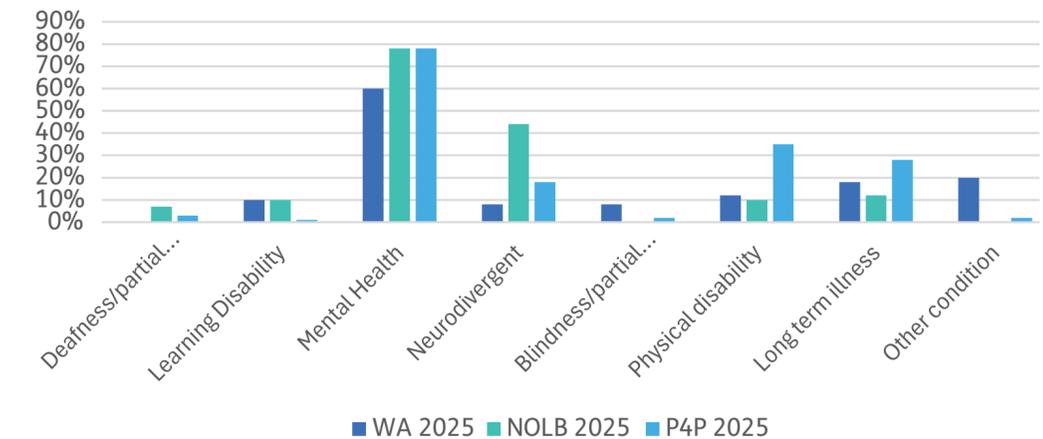
Employability referrals 24/25 - Disability



Employability referrals 23/24 - Type of disability



Employability referrals 24/25 - Type of disability



Source - Wheatley Foundation employability programme data. Does not include 'prefer not to say' or 'unknown'

Wheatley Foundation

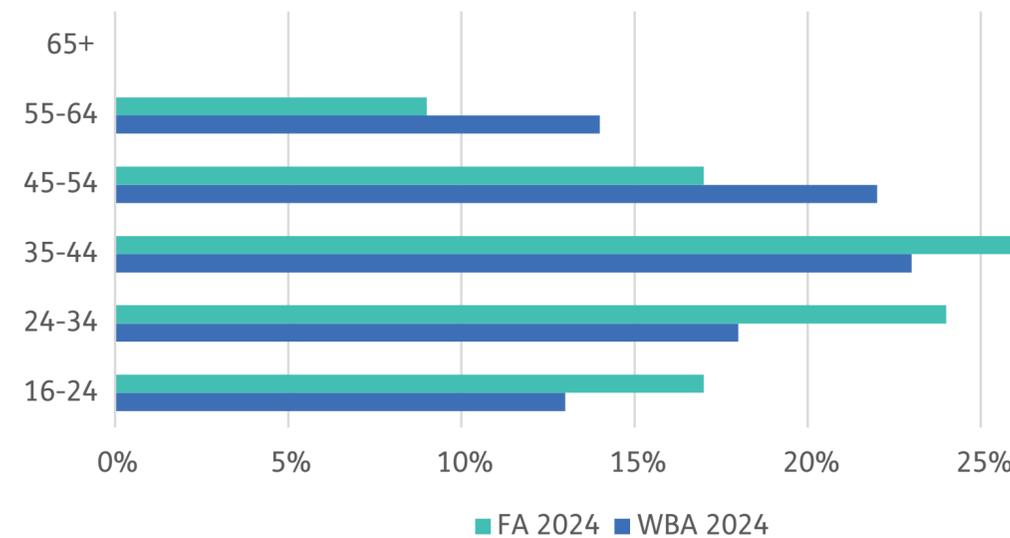
Financial wellbeing

Throughout 2024/25, we continued EDI data monitoring for those accessing our financial wellbeing programmes Fuel Advice (FA) and Welfare Benefit Advice (WBA). We provided over 7300 customers with WBA support, an increase from the previous year, and over 2100 customers supported by FA.

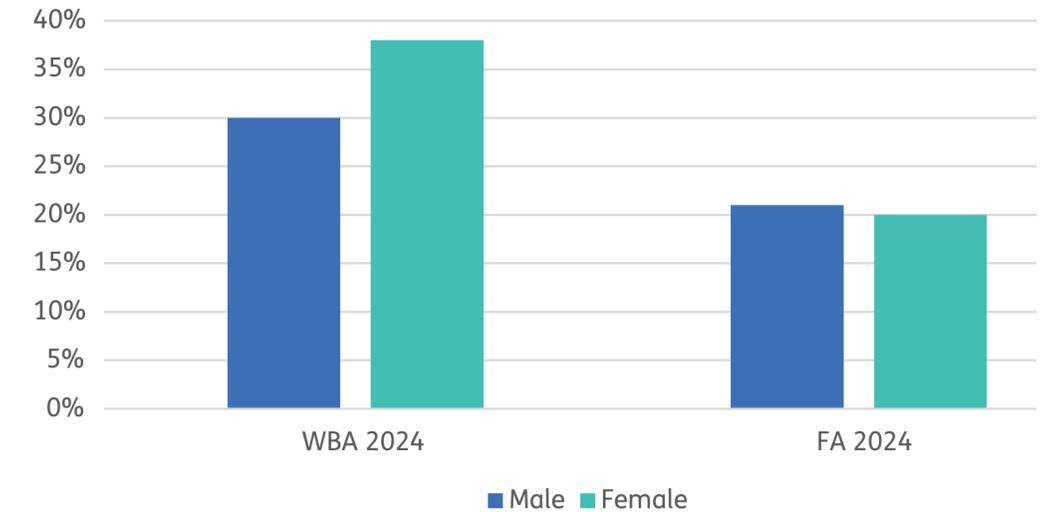
Age

In analysing the data, we see a good range of ages accessing these services which was similar across each quarter and largely in line with Scottish Census 2022 data. This also included a more balanced distribution for FA compared to last year. Our financial wellbeing team engaged at our Livingwell (designed for age 55+) complexes during winter to encourage those eligible to apply for pension credits so to receive winter fuel allowance payment.

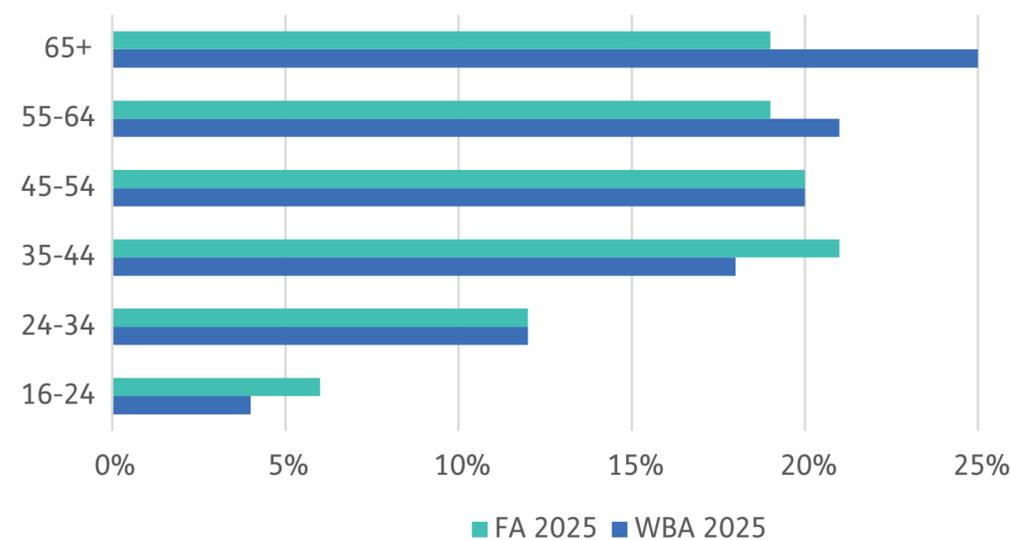
Financial wellbeing 23/24 - Age



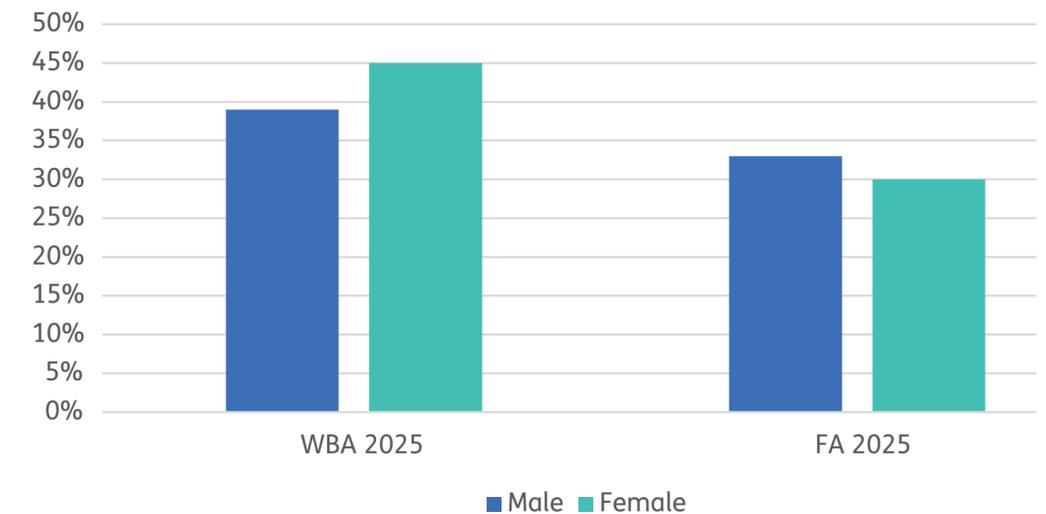
Financial wellbeing 23/24 - Sex



Financial wellbeing 24/25 - Age



Financial wellbeing 24/25 - Sex



Source – Fuel advice and welfare benefit advice (AdvicePro)

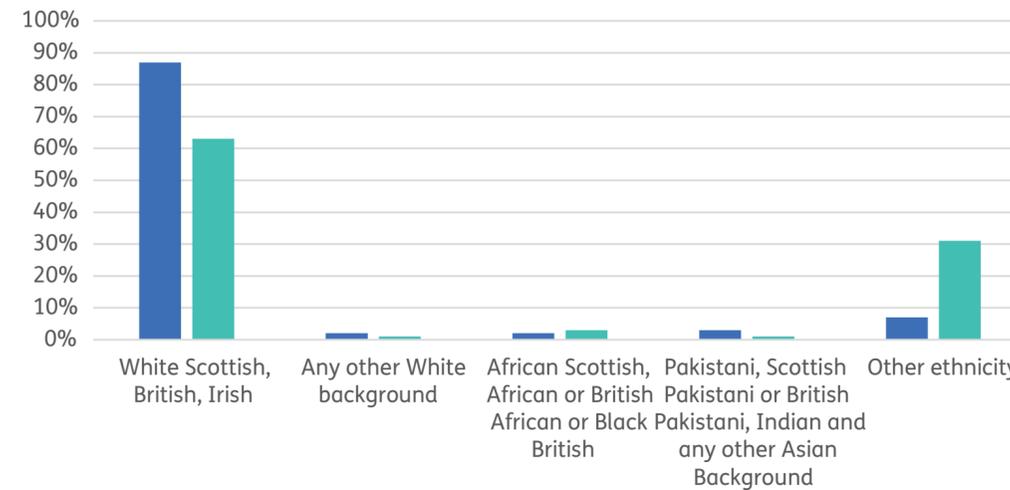
We worked to improve sex data, and in Quarter 4 we had this fully answered and showed a fairly even split between men and women.

Wheatley Foundation

Disability

There remains a gap in our disability data for these programmes although this did improve throughout the year. However, the data for 2024/25 shows only 7% of customers supported by these services declared they were disabled. Again when analysing the disabilities declared – similar to our data elsewhere – mental health is the most declared disability followed by long-term illness and ‘other’ disability.

Financial wellbeing 23/24 - Ethnicity



Source (not including prefer not to say) - Fuel advice and welfare benefit advice (AdvicePro)

Ethnicity

We saw largely the same patterns as last year, with a decrease in white British ethnic groups (from 93%) and an increase in ‘other’ ethnicities.

We have also worked to improve ethnicity data for these programmes and witnessed an increase in ethnic diversity throughout the quarters. Compared to the Scottish Census 2022 data, there is a small underrepresentation of referrals from Asian ethnic groups and ‘any other white background’. However, our ethnicity data is largely in line with our 2022 RSL customer data response.



Wheatley Foundation

Our bursary programme provides people living in our homes with financial support to attend university or college. Bursaries are awarded based on specific criteria, including prioritising people who are carers, care experienced, or live in areas of multiple deprivation.

Bursary – 2024/25 programme

We continued to provide bursaries to people living in our homes who need financial support to attend university or college.

Last year, we received 216 applicants from our customers (from 125 the year before) and 50 were awarded.

Through reviewing EDI data of applicants and awardees, last year we made a number of improvements to our Bursary programme process to increase equity of access. You can read about this in last year's [Annual Equalities Report](#).

The data on the following page shows the EDI information for applicants compared to awardees (with 'unknown' data removed). This showed:

- ▶ Variations in age for applicants compared to awarded although overall, awarded sees more balanced representation in age, and more balanced than last year;
- ▶ Overrepresentation of women in awarded data, in contrast to the previous year. Note our support focused particularly on those with disability and first language not English, rather than sex;
- ▶ More representation for people from Black and Asian ethnicity than last year, however a slight over representation in awarded for people from white British (by 9%) and any other white ethnic group (by 1%);

Wheatley Foundation

- ▶ 14 languages other than English were declared by applicants as their main language and 14% of awardees first language was not English;
- ▶ Increase in applications from those with a neurodiversity (44% of those with a disability, compared to 20% in the previous year showing the application platform was accessible); and
- ▶ Overrepresentation for disability in awarded compared to applications as we would expect given the bursary criteria which includes prioritising people who are carers, care experienced, or live in areas of multiple deprivation.

| Characteristic | Applicants | Awarded |
|--|--|---|
| Age | <ul style="list-style-type: none"> ▶ 16-24 – 53% ▶ 25-34 – 26% ▶ 35-44 – 13% ▶ 45-54 – 8% | <ul style="list-style-type: none"> ▶ 16-24 – 32% (47% last year) ▶ 25-34 – 36% (29% last year) ▶ 35-44 – 18% (20% last year) ▶ 45-54 – 14% (2% last year) |
| Sex* | <ul style="list-style-type: none"> ▶ Male – 37% ▶ Female – 63% | <ul style="list-style-type: none"> ▶ Male – 26% (48% last year) ▶ Female – 74% (52% last year) |
| Ethnicity | <ul style="list-style-type: none"> ▶ White UK – 61% ▶ Black – 19% ▶ Asian – 8% ▶ White Non-UK – 5% ▶ Other – 8% | <ul style="list-style-type: none"> ▶ White UK – 70% ▶ Black – 14% ▶ Asian – 6% ▶ White Non-UK – 6% ▶ Other – 4% |
| Disability | <ul style="list-style-type: none"> ▶ 'yes' – 17% ▶ 'no' – 83% | <ul style="list-style-type: none"> ▶ 26% (32% last year) ▶ 70% (50% last year) |
| Type of disability (% of those answered 'yes' to disability) | <ul style="list-style-type: none"> ▶ Neurodiversity – 44% ▶ Mental health – 35% ▶ Long term – 32% ▶ Learning – 24% ▶ Physical – 18% ▶ Autoimmune – 14% | <ul style="list-style-type: none"> ▶ Neurodiversity – 53% ▶ Mental health – 61% ▶ Long term – 46% ▶ Learning – 23% ▶ Physical – 23% ▶ Autoimmune – 8% |

*this relates to biological sex. Source - 2024/25 Bursary programme

Partnership to tackle social mobility

Tackling social mobility is a priority for the Foundation. For example, through partnership working we have:

- ▶ Support for MCR Pathways mentoring programme. MCR Pathways – which operates in 126 schools across Scotland – supports people to achieve their goals through mentoring as well as helping young people with work experience and training. The Group has been collaborating with MCR Pathways for over a decade, with over 40 Wheatley staff acting as volunteer mentors in that time. We will now build on that relationship by: recruiting 50 new mentors from staff and contractors; exploring work experience opportunities for young people supported by a Wheatley mentor; and providing taster sessions for young people in housing, care, legal and digital.

- ▶ To encourage staff to get involved, we have promoted testimonials from mentors and mentees showing the impact of this programme and have arranged two information sessions. The sessions include details on what to expect, the time commitment involved, what support is available, the benefits for young people and staff, and much more.
- ▶ The Wheatley Foundation supported Duo Day on 21 November 2024 in partnership with the Scottish Union of Supported Employment and Enable (SUSE). Three customers visited different parts of the business; the Customer First Centre (CFC), the mailroom, and City Building (Glasgow), our joint repairs venture, to learn about what each part does and explore job opportunities.

Following the visits, the customers worked with our Foundation to explore employment and experience opportunities tailored to their specific needs and circumstance.



Techshare

In 2024, we launched our 'Techshare' programme which sees old staff devices upcycled and made available to customers who cannot afford to buy computer equipment.

Not only does this support our sustainability ambitions but also forms part of our social mobility approach as the laptops, iPads and tablets help customers get online to study, apply for jobs and training, manage their welfare benefits or help to keep in touch with friends and family.

Professor Paddy Gray OBE, Chair of Wheatley Foundation, said:

“Techshare prevents computer devices from going to landfill and instead enriches the lives of tenants who cannot afford to buy a device and go online.”



During initial roll out, we focused on providing support to our Care customers and New Scots. We reviewed EDI data to monitor access to this programme and help us target the support. From the data, we know:

- ▶ **Age** – the 16-24 range represented over a third of those supported. We concentrated help for those in education through partnerships with Wheatley Care young person services, our Wee Bursary project and Children's Care homes;
- ▶ **Disability** – As per our targeting, over 50% of those supported had a disability, with mental health being the most declared; and
- ▶ **Ethnicity** – over 36% of customers supported were from ethnically diverse backgrounds, again representing our targeting.

By the end of March 2025, 355 refurbished devices had been passed to customers.

Our people

Our people

We've continued to build momentum with our Different Together approach, reinforcing our commitment to ensure respect, value, and belonging are part of the working experience for everyone. By remaining committed to building a workforce as diverse and vibrant as the communities we serve, we're proud to move forward on our EDI journey through the range of people initiatives shared in this report. Highlights from 2024/25 include:

Embedding an inclusive culture through engagement

Our inclusive approach continues to be firmly rooted in our employees' voice through our Community of Excellence and our six people networks which create meaningful spaces to inform our EDI priorities.

As highlighted in last year's report, each network benefits from the guidance of a

sponsor from our Executive and Senior Leadership teams.

Our people networks are:

- ▶ Disability and Neurodiversity;
- ▶ Age Networking;
- ▶ LGBTQ+;
- ▶ Carers;
- ▶ Race and Multicultural; and
- ▶ Menopause and Perimenopause.

Examples of our network's initiatives across the last year include, but are not limited to:

- ▶ Our **Disability and Neurodiversity Network** updated our Reasonable Adjustment Passport to make it more inclusive and reflective of the support needs related to neurodiversity. With expert input from neurodiversity specialists Lexxic, the rollout was complemented by targeted training for employees, managers, and parents/carers

of neurodivergent individuals. The network also championed a wellbeing movement challenge, with 121 colleagues taking part to highlight the positive impact of personalised physical activity on mental wellbeing;



Our people

- ▶ Our **Race and Multicultural Network** promoted awareness of key cultural events, including a lunch and learn session on Ramadan. This was supported by tailored guidance for managers and teams to deepen understanding of its cultural significance and the workplace adjustments that may support our Muslim colleagues and customers during fasting and prayer; and
- ▶ Our **Age Network** launched regular financial wellbeing and retirement planning sessions, including personalised 1-to-1 support from a financial education specialist with 99 colleagues taking part in these sessions. A further 96 young employees engaged in our annual Young Colleague events, designed to inspire career growth and development across the Group.

We remain committed to equipping our people with meaningful EDI knowledge to help them better understand and support our customers. This year, 1548 colleagues took part in face-to-face EDI training as part of our ongoing efforts.

In partnership with our people networks, we've also rolled out specialist EDI training in key areas of diversity where additional support for both customers and colleagues is essential.



For example, 160 colleagues attended neuro-inclusive customer service sessions, gaining the skills and insights needed to engage meaningfully and inclusively with neurodivergent customers. We also delivered neurodiversity training to 153 managers helping them to better support neurodivergent team members, with sessions for colleagues too. Specialist training on other topics such as menopause for leaders have also been delivered, with 110 managers attending.

These ongoing efforts have helped us retain our Silver TIDE Mark from the Employers Network of Equality and Inclusion (enei). These accreditations demonstrate our commitment to inclusive working practices and fostering a culture where everyone feels supported, respected, and able to thrive.

Our people

Making best use of our EDI data

Results from our EDI survey in 2024 helped to deepen our understanding of our workforce profile already captured from our first EDI survey in 2022. Our results continue to influence our areas of focus with our people networks and help us check we have the right support opportunities available for our people. This year we included new questions to learn more about social mobility and how well supported staff feel by our Different Together approach.

Highlights of the key differences in our survey data from our original survey in 2022 show:

- ▶ We have increased ethnic diversity within the organisation;
- ▶ We have increased the number of employees who are comfortable to disclose disabilities; and
- ▶ We have increased the number of colleagues disclosing minority gender identity, for example, trans or non binary identities;

From our new questions, we found:

- ▶ Over 73% of employees believe our Different Together approach is committed to creating an inclusive workplace for all; and
- ▶ Around 43% of employees working with us tell us they are from a “lower socio-economic background” (as set out by UK Social Mobility Commission).



Our people – Workforce profile

We have shared a summary of our workforce profile based on our 2024 survey respondents.



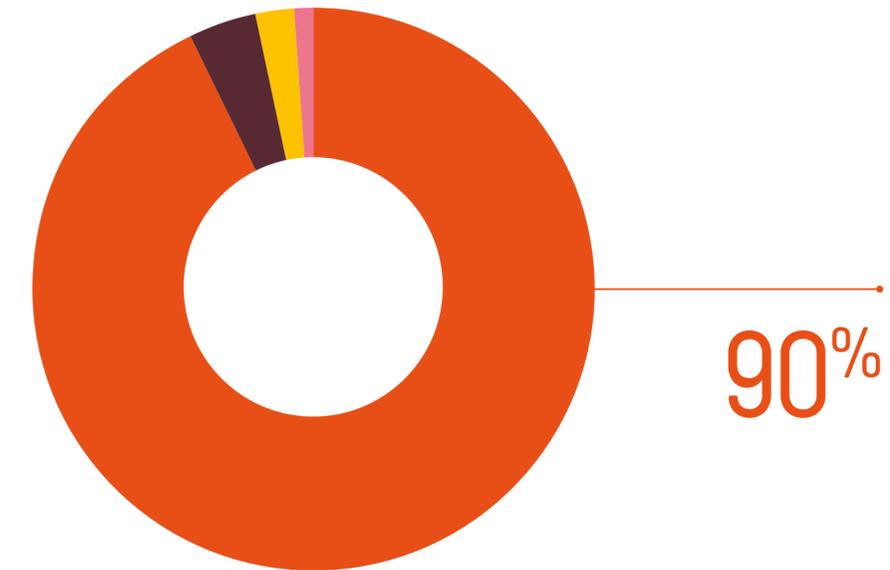
Age

Our 2024 results showed the organisation continues to hold a good representation of age diversity, with a fairly even split across our 25-64 grouping. We have also increased representation in our 16-24 age range following the re-introduction of our modern apprenticeship programmes.

| Age | 2024 results | 2022 results |
|------------|--------------|--------------|
| 16 - 19 | 2% | 1% |
| 20 - 24 | 6% | 7% |
| 25 - 34 | 20% | 19% |
| 35 - 44 | 23% | 23% |
| 45 - 54 | 24% | 26% |
| 55 - 64 | 21% | 21% |
| 65 - 74 | 3% | 2% |
| 75 or over | 0% | 0% |

Sexual orientation

We found that 90% of staff identified themselves as heterosexual/straight and 5% were gay, lesbian, bisexual or other. This is similar to our 2022 results.



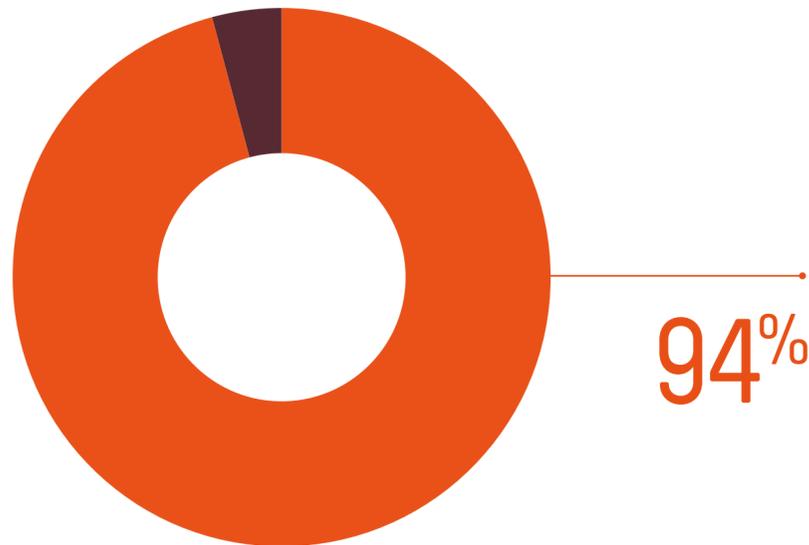
- Heterosexual / straight – 90%
- Gay/Lesbian – 3%
- Bisexual – 2%
- Other – less than 1%

Source - 2024 staff survey

Our people – Workforce profile

Ethnicity

From the survey, we found that 94% of respondents indicated they were from a white ethnic group, and 6% were from Asian, African, Caribbean/black, mixed or other ethnicities. This 6% result is nearly double our 2022 survey results and reflects our work to attract a diverse candidate pool.



- White – 94%
- Asian, African, Caribbean/black, Mixed or Other – 6%

Disability

We found that 10% of staff consider themselves to have a disability, which is an increase to our 2022 results (+3%). We also found that the number of staff who declared that they have a difference or condition that would be considered a disability under the Equalities Act 2010 also increased this year to 37% (2022 - 31%).

Numbers of staff reporting:

- ▶ Auto-immune – 21
- ▶ Deafness/partial hearing – 96
- ▶ Blindness/partial sight loss – 21
- ▶ Physical disability – 98
- ▶ Neurodivergent – 77
- ▶ Learning difference / disability – 13
- ▶ Mental health – 152
- ▶ Long-term illness / disease – 95
- ▶ Other – 15

Carers

We've seen a small rise (less than 1%) in staff disclosing they have caring responsibilities outside of work with 42% in 2024. This continues to be children under the age of 18 but also older and/or disabled relatives.

- ▶ Child (under 18) – 24%
- ▶ Disabled adult – 2%
- ▶ Disabled child – Less than 1%
- ▶ Older person – 4%
- ▶ Secondary carer – 6%
- ▶ Multiple caring responsibilities – 5%
- ▶ Not a carer – 54%

Our people – Workforce profile



Customers

We've seen a small rise (+1%) in the number of respondents who confirmed they were a Wheatley Group customer in addition to being a member of staff in 2024 at 17%.

Social mobility

Over 43% of respondents shared they have come from a “Lower socio-economic background” using measurements from the UK Social Mobility Commission. This category includes where the main household earner was in a technical occupation, such as plumber and joiner, as well as jobs like sales assistant, cleaner and waiter. This is a new area of diversity measured for our 2024 survey.

- ▶ Professional Background – 28%
- ▶ Intermediate Background – 9%
- ▶ Lower socio-economic Background – 43%
- ▶ Other – 3%

Commitment to diversity

Our 2024 survey also asked respondents if they believed our Different Together campaign was committed to creating a workplace that is inclusive of everyone. Over 73% of respondents either strongly agreed or agreed we are building an inclusive culture.

- ▶ Strongly agree – 37%
- ▶ Agree – 36%
- ▶ Neutral – 17%
- ▶ Disagree – less than 1%
- ▶ Strongly disagree – less than 1%

Our people – Workforce profile

Group Leadership Diversity Profile

In our 2024 EDI survey, around 87% of our leadership team provided responses allowing us to review our diversity profile of leaders.

Highlights of differences from our Group Leadership team's EDI profile compared to our overall staff data are:

▶ Caring

Our leadership team holds more caring responsibilities (57%) compared to all staff respondents in Group.

▶ Disability

We have strong representation of disability within our leadership team with over a quarter of leadership team respondents disclosing a difference or condition that would meet the definition of a disability (28%).

▶ Ethnicity

Around 3% of leadership team respondents were of African or Asian origin, while 95% were White. As a Group we have gradually increased our ethnic diversity on average, however this has not yet filtered through similarly to our leadership roles.

▶ Sex

At Group level the overall position for sex is 45% women and 55% men. At 31 March 2025, representation at leadership level was:

- Executive Team level: 33% women and 66% men
- Leadership team for locality housing director and above – 62% women and 38% men
- Leadership team below locality housing director – 59% women and 40% men



Source - 2024 staff survey

Our people – diverse recruitment

Insights from our recruitment data analysis show we are continuing to increase the diversity of underrepresented groups applying for roles across the Group.

We carefully monitor data on all protected characteristics of job applicants, and we have observed differences over 2024/25 in the following areas.

Ethnicity

Our continued focus to attracting candidates from ethnic minority groups has seen us engage in events organised by the Scottish Ethnic Minority community, including attending their Talent Summit to promote opportunities to work with Wheatley. This has helped us to sustain an increase of applicants from an ethnic minority groups applying for roles across Group since 2022.

Our commitment to creating opportunities for applicants from ethnic minorities will continue in 2025/26 as we work in partnership with PATH Scotland to introduce diversity traineeships as part of our graduate recruitment.



18%
ethnic minority
applicants in
2023/24

23%
ethnic minority
applicants in
2024/25

Disability

We have refreshed our websites to include video testimonials from members of our people networks outlining our inclusive practices for colleagues with disabilities.

113
disability applicants
in 2023/24

150
disability applicants
in 2024/25

Members of our People Services team have also attended external Continuous Professional Development courses on inclusive recruitment to better understand how to support candidates who need additional help as part of applying for a role with us.

Our people – diverse recruitment

Attracting young people

Through the creation of our early career opportunities across the Group we have sustained high numbers of young people aged 16-24 applying for roles with us in 2024/25.

721

16-24 applicants
in 2023/24

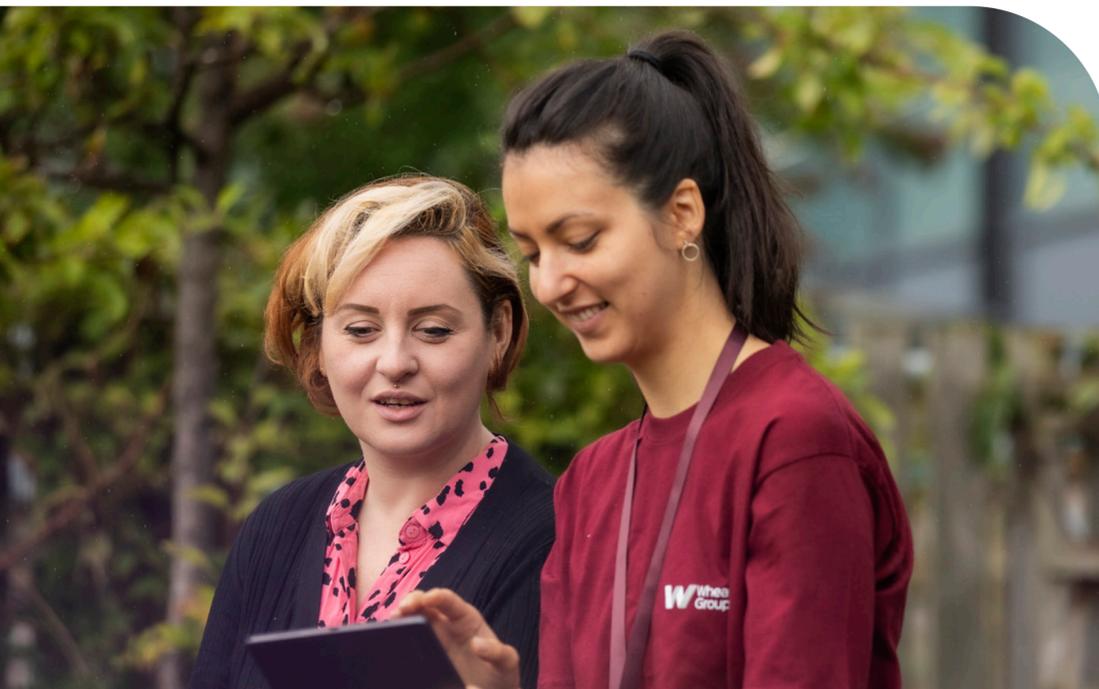
731

16-24 applicants
in 2024/25

The recruitment of new housing graduates, trades and environmental apprentices helped us increase our 16-24 workforce from 7% in 2023/24 to 8% in 2024-25.

The Investors In Young People accreditation (IIYP), first awarded to Wheatley in 2015, is another way the Group is proving to be an employer of choice for young people. An assessor from Investors in People (IIP), the organisation behind the accreditation, spent three days at Wheatley in August 2024, meeting young people and senior staff. The assessor stated:

“Wheatley is committed to creating opportunities that help young people improve their lives and reach their full potential.”



Board members

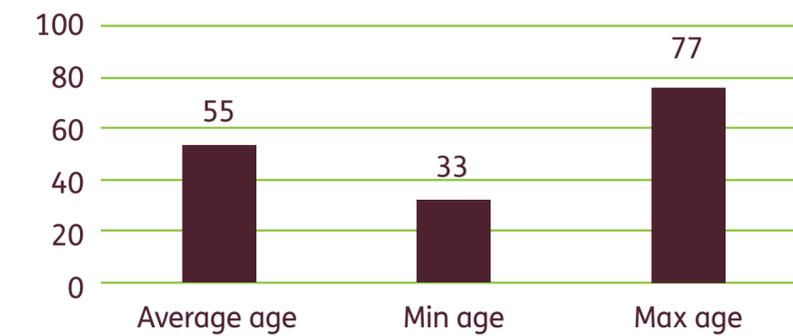
Board members

We collect equalities data from our Board members. Equalities data is one of several factors considered in our approach to inclusive and effective succession planning. At year end 31 March 2025 we had 57 Board members across our Group – we hold EDI data for 95% of them.

- ▶ **Sex*** – Over 50% of our Board members were women, which met the requirements of the [Gender Representation on Public Boards \(Scotland\) Act 20218](#).



- ▶ **Age** – The average age of our Board members was 55, with the youngest being 33 and the eldest being 77. This is in line with the 2022 Scottish Census in which the 55–59 age group was the most selected of the five-year age groups.



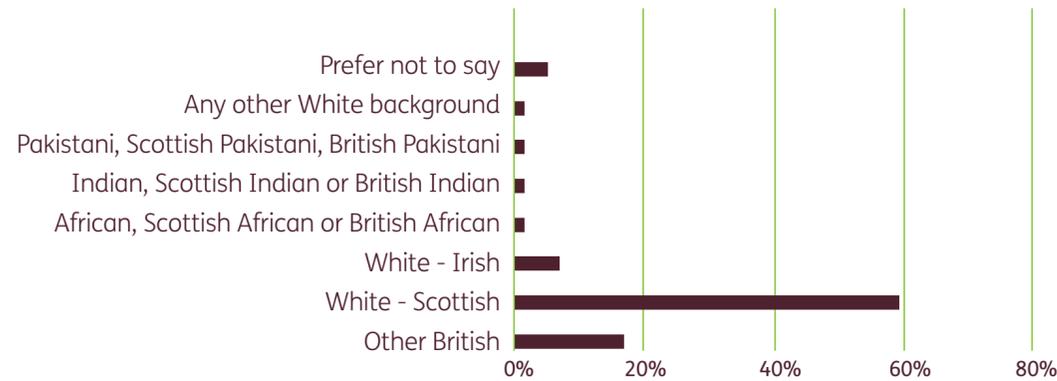
- ▶ **Disability** – 12% of our Board members indicated they had a disability. Slightly up from 11% reported last year.

* this relates to biological sex

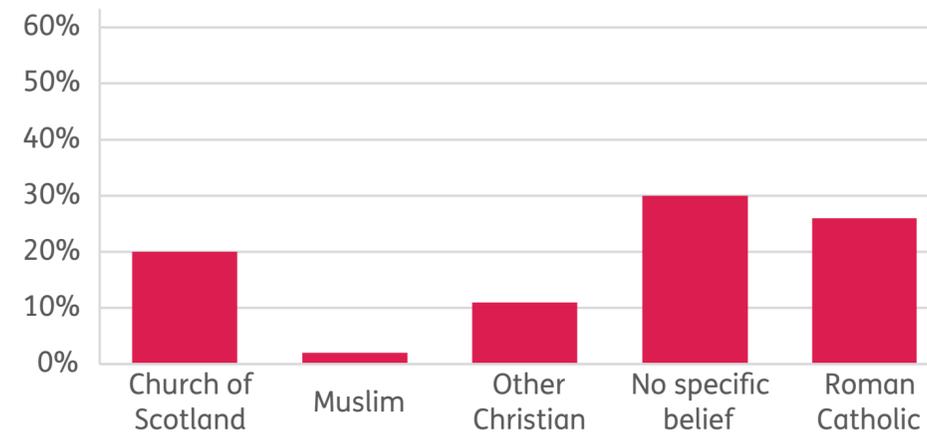
Source - Wheatley Group Board member data 2024/25. Not including 'prefer not to say'.

Board members

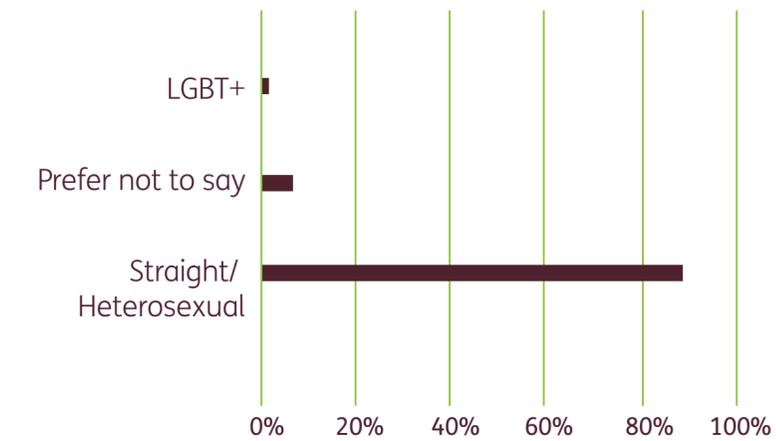
► **Ethnicity** – 6% of our Board members are from racially and ethnically underrepresented communities; comparatively the 2022 Scottish Census found that approximately 7% of the Scottish population was from an ethnically diverse background.



► **Religion and belief** – The religions declared by our Board members fall largely in line with the 2022 Scottish Census in which 22% were Roman Catholic; 20% were Church of Scotland; 5% Other Christian; and 2% Muslim. 51% of the Scottish population have no specific belief, compared to only 30% of our Board members.



► **Sexual orientation** – 89% of our Board members declared they were heterosexual and 2% LGBT+; this is slightly below the overall Scottish Census results for 2022 of 88% and 4% respectively.

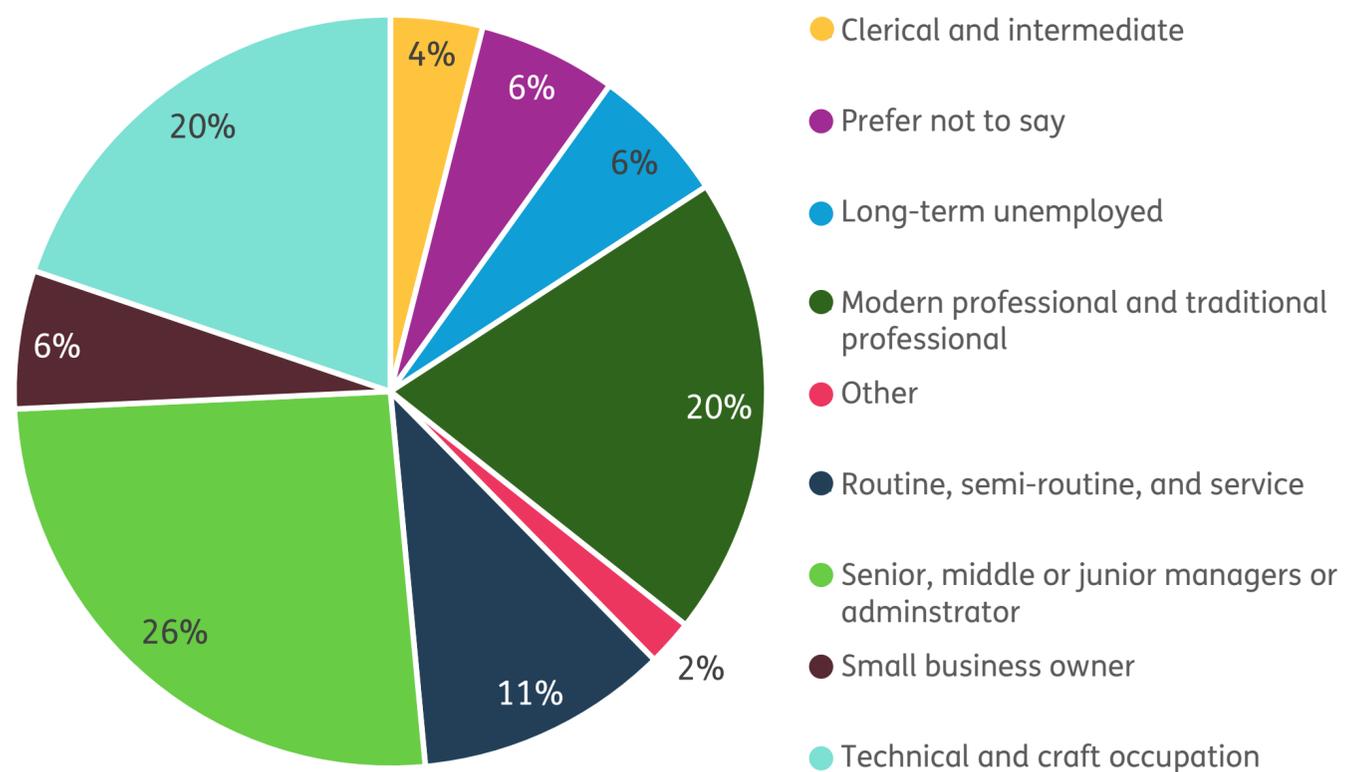


Source - Wheatley Group Board member data 2024/25.

Board members

► Board member parental occupation

– 46% of our Board members had parents with a professional or management occupation.



Suppliers

Suppliers

EDI informed procurement is important to us. Our focus goes beyond our legislative duties; to signal our commitment to EDI, when procuring we generally seek that our suppliers and contractors demonstrate the existence of their own EDI policy. Where our suppliers / contractors do not have an EDI policy, we encourage them to consider how EDI can inform their working practices and be considered within their own organisations.

We survey our suppliers annually regarding EDI and at the end of 2024/25 found of those who responded (nearly half of those contacted):

- ▶ 83% suppliers have reported having an EDI Policy in place;
- ▶ 8% mentioned that their EDI policy is currently under development/consideration;

- ▶ 9% do not have an EDI policy. Among these, one is a micro-sized organization with less than 10 employees, which holds a copy of Wheatley's latest policy and follows it as required; and
- ▶ Another supplier mentioned that they would look into developing a policy. One more supplier has an equal opportunities policy in place.

Our suppliers also support our ongoing commitment to community benefits, for example, through volunteering. This contribution is crucial in supporting local initiatives and enhancing our communities' well-being.



Next steps

Next steps

Equity, diversity and inclusion continues to be a strong focus for us and will be considered through our next 2026-31 Group strategy as an enabler of success.

Ensuring our services are personalised and tailored, we respond to need, and our decisions are driven by customer insight and data, is a priority for us. We also value our wider contributions to our communities, and view our role in supporting social mobility, providing equitable access to our services, as instrumental to tackle key societal barriers including homelessness, child, food and fuel poverty.

As we increasingly embed our EDI approach, we are viewing EDI in a more holistic sense linked to our commitment to be a responsible business and support thriving and sustainable neighbourhoods and workplaces.

We acknowledge there may be challenges in advancing EDI, however we reaffirm our commitment to ensuring no demographic group is overlooked and that EDI benefits all our people and communities. Progress with our EDI action plan continues to be monitored quarterly by our Wheatley Solutions Board. In 2025, we will also review our action plan and our EDI and Human Rights policy to align with our 2026-31 strategic aims.



Want more details?

➤ **Get in touch**

email: morgan.english@wheatley-group.com

different
together

Report

To: Wheatley Homes East Board

By: Lyndsay Brown, Director of Finance

Approved by: Pauline Turnock, Group Director of Finance

Subject: Finance Report to 30 September 2025

Date of Meeting: 27 November 2025

1. Purpose

- 1.1 The purpose of this paper is to provide the Wheatley Homes East Board with:
- An overview of the Finance Report for the period to 30 September 2025 and Q2 forecast financial out-turn, and
 - An overview of the revision to the target rate of return for social and mid-market rent new build developments.

2. Authorising and strategic context

- 2.1 Under the terms of the Intra-Group Agreement between Wheatley Homes East (“**WH East**”) and the Wheatley Group and the Terms of Reference for this Board, we are responsible for the on-going monitoring of performance against agreed targets, including the on-going performance of our finances.

3. Background - Financial performance to 30 September 2025

- 3.1 The results for the period to 30 September are summarised below.

| £000 | Period to Period 6 | | |
|--------------------------------|--------------------|---------------|--------------|
| | Actual | Budget | Variance |
| Turnover | 51,292 | 51,155 | 137 |
| Operating expenditure | (21,104) | (21,086) | (18) |
| Operating surplus | 30,188 | 30,069 | 119 |
| <i>Operating margin</i> | 59% | 59% | |
| Net interest payable | (5,647) | (5,650) | 3 |
| Surplus | 24,541 | 24,419 | 122 |
| Net Capital Expenditure | 20,532 | 19,712 | (820) |

4. Discussion

4.1 Period to 30 September 2025

A statutory surplus of £24,541k, is £122k favourable to budget. Earlier than budgeted handover new build completions generating additional rental and lease income, and additional adaptations grant funding are contributing to the favourable variance.

Key points to note:

- Net rental income is £42k favourable to budget due to the earlier than budgeted handovers and housing management performance with a YTD void rate of 1.41%, compared to the YTD budgeted rate of 1.47%;
- Grant income recognised is £83k unfavourable to budget driven by number of units handed over (231 vs 237 budgeted). At September 2025, 196 social rent units and 35 MMR units have completed;
- Other income of £2,428k is £120k favourable to budget reflecting the additional lease income from Lowther from earlier handover of MMR units in 2024/25;
- Overall operating expenditure is £18k unfavourable to budget:
 - Direct & group employee costs are £19k unfavourable to budget driven by additional agency costs to cover staff absences at our supported services;
 - Direct & group running costs are £33k favourable to budget driven by several departments reporting lower costs across Wheatley Solutions; and
 - Total repairs and maintenance costs are in line with budget, with cyclical maintenance £55k ahead of budget due to accelerated EICR works. Reactive repairs are £54k favourable with outstanding and overdue job numbers remaining stable from March 2025; and
- Net capital expenditure is £820k higher than budget. Investment in our existing homes has £457k additional spend, relating to the accelerated spend within core investment on the district heating works and higher capitalised repairs, mainly related to remedial works for two fires and damp and mould work. New build development spend is reporting is £6,288k higher than budget due to accelerated spend at Deans South Ph2, Charlesfield Road and Longniddy.

4.2 Q2 2025/26 Full Year Forecast

| | Full year 2025/26 | | |
|--------------------------------|-------------------|---------------|----------------|
| | Forecast £k | Budget £k | Variance £k |
| Turnover | 93,841 | 90,043 | 3,797 |
| Operating expenditure | (41,855) | (42,052) | 197 |
| Operating surplus | 51,985 | 47,991 | 3,994 |
| <i>Operating margin %</i> | 55% | 53% | |
| | | | |
| Net interest payable | (11,202) | (11,299) | 97 |
| Surplus | 40,783 | 36,692 | 4,091 |
| | | | |
| Net Capital Expenditure | 37,499 | 34,770 | (2,729) |

The forecast reports a statutory surplus of £40,783k for the full year out-turn to March 2026, which is £4,091k favourable to budget. Key points to note:

- Additional rental income of £84k is forecast due to new build units completing earlier than budgeted;
- Grant income is £3,054k higher than budget with 29 additional units completing in 2025/26 (Builyeon and West Craigs Ph1);
- Other income is forecast to be £610k higher, this includes £421k of additional gift aid from WDS reflecting the increased forecast development spend and additional lease income for mid-market units coupled with an uplift in the mid-market lease income;
- Direct running costs are reduced by £213k reflecting the advance donation to Wheatley Foundation made before the start of the financial year;
- Within capital expenditure, investment works are £1,515k higher including additional core investment spend of £504k to deliver tenant commitments and additional spend on district heating works of £338k with the budget reallocated from within the RSL group. Additional capitalised repairs spend of £325k is recognised for remedial works and additional £50k adaptations spend in line with the increased grant funding; and
- New build spend is higher than £10,814k due to accelerated spend on Charlesfield Road, Winchburgh and Maybury West. This has been offset by £9,600k additional grant funding.

- 4.3 The Q2 forecast shows an underlying surplus of £6,439k, which is £561k unfavourable to budget and includes additional investment spend in line with our tenant commitments to provide high quality housing and to invest to improve the energy efficiency of our homes, the capacity for which is created from our strong operating performance in WH East and across the RSL Borrower Group. The forecast variations to budget continue to be managed within the covenants and golden rules for the RSL Borrowers.

Review of new build appraisal target return rate

- 4.4 The existing development appraisal approach and target return rates were last reviewed in August 2023. Reviews are required every three years or more frequently should there be major interest rate changes. Since the last review markets have remained challenging and gilt rates, which signal government borrowing costs, have risen. Market expectations are that rates are likely to remain higher due to persistent inflation and sluggish growth.

- 4.5 Our strategic objective to increase the supply of new homes must be delivered in the context of maintaining our strong credit rating and appropriately managing financial risks. The review of the target rates of return has been undertaken to ensure that in the current economic and operational environment developments remain financially viable on a project-by-project basis and cover the cost of funding with no cross-subsidy.
- 4.6 The Bank of England has cut the UK base rate from its recent peak of 5.25% in August 2024 to the current rate of 4.00%, however despite this inflation and weak growth persist. Fiscal confidence has declined due to welfare policy reversals with higher employer NI contributions and minimum wage increases continuing to increase prices for consumers and limiting growth. These factors have increased UK 30-year gilt rates to levels not seen since the 1990s.

| | Current | 3m ago | 6m ago | 12m ago |
|-------------------|---------|--------|--------|---------|
| Central Bank Rate | 4.00 | 4.25 | 4.50 | 5.00 |
| 10yr Gilt Rate | 4.68 | 4.62 | 4.75 | 4.21 |
| 20yr Gilt Rate | 5.38 | 5.31 | 5.41 | 4.69 |
| 30yr Gilt Rate | 5.49 | 5.43 | 5.51 | 4.75 |

- 4.7 We have considered the impact of the anticipated cost of new borrowings to fund our new build programme over the next five years on the current weighted average cost of funds. This shows that interest rate increases have the effect of increasing the Group's weighted average cost of funds by 0.20% compared with our assumptions in August 2023.
- 4.8 Therefore, we propose an increase of 0.2% to the IRR target for new build projects for both social rent and mid-market rent to reflect the anticipated increase in our future cost of funds. The period over which projects are assessed remains unchanged and are summarised in the table below:

| Wheatley Subsidiary | Tenure | New Appraisal Rate | Previous Appraisal Rate | Appraisal period |
|----------------------------|------------|--------------------|-------------------------|------------------|
| WH-Glasgow Loretto WH-East | Social | 6.75% | 6.55% | 30 years |
| | Mid-Market | 6.95% | 6.75% | 30 years |
| WH-South | Social | 6.75% | 6.55% | 35 years |
| | Mid-Market | 6.95% | 6.75% | 35 years |
| Lowther Homes | Mid-Market | 6.95% | 6.75% | 35 years |

- 4.9 The actual impact will depend on property size, rental income and other scheme specific factors but as an indication, to meet the proposed target IRR of 6.75% social rent developments will require an additional £2.1k of grant per unit and for a target of 6.95% on MMR schemes, an additional £2.8k per unit. The revised rates are subject to Group Board approval at their next meeting.

5. Customer Engagement

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

6. Environmental and sustainability implications

6.1 There are no environmental or sustainability implications arising from this report.

7. Digital transformation alignment

7.1 There are no digital transformation alignment implications arising.

8. Financial and value for money implications

8.1 Our cost efficiency targets are built into the budget and delivery of these is a key element of continuing to demonstrate value for money.

9. Legal, regulatory and charitable implications

9.1 There are no legal, regulatory or charitable implications arising from this report.

10. Risk Appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

12.1 This paper presents the financial performance for the period to 30 September 2025 which shows a strong operating performance £119k favourable to budget.

13. Recommendations

13.1 The Board is requested to:

- 1) Note the Finance Report for the period ended 30 September 2025 and Q2 forecast at Appendix 1; and
- 2) Note the revision to the target rate of return for social and mid-market rent new build developments and agree the criteria used by Wheatley Developments Scotland for the approval of projects on our behalf is updated to reflect this subject to Group Board approval.

LIST OF APPENDICES:

Appendix 1: Period 6 – 30 September 2025 Finance Report



Period to 30 September 2025

Finance Report



2) Operating Statement – Period to September 2025

| | Period to 30 September 2025 | | | Full Year |
|--|-----------------------------|---------------|----------------|---------------|
| | Actual £k | Budget £k | Variance £k | Budget £k |
| INCOME | | | | |
| Rental Income | 23,338 | 23,310 | 28 | 47,147 |
| Void Losses | (329) | (343) | 14 | (685) |
| Net Rental Income | 23,009 | 22,967 | 42 | 46,462 |
| Grant Income | 25,503 | 25,586 | (83) | 37,011 |
| Other Grant Income | 352 | 294 | 58 | 588 |
| Other Income | 2,428 | 2,308 | 120 | 5,982 |
| TOTAL INCOME | 51,292 | 51,155 | 137 | 90,043 |
| EXPENDITURE | | | | |
| Employee Costs - Direct | 2,658 | 2,634 | (24) | 5,258 |
| Employee Costs - Group Services | 1,469 | 1,481 | 12 | 2,944 |
| ER/VR | 36 | 0 | (36) | 0 |
| Direct Running Costs | 2,533 | 2,538 | 5 | 5,172 |
| Running Costs - Group Services | 824 | 852 | 28 | 1,759 |
| Revenue Repairs and Maintenance | 4,519 | 4,518 | (1) | 8,794 |
| Bad Debts | 246 | 244 | (2) | 489 |
| Depreciation | 8,819 | 8,819 | 0 | 17,636 |
| TOTAL EXPENDITURE | 21,104 | 21,086 | (18) | 42,052 |
| NET OPERATING SURPLUS | 30,188 | 30,069 | 119 | 47,991 |
| <i>Net Operating Margin</i> | 59% | 59% | 0% | 53% |
| Net Interest payable & similar charges | (5,647) | (5,650) | 3 | (11,299) |
| STATUTORY SURPLUS | 24,541 | 24,419 | 122 | 36,692 |

Key highlights year to date:

Net operating surplus of £30,188k is £119k favourable to budget. Statutory surplus for the period is £24,541k, £122k favourable to budget. Earlier than budgeted handover new build completions generating additional rental and lease income and additional adaptations grant funding are contributing to the favourable variance.

- Gross rental income is £28k favourable to budget due to additional rental income from the new build completions. Void losses are £14k favourable to budget with voids losses of 1.41% compared to the budget of 1.47%.
- Grant income recognised of £25,503k is broadly in line with budget at P6. 231 properties have completed to date which is just below the budget of 237 units, YTD P6, completed at West Craigs Ph1 & 2 (106SR), West Craigs Ph3 (26SR & 35MMR), Builyeon (23SR), Winchburgh BB (19SR), Dalhousie South Ph 1 (18SR) and Sibbalds Brae (4SR).
- Other grant income of £352k includes £148k adaptation grant income which is £58k ahead of budget due to increased grant approved for the year and is in line with additional corresponding adaptation spend.
- Other income of £2,428k is £120k favourable to budget reflecting the additional lease income from Lowther and includes the 35 MMR properties at West Craigs Ph3 that completed ahead of budget.
- Total employee costs are £12k unfavourable to budget with group employee costs favourable to budget by £12k due to the timing of changes compared to the budgeted structures in Wheatley Solutions. Direct employee costs are unfavourable driven by additional agency costs to cover staff absences at the supported Livingwell sites and the Harbour.
- ERVR costs of £36k is unfavourable YTD, however, the spend is managed within the budget across the Group.
- Total running costs are £33k favourable to budget due to group running costs being £28k favourable to budget due to several departments reporting lower costs across Wheatley Solutions. Direct running costs are favourable to budget by £5k, with several departments reporting variances due to timing.
- Revenue repairs and maintenance spend is overall in line with budget. Responsive repairs are £54k favourable to budget with job numbers remaining stable from March 25 to P6. Cyclical maintenance is £55k ahead of budget driven by the timing of EICR works with spend expected to align with budget over the year.

Net interest payable of £5,647k includes interest due on the loans due to Wheatley Funding No.1 Ltd and external funders. Loan interest is in line with budget.

Net capital expenditure of £20,532k is £820k higher than budget.

- Capital investment income is £5,754k higher than budget due to grant claims made at Deans South Ph2, Charlesfield and Longniddry being ahead of budget in line with the accelerated progress and spend on site.
- Investment programme spend is £457k higher than budget. Higher capitalised repairs of £281k are reported including £130k of remedial works following two fires, £55k of specialist works in relation to damp & mould works at one property in Granton and £76k for four high value rot and roof repairs. Core programme is £144k higher than budget driven by increased spend on district heating and on boilers.
- New build spend of £22,160k is £6,288k higher than budget due to accelerated spend at Deans South Ph2, Charlesfield Road, Wallyford 5 A/B and Longniddry.

| | Period to 30 September 2025 | | | Full Year |
|--|-----------------------------|---------------|----------------|---------------|
| | Actual £k | Budget £k | Variance £k | Budget £k |
| INVESTMENT | | | | |
| Total Capital Investment Income | 7,687 | 1,933 | 5,754 | 2,126 |
| Investment Programme Expenditure | 5,740 | 5,283 | (457) | 9,156 |
| New Build & Other Investment | 22,160 | 15,872 | (6,288) | 34,945 |
| Other Capital Expenditure | 319 | 490 | 171 | 945 |
| TOTAL CAPITAL EXPENDITURE | 28,219 | 21,645 | (6,574) | 45,046 |
| NET CAPITAL EXPENDITURE | 20,532 | 19,712 | (820) | 42,920 |

3) Underlying surplus – Period to September 2025

Key highlights:

- The Operating Statement (Income and Expenditure Account) on page 2 is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2018).
- However, the inclusion of grant income on new build developments creates volatility in the results and does not reflect the underlying cash surplus/deficit on our letting activity.
- The table below therefore shows a measure of underlying surplus which adjusts our net operating surplus by excluding the accounting adjustments for the recognition of grant income, gift aid and depreciation, including capital expenditure on our existing properties.
- An underlying surplus of £2,117k is reported which is £252k unfavourable to budget. The variance is partly due to the additional remedial works within capitalised repairs spend in the year to date and the profiling of the investment programme. The unfavourable variance in WH East, is accommodated within the context of the overall budget parameters and covenants for the RSL Borrower Group.

| WH East Underlying Surplus - Sept 2025 | | | | |
|--|------------------|------------------|---------------|-----------------|
| | YTD Actual £k | YTD Budget £k | YTD Var £k | FY Budget £k |
| Net Operating Surplus | 30,188 | 30,069 | 119 | 47,991 |
| add back: | | | | |
| Depreciation | 8,819 | 8,819 | 0 | 17,636 |
| less: | | | | |
| Grant income | (25,503) | (25,586) | 83 | (37,011) |
| WDS gift aid income | 0 | 0 | 0 | (1,161) |
| Net interest payable | (5,647) | (5,650) | 3 | (11,299) |
| Investment Programme Expenditure | (5,740) | (5,283) | (457) | (9,156) |
| Underlying surplus | 2,117 | 2,369 | (252) | 7,000 |
| | | | | |

4) Wheatley Homes East Harbour – Period to September 2025

| | Period to 30 September 2025 | | | Full Year |
|--|-----------------------------|--------------|----------------|--------------|
| | Actual £k | Budget £k | Variance £k | Budget £k |
| INCOME | | | | |
| Rental Income | 503 | 516 | (13) | 1,033 |
| Void Losses | (55) | (26) | (29) | (52) |
| Net Rental Income | 448 | 490 | (42) | 981 |
| Local Authority Contract Income | 206 | 204 | 2 | 408 |
| Other Income | 0 | 0 | 0 | 0 |
| TOTAL INCOME | 654 | 694 | (40) | 1,390 |
| EXPENDITURE | | | | |
| Employee Costs - Direct | 476 | 467 | (9) | 931 |
| Direct running Costs | 117 | 170 | 53 | 340 |
| Revenue Repairs and Maintenance | 23 | 38 | 15 | 75 |
| TOTAL EXPENDITURE | 616 | 675 | 59 | 1,346 |
| NET OPERATING SURPLUS / (DEFICIT) | 38 | 19 | 19 | 44 |

Key highlights:

- Net rental income is £42k unfavourable to budget with voids £29k unfavourable. Voids are higher than budget due to some fire compartment work being undertaken, a delay in the referrals from CEC and higher customer turnover mainly in Q1.
- Employee costs of £476k are higher than budget driven by additional cover for employees on sick leave.
- Running costs of £117k include insurance, travel, safety equipment, printing, stationary and mobile costs. Costs are £53k favourable to budget due to efficiencies and timing of spend compared to the budgeted profile.

5) Property Services Operating Statement – Period to September 2025

| | Period to 30 September 2025 | | | FY Budget £k |
|-----------------------------|-----------------------------|---------------|----------------|-----------------|
| | Actual £k | Budget £k | Variance £k | |
| INCOME | | | | |
| Internal Subsidiaries | 11,459 | 10,499 | 960 | 19,421 |
| TOTAL INCOME | 11,459 | 10,499 | 960 | 19,421 |
| COST OF SALES | | | | |
| Staff | 2,224 | 2,332 | 108 | 4,665 |
| Materials | 1,378 | 1,436 | 58 | 2,660 |
| Subcontractor & Other Costs | 5,673 | 4,476 | (1,197) | 7,582 |
| TOTAL COST OF SALES | 9,275 | 8,244 | (1,031) | 14,907 |
| GROSS PROFIT/(LOSS) | 2,184 | 2,254 | (70) | 4,514 |
| Margin % | 19% | 21% | -7% | 23% |
| Overheads | 2,261 | 2,235 | (26) | 4,440 |
| NET PROFIT/(LOSS) | (77) | 19 | (96) | 74 |

Key highlights:

- Income of £11,459k is £960k favorable to budget which includes additional capitalised repairs, rechargeable major repairs and owner works.
- Cost of sales are £1,031k higher than budget.
 - Salary costs are below budget by £108k reflecting vacancies across a number of trades including multi skilled operatives & builders.
 - Subcontractor costs are £1,197k higher than budget. An additional £280k of subcontractor costs have been incurred for the accelerated district heating work reported through the Core Programme investment line, £185k relating to the remedial fire and damp & mould capitalised repair works and an additional £254k for works carried out for Lowther.
- Overhead expenditure is £26k higher than budget driven by additional expenditure across a number of lines mainly vehicle running expenses and due to the timing of expenditure, professional fees.

6) Repairs and investment – Period to September 2025

| Repairs and maintenance | Year to 30 Sep 2025 | | | |
|-------------------------|---------------------|---------------|-----------------|--------------|
| | Actual £ks | Budget £ks | Variance £ks | FY Budget |
| Responsive Repairs | 3,125 | 3,179 | 54 | 6,502 |
| Cyclical Maintenance | 1,394 | 1,339 | (55) | 2,292 |
| | 4,519 | 4,518 | (1) | 8,794 |

Repairs and maintenance

- Reactive repairs are £54k favourable to budget, delivering repairs services to meet customer demand. The number of outstanding jobs at P6 were maintained at 1,077 which is consistent as at March 25.
- Cyclical maintenance spend is ahead of budget with a £55k unfavourable variance driven by increased spend on EICRs YTD compared to budget. Spend is expected to be in line with budget for the full financial year.

| WH East Investment Works | Year to 30 Sep 2025 | | | FY Budget |
|---|---------------------|--------------|--------------|--------------|
| | Actual £k | Budget £k | Variance £k | |
| Investment Works Income | | | | |
| Disabled Adaptation Grant | 143 | 90 | 53 | 180 |
| Investment Works Income Total | 143 | 90 | 53 | 180 |
| Investment Works Expenditure | | | | |
| Core Programme (exlc SHNZ) | 3,518 | 3,374 | (144) | 5,337 |
| Capitalised repairs | 832 | 551 | (281) | 1,102 |
| Disabled Adaptations | 143 | 90 | (53) | 180 |
| Voids | 595 | 604 | 9 | 1,208 |
| Capitalised Staff | 652 | 664 | 12 | 1,329 |
| Investment Works Expenditure Total | 5,740 | 5,283 | (457) | 9,156 |
| | | | | |
| Net Total | 5,597 | 5,193 | (404) | 8,976 |

Investment

- Net Investment expenditure is £404k higher than budgeted.
- The core programme is £144k higher than budget driven by the additional spend on district heating, spend for which is managed at an overall RSL Group level.
- The additional capitalised repairs mainly relate to major works following two fires (Gorgie Park Road and Earl Gray Street) totalling £130k, £55k in relation to specialist damp & mould work at a property in Granton and £76k on four high value rot & roof jobs.
- Disabled adaptations are £53k ahead of budget due to timing of spend and working towards the higher agreed funding value of £230k.
- Void spend is £9k favourable to budget, with spend closely monitored.

7) New Build Programme – Period to September 2025

Key highlights:

Complete

- **Buileyon Road Ph3a (SR/23):** Started on site in November 2024. Site progressed well with first handovers completed in July and remaining completed in August 2025, a year earlier than budgeted.
- **Sibbalds Brae (SR/29):** Final 4 handovers in April 2025 completing the development.
- **West Craigs Phase 3 (SR/83 and MMR/42):** Final 5 handovers in July 2025 completing this development.

On Site/ Due on Site

- **Auchendinny Ph1 (MMR/24):** Approved by WDSL board in August 2025. Golden Brick payment expected in Q4 2025/26 with works starting next year later than budgeted for.
- **Charlesfield Road (SR/36):** WDSL board approved in May 2025 and grant funding approval in June 2025. Grant funding is available for the project in 2025/26. Site start commenced in September 25. Minimal budget in 2025/26 as project was assumed to be turnkey with acquisition in 2026/27.
- **Dalhousie South Phase 1 (SR/30):** Progress is ahead of schedule with first 6 handovers completed in June, 12 in September 2025 and the remaining 12 in October 2025, earlier than budgeted.
- **Deans South Phase 2 (SR/38):** On site and works are progressing well. Approval by WDSL in 2024/25 for front funding. Original grant allocation in 2025/26 was £915k. An additional £1.5m was allocated to the project in the year and this has now been drawn. Variance to budget is due to profiling of spend.
- **Longniddry Ph2 (MMR/17):** Approved by WDSL board in November 2023 and contract concluded in July 2025. Golden brick and payment for works made in July and all grant fully drawn. Variance due to timing, originally budgeted to start in January 2025.
- **St Crispins (SR/12):** Approval received in June 2023 and work on site is near completion. Handovers are scheduled for November 2025.
- **Wallyford 5 A/B (SR/29 and MMR/61):** Main works commenced on site in February 2024. Work progressing well. First handovers scheduled for October 2025. Variance reported is due to profiling of spend with total development costs expected to be in line with approval.
- **West Craigs Phase 1 & 2 (SR/188 and MMR/112):** 112 MMR and 186 SR units completed by end of August 2025, including 21 units where tenure changed to SR. Handovers are running 4 weeks behind schedule due to a water mains issue. Final 2 units handed over October 2025. All grant for the site has been fully drawn.
- **Winchburgh BB (SR/52 and MMR/29):** First handovers (5 MMR & 6 SR) in February 2025 with a further 19 SR handovers in the period to September 2025. An issue with planning has delayed the remaining handovers until January 2026.
- **Winchburgh P3 (SR/69):** Approved by WDSL board in May 2025. Grant approval in place and contract completed October 2025. First golden brick scheduled for Q3 2025/26 with further 3 golden brick tranches expected by year end. Forecasted spend is now at a cost of £5.5m & grant is available to fund all costs in 2025/26.

| | Status | Period To Date (£'000) | | | | FY Budget |
|-----------------------------------|-----------------------|------------------------|---------------|---------------|----------------|---------------|
| | | Contractor | Actual | Budget | Variance | |
| Buileyon Road Ph3a | Complete | Cala Homes | 1,151 | 1,260 | 109 | 1,965 |
| Dalhousie South Ph 1 | On Site | Barratt | 1,026 | 1,171 | 145 | 1,231 |
| Deans South Ph 2 | On Site | Springfield | 3,743 | 2,302 | (1,441) | 5,444 |
| Sibbalds Brae | Complete | Taylor Wimpey | 6 | 60 | 54 | 60 |
| St Crispins | On site | Cala | 783 | 727 | (56) | 793 |
| Sth Gilmerton Ph 2 | Aborted | | - | 16 | 16 | 764 |
| Total Social Rent | | | 6,709 | 5,536 | (1,173) | 10,257 |
| Auchendinny Ph1 | Approved/ Due on site | Bellway Homes | 22 | 650 | 628 | 2,864 |
| Charlesfield Road | On site | Cala | 3,663 | 87 | (3,576) | 128 |
| Dalhousie South Ph2A | Approved/ Due on site | Springfield | - | - | 0 | 899 |
| Longniddry Ph2 | On site | Cruden Building | 1,977 | - | (1,977) | 1,630 |
| Wallyford 5 A/B | On site | McTaggart | 5,257 | 4,407 | (850) | 8,039 |
| Wallyford 6 Ph1 | Feasibility | TBC | - | - | 0 | 1,604 |
| West Craigs Ph 1&2 | On site | Cruden Building | 1,093 | 1,223 | 130 | 1,223 |
| West Craigs Ph 3 | Complete | CCG | 1,613 | 2,213 | 600 | 2,214 |
| Winchburgh BB | On site | McTaggart | 889 | 801 | (88) | 801 |
| Winchburgh P3 | Approved/ Due on site | Lovell | 19 | - | (19) | 2,266 |
| Total Mixed Tenure | | | 14,533 | 9,381 | (5,152) | 21,668 |
| Land & Property Aquisition | | | - | 13 | 13 | 75 |
| Capitalised Interest Costs | | | - | - | 0 | 850 |
| Capitalised insurance | | | 7 | - | (7) | - |
| Prior Year | | | - | 16 | 16 | - |
| Feasibility Sites | | | 28 | 49 | 21 | 314 |
| Capitalised Staff Costs | | | 899 | 893 | (6) | 1,780 |
| Total New Build Investment | | | 22,160 | 15,872 | (6,288) | 34,945 |
| Grant Income | | | 7,544 | 1,843 | 5,701 | 10,096 |
| Net New Build Costs | | | 14,616 | 14,029 | (587) | 24,849 |

7) New Build Grant – Period to September 2025

| | Period To Date (£'000) | | | FY |
|------------------------------|------------------------|--------------|--------------|---------------|
| | Actual | Budget | Variance | Budget |
| Builyeon Road Ph3a | 0 | 203 | (203) | 203 |
| Deans South Ph 2 | 2,415 | 1,000 | 1,415 | 1,000 |
| Sth Gilmerton Ph 2 | 0 | 0 | 0 | 743 |
| Charlesfield Road | 3,780 | 0 | 3,780 | 0 |
| Total Social Rent | 6,195 | 1,203 | 4,992 | 1,946 |
| Auchendinny Ph1 | 0 | 640 | (640) | 2,116 |
| Dalhousie South Ph2A | 0 | 0 | 0 | 838 |
| Longniddry Ph2 | 1,349 | 0 | 1,349 | 1,326 |
| Wallyford 6 Ph1 | 0 | 0 | 0 | 1,604 |
| Winchburgh P3 | 0 | 0 | 0 | 2,266 |
| Total Mixed | 1,349 | 640 | 709 | 8,150 |
| | | | | |
| Total New Build Grant | 7,544 | 1,843 | 5,701 | 10,096 |

Key Commentary:

Grant income of £7.5m has been claimed for the period ended September 2025, £5.7m higher than budget.

Complete

- **Builyeon PH3a (SR 23):** Grant for the project was claimed in full during 2024/25 and no further income is expected.

Due on Site/ On Site

- **Deans South Phase 2 (SR/38):** Now in contract and on site. Board approval based on a revised grant drawdown profile agreed with WLC which required front funding of costs by WH East. £633k of grant was made available in 2024/25 and claimed in February 2025 with this being deducted from the 2026/27 allocation. Original allocation in 25/26 was £0.9m. An additional £1.5m has become available in the year and has now been fully drawn.
- **Longniddry Ph2: (MMR/17):** Grant for the project drawn in full in June 2025 to fund the Golden Brick payment and works to date.
- **Charlesfield Road (SR/36):** Board approved the development in May 2025 and grant approval received in June 2025. Golden Brick payment of £3.78m was made in September 2025 which was fully covered by grant. No further grant is expected in 2025/26.
- **Winchburgh P3 (SR/ 69):** Board approved by WDSL in May 2025 and grant funding approval in place for £7.961m comprising remaining £5.5m of SG grant funding and £2.461m from WLC ASHP fund. The £5.5m is required to be spent by 31 March 2026.

8) Balance sheet

| | 30 September 2025 | 31 March 2025 |
|--|-------------------|-----------------|
| | £'000 | £'000 |
| Fixed Assets | | |
| Social Housing Properties | 562,775 | 542,889 |
| Other Fixed Assets | 10,841 | 11,284 |
| Investment Properties | 85,304 | 85,304 |
| | 658,920 | 639,477 |
| Current Assets | | |
| Stock | 1,412 | 1,378 |
| Trade debtors | 181 | 287 |
| Other debtors | 7,750 | 4,809 |
| Rent & Service charge arrears | 2,395 | 1,821 |
| less: Provision for rent arrears | (1,275) | (1,080) |
| Prepayments and accrued income | 1,091 | 1,110 |
| Intercompany debtors | 903 | 1,488 |
| Total Debtors | 11,045 | 8,435 |
| Cash & Cash Equivalents | 1,360 | 1,907 |
| | 13,817 | 11,720 |
| Creditors: within 1 year | | |
| Trade Creditors | (1,462) | (725) |
| Accruals | (1,991) | (2,936) |
| Deferred Income | (19,652) | (37,610) |
| Prepayments of Rent and Service Charge | (2,264) | (2,053) |
| Other Creditors | (1,518) | (1,164) |
| Amounts due to Group Undertakings | (18,074) | (16,265) |
| | (44,961) | (60,753) |
| Net Current Liability | (31,144) | (49,033) |
| Long Term Creditors | | |
| Deferred income | (6,563) | (6,563) |
| Loans | (36,042) | (35,759) |
| Amounts due to Group Undertakings | (243,893) | (231,385) |
| Pension Liability | (2,206) | (2,206) |
| Net Assets | 339,072 | 314,531 |
| Capital and Reserves | | |
| Share Capital | 0 | 0 |
| Revenue Reserve b/f | 314,531 | 271,225 |
| Surplus in the year | 24,541 | 43,306 |
| Total Funds | 339,072 | 314,531 |

Key highlights year to date:

The balance sheet as at 31 March 2025 reflects the audited position and year end adjustments, including the revaluation of both housing and investment properties and actuarial valuation of the defined benefit pension scheme.

At 30 September 2025:

- The value of our **fixed assets** reflects additions in the year less depreciation.
- **Debtors (excl. cash)** - Increased by £2.6m driven by an increase of other debtors due to new build grant claim submitted but not yet received, partly offset by a decrease in intercompany debtor due to timing.
- **Short-Term Creditors** – Amounts due within one year of £46.0m have decreased by £15m, mainly driven by the decrease in deferred income of £18.8m which relates to grants received in advance of new build completions that are due to complete < 1 year, offset by an increase in intercompany creditors due to timing.
- **Loans** of £243.9m relate to funding drawn down from WFL1 and external funding of £36.0m due to THFC and Allia (inclusive of accrued interest charges). The increase in loans due to group undertakings supports the delivery of the development programme.

9) Q2 forecast 2025/26

| Operating statement | Full Year 2025/26 | | |
|---------------------------------|-------------------|---------------|----------------|
| | Q2 Forecast £k | Budget £k | Variance £k |
| INCOME | | | |
| Rental Income | 47,231 | 47,147 | 84 |
| Void Losses | (685) | (685) | 0 |
| Net Rental Income | 46,546 | 46,462 | 84 |
| Grant Income | 40,065 | 37,011 | 3,054 |
| Other Grant Income | 638 | 588 | 50 |
| Other Income | 6,592 | 5,982 | 610 |
| Total Income | 93,841 | 90,043 | 3,797 |
| EXPENDITURE | | | |
| Employee Costs - Direct | 5,258 | 5,258 | 0 |
| Employee Costs - Group Services | 2,941 | 2,944 | 3 |
| ER / VR | 36 | 0 | (36) |
| Direct Running Costs | 4,959 | 5,172 | 213 |
| Running Costs - Group Services | 1,742 | 1,759 | 17 |
| Revenue Repairs and Maintenance | 8,794 | 8,794 | 0 |
| Bad debts | 489 | 489 | 0 |
| Depreciation | 17,636 | 17,636 | 0 |
| TOTAL EXPENDITURE | 41,855 | 42,052 | 197 |
| OPERATING SURPLUS | 51,985 | 47,991 | 3,994 |
| Interest Payable | (11,202) | (11,299) | 97 |
| STATUTORY SURPLUS | 40,783 | 36,692 | 4,091 |

| Investment | Full Year 2025/26 | | |
|--|-------------------|---------------|-----------------|
| | Q2 Forecast £k | Budget £k | Variance £k |
| Total Capital Investment Income | 19,876 | 10,276 | 9,600 |
| Investment Works | 10,671 | 9,156 | (1,515) |
| New Build | 45,759 | 34,945 | (10,814) |
| Other Capital Expenditure | 945 | 945 | 0 |
| TOTAL CAPITAL EXPENDITURE | 57,375 | 45,046 | (12,329) |
| NET CAPITAL EXPENDITURE | 37,499 | 34,770 | (2,729) |

Key highlights:

A statutory surplus of £40,783k is £4,091k higher than budget is reported.

- Rental income is £84k favourable to budget driven by earlier handovers of new build units.
- Grant income is £3,054k higher than budget with 29 additional units completing in 2025/26 (Builyeon and West Craigs Ph1).
- Other Grant income is £50k favourable due to additional grant funding confirmed for aids & adaptations works with corresponding additional expenditure.
- Other income is £610k higher with an increase in gift aid from WDS of £421k. The new build spend is forecasting to be higher, therefore increasing the gift aid received. This is an intra group item. There is also additional MMR income forecast linked to the higher than budgeted rent increase applied by Lowther in 2025/26 and early completion of units in the YTD.
- ERVR is £36k higher than budget however, ERVR spend is managed within the budget across the Group.
- Employee and running cost group recharges are forecast to be £3k and £17k lower than budget respectively, reflecting the timing of changes from the budgeted staff structure and running cost savings across several departments within Wheatley Solutions.
- Direct running costs are £213k favourable to budget due to donations to Wheatley Foundation paid earlier than budgeted in March 2025.
- Net interest payable is £97k favourable to budget due to the reduction in the variable lending rate compared to budget and value achieved in the current market through entering into new funding arrangements with shorter maturities.
- Capital investment income is £9,600k favourable to budget reflecting additional grant income receivable for new build developments to support development spend being brought forward (Winchburgh Phase 1, £3.2m, Charlesfield Road, £3.8m, Maybury West, £2.9m and Deans South £1.4m).
- Investment works are £1,515k higher including additional core investment spend of £504k utilising capacity across the wider borrower group and additional spend on district heating works of £338k with the budget reallocated from within the RSL group. Additional capitalised repairs spend of £325k is recognised for remedial works not budgeted and additional £50k adaptations spend in line with the increased grant funding.
- New Build is £10,814k higher than budget due to additional grant availability with accelerated spend on Charlesfield Road (£3.6m), Winchburgh Ph1 (£3.6m) and Maybury West (£2.8m).

10) Q2 forecast – Underlying surplus

Key highlights :

- The forecast Operating Statement (Income and Expenditure Account) is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2018).
- However, the inclusion of grant income on new build developments creates volatility in the results and does not reflect the underlying cash surplus/deficit on our letting activity.
- The table below therefore shows a measure of underlying surplus which adjusts our net operating surplus by excluding the accounting adjustments for the recognition of grant income and depreciation but including capital expenditure on our existing properties.
- The Q2 forecast shows an underlying surplus of £6,439k which is £561k unfavourable to budget. The strong letting performance at P6 is forecast to continue, generating additional net rental income and an overall favourable expenditure position from our operating activities and donations to Wheatley Foundation paid earlier than budgeted in March 2025. This and the strong letting performance across the RSL Group accommodates the additional investment spend in line with our tenant commitments to provide high quality housing and invest to improve the energy efficiency of our homes. The additional spend noted for the district heating program has been fully accommodated from a reallocation of budget from WH Glasgow. Financial performance continues to be managed within the covenants and golden rules for the RSL Borrowers.

| WH East Underlying Surplus - Q2 Forecast 25/26 | | | |
|---|-----------------|---------------|---------------------|
| | Forecast £ks | Budget £ks | YTD Variance £ks |
| Net Operating surplus | 51,985 | 47,991 | 3,994 |
| add back: | | | |
| Depreciation | 17,636 | 17,636 | 0 |
| less: | | | |
| Grant income | (40,065) | (37,011) | (3,054) |
| Gift aid | (1,582) | (1,161) | (421) |
| Net interest payable | (11,202) | (11,299) | 97 |
| Total expenditure on Core Programme | (10,333) | (9,156) | (1,177) |
| Underlying surplus / (deficit) | 6,439 | 7,000 | (561) |
| Reallocation of District Heating spend budget from WH Glasgow | (338) | | |
| Reported underlying surplus / (deficit) | 6,101 | | |