

**WHEATLEY HOMES GLASGOW
BOARD MEETING**

**Friday 15 September 2023 at 10am
Wheatley House, 25 Cochrane Street, Glasgow**

AGENDA

1. Appointment of Chair
2. Apologies for absence
3. Declarations of interest
4. a) Minute of 11 August 2023 and matters arising
b) Action list

Main business and approvals

5. Neighbourhood planning (verbal)
6. Stock condition: reinforced autoclaved aerated concrete (verbal)
7. Sustainability Framework
8. New build development programme: mid-year review
9. Annual SHR assurance report
10. Winter resilience planning

Other business

11. Equality, Diversity and Inclusion
12. Hate Crime Policy
13. Governance update
14. AOCB

Report

To: Wheatley Homes Glasgow Board

By: Frank McCafferty, Group Director of Repairs and Assets

Approved by: Steven Henderson, Group Chief Executive

Subject: Sustainability Framework

Date of Meeting: 15 September 2023

1. Purpose

- 1.1 To update the Board on progress toward our sustainability objectives agreed through our Group Sustainability Framework and its supporting action plan.

2. Authorising and strategic context

- 2.1. Under our Terms of Reference, we are responsible for our own strategy and performance monitoring. 'Setting the benchmark for sustainability and reducing carbon footprint' is a stated key outcome in our strategy, *Your Home, Your Community, Your Future*. Our Sustainability Framework, which the Board considered at its meeting on 10 February 2023, provides the direction for how this vision will be realised. This update provides the Board with details of our progress in priority areas.
- 2.2. Implementation of our Sustainability Framework is monitored by Wheatley Solutions. The Wheatley Solutions Board receives quarterly updates on progress in implementing our Framework to support it in this role.

3. Background

- 3.1 Our Sustainability Framework was launched this year, together with an accompanying action plan and performance monitoring framework.
- 3.2 As part of our Framework we make clear that our approach to reducing our impact on the environment will focus on four areas:
- our existing homes and their heating systems;
 - our new build properties;
 - our business operations; and
 - our supporting activities.
- 3.3 We also make clear that achieving our sustainability objectives will involve changing behaviours in all parts of our Group and extensive engagement with our customers.

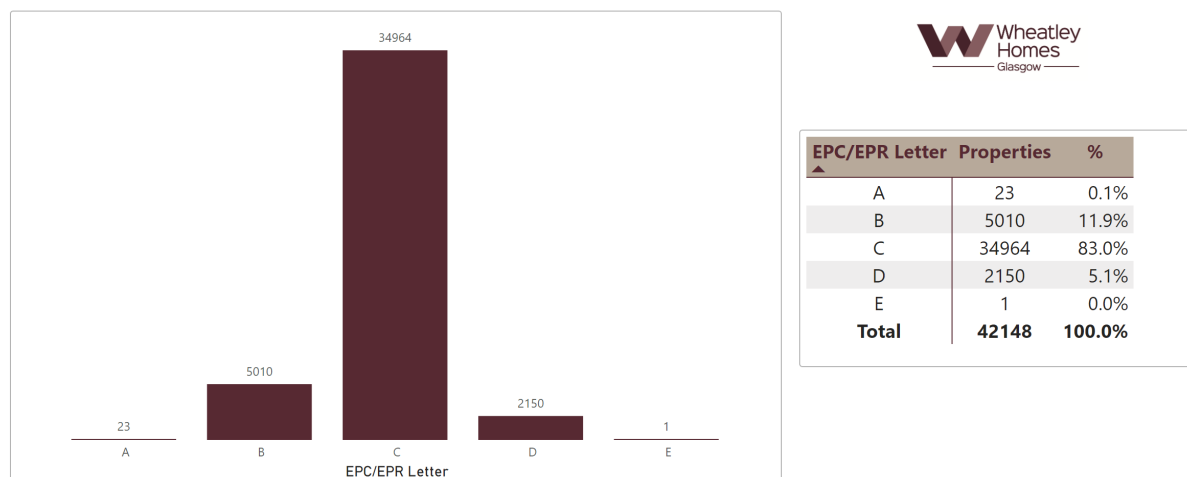
4. Discussion

Our existing homes and their heating systems

4.1. Our group wide aim is to reduce CO₂ emissions from our existing homes by 6,000 tn this year. There are two strands of this that apply to our homes:

- Improving the fabric of our homes; and
- Ensuring that the heating systems in our homes operate as efficiently as possible.

4.2. In general, the vast majority of our homes are relatively energy efficient. Currently around 95% of our homes are at EPC C or higher as shown below.



4.3. The energy efficiency of our homes compares favourably to the peers we have information for including L&Q who are reporting 79% of their properties at C, GreenSquare Accord who are reporting 67% at C, and Bromford who are reporting 87%.

4.4. Work is on-going to build on our current position through projects to improve our properties that have either just completed, are on site or are at a detailed planning stage. These projects include:

- Deep retrofit of 22 Canadian timber homes in Drumchapel which has completed recently cutting heating bills by up to 87% and saving 7 tn of CO₂ per home each year. Works undertaken included external insulated render, new double-glazed windows and doors and high-efficiency, air source heat pumps, solar panels and a heat recovery system;
- Piloting bespoke retrofit measures in pre-1919 tenements. These works are being done when properties are void and include internal wall insulation and energy efficient heating. Our aim is to complete improvements costing circa £20k per property to around 50 homes saving 448 tonnes of CO₂;
- Improving up to 116 properties across the city with inefficient electrical heating through a combination of installing solar PV, Air Source Heat Pumps, and loft insulation upgrades. Expected CO₂ savings from these works are 434 tn; and
- Pilot of an innovative solar PV system (SolShare) for use on flatted developments which negates the need for multiple inverters, maximising resident consumption of solar power generation and significantly reducing export back to the grid.

- 4.5. Our focus on these properties reflects the challenge they present and the availability of funding including from the Scottish Government and through Energy Company Obligation (“ECO”) from third parties to support improvement work.
- 4.6. These projects are in addition to the energy efficiency works that we undertake as part of our investment programmes including window and door improvements, boiler improvements and insulation.
- 4.7. We have also asked our expert advisory group on sustainability, the Pathway to Net Zero Group (“PNAG”), to provide guidance on relatively simple and innovative measures that we could consider applying to a large number of existing properties to improve energy efficiency. Doing this would be part of our ultimate objective to raise the energy performance of all properties where economically and technically feasible. Examples of areas to explore further suggested by PNAG include:
- All Buildings
 - Air leakage reduction, improved sealing and in parallel appropriate ventilation; and
 - Adjustment, deployment and supporting tenant knowledge in heating controls.
 - Ground Floors – installation of underfloor insulation for suspended ground floors using modern methods that avoid entry to premises and changes to interiors;
 - Houses & Top Floor Flats – review loft insulation, over compression of insulation, voids in insulation, topping up insulation depth, insulation covers for roof hatches, inadequate ventilation and non-insulated heating / water; and
 - Insulation of Party Walls – most attached houses and flats built since 1950 have cavity separating walls. This can account for up to 22% of heat loss. Injected insulation using bead insulation into cavity separating (party) walls could be undertaken from street side, not requiring access into properties.
- 4.8. Decisions on investment in these measures will be subject to approval through existing business and investment planning processes.
- 4.9. The other strand of our approach to improving energy efficiency of our existing homes is to ensure that the heating systems operate as effectively as possible. We have two priorities in this area:
- The completion of our ongoing programme on Connected Response installations to improve electric heating systems; and
 - The deployment of the Minibems systems to improve the efficiency of our, mainly, gas fuelled district heating systems.
- 4.10. Installation of Connected Response is progressing as planned. We recently completed our 6,000th install. The system applies smart controls to electric heating systems which can lead to savings of up to 30% for customers on the cost of heating and hot water. Introducing Connected Response also saves around 1 tn of CO₂ per property per year, which is roughly equivalent to the emissions produced driving a petrol car for a year.

- 4.11. Minibems works by using smart controls to better align the heat produced in a district heating system with actual demand. Doing this means less fuel (gas or biofuel) is needed by the plant which saves us money and reduces the CO2 produced. Detailed planning is ongoing, following contractual agreement last month, to deploy connected response to our district heating sites.
- 4.12. Early priorities will include Broomhill and Gorget, in north-west Glasgow. Overall, group wide, we intend deploying Minibems, over the next two years to district heating systems serving over 1700 customers. Once fully deployed, Minibems is estimated to save 1400 tn of CO2 a year.

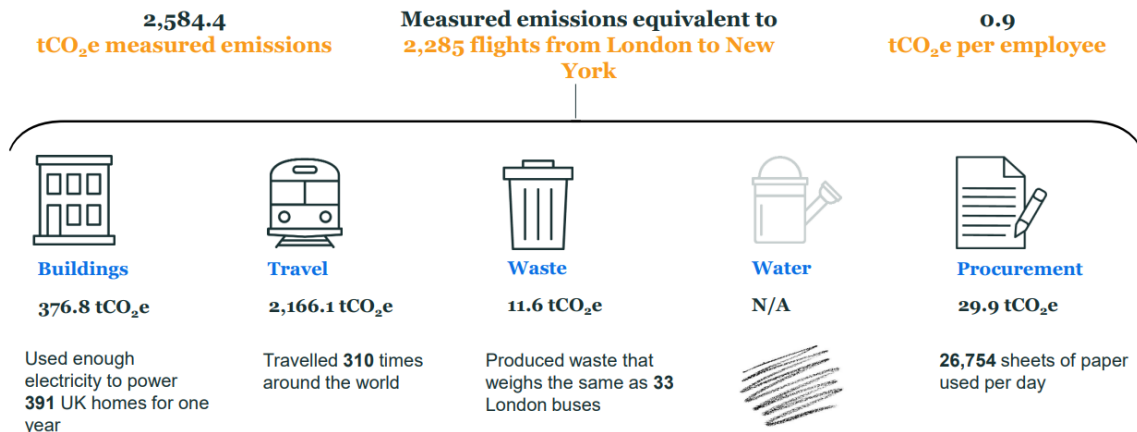
Our new build properties

- 4.13. Our Framework sets out our key actions in relation to new build homes. This includes:
- New build homes will meet the planning requirements in relation to no fossil fuel as required through Building Regulations (March 2024);
 - We will size our solar PV systems to generate sufficient electricity to mitigate high cost of operating some systems;
 - Our large-scale regeneration proposals will include an assessment of 'carbon payback';
 - We will explore the implications of design for deconstruction and look to incorporate requirements for this as part of future new-build standards;
 - We will pilot modern methods of construction; and
 - Our new homes will be at least EPC (Energy Performance Certificates) B.
- 4.14. As a result, all new build-approved projects will meet EPC B as a minimum. We also reviewed our new build specification to require zero emissions heating systems to be the preferred heating choice. A demonstration project has been instructed through Smith Scott Mullen (architect) at one of our partners' projects, Wheatley Homes East's West Craigs development, to consider an approach to an assessment of carbon payback. The findings of this will also be used to help inform our future assessments.
- 4.15. Modular projects are being planned in Glasgow and we are engaged with the Building Standards working group on the pathway to the Scottish Passivehaus Equivalent. We will also engage with the PNAG on our contribution to this working group.

Our business operations

- 4.16. Our objective is to be carbon neutral across our business operation by 2026. We have been working with PlanetMark to assess our group wide emissions. Key findings from the PlanetMark assessment for 2022/23 on emissions from our business operations are:
- | | |
|------------|----------------|
| ▪ Scope 1: | 1,847.0 tn CO2 |
| ▪ Scope 2: | 279.2 tn CO2 |
| ▪ Scope 3: | 458.2 tn CO2 |
| ▪ Total | 2,584.4 tn CO2 |

- 4.17. These emissions equate to 0.9 tn CO₂ per employee which is the same as last year. Information on the sources of these emissions is shown below:



- 4.18. Emissions from our corporate buildings have decreased from last year reflecting the improvements we made in our centres of excellence and hubs, and our new operating model. These reductions have been offset by an increase in fleet and car-based business travel, reflecting the return to normal business operations following the covid period. Waste and procurement related emissions have also increased, although these are both minor in relation to our overall total and reflect improved data availability and more detailed analysis by PlanetMark rather than any particular shift in our operations.
- 4.19. This year, emissions from our buildings will reduce further reflecting the plans we already have in place to switch all our electricity use to 'green' sources. Emissions from our fleet, predominantly through the Nets service, are expected to remain at similar levels until our planned switch to a zero emissions capable fleet. Developing options for reducing emissions from car-based business travel, waste and through our procurement process are all priorities in our sustainability delivery plan and through our recently established Sustainability CoE (Community of Excellence).

Our supporting activities

- 4.20. We established a CoE focused on sustainability in June this year. The CoE brings together around 30 staff from across our Group and will help ensure that every part of our group contributes to supporting our sustainability objectives. To ensure coordinated activity, the sustainability delivery plan at Appendix 1 has been developed. This plan brings together our sustainability-related strategic projects and other priorities to provide an overview of all activities. These cover all parts of our group and provide a focal point for the work of our CoE and for ensuring progress group-wide. Priorities in the delivery plan will be supported through the CoE including by sub-groups that have been created around themes that will be essential in achieving our sustainability-related objectives. The sub-groups - which were identified as necessary by members of the CoE - established to date are:

- **Our sustainability story** - so we have a common accessible understanding of what is being achieved;
- **zero-carbon heating systems** - so we build understanding of which systems are most effective, and link to wider factors including ensuring systems can be used effectively;

- **Learning and learning needs** - so we create training and wider development materials that meet the needs of our staff and customers;
- **impact locally** - so we are focused on ensuring that our sustainability related activities have an impact in our communities;
- **Fleet** - so our journey to a carbon neutral fleet not only meets our sustainability objectives, but also the needs of our staff that rely on vehicles to deliver their work and;
- **Sustainability data** - as this will be essential in ensuring we make necessary progress and targeting our activities effectively.

4.21. These sub-groups bring staff together to take forward the area they are responsible for and also provide a sounding board to inform delivery of the projects in the delivery plan.

5. Customer Engagement

5.1. Engaging customers and supporting changes that will have a positive impact on the environment is a priority in our Framework. Our approach to this is being developed as part of the delivery plan and CoE discussed in this update.

6. Environmental and sustainability implications

6.1 This report focuses on environmental and sustainability implications.

7. Digital transformation alignment

7.1 Where applicable, digital techniques and innovation will be used to support delivery of our sustainability objectives including through reducing travel and using cloud based services, which are typically more energy efficient than onsite provision. With this in mind, we are also, through one of our sustainability related projects, looking to quantify the positive impact adopting digital technologies has had in reducing our CO₂ emissions.

8. Financial and value for money implications

8.1 The information and focus provided through the Sustainability Framework will help ensure we maximise impact and value from sustainability related investment. We will look, as we are doing now, to leverage our sustainability related spend through working with others including Scottish Government and energy companies as part of the ECO scheme, to maximise impact.

9. Legal, regulatory and charitable implications

9.1 Changes in guidance and legislation, such as through the Scottish Government's consultation on EPCs discussed in this report, will shape future investment approaches and priorities to ensure we meet our legislative and regulatory requirements.

10. Risk Appetite and assessment

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

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

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

11. Equalities implications

11.1 Equalities implications will be assessed as part of the actions that are undertaken in implementing our Framework.

12. Key issues and conclusions

12.1 Our Sustainability Framework is shaping delivery in areas ranging from our investment in existing homes to the skills we are developing among our staff. To ensure continued focus, ongoing delivery and that required organisation wide change is embedded, we have established a sustainability CoE and a delivery plan (Appendix 1). These will help drive the delivery of sustainability objectives in line with the strategy that the Board approved.

13. Recommendations

13.1 The is asked to note this progress update including the delivery plan at Appendix 1.

List of Appendices

Appendix 1: Sustainability Delivery Plan



KPIs and Targets

Existing Homes		
KPI	Target (2023/24)	Rationale
Reduction in the CO2 emissions from our existing homes	6,000 tn	Builds on the previous target during the strategy period of reducing emissions by 4,000 tn a year
The amount of investment committed to energy efficiency improvements, and whether this is funded from our own resources	No target – absolute amount to be reported	A requirement, that is on hold at present, as part of the EESSH2 reporting
Energy Efficiency rating bands of stock – Group and by subsidiary	To be agreed following further work	A key measure in our sustainability Framework and an on hold requirement for SHR through current EESSH2
[redacted]	[redacted]	[redacted]

New build homes		
KPI	Target (2023/24)	Rationale
<p>New build properties</p> <ul style="list-style-type: none"> ▪ EPC rating ▪ kWh/m2 ▪ Carbon emissions from dwelling usage ▪ Embodied carbon in construction 	<p>B> 100% (new build)</p> <p>95% of new build properties 90 KWh/M²/YEAR or below</p> <p>99% of new build properties producing 1.2 tonnes of carbon dioxide lower each year</p> <p>Strategic Project 2023/24</p>	<p>Initial focus will be on the EPC based approach, as we build understanding on other measures (the amount of energy required to heat the home and the carbon emission from this energy source; in line with new Scottish Passive house equivalent).</p> <p>Assessment of 2022/23 projects.</p> <p>Assessment of 2022/23 projects.</p> <p>Embodied Carbon in Construction is a Strategic project for 2023/24 with West Craigs being used as a demo project. SSM engaged to review how this is measured.</p>
100% of developments are building with nature accredited	Strategic Project 2023/24	Applied at Design stage of a project. Defined project to act as a demonstration for the application of this accreditation.
Number of new build property completions with zero direct emission heating systems	No target - absolute number to be reported	From 2024, all new build will require zero direct emissions heating systems. This measure will give an indication in advance of the new requirement

Business operations		
KPI	Target (2023/24)	Rationale
CO2 emissions from our business operations as assessed by Planet Mark	1,500 tn	A key outcome in our sustainability framework. Target builds on the result calculated by Planet Mark (2,500 tn) in 22/23
Number of staff taking part in 'sustainability related learning'	Annual target to be agreed following further work	We are keen to develop skills among our staff to support the behaviour change needed for net zero - Overall aim is for all staff to have the 'sustainability' related knowledge and skills needed for their roles and to deliver the behaviour change needed for net zero

**Deliverables:
Strategic projects**

Project	Key Milestones	Target date (End of month)
Implement Group sustainability framework	<ul style="list-style-type: none"> ▪ Sustainability delivery workshop ▪ Refine sustainability performance monitoring framework ▪ Develop sustainability delivery plan ▪ Quarterly sustainability updates to ET ▪ Annual sustainability progress report via PNAG to Group Board 	April 23 May 23 June 23 June 23 Dec 23
Defined criteria for assessing where it is not cost effective or technically feasible for a property to achieve a required energy efficiency	<ul style="list-style-type: none"> ▪ Develop method for determining level of sustainability related spend a property can support* ▪ Identify suitable energy efficiency measures for different property archetypes ▪ Cost applicable energy efficiency measures ▪ Apply measures to property to determine if energy efficiency objectives can be met with level of sustainability related spend property can support ▪ Consider any implications from revised EESSH2 guidance once available ▪ Develop draft policy for Board consideration and approval 	July 23 Sept 23 Oct 23 Dec 23 Jan 24 Mar 24
Pilot archetype segment investment plans for our stock	<ul style="list-style-type: none"> ▪ Identify suitable archetype for pilot ▪ Analyse different investment scenarios and their impact ▪ Review findings with PNAG ▪ Discuss approach with Wheatley Solutions Board ▪ Determine level of spend pilot stock can sustain (linked to milestone 1 (*) above) ▪ Develop investment plan for archetype in pilot stock 	April 23 April 23 May 23 May 23 July 23 Dec 23

Project	Key Milestones	Target date (End of month)
Improve efficiency of district heating networks	▪ Agree contract with chosen supplier for smart control system for district heating networks	June 23
	▪ Define properties for phase 1 roll out	June 23
	▪ Engage customers in advance of deployment	Oct 23
	▪ Complete installation of necessary equipment (plant room and in customer home)	Dec 23
	▪ Commission and monitor to ensure operating effectively	Jan 24
	▪ Review progress and plan Phase 2 roll out	Jan 24
Develop an energy strategy including approach to our distributed heat systems	▪ Gather information of current heating systems and describe current business model	June 23
	▪ Identify and agree key objectives for our distributed heating systems	Aug 23
	▪ Identify potential options for future operation	Sept 23
	▪ Model options and agreed preferred approach	Nov 23
	▪ Document as part of heating strategy and develop implementation plan	Jan 23

Project	Key Milestones	Target date (End of month)
ESOS (Energy Savings Opportunity Scheme) assessment.	<ul style="list-style-type: none"> Procure Assessors Total Energy Calculation complete Energy Audits – 7-10 Sites Audit and ESOS Report Submission to SEPA 	Apr 23 May 23 Sept 23 Nov 23 Dec 23
Evaluate the positive impact of measures undertaken by the Group in reducing carbon emissions.	<ul style="list-style-type: none"> Research market to identify potential partner to undertake assessment Begin work with external partners to determine scope of measures to be evaluated Gather information on measures completed and upcoming measures With partners develop a measurement model to quantify impact Draft report 	July 23 August 23 Oct 23 Nov 23 Jan 24
Evaluate our Sustainability Framework	<ul style="list-style-type: none"> Identify potential partners to evaluate framework and initial progress Develop scope for evaluation in conjunction with PNAG Procure partner to undertake evaluation Draft report Final report 	Nov 23 Dec 23 Jan 24 Mar 24 Mar 24
Explore the availability and potential of tools that can be used to plan sustainability related investment works and report impact of these works	<ul style="list-style-type: none"> Outline reporting goals (June '23) System/market assessment and interoperability with existing systems (Aug '23) Take forward selected route – either inhouse development or RFQs to relevant parties System development Test and sign-off 	July 23 Sept 23 Oct 23 Jan 23 Feb 23

Project	Key Milestones	Target date (End of month)
Developing approaches to measuring embodied carbon in new build properties	<ul style="list-style-type: none"> East team to trial measuring embodied carbon at a site (West Craigs) to inform new process in the future New process developed to measure embodied carbon across new sites 	Jan 24 Mar 24
Assess how procurement approaches can be used to understand Scope 3 emissions from our suppliers and to drive reduction as part of the procurement processes	<ul style="list-style-type: none"> Develop requirement for our suppliers to provide a base line of the whole life carbon emissions associated with their products Issue data collection questionnaires via Contract Management System to all suppliers to create baseline Report to ET on the findings of early and engagement and agreed next steps. 	Dec 23 Feb 24 Apr 24
Develop innovative construction solutions and more modern methods and explore how to implement these including the benefits of close working with suppliers and contractors, and new routes to market or partnerships.	<ul style="list-style-type: none"> Approval of modular project in 2023/24 which includes monitoring of success. Possible projects include Corsbie Road, Johnstonebridge, Gladstone Road and Lochans Progress demonstration project with Scottish Government in Glasgow for the Scottish Passive House Standard Share increased knowledge of new construction methods and solutions to problems that arise and provide training/information to all internal stakeholders 	Mar 24 Mar 24 Mar 24
Size our solar PV systems to generate sufficient electricity to mitigate high cost of operating some systems	<ul style="list-style-type: none"> Ensure on all developments where possible are provided with solar PVs for both landlord supply and new properties with agreed feed in tariff process Develop measurement of KW generated, used and fed back into the grid via a feed in tariff ensuring value for money is being achieved (Landlord supply only) Review solar PV assessment method and sign off of capacity as being sufficient to mitigate operating costs 	Mar 24 Jan 24 Dec 23

Project	Key Milestones	Target date (End of month)
All our urban sites will meet Scottish Government '20-minute neighbourhoods' and other local requirements;	<ul style="list-style-type: none"> Develop a clear test for 20 minute neighbourhoods and implement it to measure all urban sites with the target of 95% of units built being in a 20 minute neighbour as defined by the Scottish Government 	Dec 23
Work with our key suppliers to document the progress made in reducing emissions from our IT infrastructure and develop insight on how emissions can be reduced yet further	<ul style="list-style-type: none"> Established an emissions dashboard within Azure for all hosted devices and services Understand potential for 2024-25 emissions reductions (desktop hosting and lomart contracts) 	July 2023 Mar 2024
Develop an approach to achieving a fleet that can operate with zero emissions including identification of challenges to address	<ul style="list-style-type: none"> Roadmap to delivering a carbon neutral capable Group fleet by 2026 agreed by ET Presentation of decarbonisation roadmap to Wheatley Solutions Board. Market review and procurement route recommendation for Salary sacrifice scheme (Grey fleet) Assessment of initial 6 months operational dataset (vehicle usage, locations, charging sites) 	May 23 Aug 23 Dec 23 Mar 24
Require alignment with Sustainability Framework to be evidence for all proposed expenditure of more than £2 million or where a change is sought to established policies or practice.	<ul style="list-style-type: none"> Research good practice in relation to embedding sustainability considerations in decision-making (July/August 2023) Develop sustainability impact assessment and guidance on when required and how to complete (September 2023) Pilot approach through October/November 2023 Roll out from January 2024 	Aug 23 Sept 23 Nov 23 Jan 24
Develop a sustainability performance measurement	<ul style="list-style-type: none"> Produce a draft sustainability performance management framework and agree with Wheatley Solutions Board 	June 23

Project	Key Milestones	Target date (End of month)
framework with progress against targets reported to Boards in the same way and at the same time as other key strategic group wide priorities.	<ul style="list-style-type: none"> ▪ Update ET reporting to better reflect sustainability measures ▪ Begin quarterly progress reporting to Wheatley Solutions ▪ Update to group Board 	Aug 23 Aug 23 Dec 23
Launch network of sustainability champions	<ul style="list-style-type: none"> ▪ Determine aims and objectives of the group ▪ Gather interest and bring together 	Sept 2023 Nov 2023
Include sustainability responsibilities in the job outputs for our Directors and Managing Directors.	<ul style="list-style-type: none"> ▪ Identify and agree wording to be included ▪ Inform Unison of any proposed changes ▪ Update existing directors and managing director's role profiles ▪ Issue updated role profiles to the relevant staff 	Sept 23
Baseline recycling facilities and establish targets with view to encourage our customers to reduce their household waste.	<ul style="list-style-type: none"> ▪ Establish current recycling facilities available to customers ▪ Scope out potential partners ▪ Develop marketing / communication plan to change customer behaviours ▪ Launch pilots across Group 	tbc
Develop tailored training programmes for housing staff that give them expertise and confidence to engage customers in their communities on how to make local contributions to improving the environment	<ul style="list-style-type: none"> ▪ Research external learning on sustainability ▪ Provide access to Sustainability Modules available on MyAcademy for COE to review and feedback on ▪ Determine the key groupings of staff and COE members and the training required for each group – working on a leaders first approach ▪ Determine best approach for learning delivery ▪ Agree learning, timescales for delivery, and budget ▪ Create plan for delivery and communication and implement group wide 	tbc
Explore the potential to build on the Foundation's core	<ul style="list-style-type: none"> ▪ Greener Communities Programme approved by Foundation Board 	May 23

Project	Key Milestones	Target date (End of month)
contribution to include additional activities that build awareness and encourage action to address the climate crisis	<ul style="list-style-type: none"> Develop and maintain partnership with Environmental Funders Network Review current Foundation programmes using a sustainability lens <i>e.g. Home Comforts, Wheatley Works</i> Support customer engagement events x5 with a sustainability focus Build understanding and awareness via promotion of national campaigns and events <i>e.g. National Bike Week</i> Deliver x5 sustainability focussed You Choose Challenges across Group 	May 23 Oct 23 Dec 23 Mar 24 Mar 24
Continue to explore how 'green' rota scheduling approach can provide an increased contribution to the aims of this framework.	<ul style="list-style-type: none"> Review / collate green scheduling approaches in place across services (survey feedback) Identify opportunities for innovative sustainability approaches (survey analysis) Share best practice at Sustainability Communities of Excellence Evaluate changes in practice (survey response) 	Aug 2023 Sept 2023 Oct 2023 Dec 2023
Our repairs service including City Building will develop sustainability action plans	<ul style="list-style-type: none"> Updated repairs policies to be developed and put forward for approval to Boards – August/September 2023 Consider updated policies and develop sustainability plans for City Building and the in-house teams. To cover: <ul style="list-style-type: none"> Repairs not renewals Material specification Improved appointments and reducing travel and no access i.e. wasted visits Transition of fleet Draft sustainability plans to be developed by the end of 2023 	tbc

Project	Key Milestones	Target date (End of month)
Develop approach to identifying locations, with community engagement, that can be 'set-aside' for habitat or where cutting cycles are arranged to provide most benefit to wildlife	<ul style="list-style-type: none"> ▪ Map out locations that would be suitable ▪ Hold community engagement events ▪ Promote new approach to customers ▪ Start wild meadow programmes across Group 	tbc

Report

To: Wheatley Homes Glasgow Board

By: Frank McCafferty, Group Director of Repairs and Assets

Approved by: Steven Henderson, Group Chief Executive

Subject: New build development programme: mid-year review

Date of Meeting: 15 September 2023

1. Purpose

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

2. Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for approving our rolling five-year development programme each February. Once the programme is approved, the Wheatley Developments Scotland Limited ("WDSL") Board is responsible for scrutinising and approving each individual contract award in line with our agreed development criteria.
- 2.2 Our development programme links to our 2021 - 2026 strategy and the strategic theme, 'Making the Most of our Homes and Assets' as follows:
- Properties developed will be warm, safe and energy-efficient homes, meeting Aspects 1 and 2 of Silver Sustainability Standards;
 - Regenerating communities to make them sustainable for the next 20 years;
 - Will deliver 1,286 new affordable homes over the next 5 years; plus 100 market acquisitions; and
 - Work to place the customer at the heart of how we plan and design our new build developments.
- 2.3 Our new build programme also helps us to deliver against the strategic theme of 'Changing Lives and Communities' through increased opportunities for training and employment and through community benefit contributions to the Wheatley Foundation.

3. Background

- 3.1 We continue to be a key partner for the Scottish Government and Glasgow City Council ("GCC") as TMDF (Transfer of Management Development Funding) authority in the delivery of an ambitious growth programme supporting the Scottish Government's *More Homes Scotland* programme and have completed 3,514 new affordable homes, across 60 sites since 2007, with a further 304 units currently on site and 47 units due on site.

- 3.2 As a strategic partner with GCC we are engaged in developing sites across the city, including major Transformational Regeneration Areas (TRAs) in Sighthill, Red Road, Govan/Ibrox as well as new opportunities in Wyndford and Milton.

4. Discussion

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

Table 1:

Indicators	Highlights & Exceptions
Unit completions	<p>During financial year 2022/2023 we completed 119 new homes across the following developments:</p> <ul style="list-style-type: none"> ▪ 26 units at Damshot Crescent, Pollock ▪ 20 units at Sighthill, Glasgow ▪ 46 Units at Watson Street, Glasgow City ▪ 27 Units at Hurlford Avenue, Garscadden <p>At the end of August 2023, we have completed 36 new homes in financial year 2023/2024, as follows:</p> <ul style="list-style-type: none"> ▪ 36 units at Sighthill, Glasgow
On site	<p>We have 304 units under construction across four live development sites:</p> <ul style="list-style-type: none"> ▪ 123 units at Calton Village Phase 1, Calton ▪ 98 units at Calton Village Phase 2, Calton ▪ 35 units at Shawbridge Street, Pollokshaws ▪ 48 Units at Ashgill Rd, Glasgow which we are supporting through the use of the charitable on-lend to Lowther Homes
Due on site	<ul style="list-style-type: none"> ▪ 47 Units at Shandwick Street, Easterhouse
Programme	<p>A pipeline of projects is being progressed to identify new opportunities to ensure delivery of the business plan target. Key projects to highlight include:</p> <ul style="list-style-type: none"> ▪ Calton Village, Phase 3 – 33 units ▪ Shawbridge Arcade, Pollokshaws - 71 units ▪ Cook Street, Tradeston – circa 100 units ▪ Wyndford – circa 400 units ▪ Abbotshall Hall Avenue, Drumchapel – 70 units ▪ Dalmarnock – 80 units <p>Lowther direct project [redacted]</p>

	The agreement to progress regeneration activity in these areas will contribute approximately 1100 units to the future pipeline.
Budget versus Spend	Spend is £9.689m against budget of £12.388m to the end of July 2023. The spend variance is due to the profile of projects, all of which remain on budget in project terms and is reflected in the potential handovers ahead of profile.
Engagement Status	We have two 'High Engagement projects' at Sighthill and Calton Village due to the significant scale and individual complexities of these projects. Updates on each of the projects are shown below.

Northbridge, Sighthill

- 4.2 All 86 homes included in the first phase units are now occupied. The wider development will provide 198 units for us, to be managed by Lowther Homes for Mid-Market Rent alongside 626 units for private sale and commercial space. This is a strategically significant project, forming the key part of the Sighthill Transformational Regeneration Area, delivered by Transforming Communities: Glasgow, of which we are a partner.
- 4.3 Dates for the handover of the platforms from GCC to Keepmoat are currently being agreed to allow the second phase to commence. It is expected that a site start will be achieved this financial year.





Calton Village

- 4.4 Calton Village Phase 1 will deliver 123 MMR units to be managed by Lowther Homes. Works commenced in 2021 and handovers are due to commence in early 2024/25. 254 units in total will be delivered at Calton Village.
- 4.5 The second phase for 98 commenced on site in May 2023, following approval from WDSL in May 2023. Phase 2 now delivers 40 units for SR and 58 units for MMR to increase tenure diversification (where only MMR units were previously planned). The final phase of 33 units is also being progressed towards approval.

GCC City Centre Living

- 4.6 We are working with GCC to identify suitable city centre sites for future development and have carried out high level site appraisals. The GCC City Centre Living Strategy seeks to enable a sustainable, inclusive and diverse city centre population of around 20,000 by 2035. The Vision supports the wider regeneration strategy through actions focussed on delivering a liveable place with the associated service and physical infrastructure.
- 4.7 GCC has produced a new Vision and Plan (Aug 23) for the City Centre's Golden 'Z' to reimagine this area of the city and unlock its potential. We are working with GCC to identify possible sites to support the progression of the Strategy, which are subject to further viability appraisal.

TC: G

- 4.8 The Transforming Communities: Glasgow (TC:G) partnership between GCC, Scottish Government and us was established in 2009 and formally constituted in 2011 as a charity, with the aim of:
- Creating mixed-use development and housing renewal;
 - Maximising the potential of public sector land assets;
 - Tackling infrastructure issues; and
 - Lever private sector investment into the programme.

- 4.9 The partnership has delivered c2,450 new homes since its inception, across seven Transformational Regeneration Areas (TRAs) in Glasgow. Two of the TRAs remain to be activated through the partnership at Red Road/Barmulloch and Govan / Ibrox. We are working with design teams to review the Masterplans, which will support the activation of both projects through TC:G. This will allow us to programme wider community consultation and progress statutory consents and developer procurement. The work undertaken on Neighbourhood Place Planning in Barmulloch will support wider community engagement.

Future Programme

- 4.10 We actively engage with GCC and private-sector developers to identify future development opportunities. In addition, the new build programme will support large-scale regeneration projects including Sighthill (86 homes completed, 112 to be delivered), Wyndford and Milton.
- 4.11 [redacted]
- 4.12 The delivery of c.1,100 units through the above projects will contribute alongside other SHIP projects to our future development programme.

Local Housing Strategy

- 4.13 Glasgow's Local Housing Strategy (LHS) was approved by the City Administration Committee in May 2023. It is the primary strategic document for housing. It sets out the housing issues and priorities for housing in the city and provides a strategic framework for housing in all tenures.
- 4.14 The LHS 2023 to 2028 vision is that Glasgow has: "more affordable, accessible, safe and sustainable homes, which support good health in thriving neighbourhoods across the city, are well-connected to jobs, education, services and opportunities, and contribute to Glasgow being an attractive place for people to live, learn, work and invest."
- 4.15 The Strategy sets out 5 key objectives including:
- 1) Delivering more homes in great places that reduce poverty and inequality, which there is a commitment to develop and monitor the implementation of under the Strategic Agreement between GCC and Wheatley Group that will support the development of housing and delivery of services in the city between 2023 and 2032.
 - 2) Improving the energy efficiency of Glasgow's homes, reducing fuel poverty and supporting a Just Transition to Net Zero through decarbonising domestic heating and energy.
 - 3) Improving the condition of Glasgow's existing homes and preserving Glasgow's tenements and built heritage.
 - 4) Supporting people to live independently and well at home, including an increase in the supply of affordable housing options to meet the needs of larger families and core social care groups.
 - 5) Improving housing options, affordability and sustainability for tenants and owners, to prevent and reduce homelessness

- 4.16 Over the 5 key objectives, GCC will continue to support Registered Social Landlords (RSLs) to deliver affordable, suitable and sustainable homes to meet needs. A target of 80% of homes approved through the Affordable Housing Supply Programme will be socially rented homes.
- 4.17 Accompanying Glasgow's LHS 2023 to 2028 is a delivery plan which sets out key actions to be implemented by Glasgow City Council and our partners. These actions include specific projects and reference to development and delivery of important sub-strategies and plans including:
- Scope, develop and deliver an affordable housing policy for the city;
 - Develop and implement a new Glasgow Housing Retrofit Programme;
 - Review the Empty Homes Strategy and produce an Action Plan;
 - Increase the supply of 3 and 4+ bedroom homes in Glasgow through the Affordable Housing Supply Programme; and
 - Improve access to affordable housing in Glasgow through implementing actions outlined in the city's Digital Housing Strategy.
- 4.18 We will continue to engage and work with GCC to deliver against the ambitions set out in the LHS, both through the Strategic Agreement, SHIP and Regeneration programmes.

Grant Benchmark

- 4.19 The Scottish Government's Grant Benchmark was reviewed in June 2023, in line with the below.

Project Type	West Highland, Island and Rural Argyll	Other Rural	City and Urban
RSL Social Rent	£111,640	£97,027	£91,182
Council Social Rent	£97,027	£88,260	£83,584
RSL Mid-Market Rent	£68,387	£66,049	£62,542
Council Mid-Market Rent	£61,957	£60,024	£57,281

- 4.20 In addition to the benchmark grant rates, further grant per unit remains available for additional quality measures, as detailed in the below table:

Additional Measure	Grant Available (per unit/3p equivalent)
Section 7, Silver level in respect of energy for space heating	£2,338
Balconies in flatted developments	£4,676
Provision of home working space	£4,092
Digitally enabled	£351
Ducting for EV charging points	£585
Automatic Fire Suppression Systems	£3,507
Zero Emissions Heating Systems	£4,676
TOTAL Available	£20,225

- 4.21 The revised grant levels provide an overall uplift of 16.9% from previous grant levels. The revised benchmark is used to review all of our projects.
- 4.22 We continue to work with GCC to agree above benchmark grant awards. Where projects are above benchmark, a technical appraisal is required which extends the period of time for grant assessment.

Open Market Acquisitions

- 4.23 An announcement was made by Scottish Government in June 2023 that £60M would be made available for homes to be acquired on the open market. It is important to note, that the £60M is being made available through existing Resource Planning Assumptions and is not a new allocation of funds for TMDF authorities. The intention of the fund is to allow for new homes to quickly be made available and address any shortfall in spend. We are engaging with GCC to consider opportunities for this approach.

Building Standards

- 4.24 Scotland's new Domestic Environmental Standards Bill has been endorsed by government, which sets out that all new housing must meet Passivhaus standards in the future. Secondary legislation will be used to secure the standard, which is expected to apply to new homes by 2024. We are engaged in a working group that has been established by Building Standards to establish a route map to the new standard. The initial meeting has been held and a number of workshops will follow. The WDSL Board will be updated on the outcomes from this group.

Cost Pressures Working Group

- 4.25 The Scottish Government has established a cost pressure working group, on which we sit alongside the SFHA, Homes for Scotland, other RSLs and contractors. The purpose of the group is to establish a clear evidence base and shared understanding of the challenges in construction costs whilst exploring a range of short- and medium-term solutions.
- 4.26 The group highlighted significant cost challenges particularly over the last 12 months being compounded by rising interest rates, indicating that this will increase the challenges facing the sector. Increased tender prices, construction costs, supply and demand imbalance in construction are all contributing to the cost pressures.
- 4.27 Further meetings are taking place over Autumn to explore possible solutions to these issues.

Housing for Varying Needs

- 4.28 In Housing 2040, Scottish Government committed to introducing a new Scottish Accessible Homes Standard which all new homes across all tenures in Scotland must achieve. The introduction of the Scottish Accessible Homes Standard is expected to mainstream a high standard of accessibility and adaptability across new homes through changes to building standards and guidance. It is intended that a review of Housing for Varying Needs (currently only applicable to grant-funded affordable homes) will support the creation of

the new standard. This would be a standard of accessibility for all new homes, not just those built with the help of funding through the Affordable Housing Supply Programme.

- 4.29 Consultation on the proposed changes is online and open until 19th October 2023 with a number of online engagement events to be organised (no dates released as yet). We are currently preparing our response to the consultation and will share this with WDSL.

Market Status

- 4.30 We have recently undertaken our first quarterly meetings with the Framework Contractors since the new contractor framework (Gen 3) launched on 31 March 2023. As Equifax ratings and published accounts are backward-looking, we are keen to be proactively engaged with the contractors with reviews of management accounts where possible, up-to-date information on subcontractor performance, pipeline of work and general market intelligence.
- 4.31 All reported improved labour market conditions, a steadying of prices for materials and an increase in subcontractor availability, given the reduction in activity in the for-sale housebuilding market.
- 4.32 There was more of a mixed picture with respect to pipeline activity across the RSL and local authority markets; smaller RSLs withdrew because of the rent freeze uncertainty and interest rate increases. All identified challenges to and potential delays from the potential introduction of Passivhaus standards, NPF4, the requirement for above-benchmark grants to be assessed by Scottish Government causing delays and some concerns due to the consultation on Housing for Varying Needs. All contractors are happy to input into any consultation on Passivhaus standards and a number have experience of delivering these projects for local authorities.

Procurement Frameworks

- 4.33 A procurement exercise took place in late 2022 which led to a new Technical Consultancy Framework (ASM001-418) coming into effect from 1 February 2023. The Framework will run for 3 years with an option to extend by 1 year at the sole discretion of the Group. Alongside this a further procurement exercise was held for our Generation 3 Construction Framework (WHG/WDSL1000) which began on 3 April 2023 for a period of 2 years with the potential to extend by 2 separate periods of 1 year.

5. Customer engagement

- 5.1 Our engagement framework, “Stronger Voices, Stronger Communities” places the customer at the heart of how we plan and design our improvement programme and new-build developments. We will continue to maximise the use of technology to engage a diverse range of customers across our footprint in both the investment planning process and the development of our new homes. We will continue to help customers to both design and visualise their new kitchen or bathroom. Work on this has commenced and is being considered for all future projects.

- 5.2 We have engaged on several local community-based meet and greet events, for example we visited the local community around the Bellgrove Hotel project where the children selected options for external play equipment and adults were shown the future plans for the area.
- 5.3 A number of Customer Voices projects are progressing across Group and learnings from these projects will be applied to future new build projects. We will work with Housing Management colleagues to link the homes built to prospective customers at an early enough date to be consulted on preferences for fixture and finishes, where possible to do so.

6. Environmental and sustainability implications

- 6.1 Our journey to Net Zero will focus on ensuring it is a just transition for our tenants, with a focus on ensuring we prioritise areas that benefit our tenants such as improving energy efficiency and reducing energy consumption.
- 6.2 Our Group Sustainability Framework sets out our key actions in relation to new build homes. This includes:
- New-build homes will meet the planning requirements in relation to no fossil fuel as required through Building Regulations (March 2024);
 - We will size our solar PV systems to generate sufficient electricity to mitigate high cost of operating some systems;
 - Our large-scale regeneration proposals will include an assessment of 'carbon payback';
 - We will explore the implications of design for deconstruction and look to incorporate requirements for this as part of future new-build standards;
 - We will pilot modern methods of construction; and
 - Our new homes will be at least EPC B.
- 6.3 Future projects are developed to meet Aspects 1 and 2 of the Silver Sustainability Standards which covers reduction in carbon dioxide emissions and energy use for space heating. EPC ratings of B have been achieved in all new properties. As our projects are all located within Glasgow, they are developed to meet the requirement of the Glasgow Standard which is more stringent than Scottish Government conditions across the rest of the Group's development programme. This includes achieving increased sustainability standards, reduction in carbon dioxide emissions and energy use for space heating.
- 6.4 Where possible, projects also feature photovoltaic panels that convert sunlight into electricity. Along with a highly efficient thermal specification these solar generation systems help the project exceed the target emission rates required by building standards. Taken as a whole, the specification helps customers reduce their energy bills.
- 6.5 Our new build specification includes the installation of fire suppression systems, electric vehicle charging points and gas-free heating options as a standard. As a standard and where we are able to do so, we will specify low-carbon heating technologies in our new developments and work towards the national decarbonisation targets for gas-free developments by 2024.

7. Digital transformation alignment

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

8. Financial and value for money implications

- 8.1 The business plan approved by the Board in February 2023 reflects a new build programme of 1,286 new units to be completed over the next five years.
- 8.2 The table below summarises target and actual spend performance for period 4; to July 2023.

Table 2

WHG Capital Expenditure, New Build Programme 2023/24 Period to End July 2023			
Spend	Budget	Variance	Budget for full year
£9.689m	£12.388m	£2.699m	£46.447m

- 8.3 £9.689m of new build expenditure has been incurred in the year to date which is £2.699m lower than budget. The variance can be attributed to the spend profile of the developments, with no material variances noted. Individual projects remain on budget in terms of approved costs. Q1 reforecast, has noted a projected gross spend of £50.723m for the year. We will continue to monitor actual delivery against assumptions within the business plan and report on any changes.
- 8.4 As reported to the Board in August, we reviewed and updated our Internal Rate of Return (IRR) target in response to rapidly changing interest rate markets. This has also now been approved by the Wheatley Group Board. The below table confirms the revised IRR targets which have applied to our projects for approval since August 2023; these remain unchanged from the targets presented in August.

Wheatley Subsidiary	Tenure	Previous IRR	New IRR Target Rate	Timeframe
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
	[redacted]	[redacted]	[redacted]	[redacted]

9. Legal, regulatory and charitable implications

- 9.1 Legal support for projects is provided by our Property Legal Team and external framework solicitors. Technical support is provided by Employers Agents to compile the construction documentation for signing.

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

10. Risk appetite and assessment

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

11. Equalities Impact

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

12. Key Issues and Conclusions

- 12.1 There are continuing challenges in the sector in relation to cost to build, the review of housing for varying needs and the move to the Scottish passive house standard. Market conditions have improved to a degree with a more stable labour availability.
- 12.2 We continue to deliver.
- 119 units completed in 2022/23;
 - 36 units completed in August in 2023;
 - 351 units on site / due on site; and
 - A healthy pipeline of units coming forward, including 1,100 regeneration units.

- 12.3 The GCC Local Housing Strategy sets out a commitment to working with us through the Strategic Agreement as well as the wider ambitions for the delivery of affordable homes. We will continue to engage with GCC to ensure the successful delivery of these ambitions.

13. Recommendations

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

Report

To: Wheatley Homes Glasgow Board

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

Approved by: Steven Henderson, Group Chief Executive

Subject: Annual SHR assurance report

Date of Meeting: 15 September 2023

1. Purpose

- 1.1 This report provides the Board with an update on the group-wide Annual Assurance Statement (“AAS”) which was received and considered by the Group Board at its meeting on 30 August 2023.

2. Authorising and strategic context

- 2.1 Under the Group Standing Orders the Group Board is responsible for approval of our AAS for submission to the Scottish Housing Regulator (“SHR”). This is in line with the SHR’s requirement that the AAS is reviewed and approved by the Board and submitted by the end of October each year.
- 2.2 Where a RSL is part of a group structure, the SHR also requires subsidiaries to be participate in the AAS. This report presents a detailed summary of the work undertaken and the evidence of assurance to allow our Board to do so.

3. Background

- 3.1 The requirement to submit an AAS was introduced by the SHR in 2019. The AAS is a way for us to assure ourselves, tenants, those who are homeless/threatened with homelessness, other service users and the SHR that we comply with our regulatory obligations.
- 3.2 If there are any areas of material non-compliance, then the AAS allows us to disclose any areas where we need to improve and set out how we will do so. We have never had any instances of material non-compliance in any previous submissions.
- 3.3 The SHR considers our AAS as part of its annual risk assessment and then uses this to help inform how it will engage with us throughout the year. This is then included within the SHR’s engagement plan for us. Where a RSL is part of a group structure, as we are, the SHR requires one AAS covering all RSLs.

- 3.4 Our approach is to undertake an annual self-assessment and subject to some form of independent scrutiny. It was agreed that this should be undertaken by a combination of our Internal Audit team and no more than triennially by an appropriate external expert. The purpose of this is to provide the Board with an additional layer of assurance that our evidence base to support our assessment of compliance is robust.

4. Discussion

Statement requirements

- 4.1 The SHR requires our AAS to be short and succinct, either confirming compliance or otherwise. Areas for improvement should be recorded in the AAS, but only where these are of such materiality and significance that we are unable to say confidently whether we were complying with a particular requirement.
- 4.2 In 2021 and 2022 the SHR asked us to provide assurance that we had appropriate plans to implement an effective approach to the collection of equalities information and that we had started to consider how we can adopt a human rights approach to our work. In this year's AAS we are being asked to provide this assurance again.
- 4.3 In addition to assurance about equalities and human rights, this year we are also being asked to provide a clear statement on our compliance with relevant obligations in relation to tenant and resident safety. This includes:
- Gas safety;
 - Electrical safety;
 - Water safety;
 - Fire safety;
 - Asbestos;
 - Damp and mould; and
 - Lift safety
- 4.4 We have taken account of updates to the SHR's guidance in the preparation of our ASS and used the toolkit developed by the Scottish Federation of Housing Associations ("SFHA") in undertaking our self-assessment and preparing our AAS.

Self-Assessment and independent review

- 4.5 A group-level self-assessment of compliance against the Regulatory Standards ("the Standards") and the requirements set out in the SHR's Regulatory Framework ("the Framework") was completed during the summer. As part of this, we identified all sources of assurance relative to each requirement and catalogued these in a detailed evidence file. Although the AAS was at group level, evidence was specifically considered in relation to our business.

- 4.6 In assessing materiality, we have based this on the SHR's Statutory Guidance which states we should consider whether the issue could:
- seriously affect the interests and safety of tenants, people who are homeless or other service users;
 - threaten the stability, efficient running or viability of service delivery arrangements;
 - bring the landlord into disrepute, or raise public or stakeholder concern about your organisation or the social housing sector; and
 - in the case of RSLs, put at risk the good governance and financial health of the organisation.
- 4.7 This year an external firm of business and governance advisors, Campbell Tickell, was commissioned to independently review our self-assessment and evidence. Campbell Tickell has completed its review and confirmed our assessment that the Group, us and our partner RSLs are materially compliant with the regulatory standards.
- 4.8 Campbell Tickell highlighted some opportunities for us to further strengthen our compliance and also highlighted two particular, non-material, areas for us to consider. The first was that our Annual Report to Tenants should provide more specificity on how and when we will address areas for improvement. This will be factored into this year's annual report to tenants.
- 4.9 The second relates to our Rules. Although we do not have any employees on any of our Boards, one interpretation of our Rules could allow for the possibility of more than one employee on the Board and could allow these employees to be counted as part of a quorum.
- 4.10 This is a theoretical rather than real risk given that all appointments are subject to approval by the Group Remuneration, Appointments, Appraisal and Governance Committee. We will however make the appropriate amendment at the next opportunity.
- 4.11 A copy of the self-assessment and details of the evidence supporting the assessment is attached at Appendix 1, with further detail on the outcome of the self-assessment and the proposed statement set out below. A more detailed update on the areas we are required to make specific reference to in our AAS are set out below:

Equalities and Human Rights

- 4.12 As with previous years, the Board has received a number of updates on our approach to equality and human rights during the course of the year. In addition, Wheatley Solutions has responsibility for overseeing our Group approach and received updates on progress against our approved Equality, Diversity and Inclusion Action Plan at each Board meeting. We balance the requirement to obtain equalities data from our customers with the requirement to limit the data held on individuals and to ensure this is proportionate and necessary. Accordingly, we carried out an anonymous survey last year and collected equalities data from over 10,300 customers across the Group including over 6,000 of our customers. We also request equalities data from those applying on the MyHousing system and analyse this quarterly.

- 4.13 Our customer equalities survey will be carried out every 3 years and is next due in 2025. Importantly, we have undertaken to review this against the Scottish census results once these are published. In the meantime, we are using the customer data to help inform our decision-making, such as in relation to the Equalities Impact Assessments we carry out on policies and service changes.
- 4.14 As detailed by the Scottish Human Rights Commission, a human rights-based approach is about empowering our tenants and service users to know and claim their rights and increasing the ability and accountability of individuals and institutions who are responsible for respecting, protecting and fulfilling rights. This means giving people greater opportunities to participate in shaping decisions that impact their human rights, such as their right to family life. Adopting a human rights-based approach to our work means that we ensure both standards and principles of human rights are integrated into our policymaking as well as day-to-day operations.

Tenant and resident safety

- 4.15 We have a robust process in place with teams dedicated to building compliance, supported by a Health and Safety Team which provides support and guidance when required. We include a compliance report to the Board on an annual basis and provide comprehensive health and safety reports bi-annually. We also recently reviewed our Fire Prevention and Mitigation Framework, routinely report on fire safety to our Boards and our Group Audit committee reviews fire safety bi-annually.
- 4.16 In the intervening period, any other matters arising either as a consequence of our work or wider public/customer interest are raised separately to the Board. During the year, for example, following tragic events in Rochdale a detailed report providing assurance about our approach to responding to damp and mould was provided to the Board. We also subsequently further strengthened our policy and processes in relation to damp, mould and condensation and introduced new reporting measures on reports of damp and mould.
- 4.17 Our approach to delivering building compliance activities is consistently delivered across our Group subsidiaries and is embedded within our Group Repairs and Maintenance Policy Framework.
- 4.18 We have a dedicated Home Safety delivery team within City Building Glasgow (CBG) that works collaboratively with our asset compliance team. The Home Safety Teams consists of leads across, gas, electrical, water management, multi-storey flat (MSF) works and lift safety. Wherever practical for similar related compliance activities within our stock, we will endeavour to package works together taking cognisance of asset compliance cycles, property attributes and individual customer requirements.
- 4.19 Our compliance processes and delivery programmes are subject to internal review through our audit and Assurance Team as well as external scrutiny. For example, through CORGI for Gas, NEIC for electrical safety, and our lifts are subject to external safety inspections through our insurers.

Social Housing Charter

- 4.20 The Charter, distinct from the Framework, contains a total of 16 outcomes and standards that social landlords should aim to achieve. As two of the standards only apply to Local Authorities, 14 apply to us. The Statutory Guidance in relation to the AAS requires us to also include a statement of compliance with the Charter. A copy of the Charter is available on the Scottish Government's website.¹
- 4.21 The SHR sets a wide range of specific performance measures RSLs must collect as part of compliance with the standards in the charter. The measures form what we report to the SHR each year as part of the Annual Return on the Charter.
- 4.22 The Charter measures are augmented by the SHR prescribing a wide range of specific questions that RSLs must ask as part of their tenant satisfaction surveys relating to the Charter standards. It is not a requirement to conduct this survey annually therefore our approach for this year does not impact our compliance.
- 4.23 We have in place a very robust approach to assurance and evidence of how we are performing relative to the charter through our core performance reporting framework. One issue that was identified in previous years has been Wheatley Homes South's Scottish Housing Quality Standard ("SHQS") and Energy Efficiency Standard for Social Housing ("ESSH") compliance levels.
- 4.24 The requirement to evidence renewal of EICRs changed from a 10 year to 5 year lifecycle last year. Reasonable efforts including making at least two appointments have been made to complete this work for all customers. Where, despite these efforts, access was not achieved the properties are reported as in abeyance in our Annual Return on the Charter. In relation to the AAS, the SHR has advised that given the importance of tenant and resident safety, if all due EICRs have not been carried out at the point of submitting the AAS then this should be identified in the AAS, including timeframe for completing all due EICRs. We have included a note to confirm that approximately 0.14% of properties across Group are recorded as not having an up-to-date EICR; within WH Glasgow this is 0.18% of our properties. In all cases, reasonable attempts to obtain access have been unsuccessful and enforcement action is being pursued so that all properties have a valid EICR by the end of the reporting year (31 March 2024).

All relevant legislative duties

- 4.25 This requirement of the AAS is, by its nature, very wide-ranging. Our approach to compliance in this area is a combination of the legal framework for our activities and our internal policies, which give substance to the respective laws and regulations. Policies are reviewed by our specialist teams and, where appropriate, by external advisors.
- 4.26 In order to monitor compliance, we operate a 3 Lines of Defence Model that provides assurance to senior management and Board members about the operation of internal controls in place to confirm we are meeting our legal obligations.

¹ <https://www.gov.scot/publications/scottish-social-housing-charter-november-2022/>

- 4.27 Beyond our core 3 Lines of Defence Model, we are subject to external scrutiny for example through the annual external audit process in specific areas of legislation and spot inspections, such as HMRC. We have not had any instances where a judgement has gone against the Group that we are materially not meeting legislative duties.

2023 Assurance Statement

- 4.28 Based on the above, the Wheatley Group Board approved the following statement for signature by the Chair:

Wheatley Housing Group Annual Assurance Statement 2023

As the parent in a Group structure, the Board confirms that we have appropriate assurance that all Registered Social Landlords ("RSL") which are part of Wheatley Housing Group Limited (being Wheatley Housing Group, Wheatley Homes Glasgow, Wheatley Homes East, Wheatley Homes South and Loretto Housing Association) materially comply with:

- all relevant regulatory requirements set out in Chapter 3 of the Regulatory Framework;
- all relevant standards and outcomes in the Scottish Social Housing Charter;
- all relevant statutory and legal requirements; and
- Regulatory Standards of Governance and Financial Management

We have gained this assurance following a review and assessment of the evidence provided at our Board meeting on 30 August 2023 and from our ongoing oversight and scrutiny of the Group's affairs throughout the year 2022/23.

The Board has overseen the assurance exercise that supports this Statement and is satisfied that it is comprehensive in its scope to include each of the group members. The Boards of each of the subsidiaries are involved in the Group assurance exercise in so far as it relates to their RSL and have also, through their representation on the parent Board, contributed to the Group assurance review.

The Group Board confirms that we have made strong progress in relation to the collection of equalities information and human rights, as required by the Regulatory Framework. We are assured we have established appropriate systems for the collection of equalities data. We are assured that we have begun using this data to help us take account of equality and human rights issues in our decision, policy-making and day-to-day service delivery.

The Group Board also confirms compliance in relation to our tenant and safety obligations. In particular, we have gained the necessary evidence-based assurance of our compliance in respect of duties relating to gas, electrical, fire, water and lift safety and obligations relating to asbestos, and damp and mould.

We recognise that we are required to notify the Scottish Housing Regulator of any changes in our compliance during the course of the year and are assured that we have effective arrangements in place to enable us to do so.

The requirement to carry out Electrical Installation Condition Reports has changed from 10 to 5 years. Approximately 0.14% of properties are recorded as not having an up to date EICR. In all cases reasonable attempts to obtain access have been unsuccessful and enforcement action is being pursued to ensure that all properties have a valid EICR.

5. Customer engagement

- 5.1 Customer engagement forms a significant part of our strategy. The AAS will be communicated to customers as part of the annual report to tenants.

6. Environmental and sustainability implications

- 6.1 There are no specific implications arising from this report.

7. Digital transformation alignment

- 7.1 There are no digital transformation implications arising from this report.

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

- 9.1 The report independently confirms that we have strong governance arrangements and provides evidence to support our compliance with the SHR regulatory framework.
- 9.2 Our AAS has been independently reviewed by an external advisor and is supported by detailed evidence of our compliance.

10. Risk appetite and assessment

- 10.1 Our agreed risk approach for governance is “cautious”. This level of risk tolerance is defined as a “preference for safe delivery options that have a low degree of inherent risk and have only limited potential for reward”. This reflects our risk appetite in relation to laws and regulation, which is “averse”, with the avoidance of risk and uncertainty is a key organisational objective and a priority for tight management controls and oversight.

11. Equalities implications

- 11.1 The self-assessment process for the ASS confirms that we are making strong progress in relation to the collection of equalities information and human rights.

12. Key issues and conclusions

- 12.1 Following the self-assessment process and external review by Campbell Tickell, we have confirmed there are no areas of material non-compliance. This reflects our strong ongoing focus on strong governance and compliance.

13. Recommendations

- 13.1 The Board is asked to note the submission of the 2023 Annual Assurance Statement to the Scottish Housing Regulator.

List of Appendices

Appendix 1 – Assurance self-assessment

Requirements for RSLs	Self-Assessment Commentary	Evidence and sources of assurance	Self Assessment
Assurance & Notification			
Prepare an Annual Assurance Statement in accordance with our published guidance, submit it to us between April and the end of October each year, and make it available to tenants and other service users.	Our annual statement takes into account the SHR's Regulatory Framework and associated guidance in relation to the preparation of Annual Assurance Statements. Details are both are clearly set out for the Board in the report seeking approval.	Our existing Assurance statement is published and available to all tenants and other service users via our own and the SHR's website: https://www.wheatley-group.com/about-wheatley/governance/assurance-statement We also use the SFHA self-assurance toolkit. <u>The full self-assessment is published as part of our Board report publication scheme</u>	Compliant
Notify SHR during the year of any material changes to the assurance in its Assurance Statement.	There were no material changes to the previous statement during the year. There are processes in place for ongoing regulatory requirements such as notifiable events; our 5 year financial projections are included in Board agenda planning; and we begin the annual assurance statement process in April each year. If any material changes were identified during the year we would take the necessary steps including notification. Our annual assurance statement is published on our websites.	Not applicable	Not applicable
Have assurance and evidence that it is meeting all of its legal obligations associated with housing and homelessness services, equality and human rights, and tenant and resident safety.	<p>In practical terms, the Group operates a 3 Lines of Defence model that provides assurance to senior management and Board members about the operation of internal controls in place to confirm the Group is meeting legal obligations in these areas. This includes an internal audit function that delivers risk-based audits that test operation of Line 1 and Line 2 controls in specific areas. In areas where there is defined legislation, we have Group-wide policies that codify how we will meet our legislative requirements. Policies are reviewed by our business leads and, where appropriate, by external advisors. We have a policy review cycle to ensure these are regularly reviewed. The Group employs experienced staff to effect the policies, including legal, health and safety, technical and housing. The legal implications section in all Board reports ensures any obligations are identified. We also report Health and Safety compliance and performance regularly through our performance updates.</p> <p>Our Equality, Diversity, Inclusion (EDI) and Human Rights policy and our Group Equality Impact Assessment (EIA) template help us to ensure that we meet our legal obligations in this area, as does a mandatory training module for all staff and an EDI Awareness course which was externally verified by an EDI expert. In recognition of the importance of this area, Wheatley Solutions has responsibility for monitoring our activity in this area and receives quarterly Board updates. In addition, a number of our staff (over 250) have undertaken Business in the Community Inclusion Champion or Inclusive Leadership training, to further strengthen EDI knowledge to support staff in their roles.</p> <p>Our Health and Safety policy was reviewed and approved in Jan 23 and helps set out how we will meet all applicable legislation. This is signed by our CEO and complemented by compliance health and safety training which staff are required to undertake.</p> <p>Resident safety is at the forefront of our activities and we report on compliance matters annually to each Board (last update: April 2023). This includes reporting on matters affecting resident safety such as gas servicing, electrical inspection, water testing and TMVs. It has also been updated to include mould and damp. Our approach to delivering compliance activities across the Group is embedded in our Group Repairs and Maintenance Policy Framework, and we have dedicated Home Safety delivery teams within City Building in the West and our internal maintenance delivery teams that work collaboratively with our Asset Landlord Compliance teams at City Building (West) and within our asset teams across the East and South.</p> <p>Gas Safety: we operate an annual (10 month) cycle. Currently our rolling annual programme is ongoing. Our Homes Safety Bundle 1 is targeted at gas properties and includes annual gas servicing; temperature checks at water outlets; TMV servicing/installs; test/servicing of smoke/heat/carbon monoxide detectors; complete all certification. We can currently report 100% compliance in respect of gas safety checks of our 46791 properties.</p> <p>Electrical safety: EICRs are required at a maximum 5-year cycle and we have a rolling annual programme of work in place for this. At year-end we reported 99.82% compliance with only 116 properties of our 63957 with an EICR out with 5 years. Our current figure (10/7/23) for RSLs is 95 properties outstanding (2- Loretto, 76 – WHG, 3 WHS and 16 WHE) Our Mechanical and Electrical Work Servicing package is subject to asset requirements. Our Home Safety Bundle 2 is for all properties and includes Installation of Smoke + Heat detectors (re-life programme); EICR inspections.</p> <p>Water safety: This is managed through a year-round rolling programme and temperature checks included in our Home Safety Bundle 1. For 22/23 we reported 100% completion for all relevant properties tasks. At year-end, 4,312 inspections had been completed giving us a completion rate of 96.59% with outstanding visits requiring access into non-communal areas for low-risk inspections. Ongoing joint working between our asset, frontline teams and maintenance delivery teams ensured these addresses were reprioritised during April – May 2023. This was a small number in low-risk areas; our best practice approach means in July 2023 we are currently sitting at 99.01% for WHS; 99.93% for WHG and 100% for Loretto (which is no access to 2 properties in WHS, both residential and very low risk and 1 property in WHG - we are working to gain access to all of these).</p> <p>Asbestos: A programme of Asbestos Management Surveys is undertaken in our relevant premises e.g. Workplaces. In our domestic properties we undertake a minimum 5% representative sample of Asbestos Management Surveys in Common Areas only. Where the sample is consistent in its findings, the information is replicated against all similar archetypes where we can be confident in the location of Asbestos Containing Materials. Where there is any uncertainty over the presence of Asbestos Containing Materials in any of our domestic properties, there is a default position of sampling prior to any works commencing that ensures no accidental release of asbestos material.</p> <p>Fire Safety: Our Fire Prevention and Mitigation Framework 2021-2026 is reviewed annually to ensure continued legal compliance; the Board receives an annual update on this and our Fire Safety performance (cApril 2023). This included details of our person-centred risk assessments and fire safety inspections, as well as details of how we compare with best practice.</p> <p>Damp and Mould : We have strengthened our dampness and mould approach which is now included in our repairs Board reporting and within our performance data updates. A detailed policy and procedure was approved in Dec 2021 and updated in March 2023. Improvements made include offering to visit a home within 48 hours of a report; significant issues being treated as an emergency and visited within 3 hours; complete repairs target within 15 working days; additional specialist resources; more training for staff.</p> <p>Lift safety: We have a six monthly Lift Insurance Inspections cycle and monthly Proactive Lift Maintenance checks – these are ongoing programmes. At year end we had completed 100% of inspections.</p>	<p>Group policies and associated documents</p> <ul style="list-style-type: none">- Group repairs and maintenance framework (under review)- Group Board approved Health and Safety Policy detailing legal requirements updated Jan 23- Group Policy Framework on Advice and Letting- Group Fire Mitigation Framework reviewed and updated April 2023- Group Anti Social Behaviour Framework (reviewed in 2021)- Group Homelessness Policy (Reviewed in December 2020)- Group Equality, Diversity and Human Rights Policy-Group Dampness and Mould policy and procedure (reviewed 2023)-Tenancy agreements-Group Housing Advice, Information and Letting policy- Group Health and Safety Management Arrangements: Asbestos, CDM, Electrical Safety, Fire Safety, Gas Safety and Legionella <p>Board reporting</p> <ul style="list-style-type: none">-Legal requirements section of Board reports-Group Health and Safety policy Board report updated Jan 23, followed by update reports- Board and Group Audit Committee update reports on Fire Safety- Risk appetite and analysis sections in Board reports- Strategic risk registers-Equality Implications sections in Board reports (and full EIA carried out if deemed required)-Board updates on compliance activity in performance reports inc. fire and gas safety and dampness and mould and Board Building compliance report (Apr 23)- Annual Home Safe building compliance report to Boards-Wheatley Solutions reports (and RSL Board updates) and appendices on EDI <p>Independent assurance</p> <ul style="list-style-type: none">- Internal Audit activity <p>External assurance</p> <ul style="list-style-type: none">- engagement of independent experts on EDI-Corgi - Gas Safety, Select - Electrical Safety-close partnership and sector forums with Scottish Fire and Rescue to ensure we follow best practice in terms of Fire Safety.	Compliant
Notify SHR of any tenant and resident safety matters which have been reported to, or are being investigated by the Health and Safety Executive, or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.	These circumstances have not arisen in year. Serious matters e.g. those involving HSE are escalated to Group Director level for consideration. As a landlord of systemic importance, Wheatley meets regularly with SHR. That forum is also used to highlight any particular issues and how to address same. Compliance relating to tenant safety is reported to our Boards e.g. through performance reports or annual compliance reports such as for Fire Safety	Not applicable	Not applicable
Make its Engagement Plan easily available and accessible to its tenants and service users, including online.	Link to Scottish Housing Regulator Engagement Plans are available on each RSL website.	The plan can be accessed via individual RSL websites in the 'about us' and 'get involved' sections.	Compliant

Register all requirements for providing data to us with the Information Commissioner's Office as a purpose for which they are acquiring data under the Data Protection Act 2018.	Privacy Impact Statements confirm the purposes for which we hold and use data, including for regulatory requirements. All RSLs are registered with ICO.	ICO registration is verifiable via its website.	Compliant
Scottish Social Housing Charter Performance			
Submit an Annual Return on the Charter to us each year in accordance with our published guidance.	The Annual Return requires to be submitted via the SHR Portal. The ARC return is included in our Board agenda planning so as to be considered by Boards in line with the timescale for return to the SHR. The ARC return is reviewed and agreed by relevant Boards and reviewed internally against the SHR technical guidance. Our Group Scrutiny Panel also received ARC performance to scrutinise. The Governance team can check the 'returns' section of the SHR landlord portal to confirm the return was received within timescales. This has been submitted to the SHR within the timescales of end of May 2023.	The SHR Portal documents receipt of our ARC return and the SHR also publishes our Charter return on their website.	Compliant
Involve tenants, and where relevant other service users, in the preparation and scrutiny of performance information. It must: - 'agree its approach with tenants - 'ensure that it is effective and meaningful – that the chosen approach gives tenants a real and demonstrable say in the assessment of performance - 'publicise the approach to tenants - 'ensure that it can be verified and be able to show that the agreed approach to involving tenants has happened - 'involve other service users in an appropriate way, having asked and had regard to their needs and wishes.	<p>At the most senior level, we have tenants on our Boards.A Stronger Voices customer engagement team was introduced in 2021/22 which is supporting the delivery of the engagement framework. To date over 2,000 of our customers have signed up as Customer Voices to be involved in engagement activity – well in excess of our target of 1500. We also collect equalities data to help ensure representative, diverse engagement.</p> <p>Customers can be involved in engagement in a variety of ways across the business. Our Scrutiny Panel approach has been enhanced and expanded to over 30 customers. In addition to reviewing performance members of the panel will be involved in thematic reviews on particular topics. The panel chose their performance priorities to scrutinise and are supported by TPAS, to help enable them to exercise their scrutiny role effectively. Engagement and scrutiny sessions are held across our RSLs on a variety of topics throughout the year. Activities are also held in local neighbourhoods including walkabouts, action days and other events.</p> <p>We held engagement sessions with customers which were recorded and shared with Boards to ensure they heard from customers about our priorities. Our pre-formal rent consultation involved over 2600 customers in focus groups and survey responses. Extensive customer engagement also informed the review of our allocations policy during 2022/23</p> <p>In addition, we have a range of methods to gather feedback from customers on their priorities including through local scrutiny meetings, surveys, face-to-face interviews, digital and text. The results of this are shared with our Boards where appropriate to inform our decision-making. In total, over 1200 engagement events were held during 2022/23. The 'get involved' section of our websites details how tenants can be involved in assessing our performance.</p> <p>Our customer engagement framework will be reviewed during 2023/24 and the customer engagement process for this is already being developed</p>	<p>Governance Framework</p> <ul style="list-style-type: none">- RSL constitutions reserving Board places to tenant members- Tenant Group Scrutiny Panel Terms of Reference and code of conduct updated May 23 <p>Board/Committee/Forum discussions and reporting</p> <ul style="list-style-type: none">- Group Scrutiny Panel meeting agendas- Scrutiny sessions slides- Wheatley Homes Glasgow tenant board member pathway programme- Customer Insight report (Nov 22)- Customer Videos (WHS, WHE, Loretto strategy workshops) <p>Other</p> <ul style="list-style-type: none">- RSL websites publicly set out the annual report to tenants- Stronger Voices, Stronger Communities - Group Engagement Framework	Compliant
Report its performance in achieving or progressing towards the Charter outcomes and standards to its tenants and other service users (no later than October each year). It must agree the format of performance reporting with tenants, ensuring that it is accessible for tenants and other service users, with plain and jargon-free language.	We publish an annual report to tenants, the format of which has been agreed by Boards and the Group Scrutiny Panel. Last year's report was issued in line with the SHR Regulatory Framework and this year's report in development, this will include input from the Group Scrutiny Panel and will be received by Boards ahead of publishing as per SHR timescales .	Prior year published Annual Report to Tenants in October 2022.	Compliant
When reporting its performance to tenants and other service users it must: - provide them with an assessment of performance in delivering each of the Charter outcomes and standards which are relevant to the landlord - include relevant comparisons – these should include comparisons with previous years, with other landlords and with national performance - set out how and when the landlord intends to address areas for improvement - give tenants and other service users a way to feed back their views on the style and form of the reporting.	Included in the last Annual Report to Tenants and will be incorporated again in this year's, due by the end of October. The relevant comparisons will be dependent on the availability of ARC performance data for the sector. We consult our tenant scrutiny panel on the format of the report.	Prior year published Annual Report to Tenants in October 2022.	Compliant
Make the SHR report on performance easily available to its tenants, including online.	This is published and is easily accessible via our website. Our tenant scrutiny panel are consulted on the format of the report annually.	Performance published on RSL websites (Home/About us/How we do business/Performance)	Compliant
Whistleblowing			
Have effective arrangements and a policy for whistleblowing by staff and governing body/elected members which it makes easily available and which it promotes.	We have a Group Whistleblowing policy in place. The policy is easily available to all staff on our intranet. The review of the policy is reserved to the Group Audit Committee. In addition, we have a short policy video with our Head of Assurance to help communicate the policy to staff in an accessible way, ensuring they understand what the policy requires of them in their role. This video was promoted through our staff intranet, WE Connect and manager Team Talks. It is held on our learning platform, MyAcademy for staff to access	<p>Governance Framework</p> <p>Group Whistleblowing Policy</p> <p>Committee reporting</p> <p>Audit Committee report and minute of discussion and approval of whistleblowing policy</p>	Compliant
Tenants and service users redress			
Make information on reporting significant performance failures, including our leaflet, available to its tenants.	<p>We have a link to the significant performance failure SHR leaflet available on all RSL websites (contact us/complaints and compliments)</p> <p>In April 2021, we updated our complaints handling procedure based on new guidance from the SPSO. We subsequently did a full review of our complaints policy which was approved in 2022. This is available publicly on our websites.</p> <p>The SHR leaflet also available in our hub offices as part of the core leaflet suite</p>	<p>RSL Websites (Contact us/complaints and compliments)</p> <p>Complaints handling policy and procedure on websites (publication scheme)</p> <p>RSL Social Media (Contact us)</p> <p>RSL Complaints Leaflets (make reference to significant performance failures)</p> <p>SHR Leaflets available in local offices</p>	Compliant
Provide tenants and other service users with the information they need to exercise their right to complain and seek redress, and respond to tenants within the timescales outlined in its service standards, in accordance with guidance from the Scottish Public Services Ombudsman (SPSO).	<p>The Group Complaints Policy is based on and complies with SPSO guidance. All Boards are made aware that SPSO guidance applies to the complaints handling.</p> <p>Our complaints procedure is set out on RSL websites, our complaints leaflet is available in local housing offices as part of the suite of core leaflets. Our Boards receive compliant reports including performance data and insight to help monitor in terms of our process and service delivery.</p>	<p>Group Complaints Policy Board report and record of Board approval</p> <p>Complaints update</p> <p>Complaints Charter data</p> <p>Complaints Leaflets</p> <p>RSL Websites (Contact us/complaints and compliments)</p>	Compliant

Ensure it has effective arrangements to learn from complaints and from other tenant and service user feedback, in accordance with SPSO guidance.	<p>Our complaints policy builds in requirement to review and Boards are routinely updated on this. Boards received bi-annual updates on complaints and what lessons we are learning from them. This performance data and analysis is also published on the website.</p> <p>There is a lessons learned field within ASTRA which should be completed to record lessons learned for every complaint received. New complaints reports will capture lessons learned and allow for further analysis of lessons learned including the information recorded by staff within ASTRA.</p> <p>We have enhanced our approach in this area by establishing a new Business Improvement Team and implementing a complaints improvement plan. We have increased awareness of the importance of complaints for example through enhanced training (sessions for all CFC advisors including 6 days of training in May 2023). and improving the quality of our responses; this is also a focus of the improvement plan. Our Tenant Scrutiny Panel also receives complaints data and insight, and are able to provide feedback on our performance in this area.</p>	<p>Policy</p> <ul style="list-style-type: none">- Group Complaints policy <p>Reporting and monitoring</p> <ul style="list-style-type: none">- Board reports on complaints <p>Public reporting</p> <ul style="list-style-type: none">- Complaints data published on RSL Websites - link on performance page to published board reports containing performance information <p>Other</p> <ul style="list-style-type: none">- ASTRA	Compliant
Equality and Human Rights			
Have assurance and evidence that it considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.	<p>The SHR has worked with representative bodies, the Equalities and Human Rights Commission (EHRC) and Scottish Human Rights Commission (SHRC) to develop a 'guidance framework' for the collection of equality data; this was subsequently updated and re-released in April 22 and June 22 following additional comment from the EHRC and Information Commissioner. When the original guidance was published we integrated this with the existing plans already reflected from an Internal Audit advisory review, carried out in 2021. The Group Board was updated in December 2021 and at their workshop in March 2022.</p> <p>To strengthen our approach and the implementation of our Equality, Diversity and Human Rights policy we engaged with external expertise via IoD Scotland , launched an ongoing a communication campaign to raise staff awareness and highly publicised staff training. Our EDI awareness e-learning module is compulsory for staff and included in inductions and we launched an EDI learning suite on MyAcademy which also includes LGBT+ Awareness and Unconscious Bias training for staff as well as useful resources i.e. podcasts. We also have relaunched Hate Crime training available. From January 2022, we set up a staff EDI working group to implement initiatives including the collection of equality data, for staff and job applicants. We expanded our external networks including membership to the employer's network for equality and inclusion (enei) and Business in the Community (bitc). We developed an internal action plan which was externally reviewed by an inclusion advisor at Bitc March 2022. The People Services Team progressed with a number of EDI initiatives including an external review of all HR policies to ensure these are inclusive in language and content, a review of our recruitment approach including adverts and an enei TIDE self-assessment for which we achieved Bronze level award. We launched a new EDI brand for the Group, Different Together, which includes a Community of Excellence (staff group and 6 equality networks, sponsored by senior exec), a resource hub for staff, and training.</p> <p>This all helps ensure staff have a consideration of equalities and human rights within their role. We continue to raise awareness of EDI to our staff through our internal comms and 'Different Together' brand i.e. awareness days, an EDI calendar based on our own staff and customer data, staff blogs. We also have an equalities section on our Group website which gives detail of our commitment to EDI, accessibility (i.e. written information and telephone), hate crime and harassment and equalities monitoring. (Home>About Wheatley>Governance>Equality and Diversity)</p> <p>We implemented a comprehensive, robust Group-wide approach towards Equality Impact Assessments to ensure we thoroughly consider the impact of our decisions, policies and service on the protected characteristic groups and remain compliant with equalities legislation. This was externally verified and our Group Policy framework now indicates which policies require an EIA. There is also EIA online training for staff and EIA template and guidance is available on our staff intranet. Equalities implications is a section in all our Board reports - here it must be clear if an EIA has been required and carried out. We held an EIA masterclass for key leads on 19 July 2023, facilitated by BITC.</p> <p>Equalities is an area our Boards have indicated a desire for increased visibility and we plan to include this as a topic for Board CPD. We collect equality information from Board members to inform our recruitment and succession planning. Age, ethnicity and disability diversity markers, along with skills, experience and gender, inform our future Group Board succession planning analysis, as well socio-economic diversity based on National Statistics Socio-economic Classification criteria. Other progressions in this area include:</p> <ul style="list-style-type: none">-A programme of EDI Champion training and Inclusive Leadership training has taken place for those in the CoE, the people services team and all managers/leaders, delivered by BITC. This has seen over 250 staff receiving the in-person training to equip them with the knowledge to better consider EDI within their role-Continue to raise awareness of celebration days and events to increase staff knowledge of EDI consideration to inform interactions with customers and colleagues e.g. Neurodiversity for People Managers training delivered by Lexxic- Neurodiversity Celebration Week, Trans and LGBT+ allyship webinars delivered by Pride Outside and the Equality network-Solutions Board approved EDI Action Plan in November 2022 and monitor progress quarterly-developed an EDI Statement of Commitment, approved by our Wheatley Solutions Board and signed off by our CEO and Group Chair- published on all our websites to signal how we are committed to achieving EDI for our customers-Partnered with Diversity Scotland to further strengthen our EDI training for staff	<p>Policy</p> <ul style="list-style-type: none">- Group Equality, Diversity and Human Rights policy (reviewed September 2022)-Group EDI Action Plan (One Group, Many Voices) - approved November 2022-ASB Framework-Provision for policies in alternative formats and languages <p>Reporting and monitoring</p> <ul style="list-style-type: none">- Board reports include an equality implications section- Externally verified EIA template and guidance - reviewed March 2023 to include use of our own data- Group Board workshop March 2022- Group Solutions update August 2022- Group Board update September 2022- Wheatley Solutions quarterly updates <p>Websites</p> <ul style="list-style-type: none">- Equality and diversity section on Group website (Home>About Wheatley>Governance>Equality and Diversity) - reviewed March 2023- internal staff awareness raising via intranet and training-statement of commitment <p>-Other</p> <ul style="list-style-type: none">- development of Different Together equality collection form and guidance- BITC inclusion champion and inclusive leadership training-Lexxic neurodiversity training and Pride Outside LGBT+ Allyship in June 2023-Translation and interpretation services through the Big Word	Compliant
To comply with these duties, landlords must collect data relating to each of the protected characteristics for their existing tenants, new tenants, people on waiting lists, governing body members and staff. Local authorities must also collect data on protected characteristics for people who apply to them as homeless. Landlords who provide Gypsy/Traveller sites must collect data on protected characteristics for these service users.	<p>Results of our customer equality data collection exercise completed with over 10,000 responses. The approach to this was developed with customers, taking into account good practice, regulatory requirements and GDPR. In collecting this data:</p> <ul style="list-style-type: none">-results of this were reported to our Boards in Nov 22- Staff diversity survey saw over 60% of staff responding; results presented to Executive Team and Wheatley Solutions Board in Feb 23 (mapped against customer data)-PowerBI now built for customer data, available for leads to access when required e.g. for use in EIAs-Equality data collection underway as part of Customer Voice re-registration - seeking customer priorities for engagement, ensuring diversity within our engagement as well as access to specific groups who we may want to engage with if we suspect a service change/policy to have a particular impact on them. This data, once built into a PoweBI for analysis, will be used for Stronger Voices and Housing Leads to inform their engagement plans. As well as identify groups who may be facing barriers to our engagement to put plans in place. - quarterly analysis of customer engagement equality data now in place-PowerBI now built for MyHousing data - Quartey analysis of this now in place with allocations team and development team. Reported to Wheatley Solutions Board May 2023-Expansion of Foundation data complete to mirror categories of customer data exercise to aid analysis of employability programmes, again analyse any gaps and address accordingly. Quarterly analysis of this now in place in line with recruitment data analysis-data to be used in Equality Impact Assessments as required <p>All Board reports have an equalities implications section.</p>	<p>Policy</p> <ul style="list-style-type: none">- Group Equality, Diversity and Human Rights policy (review 2022) <p>Reporting and monitoring</p> <ul style="list-style-type: none">- Group Board Governance update December 2021- Group Board workshop March 2022- Group Solutions update August 2022- Group Board update September 2022-Subsidiary updates November 2022 and EDI data presentations (deleted due to retention schedule) <p>Websites</p> <ul style="list-style-type: none">- Equality and diversity section on Group website (Home>About Wheatley>Governance>Equality and Diversity)- internal staff awareness raising via intranet and training <p>-Other</p> <ul style="list-style-type: none">- development of Different Together equality collection form and guidance-expansion of data collection and PowerBI analysis for customer engagement equality data, as well as MyHousing and Wheatley Foundation-collection of data through JobTrain for job applicants	Compliant
Requirements for RSLs Only			

Each RSL Must:			
Comply with the Standards of Governance and Financial Management and associated statutory guidance.	See commentary and evidence provided for each of the seven standards of governance and financial management. We are satisfied we have assessed compliance with these effectively		Compliant
Comply with, and submit information to us in accordance with, our guidance on: - notifiable events - group structures - consulting tenants where tenant consent is required - financial viability of RSLs: information requirements - determination of accounting requirements - preparation of financial statements.	See commentary and evidence provided for each of the seven standards of governance and financial management.	Landlord Portal Notifiable event register Board reports Group Standing Orders and Scheme of Delegation Rules/Articles Intra group agreements Annual accounts and auditor's report Risk register Financial projections and budget Recruitment and succession planning procedure Code of conduct Policies e.g. gifts, payments and benefits. Whistleblowing	Compliant
Keep up to date organisational details in the Register of Social Landlords, by maintaining the information provided through the Landlord Portal.	Organisational details up-to-date and regularly maintained via the SHR Landlord Portal All updates are monitored by Group Company Secretary and control checks are in place, specifically the portal is reviewed and updated monthly and after every Board cycle. This includes checking the organisational details and governing body member details are accurate for example, following retirement/appointment of Board members.	Landlord Portal SHR Website	Compliant
Make publicly available, including online, up to date details of: - who is on its governing body - the date when they first became a member/office holder - how to become a member of the RSL and of the governing body, and - minutes of governing body meetings.	About us section of RSL websites includes information about who is on the governing body and the date they first became an office holder. The 'getting involved' section of each RSL website sets out how to become a member of the RSL or a governing body member (where applicable) as does our RSLs constitutions which are available on websites. Where applicable, membership policies are also published on relevant website. Details of our governing body members are published online, including when elected. Information on our websites is easily accessible and up to date. We have a clear recruitment and succession planning process, introduced as a procedure following suggestion from Campbell Tickell from the 2021 strategic governance review. Minutes of Board meetings published following approval by Board and redaction in line with Freedom of Information requirements.	RSL websites - 'about us' and 'get involved' sections. Published membership policy (where applicable) via website, and membership details available in Rules/Articles published on websites Published minutes via website	Compliant

Regulatory Standards of Governance and Financial Management	Self-Assessment Commentary	Evidence and sources of assurance	Self Assessment
Standard 1 The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.			
1.1 The governing body sets the RSL's strategic direction. It agrees and oversees the organisation's business plan to achieve its purpose and intended outcomes for its tenants and other service users.	<p>The Group Standing Orders formally define the roles of each Board in this regard, with the approval of the strategy (strategic direction) and business plan reserved to each individual Board for approval (but subject also to agreement of the Group Board). The Group Standing Orders were subsequently reviewed during 2022 and specific Terms of Reference approved by each RSL Board introduced.</p> <p>The business plan is always considered within the context of outcomes it contributes to achieving for tenants and its implementation is overseen by the Board as part of the regular financial reporting item.</p> <p>Our Boards have an annual strategy workshop to review their 5 year strategy and direction to ensure this remains relevant or is refreshed as necessary. These took place in March for Wheatley Homes Glasgow and May this year for our other RSLs. We have regular customer insight reporting to Board and collecting customer views to use this, along with other customer data, to inform the strategy workshops. To inform strategic planning and decision making, our Boards have and make effective use of robust, up to date information about the impact of the current economic, political, policy and operating environments on our tenants and other service users and on our organisation.</p>	Governance Framework <ul style="list-style-type: none">- Group Standing Orders (reviewed 2022)- Terms of Reference- Board strategy workshop materials- Board reports on strategy development process and associated minutes- Board reports on business plan and associated minuted confirming Board approval (Feb 23)- Risk registers and workshops- Customer Insight reporting- Customer priorities videos	Compliant
1.2 The RSL's governance policies and arrangements set out the respective roles, responsibilities and accountabilities of governing body members and senior officers, and the governing body exercises overall responsibility and control of the strategic leadership of the RSL.	<p>The Group Standing Orders detail the respective roles and responsibilities of the Group and subsidiary Boards as well as detailing the Scheme of Financial Delegation and delegations to Group CEO. The newly approved Terms of Reference for each subsidiary Board set out the roles and responsibilities of each Board.</p> <p>Board member roles and responsibilities are also set out in the Standing Orders. We have a Code of Conduct that is issued to all Board members and sets out their responsibilities and required conduct. We also have a staff Code of Conduct. Board appraisals are held with the Chair each year in line with our Board effectiveness and appraisal policy,</p>	Governance Framework <ul style="list-style-type: none">- Group Standing Orders- Terms of Reference- Codes of Conduct- Board appraisals	Compliant
1.3 The governing body ensures the RSL complies with its constitution and its legal obligations. Its constitution adheres to these Standards and the constitutional requirements set out below.	<p>The RSLs are appropriately constituted and the Group Standing Orders set out effective decision making processes, as well as delegated authority.</p> <p>Board minutes and reports will provide details of how we ensure constitutional compliance and legal where applicable.</p>	Governance Framework <ul style="list-style-type: none">- Individual entity constitutions- Group Standing Orders-Board report template External validation <ul style="list-style-type: none">- External legal advisors engaged as required on material constitutional changes	Compliant
1.4 All governing body members accept collective responsibility for their decisions.	<p>This is enshrined in the Code of Conduct as a requirement. No governing body members have breached the code of conduct in this regard, as such no action has been taken.</p>	<p>No issues raised or identified during the year of a Board member not accepting collective responsibility</p> <p>-Board appraisal forms and interviews - issue not raised</p> <p>-Signed Codes of Conduct</p>	Compliant
1.5 All governing body members and senior officers understand their respective roles, and working relationships are constructive, professional and effective.	<p>The respective roles are set out in the Group Standing Orders which sets out roles clearly and is explicit about the distinction between the role of management and the role of the Board.</p> <p>A comprehensive induction programme is in place, with a discussion about the role of the Board and Management. This area is also explored and tested as part of the annual appraisal process. In addition, we have introduced a Group Board effectiveness and appraisal policy and Group recruitment and succession planning policy.</p> <p>We have CPD programme and training for our Board members as well as a Leadership development programme for senior staff. For example, institute of Directors (IoD) training was extended out to Directors in organisation as well as Board members and we will extend further IoD CPD sessions to staff also</p>	Governance Framework <ul style="list-style-type: none">- Recruitment and Selection Process and Induction Programme- Group recruitment and succession planning policy- Group Board effectiveness and appraisal policy- Group Standing Orders- Board CPD programme External Validation <ul style="list-style-type: none">-Campbell Tickell interviews with Board members as part of previous governance review Training <ul style="list-style-type: none">- CPD training including IoD - open to senior staff and Boards	Compliant
1.6 Each governing body member always acts in the best interests of the RSL and its tenants and service users, and does not place any personal or other interest ahead of their primary duty to the RSL.	<p>The Standing Orders set out clearly the relationship between the parent Board and subsidiaries and the division of responsibilities.</p> <p>All Board Members are required to sign the Code of Conduct and complete a Governing Body Member Declaration of Interests form which covers this and the organisation maintains a register of interests, which is annually reviewed. There is a standing Board meeting agenda item regarding declaration of interests and we have introduced a Group conflicts on interests policy . Board appraisal has a specific question regarding decision making being in the best interests and no issues have been identified regarding independence of decision making.</p> <p>Our register of interests is annually reviewed to ensure up-to-date</p>	<p>Governance Framework</p> <p>Board Code of Conduct</p> <p>Group Standing Orders</p> <p>Arrangements in place in respect of conflicts and declarations of interest - standard Board agenda item and Register of Interests form</p> <p>Group conflicts of interest policy</p> <p>Other</p> <p>Annual Board appraisal - no issues raised by any Chair or Board member</p>	Compliant
1.7 The RSL maintains its independence by conducting its affairs without control, undue reference to or influence by any other body (unless it is constituted as the subsidiary of another body).	<p>The Group Standing Orders set out clearly the relationship between the parent Board and subsidiaries and the division of responsibilities. The composition of the Board is such that no other body exercises undue control or influence over the group and this is formally documented in Intra Group Agreements</p> <p>The requirement to act in the best interests of the group is reflected in the Group Code of Conduct. All Board Members complete a Governing Body Member Declaration which covers this and the organisation maintains a register of interests. Our CPD programme for Board members takes consideration of this. The Institute of Directors has delivered Role Of the Non-Executive training which covered managing interests e.g. in wearing different 'hats' as a Board member. Interests are declared at the start of meetings and managed via our policy</p>	Governance Framework <ul style="list-style-type: none">Group Code of ConductRegister of Interests formGroup Standing OrdersArrangements in place in respect of conflicts and declarations of interestGroup conflicts of interest policyIntra Group AgreementBoard annual appraisal process Other <ul style="list-style-type: none">Role of the Director training by Institute of Directors	Compliant

Standard 2 The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities. Guidance			
2.1 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.	<p>Each RSL within the group has a website which includes a 'Freedom to Information' section and a Publication Scheme. This explains clearly and comprehensively what information is available (with links) and how to obtain information which is not published, including fees applicable.</p> <p>We communicate through a range of methods and provide information via a combination of:</p> <ul style="list-style-type: none">- Websites (which are accessible and include an accessibility section)- annual report to tenants (published on our websites)- news section on websites- social media posts- consultations <p>We ask tenants as part of our Tenant Satisfaction Survey what tenants think about being kept informed. We also carried out a communication data exercise in 2022 and sought communication preferences as part of this (phone, email, text) to ensure we communicate accordingly. We offer alternative methods (e.g. large print, braille, translation/interpretation) when required and have adopted a 'leaving nobody behind' approach in terms of digital comms. Our Group Engagement Framework is due for review this year, which will include an Equality Impact Assessment.</p>	<p>Policy Engagement Framework</p> <p>Publications Subsidiary and group websites (including accessibility section https://www.wheatley-group.com/home/accessibility) Information on performance, future plans e.g. investment and satisfaction results published on websites Annual Report to Tenants social media posts Board reports</p>	Compliant
2.2 The governing body recognises it is accountable to its tenants, and has a wider public accountability to the taxpayer as a recipient of public funds, and actively manages its accountabilities.	<p>Our induction programme emphasises the Group's governing bodies' accountability to tenants and service users (i.e. regarding the role of the Board).</p> <p>Each RSL subsidiary publishes an Annual Report to Tenants, setting out how it has performed. Our Group Scrutiny Panel scrutinise our performance throughout the year, with a Panel statement being included in the Annual Report.</p> <p>Quarterly complaint performance is published on our websites and Boards receive Complaint updates and insights - these reports are also published.</p> <p>Our Publication Scheme ensures that we provide a significant amount of information, supporting accountability.</p>	<p>Governance Framework Annual Report to Tenants Wheatley Group Annual Report and Financial Statements Subsidiary and group websites (investor relations section of website gives information on use of funds, including public funds) Group Code of Conduct Group Engagement Framework</p>	Compliant
2.3 The governing body is open and transparent about what it does, publishes information about its activities and, wherever possible, agrees to requests for information about the work of the governing body and the RSL.	<p>We are committed to being transparent and open about the way we work, the services we provide and the decisions we make. One of the ways we do this is through our publications scheme under The Freedom of Information (Scotland) Act 2002. We have a published Guide to Information that reflects the Model publication scheme published by the Scottish Information Commissioner. We are also bound by the Environmental Information (Scotland) Regulations 2004 which gives the public the right to access environmental information we hold.</p> <p>Our websites also provide information on our governing body members, including when elected. We publish Board reports and minutes on our websites also.</p>	<p>EVIDENCE: Provided via a combination of:</p> <ul style="list-style-type: none">- Website- Annual Report to Tenants- Publishing Board reports and minutes-Publication schemes	Compliant
2.4 The RSL seeks out the needs, priorities, views and aspirations of tenants, service users and stakeholders. The governing body takes account of this information in its strategies, plans and decisions.	<p>We have a commitment to further embedding the voice of our customers in our decision-making. This also follows a recommendation from Campbell Tickell as part of the most recent strategic governance review to take consideration the opportunity to deepen tenant insight for example by using data and interaction with group such as our Scrutiny Panel. The implementation of our Engagement Framework, Stronger Voices Stronger Communities, contains a commitment that customer engagement would be sought as part of key policy and service changes.</p> <p>Stronger Voices, Stronger Communities incorporates a variety of ways customers are engaged across the group to shape what the group does. We do this via a combination of the following and use both in-person and digital methods (e.g.. surveys, focus groups):</p> <ul style="list-style-type: none">- Stronger Voices team i.e. gathering intelligence and priorities through Walkabouts- governance structures- Customer Voices focus groups being involved in co-creating/reviewing policies or our approaches e.g. to equality data collection- Tenant Scrutiny Panel (recently expanded)- locality planning- use of complaints- annual satisfaction surveys- consultations e.g. rent- tenant members on Boards representing service user views-RTOs <p>Continued enhancement of customer engagement approach including re-registration of Customer Voices to seek their particular priorities. We also seek performance priorities through customer scrutiny sessions. In addition, we held customer priorities sessions in April and May 2023, facilitated by TPAS, to inform Board strategy workshops - these sessions were filmed and played for Boards. At the highest decision-making level, we have launched tenant board member pathway programmes to further enhance the tenant voice at Board level. Tenant board members bring customer insight to strategic decision-making. All Board reports contain a customer engagement section. The Boards will also receive a bi-annual update on how we used the full range of our planned engagement activity and customer insight to inform priorities.</p> <p>Our Group Equality, Diversity and Human Rights policy also demonstrates how tenant needs will inform our plans and decisions. For example, we developed our approach to customer equality data collection and use this data to tailor our service design and delivery to the needs of our customers e.g. through Equality Impact Assessments. We are currently planning our Tenant Satisfaction Survey to be carried out this year in line with requirements of the Scottish Social Housing Charter.</p>	<p>External validation</p> <ul style="list-style-type: none">- Meetings between senior management and stakeholders- Direct Board engagement with key stakeholders e.g. Housing Minister- BMG independently facilitated rent-setting workshops for 2022/23 rent setting process <p>Decision making</p> <ul style="list-style-type: none">- Annual Board strategy workshop briefing packs detailing background information- Board composition includes tenants - builds in feedback at decision making point- Customer Voices involved in development and review of policies/strategies- Board report on rent setting - documents extensive consultation feedback <p>Board reporting and monitoring</p> <ul style="list-style-type: none">- ongoing Board reports on key areas of tenant feedback, including complaints- customer engagement section included in Board reports-Bi-annual customer insight reports-Bi-annual engagement update <p>Engagement Framework</p> <ul style="list-style-type: none">- Locality engagement plans, including the range of engagement and feedback events facilitated during the process <p>Other</p> <ul style="list-style-type: none">-customer priority sessions and videos to inform strategy workshops	Compliant
2.5 The RSL is open, co-operative, and engages effectively with all its regulators and funders, notifying them of anything that may affect its ability to fulfil its obligations. It informs the Scottish Housing Regulator about any significant events such as a major issue, event or change as set out and required in notifiable events guidance.	<p>We have high engagement and as such meet the SHR on a regular basis as well as having an ongoing line of communication. Regular meetings held with Funders. We notify SHR of 'Notifiable Events' in accordance with the requirements of SHR Notifiable Events guidance.</p> <p>Notifiable events are highlighted through a review of the SHR notifiable events guidance. For example, this was reviewed prior to consulting customers on the disposal of multi-storey rooftop space for telecommunications leases. The Governance and Executives teams understand the notifiable events requirements and discuss the group's approach openly with the SHR.</p> <p>Our financial reporting contains covenant compliance. All Board reports have a legal/regulatory implications section also. Our agenda planning takes consideration of this to ensure approvals are received in line with statutory requirements e.g. to submit 5-year financial projections to SHR.</p> <p>We also maintain disposals and acquisition registers which we receive notification from the property legal team either through direct email to the Governance team or to our Board and Committees mailbox, which is checked regularly. For additional assurance, we receive a monthly round-up of disposals and acquisitions from the property legal team to check against our own records. It is the responsibility of the Governance team to action and notify of any relevant disposals or acquisitions and we do this monthly. We also keep a register of notifiable events. Additionally, in 2022 we introduced a Group Disposal and Acquisition Policy and RSL versions of this (reviewed and updated in June 2023); this included introducing an annual update to Boards on disposals and acquisitions which Boards received in May 2023.</p>	<p>Evidence SHR Quarterly Meeting agendas Funder meeting agendas Group Engagement Plan - published by WHG and SHR Internal notifiable events register and disposal and acquisitions register Disposal and acquisition update to Boards</p>	Compliant

Standard 3 The RSL manages its resources to ensure its financial well-being while maintaining rents at a level that tenants can afford to pay.			
3.1 The RSL has effective financial and treasury management controls and procedures, to achieve the right balance between costs and outcomes, and control costs effectively. The RSL ensures security of assets, the proper use of public and private funds, and access to sufficient liquidity at all times.	<p>The Standing Orders set out clear financial delegations and there is an appropriate Treasury Management Policy in place. The Treasury Management policy was reviewed and refined this year and financial information is regularly reported to the Board including compliance with golden rules and covenants.</p> <p>In addition to this we regularly report to Boards and have an extensive discussion each year on financial projections and treasury management, including liquidity. Our financial planning and budget setting take account of current economic and political context, which we then monitor. Developing our annual rent setting consultation, Boards consider rigorous affordability analysis, value for money, tenant consultation and comparison. Tenants views are then sought in regards financial impact of differing rent options on service delivery and investment. This feedback was considered by Boards when making decision.</p> <p>Our annual reports explain how rents were spent. The reports are developed following external audit - the audit committee oversees the audit plan.</p> <p>We also have a suite of policies to mitigate against the misuse of our finances including our Group Whistleblowing policy, Group Fraud, Corruption and Bribery Policy and Group AntiMoney Laundering and Counter Terrorism Financing policy. To further aid communication of Group Assurance policies, launched policy videos to alert staff of the key information the need to know and follow.</p>	<p>External validation</p> <ul style="list-style-type: none">- Review by Rathbones of core business planning assumptions- Group Treasury Management Policy (reviewed 2022) was reviewed by our external treasury advisors- External audit process <p>Governance and Policy Framework</p> <ul style="list-style-type: none">- Treasury Management Policy- Group Whistleblowing Policy (reviewed 2022)- Fraud, Corruption and Bribery Policy (reviewed 2022)- Group AntiMoney Laundering and Counter Terrorism Financing policy- Group Standing Orders including financial delegations (reviewed 2022)-Group Assurance policy videos launched to all staff during 2023 <p>Ongoing reporting</p> <ul style="list-style-type: none">- Quarterly treasury report to Group Board on funding requirements and liquidity- Covenant compliance- Internal Audit core programme of auditing key financial controls- Finance reports to Boards	Compliant
3.2 The governing body fully understands the implications of the treasury management strategy it adopts, ensures this is in the best interests of the RSL and that it understands the associated risks.	<p>There is a suitable treasury management policy in place, which was reviewed by the Group Board during the last year.</p> <p>The Board skills matrix is takes into account the need for membership to include Non-Executives with relevant skills and experience in this area.</p> <p>Boards routinely seek sufficient external independent guidance to ensure its decisions are in our best interest, with significant input from external legal advisors.</p>	<p>Board membership</p> <ul style="list-style-type: none">-The Board succession planning specifically seeks to ensure we have individuals with skills and experience in this area- Board skills matrices <p>Policy Framework</p> <ul style="list-style-type: none">- Treasury Management Policy- Quarterly treasury update to Wheatley Group Board <p>External validation</p> <ul style="list-style-type: none">- Extensive external legal advice on any major funding transactions, specifically in relation to the risks	Compliant
3.3 The RSL has a robust business planning and control framework and effective systems to monitor and accurately report delivery of its plans. Risks to the delivery of financial plans are identified and managed effectively. The RSL considers sufficiently the financial implications of risks to the delivery of plans.	<p>Business planning process takes into account a wide range of variables, which are reflected in Board reports e.g. sensitivity testing, assumptions. These are reviewed and tested and Board receive Business plans in February each year. This approach reflects a Campbell Tickell recommendation from our 2021 strategic governance review to <i>Maintain confidence that stress-testing and scenario-testing sufficiently test the implications of difficulties arising in subsidiaries.</i></p> <p>Financial performance is reported to Board as a standing item detailing performance relative to business plans and budgets. Reports to the Board on financial projections are part of the business planning process set out comprehensive and clearly explained information including appropriate context, detailed financial projections and details of projected compliance with golden rules and covenants.</p> <p>Minutes demonstrate a good level of Board engagement with financial projection reporting. Regular reporting to Board provides clear information about financial performance across the group including all subsidiaries as well as performance against covenants and golden rules.</p> <p>In regards to performance, KPIs and targets are reviewed annually by Boards within the Delivery Plan update - Boards receive quarterly performance updates.</p>	<p>Board reporting and monitoring</p> <ul style="list-style-type: none">- Annual stress testing of business plan as part of Board approval process-Annual Budget report- Pandemic and wider economic impact scenario testing on financial projections- Risk register considered by the Group Audit Committee at every meeting and by each Board periodically - Risk workshops held with Boards in May/June 23, risk approach reviewed and updated- Board reports regarding Financial Performance- Treasury management reports-Performance reports-Board reports re budget proposals and financial assumptions - Feb 23	Compliant
3.4 The governing body ensures financial forecasts are based on appropriate and reasonable assumptions and information, including information about what tenants can afford to pay and feedback from consultation with tenants on rent increases.	<p>Our assumptions are validated externally where appropriate and always subject to sensitivity analysis. As part of agreeing our financial projections each year the rent increase is subject to specific separate report which takes into account affordability for tenants.</p> <p>We had our most extensive customer engagement to inform rent increase approach for 23/24 which saw more customers than ever involved in providing feedback on proposals and their priorities for investment/services. Detailed analysis on affordability in light of cost of living crisis was reported to Boards, as well as comparison within the sector. This was our highest return for our rent consultation with full analysis of results and feedback reported to Boards to inform decision on increase.</p> <p>Our five-year financial projections are considered by Boards and submitted to the SHR in accordance with statutory requirements.</p>	<p>Board reporting and monitoring</p> <ul style="list-style-type: none">- Board reports regarding Financial Performance and Financial Projections- Report to Group Board on treasury update and policy- Financial performance report to Group Board and Subsidiary Board meeting- Minutes of Group and Subsidiary Board meetings-Tenant rent setting consultation approach and results for 2023	Compliant
3.5 The RSL monitors, reports on and complies with any covenants it has agreed with funders. The governing body assesses the risks of these not being complied with and takes appropriate action to mitigate and manage them.	<p>We have an on-going process and report compliance as part of finance report to Group Board in addition to projected compliance being a consideration when assessing and agreeing our financial projections. We can confirm we are compliant with our covenants.</p>	<p>Board reporting and monitoring</p> <ul style="list-style-type: none">- Financial performance and treasury reports to Group Board- Report to Boards on financial projections	Compliant
3.6 The governing body ensures that employee salaries, benefits and its pension offerings are at a level that is sufficient to ensure the appropriate quality of staff to run the organisation successfully, but which is affordable and not more than is necessary for this purpose.	<p>All staff gradings are subject to an internal assessment using defined criteria by Employee Relations. We also engage with our Trade Unions as part of our annual pay uplift and benefit package review.</p> <p>The pension arrangements are routinely reviewed by the Board/RAAG and this included changes for auto-enrolment to not offer SPF to all incoming employees. This was on the basis that it was not necessary to attract employees. Our Group Pension Strategy was last reviewed and approved by the Group Board in December 2021.</p> <p>Overall staffing costs and their impact are considered as part of the financial projections.</p>	<p>Governance Framework</p> <ul style="list-style-type: none">- Group Standing Orders <p>Board reporting and monitoring</p> <ul style="list-style-type: none">- Confidential minute of RAAG report to Board on Chief Executive's remuneration- Financial projections- Dual pension arrangements in place for Wheatley Homes Glasgow- Group Pension Strategy-employee terms and conditions	Compliant
3.7 The governing body ensures the RSL provides accurate and timely statutory and regulatory financial returns to the Scottish Housing Regulator. The governing body assures itself that it has evidence the data is accurate before signing it off.	<p>All returns are submitted to the SHR. Where appropriate, we schedule our Board meetings around key Regulatory returns for sign off ahead of submission deadline, for example 5YFP, loan portfolio and ARC are included on the agendas for all RSL Board meetings in May. Governing Body requires formal Board reports to be provided with clear recommendations about sign-off.</p> <p>The Governance team check the SHR portal to ensure returns have been made within timescales. Return of regulatory returns within timescales is included in Business Excellence Frameworks (BEF) between Wheatley Solutions and RSLs.</p>	<p>Board reporting and monitoring</p> <ul style="list-style-type: none">- Board papers and agendas- Solutions Business Excellence Frameworks	Compliant

Standard 4 The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.			
4.1 The governing body ensures it receives good quality information and advice from staff and, where necessary, expert independent advisers, that is timely and appropriate to its strategic role and decisions. The governing body is able to evidence any of its decisions.	<p>Board reports are structured in a Board approved standard format with specific headings to ensure appropriate information is contained in key areas such as recommendations, finance, risk and legal/regulatory. In 2021, Campbell Tickell carried out a strategic governance review - this included the recommendation '<i>Efforts should be made to ensure Board and committee papers are concise, with executive summaries incorporated into the template and recommendations moved up-front in reporting</i></p> <p>We partially accepted this recommendation and carried out a full review of the board template, including content and structure, in early 2022 and a new template is now in use. Board feedback on reports is received during meetings as well as part of the annual Board appraisal. This helps ensure our reports give members the information they need in a format easy to use, with a manageable volume of information, issued a week before meetings to give sufficient time to consider issues effectively.</p> <p>We also accepted the suggestion from Campbell Tickell for subsidiary Board members to provide feedback from the Group Board on any material, relevant (non-sensitive) issues.</p> <p>Agenda planning takes consideration to allow sufficient time for matters. External advice is received and reported to Boards when required. Our minutes are clear and complimented by our reports - these are available under our publication schemes.</p>	<p>Board reporting and monitoring</p> <p>- Board reporting template</p> <p>- Board meeting papers</p> <p>- Board and Committee minutes</p> <p>Governance Framework</p> <p>- Group Standing Orders and Scheme of Delegation</p> <p>External Assurance</p> <p>- Campbell Tickell review of governance arrangements, including the quality of Board papers.</p>	Compliant
4.2 The governing body challenges and holds the senior officer to account for their performance in achieving the RSL's purpose and objectives.	<p>This is primarily discharged via Board meetings in which our Boards and senior staff have a professional relationship. Boards regularly review RSL performance through quarterly updates; we annually review our performance management framework including targets and annually review our strategy through Board workshops. This helps ensure our performance links to our objectives and strategy and measures remain relevant.</p> <p>Senior officer appraisal is responsibility of our RAAG committee.</p>	<p>Board reporting and monitoring</p> <p>- Board Reports and associated minutes</p>	Compliant
4.3 The governing body identifies risks that might prevent it from achieving the RSL's purpose and has effective strategies and systems for risk management and mitigation, internal control and audit.	<p>We have a clearly defined risk management framework. This is reviewed on an ongoing basis. Risk analysis is a specific element of all Board papers and therefore embedded in our decision making at Board level. Board also hold an annual risk workshop with informs risk registers, which Boards oversee. Boards also receive IA updates, of which programme progress is also reported to our Group Audit Committee.</p> <p>During the 2021 strategic governance review, Campbell Tickell recommended that <i>we introduce a single risk appetite for the group, with tolerances within which the subsidiaries are required to operate</i>. We partially accepted this as we have different risk appetite levels which reflect the different maturity levels and types of activity across the Group. All risk statements were subsequently reviewed and the underlying requirement for the Group Board to have control over risk oversight is met by all risk appetite statements and any changes requiring Group Board approval.</p> <p>Where there is a particular risk there is an enhanced level of Board reporting on specific risks as has been in place e.g. through Cyber Security updates and Dampness and mould reporting. As per Campbell Tickell suggestion, our strategic risk registers are ranked in order and frequency of reporting on risk to subsidiary Boards was increased to quarterly</p>	<p>Group policies</p> <p>- Risk management policy</p> <p>-Business continuity policy</p> <p>Governance framework</p> <p>- Group Standing Orders (including Board and committee Terms of Reference) and Audit Committee Terms of Reference - Reviewed 2022 as part of Strategic Governance review</p> <p>Board reporting and monitoring</p> <p>- Reports to Group Audit Committee and all RSL Boards inc. IA programme and assurance updates</p> <p>- Minutes relative to the above</p> <p>-Risk registers</p>	Compliant
4.4 Where the RSL is the parent within a group structure it fulfils its responsibilities as required in our group structures guidance to: (a) control the activities of, and manage risks arising from, its subsidiaries; (b) ensure appropriate use of funds within the group; (c) manage and mitigate risk to the core business; and (d) uphold strong standards of governance and protect the reputation of the group for investment and other purposes.	<p>The role and controls of the Parent are codified in all subsidiary constitutions, along with the roles and responsibilities set out in Intra Group agreements and the Group Standing Orders. Examples of this include Parent approval rights over areas such as Board appointments, constitutional changes, policy and funding.</p> <p>In addition to this, our standard reporting arrangements are such that the Group Board always receives Group-wide performance information as well as details of any material issues at individual subsidiary level. We have effective management in place to identify and manage potential conflicts of interests.</p> <p>Following recommendation by Campbell Tickell following our recent strategic governance review, we updated our Group Standing Orders to further codify the scrutiny role of the Group Board and define routes and parameters for escalation. This also involved introducing terms of reference for each Board to ensure roles and responsibilities, including relative to the Group Board, are well defined and understood. For example, sustainability and equality, diversity and inclusion are now areas included in the Wheatley Solutions ToR. As an addition, it is formally documented through the Group Standing Orders that subsidairy Chairs feedback any material issues to the Group Board during Board discussions.</p>	<p>Governance Framework</p> <p>- Constitutions</p> <p>- Group Standing Orders</p> <p>- Intra Group Agreement</p> <p>-Code of conduct</p> <p>Board reporting and monitoring</p> <p>- Board packs</p>	Compliant
4.5 The RSL has an internal audit function. The governing body ensures the effective oversight of the internal audit programme by an audit committee or otherwise. It has arrangements in place to monitor and review the quality and effectiveness of internal audit activity, to ensure that it meets its assurance needs in relation to regulatory requirements and the Standards of Governance and Financial Management. Where the RSL does not have an audit committee, it has alternative arrangements in place to ensure that the functions normally provided by a committee are discharged.	<p>We have a clearly established Group Audit Committee with a remit including oversight of internal audit, including audit programme which is reviewed regularly to reflect current and anticipated priorities</p> <p>The IA team is required to have an External Quality Assessment at least every 5 years to give the AC assurance on the quality and effectiveness of the Internal Audit function. (Last completed in Nov 2022)</p>	<p>Governance framework</p> <p>- Audit Committee Terms of Reference (reviewed 2022)</p> <p>Board reporting and monitoring</p> <p>- Assurance Update Board Reports</p> <p>- Group Audit Committee reports</p> <p>External</p> <p>- IA EQA</p>	Compliant
4.6 The governing body has formal and transparent arrangements for maintaining an appropriate relationship with the RSL's external auditor and its internal auditor.	<p>This is clearly defined via the Group Standing Orders, mainly within the purview of the Group Audit Committee. These also include Terms of Reference for the Audit Committee, which were reviewed in 2022. The Committee completed a self-assessment of performance this year, which included consideration of how relationship with External Audit and Internal Audit is maintained.</p>	<p>Governance framework</p> <p>- Audit Committee Terms of Reference (updated 2022)</p>	Compliant
Standard 5 The RSL conducts its affairs with honesty and integrity. Guidance			
5.1 The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds the good reputation of the RSL and the sector.	<p>We have an agreed set of Group values, promoted via our website. These values are embedded into the culture of our organisation and demonstrated by senior leaders and our Boards. We are a living wage, disability confident, mindful employer charter and investors in people - platinum employer. We have enei (employers network for equality and diversity) Bronze level TIDE accretion and are members of Business in the Community. We promote this culture through our Different Together brand. The Wheatley Group Code of Conduct sets out expectations.</p> <p>Staff are also bound by the Code of Conduct and HR Policies. We have a Whistleblowing Policy, an anti-fraud, corruption and Bribery Policy, an Anti-money Laundering policy, and Payments Benefits Gifts and Hospitality Policy. The Code of Conduct has been strengthened for the Group Board via stronger provisions for dealing with any suspected breaches, with the power now in place to enforce vacation of office.</p>	<p>Governance framework</p> <p>- Group Standing Orders</p> <p>- Group Code of Conduct (governing body and staff) and Group Values</p> <p>- Whistleblowing policy</p> <p>- Anti-fraud, corruption and Bribery Policy,</p> <p>-Anti-money Laundering policy.</p> <p>-policy communication supported by videos for staff</p> <p>- Gifts and hospitality register</p>	Compliant

5.2 The RSL upholds and promotes the standards of behaviour and conduct it expects of governing body members and staff through an appropriate code of conduct. It manages governing body members' performance, ensures compliance and has a robust system to deal with any breach of the code.	We operate a Group Code of Conduct which all members are required to sign up to; this is consistent with regulatory requirements and sector good practice. It includes arrangements to deal with any breach of the code. An annual appraisal system is in place to manage governing body performance. Similar arrangements are in place for staff via HR policies and the Staff code of conduct.	Governance framework <ul style="list-style-type: none">- Group Code of Conduct and Conflicts Policy - including process for dealing with breaches- Governing Body Board effectiveness and Appraisal Policy (reviewed 2022) and process¹- HR policies and staff code of conduct available on We Connect.	Compliant
5.3 The RSL pays due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements.	<p>Our leaders empower all employees to live the Wheatley Group values; Trust, Community, Excellence and Ambition. The values are integrated into the MyAppraisal appraisal process. Our EDI and Human Rights policy outlines how we pays due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work. We updated our policy in 2022, detailing how we will use equality data to inform decision-making as per the SHR requirement and taking account of SFHA good practice advice.</p> <p>This is also embedded in our HR policies and in our governance arrangements through Equality Impact Assessments and including an equalities section in all Board reports to ensure equality implications are considered. We also ensure our staff are trained with EDI e-learning and Hate Crime training so staff are educated on the protected characteristics. EDI training is included in staff induction. in addition, we have staff and group governing body members' Codes of Conduct which our staff and Board members must abide by.</p> <p>We have continued to further strengthen this standard by introducing quarterly updates on EDI for the Wheatley Solutions Board, which includes monitoring progress with our EDI Action plan and how we are using the equalities data collected to inform our service design and delivery. We have introduced quarterly monitoring and analysis of our equality data for; MyHousing (Allocations); Customer Voice (engagement); Wheatley Works (employability) and JobTrain (applicants). We also collect Board member equality data to inform succession plans. This data collection complies with GDPR. We continue to promote and raise the profile of our Different Together approach through our staff CoE and networks, sponsored by our Executives. We have further enhanced our EDI training with in-person sessions for staff and through leadership development.</p> <p>We have effective arrangements in place to make reasonable adjustments (including a resonate adjustment passport for staff), consider accessibility (i.e. alternative formats of materials available as required) as well as practical arrangements i.e. for translation/interpretation through the BigWord.</p>	Group policies and associated documents <ul style="list-style-type: none">- Wheatley Group Values- HR policies including Dignity at Work and Employee Code of Conduct- Group Governing Body Member Code of Conduct and Conflicts Policy (policy reviewed 2022)- Group Equality, Diversity and Human Rights policy (reviewed 2022)- Equality Impact Assessments including template, guidance and training - externally validated. Equalities implications in all Board reports.- Equality, Diversity and Inclusion awareness training mandatory for all staff and included in induction - externally validated- Hate Crime training for staff-Resemble adjustments carried out-Group EDI Action Plan (approved Nov 22)-Wheatley Solutions Board updates - including data gathering-Different Together CoE and networking groups-Working group of Stronger Voices CoE focussed on equalities-enhanced in person training facilitated by BITC- Inclusion Champions and Inclusive Leaders-ongoing partnership with Diversity Scotland to further enhance training and induction	Compliant
5.4 Governing body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position.	We operate a register of interests (ROI) and declarations of interest is a standing item on Board meeting agendas. Our Group policies on Gifts, Hospitality, payments and benefits have been refreshed during early 2022. This includes guidelines staff must follow to declare an interest i.e. completing a declaration of interest form for inclusion in our staff register of interest. A new policy on Non-Executive Director Conflicts of Interest has also now been introduced. Our policies reflect regulatory and constitutional requirements. We annually review our ROI to ensure up-to-date and accurate. Any actions regarding conflicts or potential conflicts which are declared are recorded in minutes. We publish Board member interests online. We also have procurement information publicly available online to help support compliance in regards to interests.	Group policies and associated documents <ul style="list-style-type: none">- Group Code of Conduct- Group Conflicts of Interest Policy- Register of Interests form and Group register of interests/related parties (annually reviewed)- Staff Register of Interests and form (reviewed and updated in October 2022)- Group policy on gifts, hospitality, payments and benefits (updated 2022)- Non - Executive Director Conflicts of Interest Policy (introduced 2022) Board reporting and monitoring <ul style="list-style-type: none">- Minutes of Board meetings- Example of standing item on Board meeting agendas- Interests published on Board member website page and on AdminControl, our online Board portal	Compliant
5.5 The governing body is responsible for the management, support, remuneration and appraisal of the RSL's senior officer and obtains independent, professional advice on matters where it would be inappropriate for the senior officer to provide advice.	<p>Group CEO appraisal is undertaken by Group Chair and remuneration levels are set by the Board based on previous SHR Recommended practice such as relevant benchmarking and metrics such as pay per home. Our RAAG committee considers this for recommendation to our Group Board.</p> <p>The Board accesses independent professional advice and holds discussions without the Group Chief Executive where appropriate. There is an effective process in place for annual appraisal</p>	Group governance framework <ul style="list-style-type: none">- Group Standing Orders Board reporting <ul style="list-style-type: none">- Reports to RAAG Committee and Group Board on Group CEO terms and conditions.-RAAG minutes Feb 2023	Compliant
5.6 There are clear procedures for employees and governing body members to raise concerns or whistle blow if they believe there has been fraud, corruption or other wrongdoing within the RSL.	We have specific Whistleblowing and Fraud, Bribery and Corruption and Anti-money laundering Policies in place, approved by the Group Audit Committee. These were reviewed in 2022 and set out to prevent and detect attempted wrongdoing. We regularly review these policies to ensure up-to-date and consistent with regulatory and good practice advice. We recently launched policy videos for these policies are part of their communication to staff - these are available on our intranet and online. In relation to Whistleblowing, this policy outlines the support and independent advice available. Any instances reported follow policy procedure including reporting to Board/committee.	Group policies <ul style="list-style-type: none">- Group Whistleblowing policy- Group Fraud, Corruption and Bribery policy- Group Anti money laundering and counter terrorism financing policy- Internal audit reports to Group Audit Committee	Compliant
5.7 Severance payments are only made in accordance with a clear policy which is approved by the governing body, is consistently applied and in accordance with contractual obligations. Such payments are monitored by the governing body to ensure the payment represents value for money. Alternatives to severance must be considered including redeployment.	Our existing approach to ER/VR consists of two elements: our individual policies on Early Retirement and Redundancy and the affordability criteria we apply agreeing any form of what may be classified as a 'severance payment. Any instances of severance are reported to RAAG committee.	Group policies and associated documents <ul style="list-style-type: none">- Policies on redeployment, redundancy and early retirement linked to redundancy (WH Glasgow, Loretto, and WH East)-Terms and conditions of employment- Legal Advice regarding severance	Compliant
5.8 Where a severance payment is accompanied by a settlement agreement this must not be used to limit public accountability or whistleblowing. RSLs must take professional legal advice before entering into a settlement agreement.	We engage external legal advice in relation to any settlement agreements and we seek legal advice in every instance.	Legal Advice regarding severance	Compliant
Standard 6 The governing body and senior officers have the skills and knowledge they need to be effective.		Guidance	
6.1 The RSL has a formal, rigorous and transparent process for the election, appointment and recruitment of governing body members. The RSL formally and actively plans to ensure orderly succession to governing body places to maintain an appropriate and effective composition of governing body members and to ensure sustainability of the governing body.	<p>We undertake review of our succession plans to ensure we maintain an appropriate and effective composition. We have an Appraisal and Board effectiveness policy and Board recruitment succession planning procedure (reviewed and introduced in 2022). The Board undertake an annual appraisal process, as considered and agreed by RAAG. We carry out a skills self-assessment and mapping exercise against agreed skills matrices with our Boards. We also collect equalities data from our Board members. This all informs our 3-year succession plans which we review annually.</p> <p>Recruitment vacancies are always advertised and subject to:</p> <ul style="list-style-type: none">- the process set out in constitutions- recruitment policy- RAAG committee agreement	Group governance framework <ul style="list-style-type: none">- Group Standing Orders- Group Board effectiveness and appraisal policy- Group Board recruitment and succession planning procedure- Sub Board skills matrices and succession plans	Compliant

6.2 The governing body annually assesses the skills, knowledge, diversity and objectivity it needs to provide capable leadership, control and constructive challenge to achieve the RSL's purpose, deliver good tenant outcomes, and manage its affairs. It assesses what is contributed by continuing governing body members, and what gaps there are that need to be filled.	Annual appraisal is in place and the policy includes skills self assessment together with a 1-2-1 review with Chair to evaluate performance/contribution. Each Board has an agreed skills matrix to ensure the Board has a range and skills, knowledge and experience to fulfil responsibilities effectively. This appraisal process is considered annually and agreed by our RAAG committee. The outcomes of our appraisal process are then reported in Board reports, e.g. August 2022. The Group has an appropriate Succession Planning Procedure in place, with Boards receiving 3-year succession plans annually. We collect diversity data from Board members which informs succession planning also.	Group governance framework <ul style="list-style-type: none">- Constitutions- Group Standing Orders- Group Board recruitment and succession planning procedure Board reporting and monitoring <ul style="list-style-type: none">- Board appraisal process and report to Group Board;- RSL Board Succession Plans- Board induction process- Subsidiary Board reports on appraisal and succession	Compliant
6.3 The RSL ensures that all governing body members are subject to annual performance reviews to assess their contribution and effectiveness. The governing body takes account of these annual performance reviews and its skills needs in its succession planning and learning and development plans. The governing body ensures that any non-executive member seeking re-election after nine years' continuous service can demonstrate their continued effectiveness.	An annual appraisal process is in place and the policy includes self-assessment together with a 1-2-1 review with the Chair to evaluate performance. Appraisal process considers the compositions and capabilities of Boards, as well as informing CPD plans to support Board members to develop/enhance skills. Boards also annually consider 3-year succession plans, which are developed to ensure regulatory/constitutional requirements are met.	Group governance framework <ul style="list-style-type: none">- Constitutions- Group Standing Orders- Group Board recruitment and succession planning procedure- Board induction process- Board CPD Programme Board reporting and monitoring <ul style="list-style-type: none">- Board appraisal report to Group Board;- 3-year Succession Plans including specific agreement to extend beyond 9 years and assessment of continued effectiveness to support this	Compliant
6.4 The RSL encourages as diverse a membership as is compatible with its constitution and actively engages its membership in the process for filling vacancies on the governing body.	Our approach, as documented in our membership policies and constitutions, was reviewed last year and agreed by all relevant Boards taking into account this Regulatory Standard. Our membership policies are reviewed regularly to ensure up-to-date and consistent with constitutions.	Group policies <ul style="list-style-type: none">- Membership Policies (published online) Group governance framework <ul style="list-style-type: none">- Constitutions Board reporting <ul style="list-style-type: none">- reports to individual Boards regarding membership changes and assessing compliance with this standard as part of the changes agreed	Compliant
6.5 The RSL ensures all new governing body members receive an effective induction programme to enable them to fully understand and exercise their governance responsibilities. Existing governing body members are given ongoing support and training to gain, or refresh, skills and expertise and sustain their continued effectiveness.	We have a structured approach to board induction and CPD. In addition to this, we take into account the operating context, with tailored CPD being delivered. We use a hybrid approach of both online and in-person CPD and will use this going forward. Our annual Board appraisal process, in which we consider the balance of skills and experience on our Boards, also takes CPD requirements into account	Induction and training <ul style="list-style-type: none">- Induction process- CPD programme- Institute of Directors (IoD) induction programme session on the Role of a Non-Exec Director -annual appraisal process and Board reports	Compliant
6.6 If the governing body decides to pay any of its non-executive members then it has a policy framework to demonstrate clearly how paying its members will enhance decision-making, strengthen accountability and ownership of decisions, improve overall the quality of good governance and financial management and deliver value for money.	The Group Governing Body Remuneration Policy sets out the Group's approach to remuneration - which is to remunerate non-executive positions in order to attract and retain those with the right talents, skills and experience. The remuneration is based on a number of principles, which are set out in the Policy. Currently, it is only our Group Board, Group Committees, Wheatley Developments and The Wheatley Foundation Chair roles that are remunerated - remuneration is considered by RAAG for recommendation to Group Board.	Group policy framework <ul style="list-style-type: none">- Governing Body Remuneration Policy Board reporting and monitoring <ul style="list-style-type: none">- Board reports e.g. February 2022, September 2022	Compliant
6.7 The governing body is satisfied that the senior officer has the necessary skills and knowledge to do his/her job. The governing body sets the senior officer's objectives, oversees performance, ensures annual performance appraisal, and requires continuous professional development.	<p>This is overseen via the Group Chair, who undertakes an annual appraisal of the Group Chief Executive and provides feedback to the Group RAAG Committee and Group Board.</p> <p>We recently went through a process for appointing new CEO. This was undertaken in early 2022, with the appointment from September 2022. External recruitment advisors, the Group Chair, and Chair of Audit Committee were all involved to ensure the successful candidate had the correct skills and experience. Our RAAG committee also considers remuneration in accordance with our policy.</p>	Board reporting and monitoring <ul style="list-style-type: none">- Confidential minutes of RAAG report to Group Board.	Compliant
Standard 7 The RSL ensures that any organisational changes or disposals it makes safeguard the interests of, and benefit, current and future tenants.			
Guidance			
7.1 The governing body discusses and scrutinises any proposal for organisational change and ensures that the proposal will benefit current and future tenants.	The West Lothian Housing Partnership (WLHP) transfer to Wheatley Homes East (WHE, previously called Dunedin Canmore) commenced early 2022 - this was reviewed by the WLHP, WHE and Group Boards taking into account the implications for tenants. Cube also transferred to WH Glasgow and Loretto in May/June 2021 with the Cube, WH Glasgow and Loretto Boards taking all the necessary steps for transfer including reviewing the proposals and outcome of customer consultation to ensure they were satisfied with the benefits to customers. Engagement on the re-branding of WH Glasgow following the Cube transfer took place in autumn 2021; again the Board carefully scrutinised plans before approving the change. Name changes for DC to WHE and DGHP to WHS took a similar approach. In considering the proposals for these projects, Boards were clear about objectives and implications for tenants, as well as consultation requirements with tenants. The SHR was notified in accordance with regulatory requirements.	Board reporting and monitoring <ul style="list-style-type: none">- Board reports- Board minutes	Compliant
7.2 The RSL ensures that its governance structures are as simple as possible, clear and allow it to meet the Standards of Governance & Financial Management, Constitutional Requirements, and Group Structures guidance.	<p>We operate a relatively flat and simple corporate structure. Our 2021 Strategic Governance Review with advice from Campbell Tickell, supports recent decision to rationalise the Group by dispersing activities of Cube and ultimately winding one entity up. We then undertook further consolidation of the Group structure and the transfer of West Lothian Housing Partnership to Wheatley Homes East is now complete. Recent consolidation outwith our RSLs will also lead to the winding-up of Novantie Limited, YourPlace Property Management Limited and Wheatley Enterprises Limited.</p> <p>All proposed organisational changes were considered by Boards to ensure these continue to deliver effective governance, whilst demonstrating quantifiable benefits for tenants and stakeholders. This is also in the context of retaining different geographies with distinct local characteristics hence why we consider locally-based governance and local tenant voices on Boards, important.</p> <p>Intra-group agreements are in place between the parent and each subsidiary.</p>	Group governance framework <ul style="list-style-type: none">- Group Standing Orders- Intra-Group Agreements External validation <ul style="list-style-type: none">- Campbell Tickell Governance review Board reporting and monitoring <ul style="list-style-type: none">- Board packs	Compliant
7.3 The RSL ensures adequate consultation with, and support from, key stakeholders including tenants, members, funders (who may need to give specific approval) and local authorities as well as other regulators.	The WH Glasgow name change project also involved consultation with customers in autumn 2021 and Stakeholder engagement for the WLHP transfer commenced in March 2022, including engagement with the regulator. Subsequent name change projects also included stakeholder and regulator engagement. Board reports for these projects identified a schedule of key milestones including stakeholder engagement; Boards oversaw the delivery and achievement of these exercises, including securing necessary approvals e.g. from funders, through tenant ballot.	Board reporting and monitoring <ul style="list-style-type: none">- Board reports-Tenant consultation records-Approvals e.g. funders, OSCR, FCA, SHR Other <ul style="list-style-type: none">- Exchanges with Local Authorities and customers	Compliant
7.4 The governing body is satisfied that the new (or changed) organisation will be financially viable, efficient and will provide good outcomes for tenants.	This was assessed fully by the respective Boards in relation to the previous Cube Housing transfer and before progressing with the WLHP transfer i.e. in developing proposals which customers were consulted and balloted on. In considering proposals our Boards have regard to financial implications, benefit to customers, efficiencies, and laws and regulation.	Board reporting and monitoring <ul style="list-style-type: none">- Board reports - including financial implications, benefits to tenants, independent advice and feedback from consultation to develop proposals for consideration- Board minutes	Compliant

7.5 The RSL establishes robust monitoring systems to ensure that delivery of the objective of the change and of commitments made to tenants are achieved (for example in relation to service standards, operating costs and investment levels).	We have clear monitoring arrangements in place for ensuring commitments to tenants are monitored and delivered. These will also be reported to the relevant Boards on an ongoing basis.	Board reporting including updates post-transfers, annual rent setting where there has been a rent promise made as part of partnership proposal	Compliant
7.6 Charitable RSLs seek consent/ notify OSCR of changes to their constitution and other changes as appropriate.	OSCR approval sought in respect of WLHP transfer and WH Glasgow name change, also for DC and DGHP name change to Wheatley Homes East and Wheatley Homes South respectively. OSCR notified of Cube transfer and WLHP transfer within timescales i.e. within 3 months. Boards assured that consents are obtained within timescales as set out in Board reports.	Formal notification documents to OSCR including applications and consent	Compliant
7.7 The governing body ensures that disposals, acquisitions and investments fit with the RSL's objectives and business plan, and that its strategy is sustainable. It considers these taking account of appropriate professional advice and a consideration of value for money - whether as part of a broader strategy or on a case-by-case basis.	The Terms of Reference for each Board set out that each Board is responsible for its own organisation's disposals/acquisitions and for setting the parameters of any delegation of same. We have a group-wide acquisitions and disposals framework which was agreed and adopted by each entity. The subsidiary-specific policies put in place contain template forms to be completed for each disposal/acquisition and require business leads and key stakeholder departments (including finance and the asset teams) to be involved in the decision-making. We have introduced annual reports on disposals/acquisitions for each Board.	Board reporting and monitoring - Sub Board report - Group Standing Orders	Compliant
7.8 The RSL complies with regulatory guidance on tenant consultation, ballots and authorisation.	The three recent instances of re-structure within the Group have demonstrated consultation with tenants, ensuring that relevant Boards have considered and approved proposals and have been assured that all regulatory requirements were followed - in 2022, this included the WLHP consultation and ballot to join Wheatley Homes East (then called Dunedin Canmore).	Board reports and associated tenant consultation/ballot documentation e.g. East of Scotland partnership Notifiable events register SHR approvals	Compliant
7.9 The RSL notifies the Regulator of disposals in accordance with regulatory guidance.	We have a clear, robust internal process in place for ensuring that all disposals are notified to the SHR. All staff who are potentially involved in disposals are clear on where this triggers a notification requirement. The Property Legal team notifies the Governance team of any disposals. The Governance team maintains a disposal register and notifies the SHR of any notifiable disposals on a monthly basis using the SHR portal. The Governance team reconciles its records against the Property Legal team records on a monthly basis to ensure all disposals are captured. An updated disposals policy was approved and rolled out during 2022; this was subsequently reviewed in June 2023.	SHR Portal holds records of all notifiable disposals. Disposals register Annual update to Board (May 23) Disposals and acquisition policy Notifiable events register	Compliant
7.10 The RSL only agrees to fixed or floating charges where the assets are used to support core activities. This should exclude providing security in relation to staff pensions.	<p>The Group funding structure is split between 'RSL' and 'Others.' Wheatley Funding No. 1 Limited (WFL1) was formed as a special purpose vehicle to facilitate funding the Group RSLs from bond issuance and bank lenders. WFL1 borrows funds from the bond issuer and banks and on-lends them to the RSLs within the Group in accordance with the criteria set out in the Intercompany Loan Agreements. The Bond is secured against Group Properties. These Charged Properties are named in the Bond Trust Deed and there are requirements to notify the Trustee if the Group wants to add, substitute, release or dispose of a property charged against the Bond loan value. A Secured stock spreadsheet is maintained by the Treasury Team.</p> <p>Annual Valuations on the Group Assets are undertaken by JLL including separate valuations for each funder against assets. In addition, Prudential Securities provides its own report on funding against the Group Assets which Treasury reconcile quarterly against their own records.</p>	Corporate records - Financial records of RSLs and WFL1 - Security spreadsheet -Regulatory and financial implications section in Board report templates -Board reports e.g. business plan, funding updates	Compliant

Appendix 1.3			
The constitution of the RSL must comply with all legislative requirements under the 2010 Act (which are not replicated here) and the following regulatory requirements:	Self-Assessment Commentary	Evidence and sources of assurance	Self Assessment
	All RSL rules take into account the SFHA Charitable Model Rules, subject to us ensuring that the reflect our own needs. All constitutions are subject to a) review by individual Boards b) review by our external legal advisors, and c) agreement by members.		Compliant
1. It sets out clearly the RSL’s purpose, objects and powers.	WH Glasgow: section 2 of Rules- Objects and purpose; 45-47 Powers Loretto: section 2 of Rules- Objects and purpose; 45-47 Powers WHE: section 2 of Rules- Objects and purpose; 45-47 Powers WHS- section 5 of Articles - Objects and purpose; 6 - Powers; 45-46	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of material constitutional changes.	Compliant
2. The RSL is able to fulfil its obligations in terms of its legal status and (if relevant) its obligations as a registered charity. These obligations and how they will be met are set out in the constitution.	Obligations and how these will be met are set out in Rules/Articles	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of material constitutional changes.	Compliant
3. There is a system for keeping accounts and ensuring an independent audit by an appropriately qualified person. There is a proper procedure for appointing an auditor. The governing body should take whatever measures are necessary to ensure the continuing independence of the auditor including periodic review of the need for audit rotation. The RSL must send a copy of its accounts and the auditor’s report to us within six months of the end of the period to which they relate.	WHG - sections 69-74 of Rules Loretto - sections 69-74 of Rules WHE - sections 69-74 of Rules WHS - section 62 of Articles The Group has established financial procedures for preparing the annual accounts. These are kept and prepared within the requirements of our RSLs Rules/Articles. The appointment of auditor is considered annually as part of the AGM. The appointment of the external auditor is also approved by Group Audit Committee who also reviews their performance as part of their annual self-assessment. Audited accounts and auditor's report are presented to the Board for approval in August Board meetings. Accounts presented to members at AGM and audit elected for the following financial year. All annual returns regarding annual accounts are made within required timescales each year including to SHR, OSCR and FCA or Companies House (as appropriate).	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of material constitutional changes.	Compliant
4. It is clear what investments and borrowing the governing body can authorise.	WH Glasgow: section 18, 80 of Rules Loretto: section 18, 80 of Rules WHE: section 18, 80 of Rules WHS- section 7, 47 of Articles	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of all constitutional changes.	Compliant
5. There is a procedure for dealing with disputes on matters contained within the constitution.	WH Glasgow: section 82 of Rules Loretto: section 82 of Rules WHE: section 82 of Rules WHS- section 68 of Articles	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of all constitutional changes.	Compliant
6. It is clear how changes can be made to the constitution.	WH Glasgow: section 88 of Rules Loretto: section 88 of Rules WHE: section 88 of Rules WHS- sections 72-75 of Articles	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of all constitutional changes. For example, our legal advisors were engaged during the name change process for WH Glasgow which involved holding an SGM on the 29 June 2022 to pass the resolutions for the name change and also to update the RSLs rules. The name change was registered with the FCA on 20 July and rule change on 17 August - all other necessary notifications including to the SHR have been/will be made within required timelines. - Evidence in folder. We have engaged legal advice for upcoming name changes for Dunedin Canmore and DGHP. This includes an Article change for DGHP. This has been approved by the Boards with a SGM being held on 22 September for Duendin Canmore and 21 September for DGHP.	Compliant
7. It is clear how the RSL can be closed down.	WH Glasgow: section 86 of Rules Loretto: section 86 of Rules WHE: section 86 of Rules WHS- section 70 of Articles	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of all constitutional changes.	Compliant
8. The RSL can demonstrate its governance and financial arrangements are such as to allow the Regulator to regulate effectively, and exercise our full regulatory powers.	Demonstrated through our RSL Rules/Articles, Group Standing Orders and governance policies, RSL Board Terms of Reference, Board meetings and accompanying reports and ongoing regulatory engagement with SHR as required.	All RSL Rules/Articles of Association and supporting Board papers at time of approval. Harper MacLeod are involved in the preparation of all constitutional changes.	Compliant

In relation to an RSL within a group structure:			
9. Each organisation within the group must have a distinct legal identity and separate constitution. The constitutional and financial relationships between all organisations in the group (registered or non-registered) must be documented formally and in terms that are transparent and understandable.	All RSLs have their own legal identity and Articles and Rules. Defined Group Structure and organisations enter into an Intra-Group Agreement with the Parent, which defines the relationship.	All RSL Rules/Articles of Association Model Intra Group Agreement	Compliant
10. If any of the organisations within the group are charities, the RSL's role and relationships with other group members are consistent with charity law.	As set out in RSL Rules/Articles of Association - WHG, Loretto, WHE and WHS are charities.	All RSL Rules/Articles of Association	Compliant
11. The constitutions of group members must enable the parent to exercise control and to take corrective action where required.	Articles/Rules set out powers of Parent and where Parent approval is required	All RSL Rules/Articles of Association	Compliant
12. There are procedures in place designed to avoid conflicts of interest, particularly where members of the subsidiary's governing body are also members of the parent's governing body.	Register of of interests reviewed and updated annually, declarations of interest as standing agenda item and newly reviewed Conflicts of Interest policy. Also detailed in Rules/Articles in terms of Board membership.	All RSL Rules/Articles of Association Group Conflicts of Interest policy	Compliant
13. Where it is constituted as a subsidiary of another body, the RSL's constitution permits control by the parent but with sufficient independence to carry out its business, within limits set by the parent.	As per constitutions	All RSL Rules/Articles of Association	Compliant
With regard to the governing body of the RSL and the members of the governing body:			
14. Recruitment to the governing body is open and transparent. It is clear who is eligible to become a member of the governing body and how to become a member of the governing body whether by election, nomination, selection, etc and how membership is ended. There is a procedure for removing members from the governing body.	WH Glasgow: section 39-44 of Rules Loretto: section 39-44 of Rules WHE: section 39-44 of Rules WHS- section 38-45, 49 of Articles	All RSL Rules/Articles of Association	Compliant
15. There is a procedure by which members stand down from the governing body to allow for a turnover in membership. Governing body members are appointed for specific terms subject to re-election or re-appointment.	Board members are appointed for 3-year fixed terms before re-appointment required. Board members cannot serve beyond 9 consecutive years (unless extended and approved by Parent) - specific terms of this are set out in relevant constitutions	All RSL Rules/Articles of Association	Compliant
16. The membership of the governing body must be no fewer than seven and not normally exceed 15 members, including co-opted members. Names of the governing body members must be accessible to the public.	Composition of Board- WH Glasgow: section 37 of Rules Loretto: section 37 of Rules WHE: section 37 of Rules WHS- section 37 of Articles All Board members available on websites	All RSL Rules/Articles of Association	Compliant
17. The powers and responsibilities of the governing body are clearly set out.	As per constitutions	All RSL Rules/Articles of Association	Compliant
18. The roles, powers and responsibilities of governing body office bearers are set out. And any delegation to committees or staff are clearly set out in standing orders and delegated authorities.	As per constitutions and Group Standing Orders WH Glasgow: section 59 of Rules Loretto: section 59 of Rules WHE: section 59 of Rules WHS- section 60 of Articles	All RSL Rules/Articles of Association	Compliant
19. There are provisions for the RSL to remove a governing body member who does not sign up to the code of conduct and to take action against or remove a governing body member in breach of the code.	WH Glasgow: section 37.5, 37.10, 44.5 of Rules Loretto: section 37.5, 37.10, 44.5 of Rules WHE: section 37.5, 37.10, 44.5 of Rules WHS- section 14 and 44 of Articles	All RSL Rules/Articles of Association	Compliant
20. Where the constitution allows executive staff on to the governing body, they must be excluded from holding office, and cannot form a quorum or a majority. Executive members of the governing body should not receive any additional payment for their governing body role over and above what they are entitled to under their contract of employment.	As per constitutions. <i>When WH -Glasgow's constitution is next reviewed, this section will be updated as per Campbell Tickell recommendation.</i>	All RSL Rules/Articles of Association	Compliant
21. It is clear what types of meetings can and should be held and their purpose. There are clear procedures to call all meetings, and it is clear what the quorum of meetings should be, how resolutions will be passed, and decisions recorded, and how many meetings should take place each year, subject to a minimum of six governing body meetings a year.	As per constitutions - procedure for Board meetings, annual general meetings and special general meetings (or extraordinary general meetings for WHS) including calling notices	All RSL Rules/Articles of Association	Compliant
22. The governing body cannot act for longer than two months if its membership falls below seven. If at the end of that period it has not found new members then the only power it will have is to act to bring the governing body members up to seven.	WH Glasgow: section 49 of Rules Loretto: section 49 of Rules WHE: section 49 of Rules WHS- section 53(9)	All RSL Rules/Articles of Association	Compliant
23. There is a clear process to identify and address any conflicts of interest on the governing body.	As per constitutions, Group conflicts of interest policy and standing item on agenda	All RSL Rules/Articles of Association Group Conflicts of Interest policy	Compliant
24. The Chairperson's role is set out formally; the Chairperson is responsible for the leadership of the governing body and ensuring its effectiveness in all aspects of its role. There is a clear process to select the Chairperson, who cannot be an executive member, and must not hold office continuously for more than five years.	WHG - sections 59.6 - 59.14. of Rules Loretto - section 59.6 - 59.12 of Rules WHE: section 59.5-59.11 of Rules WHS- section 60.2-60.9 of Articles	All RSL Rules/Articles of Association	Compliant
25. If the RSL pays any of its non-executive governing body members then it must ensure that: a) the governing body takes account of independent guidance in setting payment amounts and can demonstrate value for money; b) the payments are linked to specified duties and there is a clear process for assessing performance in carrying out these duties; c) details of governing body payments are published in the RSL's annual accounts; and d) where an RSL has subsidiaries it must ensure any payments and benefits to subsidiary governing body members are included in the policy. Charitable RSLs must comply with the Charities and Trustee Investment (Scotland) Act 2005 and any associated guidance from the charity regulator when considering payments or benefits to charity trustees.	As per constitutions - no Board member is paid in capacity of sitting on RSL Board. In particular, for WHG - Rules 38.1 and 38.1 refer to payment. Payments can only be made under a Board approved policy. Rules do not prevent payment. For Loretto/WHE - Rules 38.1 and 38.3 apply. Payments restricted by Charities and Trustee Investment (Scotland) Act 2005 and as set out in the Board's policy. For WHS - Articles do not prevent payment. Article 52(1) provides for the Board periodically reviewing its policy on payment; payments can only be made under that policy.	All RSL Rules/Articles of Association	Compliant
26. The role and status of co-opted is set out. Co-opted do not form part of any quorum required for meetings of the governing body and may not vote on matters directly affecting the constitution and membership of the organisation or the election or appointment of its office bearers.	WH Glasgow: section 42 of Rules Loretto: section 42 of Rules WHE: section 42 of Rules WHS- section 43 of Articles	All RSL Rules/Articles of Association	Compliant

With regard to the general membership of the RSL:			
27. It is clear who is eligible to become a member of the RSL and who cannot, and it is clear how to become a member and how membership is ended. Names of the members must be accessible to any other member or anyone with an interest in the RSL’s funds.	This is detailed through a combination of constitutions and membership policies. Policies are available on the website - Loreto Membership policy updated and approved March 2023; WHE updated and approved May 2023.	All RSL Rules/Articles of Association - Membership policies	Compliant
28. Membership of the RSL should reflect the purpose and objects of the RSL.	Members of WH Glasgow and WHG are the Board, so by definition reflect the purpose and objects as they set them Other RSLs have membership policies that set out the membership. Membership is primarily open to tenants, Board members and the Parent . Our Board members undertake an annual skills self-assessment against agreed skills matrices to confirm members have the right skills / experience to successfully oversee the delivery of the RSL purpose and objects. The skills mapping is used to identify any gaps which inform our succession planning and CPD planning.	All RSL Rules/Articles of Association - Membership policies - Skills self-assessment and skills matrix	Compliant
29. There is a clear procedure, including the quorum and voting procedure, for the membership of the RSL to meet and it is clear what business the membership can discuss and what decisions it can make, subject to a minimum of one annual meeting.	Clearly detailed within each constitution	All RSL Rules/Articles of Association	Compliant

Report

To: Wheatley Homes Glasgow Board

By: Laura Pluck, Group Director of Communities

Approved by: Steven Henderson, Group Chief Executive

Subject: Winter resilience planning

Date of Meeting: 15 September 2023

1. Purpose

- 1.1. To update the Board on our approach to winter resilience planning this year for our business operations and customers experiencing hardship.

2. Authorising and strategic context

- 2.1. Under the Group Standing Orders the Group Chief Executive is responsible for our operations. Under our Terms of Reference we are responsible for approving our strategy and for monitoring our performance. This report explains the operational plans we are putting in place to mitigate the ongoing risks from winter-related incidents and economic factors impacting our customers' household costs.
- 2.2. 'Delivering Exceptional Customer Experience' and 'Changing Lives and Communities' are key strategic themes of the Your Home, Your Community, Your Future Strategy 2021- 2026. The paper sets out our winter planning approach which seeks to ensure customer service levels are consistent throughout this period by anticipating and planning proactively for the winter months and unique challenges it brings. The plan will cover provision of core services to customers including supporting customers through the cost-of-living crisis.

3. Background

- 3.1. We have well-established approaches that have been deployed in previous years to address the operational business risks of the winter period across all business areas. These plans have been reviewed and augmented to take the wider actions and approaches developed across a range of services including our repairs service, the Customer First Centre (CFC), our Neighbourhood Environmental Teams (NETs) and Housing and Care services, to mitigate against business impact linked to winter challenges our customers and services face.

- 3.2. This year, winter planning continues to focus on current risks around business continuity throughout the winter months as well as the ongoing impact of the cost-of-living crisis on tenants. The approaches developed reflect both the learning of previous years and the revised approach to business continuity planning.
- 3.3. The report sets out the key areas of risk and the measures in place, underway or planned to mitigate the anticipated winter impact.

4. Discussion

Cost-of-living crisis

- 4.1. One of the challenges continuing to face us this winter is to adequately support tenants through the continuing cost-of-living crisis. Although inflation has reduced over the year, with an expectation it will drop to 5% at the end of 2023, tenants are still experiencing exceptional pressures on their income. In July inflation rates dropped to 6.8%, which is still significantly higher than normal. Food and fuel costs remain high, with food prices 14.8% higher than a year ago. We expect that the challenges tenants face will be as significant as 2022.
- 4.2. Our 'Here for You' initiative and campaign, launched in August 2022, continues to highlight the wide range of internal and external customer support and advice on offer. Demand for the 'Here for You' fund has continued in the first 5 months of this year. We continue to support tenants most in need with financial support offered for the cost of food, fuel and rent where people are in crisis. The aim continues to be to reach those most in need, supporting customers in crisis, while raising their awareness of and access to the range of wider wraparound support on offer to them both internally and externally.
- 4.3. A key focus of the 'Here for You' initiative and campaign is to ensure frontline staff and tenants continue to be aware of and directed to the support available to them in their local communities. Our digital directory of support available is updated regularly to ensure staff have at their fingertips, the organisations and funds available to our tenants externally. In Q1 of this year, 55% of 'Here for You' referrals included onward referrals for customers to access support externally. This included referrals to external food support such as local pantries and larders, mental health organisations and local authority support funds.
- 4.4. External grant funding is being accessed at every possible opportunity to enhance how we can support customers. Since April 2023, the Foundation has successfully secured £266k to support customers specifically with fuel /benefits advice, energy efficient cooking appliances, digital devices and food vouchers. Securing additional external funding to support customers will remain a key priority for the Foundation over the coming months. We anticipate securing an additional £350k of funding to support customers over the winter period with energy costs and food security from the National Lottery Cost of Living Fund and the Fuel Insecurity Fund administered by SFHA.

Rent Campaign

- 4.5. Our highly successful rent campaigns are launched each year and run from November to January. As is always the case, the annual rent campaign focuses on early intervention, encouraging and supporting tenants to pay their rent and reduce the risk of debt, ensuring their home is not at risk. The campaign reminds customers of the importance of paying rent, whilst recognising the challenges faced by customers.
- 4.6. We will continue to make customers aware of our suite of wraparound services, stressing that we are here to help everyone, whatever their circumstance and we are available 24/7. This includes our Welfare Benefit Officers; Fuel Advisors and 'Here for You' fund. Our new operating model with the introduction of an enhanced MyRepairs Team, will enable our housing staff to spend more time in the community supporting customers who are at risk of or in arrears.
- 4.7. The key outcomes of the rent campaign are to;
- Maximise income collection over the Christmas period;
 - Reduced number of customers in arrears – reducing the stress of debt;
 - Increase in customers paying by Direct Debit;
 - Increased use of appropriate wraparound services; and
 - Increased number of customers contacted during the campaign.

Business Continuity

- 4.8. Business Continuity and its planning (BCP) is well established across all service areas for the purpose of returning to normal levels of service following an incident which causes disruption and affects our ability to provide key services.
- 4.9. Our BCP and associated impact assessments are in place and are reviewed on an annual basis as a minimum by Business Continuity Co-ordinators. To ensure these are effective, elements of the BCP are tested on a quarterly basis across each service area. Continuity plans consider risk and impact in respect of the following areas as a minimum:
- Loss of Key Suppliers and Supply Chain;
 - Loss of IT, Data Networks and Data Servers;
 - Epidemic / Pandemic Outbreak;
 - Severe Weather Event;
 - Loss of Utilities;
 - Fuel Supply Shortage; and
 - Local and National power outage (planned and unplanned).
- 4.10. Senior Leaders across the business who have responsibility for Business Continuity Plans and Emergency Plans have undertaken scenario planning sessions facilitated by our Health & Safety Team throughout the year. A scenario planning session for a severe weather incident is planned for October 2023 with all business leads across the organisation. This gives business leads an opportunity to talk through a specific scenario for the purposes of testing our business continuity plans and refining these based on any lessons learned from the session.

- 4.11. Additionally, we have a detailed suite of emergency response plans and escalation procedures covering all services including the Customer First Centre, City Building Glasgow (“CBG”) and other key contractors. These plans set out specific protocols if faced with any of the events described above such as severe weather (snow, storm, and flood) as well as practical issues such as snow socks, grit, sandbags, temp cooking, key contact information and emergency staff cover arrangements. The plans reflect legislative and regulatory requirements and priorities of each business area.
- 4.12. As part of our Strategic Partnership with Glasgow City Council we agreed that we would join the Council Resilience Group. The Director of Health and Safety attends this group representing us. This affords opportunity for sharing experience and learning as well as access to shared resources in the event of critical incidents which impact provision of services.

Repairs

- 4.13. We know from experience that repairs demand increases throughout the winter months because of the impacts of colder and wetter weather. We are working together with CBG on our annual approach to winter inclement weather ensuring there are sufficient resources available to meet demand for gas and heating breakdowns. To protect the resource that would be needed to attend reported breakdowns throughout this period, and ensuring that we remain fully gas safety compliant, work is underway to ensure gas servicing due to expire between December and January is complete prior to the festive period.
- 4.14. We will, as in previous years, step up the level of monitoring of repairs, reviewing repairs raised in the previous 24 hours to monitor demand. Any significant spikes in demand because of winter weather events or negative trends will be quickly identified and escalated to target resources or inform key business areas. Processes are in place to implement daily business continuity meetings should demand for repairs spike. These will be led by the Director of Repairs, Investment and Compliance and will include colleagues from CBG, housing and the CFC. Weather warnings/patterns will also be monitored daily by our Customer First Centre and flagged to all relevant business leads.
- 4.15. Our CFC staff have undergone enhanced training around repairs with a small, dedicated team of advisors receiving most repairs calls from customers throughout each day.

Winter Home Checks

- 4.16. Each year we offer ‘Winter Ready’ checks for some of our most vulnerable customers. The purpose of the ‘Winter Ready’ check is to give a personalised, proactive review of heating systems prior to the colder weather as well as share advice and tips on managing throughout the winter. In addition, we will publish ‘Keeping Safe and Warm’ advice on our websites and social media channels throughout the winter period.

Damp and Mould

- 4.17. Damp and mould continue to be an area of focus and it is anticipated that over the winter period there will be a seasonal increase in the number of reported mould cases. Our current processes are robust, and our target is that anyone reporting damp or mould is visited within 2 working days.
- 4.18. To mitigate seasonal fluctuations analysis is being undertaken to identify customers who have reported issues with damp and mould on 2 or more occasions this year. These customers will then be contacted to identify and put in place any supports needed proactively. Additional inspection resources are also being made available by CBG to meet any increase in reported cases of damp or mould.
- 4.19. A 'See it, Report it' campaign is currently being developed and further enhances our already strong approach to damp and mould. This is an internal campaign aimed at staff to reiterate our messaging around the seriousness of damp and mould in tenants' homes and staff's responsibility when in tenants' homes to identify and report immediately any issues relating to damp or mould to ensure we respond timeously.
- 4.20. Damp and mould cases will continue to be monitored daily throughout the winter and resources adjusted accordingly to ensure we continue to meet our response timescales.

Infection prevention and control

- 4.21. Covid, flu and general infection control remains an important consideration in our planning through this winter. General Infection Prevention and Control Training remains available on MyAcademy for all staff. This promotes good infection, prevention, control procedures, donning on/off PPE, awareness of symptoms and signposting to national IPC Manual.
- 4.22. Coronavirus Awareness Training has been delivered extensively and whilst all social restrictions have been eased and the course outdated, the retention of knowledge remains current in reducing the risk of infection.
- 4.23. Working Safely with Covid Guidelines have been updated to reflect changes in Public Health Scotland Guidance and our guidance and Operating Safety Manual (OSM) reflect this. We continue to maintain 12 weeks of supply of relevant PPE, provide sanitiser and cleansing wipes in all areas of the business. We also have a stock of LFD for staff to use should they be symptomatic.
- 4.24. We have a flu vaccination programme available to all staff, who are currently being asked to book an appointment at one of our Centres of Excellence through October. Where staff do not book an appointment via this programme, we encourage them to utilise working time to access the vaccination through their GP or pharmacist, and they are able to claim any associated costs from our W.E. Benefit portal. This year the Covid vaccination programme (managed by Public Health Scotland) is targeted at over 65's, health and social care staff and those with health vulnerabilities. We will ensure staff who are eligible are supported to utilise working time to receive this vaccination.

- 4.25. Our well-established hybrid working allows for staff who may be unable to attend a Hub or be out in the community, the ability to be able to work from home. This supports the wider teams to continue to provide our key services to customers.
- 4.26. While our winter plan has been established, we will monitor the need to alter our approaches throughout the coming 6 months in response to changing need or circumstance.

5. Customer engagement

- 5.1. Customer engagement will take place through Housing Officer customer conversations in the community, or targeted contact as part of the rent or 'Here for You' campaigns.
- 5.2. Our Customer First Centre staff are fully aware of our winter planning approach, wider wraparound supports and how to support customers and arrange referrals where this would benefit the customer.
- 5.3. At the end of August, customer visits by housing staff have increased by 100% on last year, with over 69,000 visits carried out this year to the end of August.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

- 7.1. We communicate relevant winter planning information to customers through a range of face-to-face, telephony and digital methods including social media, bulk texting and emails.
- 7.2. All staff have access to handheld technology and can be contacted and have messages promptly disseminated should the need arise in any emergency event.
- 7.3. Business Continuity and Emergency Plans and protocols are retained digitally on SharePoint as well as hard copies with key personnel in the event of limited or no access to IT systems.

8. Financial and value for money implications

- 8.1. The activities set out in this report will be delivered from within existing partner organisation budget allocations and reflect what customers value.

9. Legal, regulatory and charitable implications

- 9.1. There are no legal, regulatory or charitable implications as a result of this paper.

10. Risk Appetite and assessment

- 10.1 The risk appetite in respect of delivering exceptional customer experience is 'open'. The primary risk in relation to winter-related incidents is a service failure as a result of an unplanned emergency situation. We mitigate this by having robust business continuity planning in place. This is augmented by additional winter planning which considers all relevant and current risks and proactively plans to mitigate against these.

11. Equalities implications

- 11.1. Equalities will be considered in the implementation of our winter resilience plan, particularly in terms of supporting those with health vulnerabilities, the over 65's and those experiencing socio-economic disadvantage as outlined in this report.

12. Key issues and conclusions

- 12.1. We have well-established approaches that have been deployed in previous years to address the operational business risks of the winter period across all business areas. Planning this year reflects current areas of risk including the ongoing cost of living crisis, our repair service response and the potential for staff shortage.
- 12.2. Winter planning is well underway in each business area and will be continuously monitored and reviewed as we progress throughout the winter months.

13. Recommendations

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

LIST OF APPENDICES:
None

Report

To: Wheatley Homes Glasgow Board

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

Approved by: Steven Henderson, Group Chief Executive

Subject: Equality, Diversity and Inclusion

Date of Meeting: 15 September 2023

1. Purpose

- 1.1 This report provides an update on Equality, Diversity and Inclusion (“EDI”) activity across the group and progress with our Group EDI action plan, *One Group, Many Voices*, supporting the implementation of our Group EDI and Human Rights policy.

2. Authorising and strategic context

- 2.1 Our strategy to 2026 sets out our desire to increasingly tailor services 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, the Group Board is responsible for approving group policies and their designation as applying Group-wide; the Group Board approved the EDI and Human Rights policy on 28 September 2022. We are responsible for applying these within our own business.
- 2.3 Given the importance of EDI to our business, the Wheatley Solutions Board has been tasked with monitoring the group-wide approach. Accordingly, EDI is a standing item on Wheatley Solutions' agenda.

3. Background

- 3.1 In November 2022, the Board received an update on our EDI activity underway and planned. This particularly focussed on equality data collection, considering the Scottish Housing Regulator’s requirement for each landlord to collect data on each of the protected characteristics from existing tenants, people on waiting lists, staff, applicants and governing body members.

- 3.2 Given the importance of this area, the Wheatley Solutions Board receives a quarterly update to monitor our progress against our Group EDI action plan (Appendix 1). The action plan was developed with input from our staff - including through our *Different Together* Community of Excellence ("CoE") - our trade unions and was reviewed externally by an inclusion advisor from Business in the Community (bitc).

4. Discussion

- 4.1. Our Group EDI action plan, *One Group Many Voices* sets out:
- how we will use and analyse equality data to better design, adapt, monitor and evaluate services, policies and processes;
 - the actions we take to promote a culture of EDI; and
 - the activities we undertake that directly improve EDI.
- 4.2 The action plan is focussed on 4 Equality Outcomes to help us achieve the ambitions within our Group EDI and Human Rights policy. Since approval of the action plan last year, we have made significant progress with many of the actions now being complete or ongoing as business as usual. Our focus over the next year will therefore be to build on our progress, focussing on embedding the structures and foundations now in place.
- 4.3 The following sections of this report provide an update on our EDI activity across WH Glasgow and the wider Group under each action plan Equality Outcome.

Equality Outcome 1: One Group, Many Voices

- 4.4 This section of the action plan focuses on the collection, secure storing, regular reporting, monitoring and analysis of the data collected to inform our decision-making and service delivery. For example we use equality data to inform our equality impact assessments (EIA), in order to assess the potential impacts of new/reviewed policies/services on protected characteristic groups, identifying any actions to mitigate against potential negative impacts and maximise any potential positive impacts. We have hugely expanded our equality data collection and monitoring over the last year. We now have equality data on the protected characteristics for the following groups:
- Customers – anonymous survey, circa 6.7k responses from our customers. Results reported to the Board in November 2022;
 - Prospective customers – MyHousing, our housing application platform;
 - Customer Voices – our customer engagement programme;
 - Employees – staff survey, circa 60% response rate;
 - Job applicants – JobTrain and Foundation employability programmes; and
 - Board members – upon appointment

- 4.5 For prospective customers, we collect equality data through our MyHousing allocation system and analyse and report this quarterly. In 2022/23 Q3/4 and 2023/24 Q1, we received over 6200 applicants in our areas. We have analysed this data and used this to help us make improvements. For example, our analysis showed that c.67% of applicants who have a disability also have a mental health condition. In response to this, we strengthened our signposting to resources available for mental health support on our MyHousing website, with the below resource link appearing at several sections on the site:

How we rent homes

Homes are advertised on the MyHousing website twice a week.

The [search for a home](#) section is updated every Tuesday and Friday at 8am.

It's easy to note an interest – and you have three days to do so from the day the home is advertised.

You can note interest in three homes in each advertising cycle. You should note interest in homes advertised in your priority [Band](#) which suits you and your household.

Priority is given to applicants who are in the same Band that the home was advertised for.

Once the closing date has passed, the home will be offered in the first instance to the applicant who has noted an interest and has been in the applicant band the longest.

Our 'Fast lets' – homes which are immediately available to all Bands – are added daily.

You can only note an interest in [one](#) Fast Let home in each advertising cycle.

[View 'Fast lets'](#)

Moving home, or applying for a home, can be stressful and have an impact on your mental wellbeing.

If you are struggling with your mental health, you can find out about the resources available to you by [clicking here](#).

- 4.6 We see a lot more diversity of applicants compared to our Group partners particularly for example, in terms of ethnicity. Since we expanded the MyHousing equality data collection, we can see that 9% of applicants are from an African ethnic background; this is compared to 6% of applicants for Loretto Housing areas and 7% of WH East applicants for non-Edinburgh areas. Comparing this to our customer equality data survey, only 4% of respondents were from an African background. Moreover since Q3 last year, of the 19% of non-UK nationals (1086 applicants); 73% were refugees, 19% were migrant workers and 7% were asylum seekers. In terms of sexual orientation c.6.4% of applicants identified as LGBT+ which is higher than the national average, estimated at around 4%.
- 4.7 In order to ensure applicants feel supported, we have reinforced our commitment to EDI on the MyHousing site. Our equality data is shared with the development teams to ensure that it is considered, along with other relevant information, as part of the mix of housing we design and build. The full set of this data is included in Appendix 2.
- 4.8 It should be noted that at this stage, we have focussed on the data we have collected. The results of the Scottish Census are due to be published in 2024. Once we have access to those then we will be able to carry out more detailed analysis on our communities and housing applicants relative to the broader population.

- 4.9 Quarterly analysis is now underway for EDI data collected through Wheatley Foundation employability projects, including the Way Ahead project in Glasgow. In quarter one of this year, there were 24 referrals involved in Way Ahead. Analysis of the equality data shows (for those who answered):
- a younger age profile, as we would expect for this project;
 - a significant increase in disability from 10% 22/23 Q4 to 50% 23/24 Q1. We expect this to be due to referrals coming through the Enable contract (detailed later in the report); and
 - The majority of disabilities declared relate to learning difficulty conditions.
- 4.10 We have expanded our data analysis from the Foundation to include customers supported by fuel advice, welfare benefits advice and EatWell. It is important we monitor access to these services to help us identify and then mitigate any potential barriers. We have also included equality data for applications for bursaries; in future this will also us to compare applicant data with those who are successful, with the intention of identifying and mitigating any barriers and equality of opportunity. Quarter one analysis of this data is attached at Appendix 2.
- 4.11 In addition, we collect equality data for our Wheatley Works programme (Changing Lives, Environmental Roots and Modern Apprenticeships) as these are key pathways into our organisation. Analysis of this is included within recruitment data monitored by our People Services team to help identify any potential barriers or underrepresented groups. For example, we have made recent improvements in our recruitment process such as providing applicants with a named contact and a menu of reasonable adjustments we can make. This makes the application process more accessible particularly for those with disabilities and neurodiversity.

Customer voices

- 4.12 We have a strong commitment to customer engagement which is reflected in our Customer Voice programme. To ensure our register of Customer Voices is as up to date as possible we invite Customer Voices to re-register each year. As part of this year's re-registration, we have been collecting equality data, with over 440 customers having provided this so far; our Stronger Voices Officers are following up with the remaining Customer Voices. Our Stronger Voices Community of Excellence ("CoE") considered the equalities information in April and our specialist Data and Information Analyst provided training to all of our Stronger Voices Officers on the interrogation of data and how to effectively use this to inform our local engagement plans in an inclusive and accessible way.
- 4.13 By way of example, and similar to our housing applicants, in recognition that c.61% of our Customer Voices who have disclosed themselves as disabled indicated they have a mental health condition, we held an event in celebration of mental health awareness week. This wellbeing drop-in was an opportunity for customers to have a chat and link in with local mental health services and local community groups. Furthermore, one of our Stronger Voices Officer attends an Ethnic Women's group that meets weekly; this has also led to some customers signing up to our Customer Voice programme. Events such as this help us promote and signpost the support we have available for customers. Our Customer Voice EDI data is included in Appendix 2, giving a comparison against our customer EDI survey results.

Staff

- 4.14 We undertook a staff diversity survey during 2022 which resulted in over 1700 (circa 60%) returns including over 570 returns from staff working in WH Glasgow. The results of our employee survey were shared with over 80 leaders at our Group-wide Leaders Forum in March, where our EDI and Human Rights policy was a 'spotlight' item. Our People Services team attended each of our management teams to present the data, tailored to what it means for that particular team. This also included an analysis of our recruitment data and an update on the actions we have put in place to diversify our pool of candidates.
- 4.15 Our *Different Together* CoE received the staff survey update at their meeting in April, feeding back on further initiatives we could explore to widen the diversity of our candidates. For example, through showcasing career opportunities in partnership with Wheatley community schools and colleges. Although we have made progress through refreshing our recruitment approach, with bitc confirming we are achieving best practice, we continue to work to make further improvements. Recruitment colleagues and our Race and Multicultural network group have recently engaged with Black Professional Scotland, who aim to empower Scotland-based black ethnic minority professionals with further employability skills, to explore how we could mutually support each other.
- 4.16 We are currently developing an annual equalities report that will include detail of all the data that has been collected in the last year, what this has informed, what actions have been put in place as a result and what benefits we have seen, or expect to see, as a result. The annual report will be published on our website and is an important element of increasing our transparency to customers and stakeholders.

Equality Outcome 2: Data and insight-driven decisions

- 4.17 Following the collection of data, we must effectively embed the use of this to supplement other customer insight and help drive our decisions. This is the focus of this section of the action plan and is particularly important in terms of engagement to ensure the customer voice is at the heart of our service delivery. To understand how our employee diversity reflects the communities we serve, we will undertake a mapping exercise against Scottish Census data. The recently published Scottish Census release schedule states that full data will not be available until 2024/25 so we will carry this action into next year.
- 4.18 Our engagement framework itself is designed to be flexible, offering different methods of being involved to maximise the diversity of those who can and do participate, such as in-person, online, neighbourhood walkabouts or panel events. Our Stronger Voices Officers work closely with our Customer Voices and can assist with accessing IT courses and support, language skills and other development opportunities to ensure accessibility to engaging with us. The Stronger Voices team is also working with our Academy and has developed a learning platform for Customer Voices, giving access to courses on topics such as employability, as well as fuel and money advice. This is currently in a pilot phase before full rollout.

- 4.19 Our framework is being reviewed and customer engagement to inform this and the accompanying EIA is underway. Across the Group, we held 8 focus groups in July/August which involved over 60 customers across Group, including 22 of our customers. These sought feedback on the following:
- Are there any new ways we might engage in future?
 - How do we make it easier for people to engage?
 - How can we listen better? and
 - Is there more we could do to keep you informed on how you are influencing decision-making?
- 4.20 Analysis of the feedback from the focus group is underway to inform the review and the EIA. Some feedback we have had in terms of the barriers customers face to engagement relate mainly to medical concerns, for example becoming unable to attend events due to hospital appointments. The EIA is therefore a key process to assess and evidence the inclusivity and diversity of our engagement approach. A working group of our Stronger Voices CoE is focussed on this currently. This will be presented to the Group Board along with the updated framework for approval in Q4.
- 4.21 A recent Shelter Scotland report¹ found that the occurrence and fear of racial harassment were common for people from minoritised ethnic communities living in social housing and recommended a more effective zero-tolerance approach against perpetrators of racial harassment. We were mentioned twice in the report as an example of good practice for (i) our use of Choice Based Letting and (ii) our anti-social behaviour framework and approach. Following the publication of this report, Shelter Scotland held workshops at the end of August to bring the sector together to define the key actions required to take forward the report's recommendations. Representatives from our Governance, MyHousing and Group Protection teams attended this workshop to bring back learning to inform our own Action Plan review.
- 4.22 Prior to the report publication, we had already begun to develop a Hate Crime policy, to further strengthen our already established Hate Crime approach and training; this is presented in a separate agenda item. As part of the development of this policy, we have used our Customer Voice EDI data to engage with ethnic minority groups ensuring the experience shapes our policy. We have also facilitated a women-only focus group to help increase participation from ethnic minority women.
- 4.23 Feedback from these groups was positive in regards to our approach and aims of the Hate Crime policy, feeling this will give a greater understanding of what a Hate Crime is and also encourage people to report when they have been a victim. Some mentioned poor experiences they had had with other housing associations and agencies, for example different treatment or stigmatisation, but all had encouraging comments about the support and experience with us. Insight from this engagement will also feed into the EIA for the Hate Crime policy. The policy lead, along with a number of other senior leaders and policy leads, attended an EIA masterclass in July to expand their knowledge and support their undertaking of the assessment (further detail at paragraph 4.40).

¹ Shelter Scotland: Minoritised ethnic groups' access to social housing in Scotland June 2023

- 4.24 To further enhance our use of community benefits offered by our suppliers we have engaged with providers such as our legal services providers to share business priorities, discuss market trends and importantly, ensure we utilise the added value offerings such as training. Recently, this included meeting with the senior Diversity and Inclusion Associate at one of our panel firms to share knowledge, experiences/barriers in the organisations' EDI journeys and expand our networks. Following this, representatives from our panel firm's EDI staff network groups attended our *Different Together* CoE in August to meet with our staff, sharing learning, challenges and best practice. We are also scoping other ways in which our legal providers can support our EDI objectives, for example through work experience programmes for our customers.
- 4.25 We have one action in this section of the Action Plan still to complete: *Benchmark Board diversity annually against sector data and report via RAAG Committee, with approach to diversity being extended to all partner Boards.* This will be undertaken in November, following the annual Board retirements, appointments/reappointments that take place in September.

Equality Outcome 3: Open to all

- 4.26 This outcome focuses on supportive services, in particular for refugees and access to housing; inclusive recruitment and induction; fostering an EDI culture and; ensuring our employee wellbeing benefits package is suitable for different needs.
- 4.27 We continue to show our commitment to supporting refugees, increasing plans to house Ukrainian refugees from 300 to more than 700 across the Group. To date, as a group we supported temporary accommodation and reported a total of 214 lets to local authorities in Edinburgh, Glasgow, Dumfries and Galloway, West Lothian and South Lanarkshire for Ukrainian families. 53 lets in Glasgow have now been flipped to permanent homes for the families. We will continue to flip the remaining properties leased during the course of this year to permanent homes. We continue to monitor and track the number of refugees housed, including capturing first/second languages.
- 4.28 We have developed a New Scots e-learning module; this training is aimed at frontline staff including housing, NETs and CFC to raise awareness on who is a 'New Scot' and how we support customers including through our New Scots welcome package and translations. This also includes a 'journey of a refugee' video to increase staff understanding about the particular barriers this group may face, as well as common queries we get and how to respond to these cases in terms of mental health/isolation, no recourse to public funds and family reunions. The training also covers safety and wellbeing issues particularly known to have an increased likelihood of being experienced by New Scots (e.g. domestic abuse, forced marriage, female genital mutilation, hate crime and human trafficking). Once this module is launched, all actions within this outcome are complete.

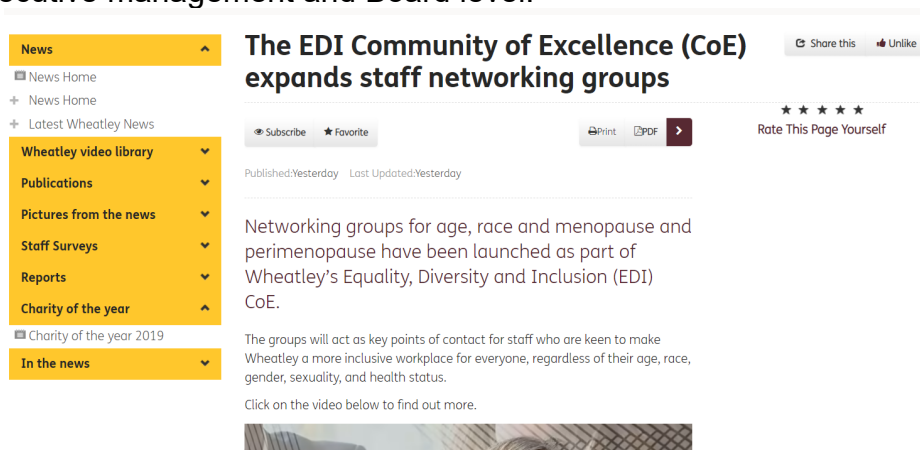
- 4.29 We want our employees to feel confident and have an understanding/awareness of EDI considerations/implications in order to appreciate the value and importance of taking an EDI approach in our work. We have refreshed our EDI training approach to enhance and complement the mandatory e-learning modules currently available for staff by working with bitc to deliver in-person, in-depth Inclusion Champion sessions. To date, all People Services staff and all members of the CoE have attended sessions. In enhancing our EDI organisational culture, bitc have also delivered an Inclusive Leadership training programme which has seen **over 250** people managers across the group receive face-to-face training, equipping them with the skills and knowledge to manage in an EDI positive way. We also held a bespoke session for trade union representatives, which 22 representatives attended. Overall, participants agreed that they felt better informed on the topics covered and on average, rated the sessions as 9.68 out of 10. When asked how the training could be improved, feedback included:

‘Thought the session was great. Would like refreshers every 6 or 12 months.’

‘Perhaps some scenario-based discussions would be good. It was great and like how it was tailored to Wheatley.’

- 4.30 In utilising our bitc membership, we are taking part in a Skills Exchange programme with Glasgow Caledonian University to engage and inspire future leaders; this involves welcoming a Masters Student in Climate Justice to write their dissertation project on Sustainable Housing, drawing on the expertise of our Sustainability team. In addition, our Group Chief Executive has joined the bitc Scotland Leadership Board. This brings together the knowledge, skills and connections of senior-level professionals to provide strategic guidance and support to bitc’s commitment ‘changing business, transforming lives and helping the planet and communities thrive.’
- 4.31 To better disseminate bitc resources to staff internally, we have added their events and webinars to our EDI learning suite so staff can self-serve. In addition to bitc, we also engaged with specialists to celebrate Neurodiversity Week; we held in-person and online events for staff, supported by our Disability and Neurodiversity network group, with approximately 80 colleagues participating in this. This included Supporting Neurodiversity in the Workplace webinars delivered by Lexxic, a specialist psychological consultancy. Following this celebration week, two staff disclosed a disability to their manager which they had previously kept private. This is strong evidence that helps demonstrate how we support and empower staff with differing needs.
- 4.32 Our recruitment team has been working more closely with our Stronger Voices team to attend events, outreach to communities and encourage underrepresented groups to apply for jobs with us, for example at a recent East End Homes Community event. We have also utilised the Customer First Centre welcome message to highlight recruitment opportunities and distributed leaflets/posters within our multi-storey sites to encourage customers to apply for roles in environmental teams. To further encourage underrepresented groups to apply with us, a review of our careers and attraction pages is underway for all our websites to rebrand this under *Different Together*, promote EDI campaign information and highlight examples of current staff diversity.

- 4.33 We have seen success recently following the improvements to our recruitment process, particularly following the review from our neurodiverse and disability group. For instance, in a recent NETs recruitment campaign, we provided applicants with themes in advance of the interview. We also had a candidate disclose their neurodiversity and request additional support after seeing our Different Together campaign. The candidate received 1-2-1 interview skills training which included a mock interview and following this the candidate was successful. Whilst this is only one individual it is evidence that our public messaging can make a difference.
- 4.34 We have also launched a new Interview and Selection Skills training module, which is mandatory for hiring managers and has a 3 year re-certification cycle. This module is designed to prepare managers for the recruitment process, reduce the likelihood of any bias and ensure the experience is a positive one for applicants and interviewees. In launching this training, we have also promoted recommended good practice on setting up diverse interview panels and our updated Unconscious Bias e-learning.
- 4.35 Communicating both internally to staff and publicly to our customers and stakeholders helps not only inform but sends a strong message of our commitment to EDI. We continue to have weekly EDI content shared on WE Connect and regularly feature in our Group CEO's weekly video message. Working with our CoE members developed a Statement of Commitment; this was signed by our Group CEO and Group Chair, who have both attended a *Different Together* CoE meeting. This is published on our websites and follows best practice as a short, formal articulation that clearly demonstrates to our customers and employees (both prospective and current), and any other stakeholder our organisational values, expectations and goals when it comes to EDI. We define what EDI means for us, why this is important to us and how we plan to include EDI within our organisation. The Statement was reviewed externally by enei also. All this sends a strong signal to staff that our leaders are championing inclusion and provides assurance that EDI is a focus at both executive management and Board level.



The screenshot shows a news article on a website. On the left is a yellow sidebar menu with links: News, News Home, Latest Wheatley News, Wheatley video library, Publications, Pictures from the news, Staff Surveys, Reports, Charity of the year, Charity of the year 2019, and In the news. The main article title is 'The EDI Community of Excellence (CoE) expands staff networking groups'. Below the title are buttons for 'Subscribe', 'Favorite', 'Print', and 'PDF'. The article text states: 'Networking groups for age, race and menopause and perimenopause have been launched as part of Wheatley's Equality, Diversity and Inclusion (EDI) CoE. The groups will act as key points of contact for staff who are keen to make Wheatley a more inclusive workplace for everyone, regardless of their age, race, gender, sexuality, and health status. Click on the video below to find out more.' Below the text is a video player showing a group of people.

4.36 We now have six staff EDI networks, all sponsored by a senior executive. These groups continue to make progress, for instance:

- Our race and multicultural group met Kaleidoscope, a cultural diversity network from L& Q Housing Group, to learn from the successes the group has had at L & Q. The group is also leading on singing up to BITC's Race at Work Charter and will attend a BITC Race at Work Charter in September, in preparation for an internal campaign to celebrate Black History Month;
- Following feedback from the Carers Network we have enhanced our paid carers leave to a minimum of 6 days leave and promoted this across the organisation as part of Carers Week;
- Perimenopause and menopausal group are working on menopause guidance to support staff and managers – to be launched this month; and
- LGBT+ had a successful Pride campaign attending events in Glasgow (see images below) and gained interest from allies to support the Group.




Inclusiveness by design

- 4.37 The final Equality Outcome focuses on embedding our EDI culture within policies, services, communication, training and benchmarking. We are awaiting the outcome of our submission for our Employers Network for Equality and Inclusion Talent Inclusion and Diversity Evaluation (“TIDE”). Last year we were accredited Bronze so this self-assessment will provide us with a measurable impact of all our recent EDI progress. We have made significant progress since our last self-assessment and hope to see this reflected in our results.
- 4.38 Publicly, ensuring our websites are welcoming and representative of our communities is important. We reviewed and rebranded the equality sections of our websites under our *Different Together* brand. The imagery used follows feedback from customers that this was their preference and felt the most inclusive of different customer groups.

Equality, diversity and inclusion


Our customers come from all walks of life. But one thing is always the same – everyone is valued and gets fair treatment.



Wheatley Group is committed to the principles of Equality, Diversity and Inclusion (EDI); this goes to the heart of the common values shared by the Group. For us, this means:


- ▶ **equality** - people with different characteristics are treated fairly and have access to equal opportunities
- ▶ **diversity** - respecting and valuing individual differences and unique characteristics, both in our organisation and in our communities
- ▶ **inclusion** - making sure our employees and customers feel comfortable being themselves and that they feel valued, respected and heard

Latest news



Wheatley staff help tenants with millions of pounds of support

Wheatley Group has helped tenants across Scotland access almost £9 million in benefits and financial support.



- 4.39 The Wheatley Foundation continues to deliver projects which improve access to education, employment opportunities as well as social and community activities. The Wheatley Works team has been working with partners in our communities to reach more diverse groups and improve access to our projects. This has included CEMVO Scotland, a strategic partner of the Scottish Government Equality Unit and Enable Scotland, an organisation that support people who have a learning disability. Our new partnership employability contract also launched in Q1 which aims to support disabled parents with children under 5 to begin to prepare for work in the future. This project will be delivered in partnership with Enable, Parents in Trauma and One Parent Families.
- 4.40 The 2023/24 Bursaries programme launched in Q1 this year providing 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. This year, we received 83 applicants from our customers and 35 were successful in receiving a bursary.

- 4.41 To further strengthen our EIA approach, bitc delivered an in-person masterclass to 15 key policy and service leads from across the business including Care, Business Improvement, Group Protection, MyHousing and People Services. The session focussed on:
- Understanding why EIAs are important and their benefits;
 - Understanding best practice for conducting an EIA, what processes to go through and which stakeholders to engage; and
 - Increasing knowledge of the Group's approach to EIAs
- 4.42 Feedback from the session was positive with 80% of participants indicating they felt better informed, and in particular felt going through an example EIA on a Group policy was beneficial. For ongoing support and development, we will hold internal EIA sessions as required to help leads in conducting the assessments. This will supplement our comprehensive guidance and training.
- 4.43 To support our staff EDI learning going forward, we have considered proposals and appointed Diversity Scotland to deliver a 'train the trainer' approach. This will allow 8 of our in-house MyAcademy trainers to deliver in-person EDI training to staff with a view to all staff having received this by December 2024. This will then form part of the induction process for all new employees.
- 4.44 Through this training programme, we will also have access to licensed Diversity Scotland resources such as e-learning modules. The founder and CEO of Diversity Scotland attended the Different Together CoE in June, and members of the CoE will also pilot the training giving us an opportunity to feedback and influence the delivery going forward.
- 4.45 Informed by the results of our staff and customer equality survey, we have developed and published an EDI calendar (both a staff and customer-facing version). This has been designed to support staff and promote EDI-friendly interactions with customers and colleagues by detailing important celebration and awareness days. This has been published on our intranet and EDI section of our websites. The calendar is also being used by the Stronger Voices team when planning engagement events- this is attached at Appendix 3.
- 4.46 Finally, we have strengthened equalities within our procurement by adding the existence of an EDI policy as a desirable requirement within our own Procurement policy, approved by the Wheatley Solutions Board in February 2022. By having this as a desirable, this helps ensure small businesses who may not have a policy are not penalised whilst still demonstrating the importance to us.

5. Customer Engagement

- 5.1 The collection of equalities data required extensive customer engagement as we were required to ask all waiting list applicants, new tenants and existing tenants for protected characteristic data.
- 5.2 We co-created our approach towards this with customers through focus groups as it was critical that as part of asking for this information, we were clear on why we were collecting it, what we will do with it and that provision of this information was voluntary and anonymous. By involving customers in the design of our approach, we believe this has supported a higher response rate.

- 5.3 This data, as detailed above and within our EDI action plan, is used within our service design and delivery- this includes informing our engagement approach which we are currently reviewing. Our EDI approach is a key influence in the review.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

- 7.1 We have developed digital platforms to allow for easier analysis and utilising of our customer equality data, for example through the use of PowerBI.

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 The progress made and highlighted in the report, as well as our reviewed EDI and Human Rights policy, 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 approach for governance is “cautious”. This level of risk tolerance is defined as a “preference for safe delivery options that have a low degree of inherent risk and have only limited potential for reward”. This reflects our risk appetite in relation to laws and regulations, which is “averse”, with the avoidance of risk and uncertainty is a key organisational objective and a priority for tight management controls and oversight.
- 10.2 To mitigate this we engage independent external advice as part of developing an approach to demonstrate and evidence how we meet our equalities regulatory obligations.

11. Equalities implications

- 11.1 The report outlines the recent progress that has been made with our EDI agenda, particularly against the actions contained within our Group EDI action plan. These actions will support us to assess equality implications more clearly in our decision-making.

12. Key issues and conclusions

- 12.1 As a Group we are strongly committed to EDI. This is demonstrated through our action plan and the oversight of our EDI being a formal responsibility of our corporate services provider, the Wheatley Solutions Board.

- 12.2 Since our action plan was agreed in November last year, we have made significant progress with most actions now being complete or ongoing as business as usual. We have significantly improved in a number of areas, in particular our data collection, data monitoring and analysis, and taking decisions based on the data and analysis.
- 12.3 We are now in the development phase of the next iteration of our action plan, which will build on our success to date and also factor in the result of our TIDE assessment and information for the national census as it emerges.

13. Recommendations

- 13.1 The Board is asked to note the progress on our Equality, Diversity and Inclusion activity across the Group.

LIST OF APPENDICES:

All appendices redacted, available [here](#)

Report

To: Wheatley Homes Glasgow Board

By: Laura Pluck, Group Director of Communities

Approved by: Steven Henderson, Group Chief Executive

Subject: Hate Crime Policy

Date of Meeting: 15 September 2023

1. Purpose

- 1.1 The purpose of this report is to provide the Board with an overview of the newly designed Group Hate Crime Policy and seek comments from the Board in advance of the document being presented to the Group Board for approval.

2. Authorising and strategic context

- 2.1 Under the Group Standing Orders, the Board is responsible for overseeing the implementation of relevant Group policies and framework. The Hate Crime Policy will be a group-wide policy and feedback is being sought from us, prior to this being presented to the Group Board for approval.
- 2.2 The Hate Crime Policy aligns to our strategic theme, *Changing Lives and Communities* and our strategic outcome of *developing peaceful and connected neighbourhoods*.

3. Background

- 3.1 Hate crime is an issue affecting communities across Scotland and is particularly harmful given the nature of the offending relates to targeting a person, group, or a community based on who they are, how they look, or how they choose to live. If left unchallenged it can create division and leave people feeling isolated and unwelcome within communities, which is in direct contrast to the type of neighbourhoods we want our customers to live in.
- 3.2 In our strategy we outline that we want our customers to feel safe and secure and the neighbourhood they live in to be peaceful, vibrant, and somewhere people look out for each other. The existence of hate crime within our communities is a clear barrier to achieving this, therefore the creation of a Hate Crime Policy will help mitigate against this by raising awareness and detailing how we will approach this as an organisation.

- 3.3 Hate crime is defined by Police Scotland as “**any crime which is perceived by the victim or any other person to be motivated (wholly or partly) by malice and ill will towards a social group**”. Essentially it is a criminal offence where there was a motivation of hostility or prejudice based on one of five protected characteristics:
- Race;
 - Religion;
 - Sexual Orientation;
 - Disability; and
 - Transgender identity
- 3.4 The Hate Crime & Public Order (Scotland) Act 2021 extends the protected characteristics to include:
- Hostility or prejudice based on age; and
 - Updated definition of transgender identity, where it now includes a separate provision for ‘variations in sex characteristics’ as a protected characteristic
- 3.5 This legislation has still to be implemented but is expected to come into force in early 2024.
- 3.6 People with shared characteristics can experience hate crime differently and this can be magnified for them (e.g. sexual orientation and race). In Scotland the level of hate crime has shown a stable picture since 2014-2015, where between 6,300 and 7,000 crimes are reported each year. During 2021-2022 there were 6,927 hate crimes reported. It is widely recognised that underreporting is a key factor when it comes to analysing levels of hate crime and is a widely known issue when it comes to this type of crime.
- 3.7 The Scottish Government and Police Scotland recently launched the Hate Crime Strategy for Scotland in March 2023, which outlines their vision **for a Scotland where everyone lives free from hatred and prejudice**. To achieve this vision, they have set out 3 clear aims and 14 supporting commitments, where working collaboratively with partners and stakeholders is essential to take this work forward. The strategy is underpinned by the development of a delivery plan that will set out the immediate and medium-longer terms priorities.
- 3.8 Hate crime is dealt with under our antisocial behaviour (ASB) framework when reported by our customers. It is dealt with under our most serious categorisation of offence – Category A – and assigned to the caseload of the antisocial behaviour intervention and prevention officers (ASBIP) within the Community Improvement Partnership (CIP) to deal with. This demonstrates the seriousness afforded to hate crime given the nature of this and the impact it has on individuals and wider communities.
- 3.9 During 2022/2023 there were 123 cases of hate crime recorded within Wheatley Homes Glasgow and dealt with by the ASBIP officers, which comprised:
- 75 Race related incidents;
 - 29 Religious related incidents;
 - 13 Sexual Orientation related incidents; and
 - 6 Disability related incidents.

- 3.10 There were no incidents reported related to transgender identity during 2022/2023. Given that we know hate crime is vastly underreported, the true picture is likely to be much higher than that reported above.
- 3.11 Early intervention and prevention activity are key to targeting and tackling hate crime and it is important we work in partnership with agencies and organisations to help build confidence and trust for those impacted to report this. Our Hate Crime Policy will be a tool to support this, where we will raise awareness and understanding of the crime with staff and customers to outline the process to report and support available.

4. Discussion

- 4.1 As an RSL we have a responsibility to work in partnership with other agencies and help ensure as far as reasonably possible that tenants and other customers live in well-maintained neighbourhoods where they feel safe. We report on our anti-social behaviour performance through our Annual Return on the Charter. Hate crime is a form of anti-social behaviour. We developed a policy to support staff awareness around hate crime and to ensure they hold the correct knowledge, skills and understanding to recognise and respond to this.
- 4.2 Hate crime has a significant impact on communities and is in direct contrast to our approach towards neighbourhoods as outlined within our Group strategy. Hate crime creates fear, isolation and mistrust and it is essential this is tackled robustly and appropriately to foster communities where everyone feels safe and included.
- 4.3 Our role is to raise awareness of the existence and prevalence of hate crime, encourage increased reporting, and utilising the policies, resources, and powers at our disposal, to tackle it and support those impacted.
- 4.4 Reporting is a crucial element and the policy outlines how to report hate crime, the process, reasons why some people don't feel confident reporting and alternatives to reporting directly to Police Scotland including via Crimestoppers or the Third-Party Reporting mechanism.
- 4.5 The process for dealing with hate crimes reported to us is covered extensively in the policy document and includes the types of preventative measures we utilise to support victims and perpetrators and the more enforcement-based approaches we can use as an RSL to deal with the exhibited behaviours and conduct where necessary.
- 4.6 The document covers essential areas important to enhance the understanding of hate crime, including the picture of hate crime within Scotland, the legislation, the definition, types of hate crime and the importance of perception. Perception is a key element for victims and witnesses, where if it is believed the incident was motivated by hate or prejudice, then this would be determined to be a hate crime.

- 4.7 It is important that our staff are confident in dealing with hate crime and that they are informed and educated to be able to provide the correct level of support that our customers require. The policy will help with this. It will be launched across Group and particular attention will be paid through the implementation plan to bringing the policy to staff in frontline roles where they routinely interact with customers, such as our Housing Officers. We will utilise communication mechanisms to ensure maximum reach to all staff across Group including WE Connect, Talk Together and the Wheatley Leaders Forum.
- 4.8 The policy is supported by our hate crime e-learning module, which was co-written between Wheatley Group and Police Scotland and covers hate crime from both a police and housing perspective. The policy will sit alongside our Protecting People Policy Framework, along with our recently launched Suicide Prevention Framework.
- 4.9 The policy was written taking account of the Scottish Government and Police Scotland Hate Crime Strategy for Scotland, to ensure it was in line with the aims and commitments outlined therein. It is clear within this strategy that hate crime is no single organisation's responsibility; it is everyone's responsibility within society to ensure that it is not tolerated.

5. Customer Engagement

- 5.1 Two focus groups were arranged with some of our New Scots customers, where consultation was held on the Hate Crime Policy. One group was mixed and the other a female-only group. The policy was well received by our customers, and they were very pleased to see that we had one and felt supported by this. Some comments included:

"This is a step in the right direction".

"Good that you have policy and can see what action is being taken, how this will be done and also about support for the victims".

- 5.2 The policy was issued for consultation to internal staff through the Protecting People and Communities CoE, which includes colleagues from across the business such as health and safety, legal, employee relations, care, and frontline housing. It was also circulated to the LGBTQ+ and Disability & Neurodiversity staff networking groups from the Different Together CoE, where again feedback was positive, and the policy described as *"very in depth and informative"*.
- 5.3 In terms of external partners, the policy was shared with our colleagues at Police Scotland within the CIP for comment, as well as with the Glasgow City Council Hate Crime Policy Officer. The Hate Crime Policy Officer described the policy as being *"extremely strong with things in here that would be considered as best practice"*. All comments were considered and incorporated into the policy, which on the main centred around clarity and precision of language.

6. Environmental and sustainability implications

- 6.1 Development and implementation of the Hate Crime Policy meets three of the UN Sustainable Development Goals, which include:
- Goal 3: Good health and wellbeing;
 - Goal 10: Reduced inequalities; and
 - Goal 16: Peace, Justice, and Strong Institutions
- 6.2 Embedding the policy within our Group Policy Framework means we're able to demonstrate our commitment to creating thriving neighbourhoods where all customers feel:
- Integrated;
 - Safe; and
 - Proud to be part of the community

7. Digital transformation alignment

- 7.1 The policy will be available digitally for staff to access from our Group Policy Hub on W.E. Connect and be available for our customers via the Wheatley Homes Glasgow website.
- 7.2 In terms of implementation of the policy and rollout across Group, digital methods of communication will be utilised to raise awareness of the policy (W.E. Connect and Talk Together) and online methods for overview sessions with staff teams (MS Teams).

8. Financial and value for money implications

- 8.1 There are no financial implications as a result of adoption of the Hate Crime Policy.
- 8.2 In terms of value for money, the policy will help raise awareness and understanding of hate crime for our staff, therefore ensuring we deal with this appropriately to achieve positive outcomes for victims. This should therefore have the potential to support tenancy sustainment for any customers impacted within our communities.

9. Legal, regulatory and charitable implications

- 9.1 The policy has been written by taking cognisance of current hate crime legislation, whilst making reference to the fact that new legislation in the form of the Hate Crime & Public Order (Scotland) Act 2021 has been passed into law, however, has yet to be implemented. The policy will be reviewed once the legislation is implemented, which at this time is expected to be in early 2024.
- 9.2 Our legal team has reviewed the policy and provided comments that have been fully incorporated within the final version.

- 9.3 As a RSL there is a regulatory requirement to report on antisocial behaviour through the annual return of the Scottish Social Housing Charter. Hate crime is defined as the highest category of antisocial behaviour (ASB) within our ASB framework. Implementation of the Hate Crime Policy will help support our compliance with this, given improved awareness of hate crime for our staff.

10. Risk Appetite and assessment

- 10.1 The Hate Crime Policy supports our ambitions within our strategic themes of Changing Lives and Communities, Developing our Shared Capability and Enabling our Ambitions. Our risk appetite in relation to operational delivery for these themes ranges from open to hungry.
- 10.2 This means that innovation is supported where we seek to explore new working practices that offer high business reward for staff and customers. The creation of the Hate Crime policy is consistent with these risk appetites.
- 10.3 The risk to the organisation for non-development of the policy could be:
- Increased hate crimes occurring within our communities which we remain unaware of to be able to appropriately support our customers;
 - Customers continuing to be unaware they've been victims of hate crime given lack of understanding;
 - Uneducated workforce who are unable to respond to the needs of our customers;
 - Reputationally, it puts us behind other similar organisations who are actively involved in raising awareness of hate crime and educating their staff in this area; and
 - Less awareness of how much of an issue hate crime is for us, without a clear ambition to capture and analyse this data.

11. Equalities implications

- 11.1 Equality and diversity are at the heart of the Hate Crime Policy, as the aim outlined is *"to work with customers, staff, and partners to develop peaceful and connected neighbourhoods and make homes and lives better for all. We will design and deliver services to minimise the risk of harm, abuse and prejudice within our communities and engage with customers and stakeholders to ensure their opinions and experiences feature throughout"*.
- 11.2 Tackling hate crime is key to building stronger and more thriving neighbourhoods, where our customers feel safe, included, and valued. The policy helps to achieve this and will be utilised to raise awareness of hate crime to support with early intervention and prevention activity. Alongside our ASB Framework, it sets out how we will deal with reports of hate crime and the seriousness around which it is considered, making clear to anyone involved in this type of conduct the action that will be taken.
- 11.3 An Equality Impact Assessment (EIA) has been completed on the policy. It is of note that the policy addresses a number of the characteristics identified within the EIA given the alignment of the protected characteristics covered by hate crime legislation. A copy of the EIA is attached at Appendix 2.

12. Key issues and conclusions

- 12.1 Hate crime is an issue affecting all communities across Scotland and has a particularly adverse effect on those impacted by it given the nature of the crime is to target individuals for their personal characteristics including who they are, how they look and how they choose to live their life.
- 12.2 Our Group Strategy sets out that we want our customers to feel safe and secure and live in thriving and peaceful neighbourhoods. Hate crime is a clear obstacle to achieving this vision and something that must be tackled accordingly.
- 12.3 The Scottish Government and Police Scotland launched the Hate Crime Strategy for Scotland in March 2023, which outlines that all agencies must work together to tackle hate crime as no one agency can do this alone. The vision for this strategy is **for a Scotland where everyone lives free from hatred and prejudice**. A corresponding delivery plan is in development to support achievement of the stated 3 aims and 14 commitments set out within the strategy.
- 12.4 Our Hate Crime Policy has been established to set out our approach towards tackling hate crime within our communities and what support we have in place to deal with this. It outlines the picture of hate crime in Scotland, the legal context, how to report hate crimes (including third-party reporting), as well as all support services in place for those affected.
- 12.5 Extensive engagement has taken place with staff, customers, and external partners to ensure the policy is accurate, relevant, and fit for purpose. All feedback received was positive around the existence of such a policy and incorporated into the final version.

13. Recommendations

- 13.1 The Board is asked to note and comment on the Group Hate Crime Policy prior to it being presented to the Wheatley Group Board for approval.

LIST OF APPENDICES:

Appendix 1: Group Hate Crime Policy [redacted] available [here](#)

Appendix 2: Equality Impact Assessment

Name of policy: Group Hate Crime Policy

1. Introduction

Lead Officer	Anne Marie Kite, Group Protection Liaison Manager
Others involved in the assessment	Morgan English, Governance Project and Policy Lead
Date(s) of assessment	July 2023

2. Description of policy/strategy/project

Background	<p>Hate crime is an issue affecting communities across Scotland and is particularly harmful given the nature of the offending relates to targeting a person, group, or a community based on who they are, how they look, or how they choose to live. According to the Crown Office & Procurator Fiscal Service on Hate Crime in Scotland 2022-23, there were a total of 5,738 charges reported containing at least one element of hate crime. If left unchallenged it can create division and leave people feeling isolated and unwelcome within communities, which is in direct contrast to the type of neighbourhoods we want our customers to live in.</p> <p>In our strategy we outline that we want our customers to feel safe and secure and the neighbourhood they live in to be peaceful, vibrant, and somewhere people look out for each other. The existence of hate crime within our communities is a clear barrier to achieving this, therefore the creation of a Group Hate Crime Policy will help mitigate against this by raising awareness and detailing how we will approach this as an organisation. The Wheatley Group promotes equality and champions diversity across all areas of our operation and service delivery and we firmly maintain that every individual should be respected, valued, and included within society.</p>
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	<p>Hate crime is defined by Police Scotland as “any crime which is perceived by the victim or any other person to be motivated (wholly or partly) by malice and ill will towards a social group”. Essentially it is any criminal offence where there was a motivation of hostility or prejudice based on one of five protected characteristics:</p> <ul style="list-style-type: none"> ▪ Race; ▪ Religion; ▪ Sexual Orientation; ▪ Disability; ▪ Transgender identity. <p>Our principal aim will be to work with customers, staff, and partners to develop peaceful and connected neighbourhoods and make homes and lives better for all. We will design and deliver services to minimise the risk of harm, abuse and prejudice within our communities and engage with customers and stakeholders to ensure their opinions and experiences feature throughout.</p>
<p>Purpose and outcomes</p>	<p>The Group Hate Crime Policy outlines our commitments to making communities safer and we will achieve our aim by successfully implementing the following objectives across all subsidiaries:</p> <ul style="list-style-type: none"> ▪ We will ensure our policies and operational resources are fit for purpose and meet the needs of our customers and staff. We will develop an action plan committing to support our customers experiencing hate crime. They will reflect and take account of the wider National hate crime strategic and legislative activity and picture; ▪ We will support those affected by hate crime and treat them with respect; where the circumstances will be investigated professionally and thoroughly under our Unacceptable Actions Policy (for incidents perpetrated against staff) and our Antisocial Behaviour (ASB) Framework (for incidents perpetrated against customers); ▪ We will work in partnership with external agencies and organisations, including Police Scotland who have a duty to investigate hate crimes and Incidents; ▪ We will provide support to those affected (both staff and customers) and proactively work to develop and maintain relationships and partnerships with external organisations working with victims of hate crime;

	<ul style="list-style-type: none"> ▪ We will embed a culture of early intervention; working closely with frontline officers and other staff groups, and will respond quickly to any signs of marginalisation of our customers; ▪ We will raise awareness of hate crime and ensure staff are responsive to this in an educated and sensitive manner and equipped to support those impacted; ▪ We will encourage the increase of hate crime reporting by building resilience in our customers and supporting them to have the confidence to do so. A key element of delivering on this objective will be promoting awareness and education at every opportunity; ▪ We will ensure all reports of hate crime are taken seriously by the Group and investigated thoroughly through our ASB reporting processes and Unacceptable Actions Policy; ▪ We will use our ASB Framework and bespoke Toolkit to support staff in maintaining a consistent approach in tackling hate crime within our communities.
<p>Link to Wheatley Group Strategic themes and outcomes</p>	<p>The strategic themes that the framework links to from our Group 2021-2026 strategy Your Home, Your Community, Your Future are:</p> <p><u>Changing Lives and Communities:</u></p> <p>It contributes to delivery of the strategic outcome of developing peaceful and connected neighbourhoods. We want our customers to feel a sense of belonging and neighbourliness, where they feel connected and integrated within the community. Our confidence cycle within the Community Improvement Partnership (CIP) will help improve customers resilience and confidence to report crimes and in turn help create communities that are peaceful and thriving.</p> <p><u>Developing our Shared Capability:</u></p> <p>It contributes to delivery of the strategic outcome of W.E Work – strengthening the skills and agility of our staff. Upskilling our staff to be confident in recognising and responding to hate crime is a key ambition of the policy. This will empower them to be responsive to our customers' needs and help build trust and confidence in our ability to support them effectively should they become a victim of hate crime.</p>

Enabling our Ambitions:

In particular, the policy supports achievement of the outcome of 'influencing locally and nationally to benefit our customers'. The policy demonstrates our commitment to tackling hate crime within our communities and the strong approach taken. We are well placed to be engaged in local and national conversations in relation to hate crime given our development of strategic partnerships.

3. Key data sets

The following data sets have been used in the assessment of this framework. Data has been sourced from the **Scottish Census 2011** ([Welcome to Scotland's Census | Scotland's Census \(scotlandscensus.gov.uk\)](https://www.scotlandscensus.gov.uk/)) and other relevant sources to provide a benchmark from which impacts can be identified and measured.

Protected Characteristics; Equality Act 2010	Key statistics – Scotland Total population – 5,460,000 (2019- Housing and homelessness statistics - Shelter Scotland) Group customer equality data collection 2022 -
Age	<p>Scottish Census population:</p> <p>U15 = 16%</p> <p>15-39 = 32%</p> <p>40-64 = 35%</p> <p>65+ = 17%</p> <p>Group: 44% of respondents were 65+</p>
Disability	<p>30% of Scottish population have a long term disability</p> <p>45% of respondents to the Group equality data were disabled, with long-term illness being the biggest category of disability.</p>
Trans/ gender reassignment	Projected 1% of the Scottish population are trans. 1.68% of respondents to the Group customer equality data were trans.

Marriage and civil partnership	<p>From 2011 Scottish Census:</p> <p>672,066 single; 986,763 married; 3,512 in same-sex civil partnership; 119,400 separated (but still legally married or in civil partnership); 294,042 divorced or legally dissolved civil partnership; 296,994 widowed or surviving partner in civil partnership</p> <p>From our Group equality data collection:</p> <p>3.74% of customers were in a civil partnership and 23% were married.</p>
Pregnancy/maternity	<p>2019 - 49,863 births in Scotland (Births in Scotland National Records of Scotland (nrscotland.gov.uk)) Higher rate of teenage pregnancy than most other western European countries; target for Scottish government to reduce unintended pregnancies. Teenage pregnancy in deprived areas more than treble compared to those living in less social deprivation.</p> <p>From our equality data collection for customers, as a Group we know 97.6% currently are not pregnant and 97% have not taken maternity/paternity leave in the last year.</p>
Race	<p>Ethnic minority groups represent 4% of the Scottish population</p> <p>Of which 3% are Asian and 1.2% are white Polish (concentrated in Aberdeen and Edinburgh).</p> <p>Edinburgh and Aberdeen have 8% culturally and ethnically diverse communities and Dundee has 6%.</p> <p>From Demographics Profile 2021 (hscp.scot): Glasgow has projections of 16% ethnically and culturally diverse communities.</p> <p>From our Group customer data collection, 73% of respondents were white Scottish; 11% white British; 3% African, 1.4% Polish, 1.1% Asian</p>
Religion or Belief	<p>2011 Census: 54% Christian, 37% had no religion, 1.4% Muslim, 0.7% were Buddhist, Hindu or Sikh, 0.1% Jewish, 0.3% other religion, (6.7% religion not stated).</p> <p>2022 Group data collection: 37% Church of Scotland; 23% Roman Catholic; 19% no specific belief; 7% other Christian; 4% Muslim</p>
Sex	<p>Total Population size in 2019 (Housing and homelessness statistics - Shelter Scotland) was 5,460,000 people (48.5% male and 51.5% female)</p>

Equality Impact Assessment (EIA)

	Group data collection: 45% male, 53% female
Sexual orientation	2011 Census: 5% - 7% identify as LGBTQ+ 2022 customer data collection: 6% identify as LGBTQ+

In Scotland, there is the characteristic of:

Socio-economic disadvantage	Scottish Index of Multiple Deprivation - http://www.gov.scot/Topics/Statistics/SIMD
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4. Identified impact on protected characteristics

Think about the impact the policy/practice will have on **eliminating discrimination, promoting equality of opportunity, and fostering good relations between different groups**. Also consider whether there is **potential for discrimination**.

Protected characteristic	What do we know about this group in the context of this strategy? ¹	What is the potential impact (positive, neutral and negative) on people who share the characteristic? (Red = negative. Amber = neutral. Green = positive impact)	What could we do to reduce any negative impacts, maximise positive impacts and ensure quality information? What further evidence should we collect?
Age	<p>Age is not currently a protected characteristic included in the definition of what a hate crime is so there is no recorded data available. The Hate Crime and Public Order (Scotland) Act 2021 is new legislation which was passed by the Scottish Parliament on 11 March 2021 and it received Royal Assent on 23 April 2021. No commencement date has been confirmed for the provisions within the Act and therefore all existing hate crime legislation remains in force.</p> <p>The Act seeks to modernise, consolidate and extend hate crime legislation in Scotland. The Act will add two new groups to the list of protected characteristics currently covered by hate crime legislation: Age and Variations in Sex Characteristics. All the aggravations will operate in the same way as those currently in existence.</p>	(Red = negative. Amber = neutral. Green = positive impact)	<p>We will raise awareness and understanding of hate crime with staff and customers to outline the process to report and support available.</p> <p>We will encourage completion of our hate crime e-learning module.</p> <p>We will raise awareness of the new legislation in the Hate Crime and Public Order (Scotland) Act 2021 so that staff are aware and we will review recorded data on hate</p>

Equality Impact Assessment (EIA)

	<p>This policy will support all victims of hate crime, regardless of age, and all reports will be categorized and treated as being within our most severe ASB cases.</p>		<p>crime reports as they become available and adapt our supports if necessary.</p> <p>We will also review this new data through our ASB and BIT systems.</p> <p>We will support customers to encourage reporting of every hate crime.</p> <p>Wraparound supports are available to all.</p>
Disability	<p>Evidence from COPFS in the Hate Crime in Scotland 2022-23 document states that the number of disability aggravated charges increased by 3% to 722 in 2022-23. This is the highest number of charges reported since the legislation creating this aggravation came into force in 2010 and follows an increase of over 50% in the number of charges reported in 2021-22 compared to 2020-21.</p> <p>In total, 92% of charges led to court proceedings and no action was taken against 2% of charges. 83% of offences reported with a disability aggravation related to charges of threatening or abusive behaviour under section 38 of the Criminal Justice and Licensing (Scotland) Act 2010.</p> <p>47% of the 9,343 customers who answered the question within our equality survey identified themselves as having a disability.</p>	<p>(Red = negative. Amber = neutral. Green = positive impact)</p>	<p>Ensure that all staff and customers are aware that disability hate crime includes crimes motivated by prejudice based on disability, defined by the Equality Act 2010 as 'a physical or mental impairment that has a substantial and long term negative effect on a person's ability to do normal daily activities'. Awareness is key so that early intervention and prevention activity are implemented.</p>

Equality Impact Assessment (EIA)

	<p>Of the 157 cases of hate crime recorded across group in 2022/23, 7% (12 cases) were against a person who has a disability.</p> <p>The policy outlines that people with a disability are at risk of being victims of a hate crime and describes our procedure to support them. It also outlines the procedure of when we have concerns about an adult at risk when they have a disability or mental health issues. In such cases we will liaise with Social Work Services and Police Scotland if necessary.</p>		<p>Wraparound supports are available to all.</p> <p>We will encourage completion of our hate crime e-learning module.</p> <p>The Protecting People Policy Framework (PPPF) supports staff to identify where there are concerns and how to support any adults at risk.</p>
Trans/gender reassignment	<p>According to the COPFS (Hate Crime in Scotland 2022-23), there were 55 charges reported in 2022-23 with an aggravation of transgender identity. This is lower than the 86 charges reported in 2021-22 but is the second highest number of charges reported since the legislation introducing this aggravation came into force in 2010.</p> <p>Court proceedings were raised in respect of 85% of the total charges in 2022-23 and of that, 84% were for offences reported with a transgender aggravation related to charges of threatening or abusive behaviour under section 38 of the Criminal Justice and Licensing (Scotland) Act 2010. No court action was taken in 2% of the charges.</p> <p>Of the 9,657 people who answered the question on considering themselves to be a trans person in our equality survey, 1.7% of the participants said they did identify as trans.</p>	<p>(Red = negative. Amber = neutral. Green = positive impact)</p>	<p>Ensure that all staff and customers are aware that transphobic hate crime includes crime motivated by prejudice based on transgender identity. Transgender identity describes people whose gender identity or expression differs from that normally associated with their birth sex.</p> <p>There is opportunity to strengthen our partnerships with trans specific organisations to ensure that we are best placed to</p>

Equality Impact Assessment (EIA)

	<p>The Group Protection Team are aware of support agencies from the third sector supporting the LGBT+ community through our involvement in various Hate Crime forums across our stock footprint.</p> <p>The policy outlines that although we had no reports of hate crimes being perpetrated against someone who is transgender, this is an at risk group that may be under reported.</p> <p>It also explains that the definition of transgender identity has been updated in The Hate Crime and Public Order (Scotland) Act 2021 where it now includes a separate provision for 'variations in sex characteristics' as a protected characteristic. This will come into force in 2024.</p>		<p>support these customers in terms of signposting for specialist support.</p> <p>Wraparound supports are available to all.</p> <p>We will encourage completion of our hate crime e-learning module and the Equality, Diversity and Inclusion training.</p>
<p>Marriage and civil partnership*</p>	<p>73.7% of customers of our equality sample recorded being married and 6.99% of being in a civil partnership.</p> <p>Marriage and civil partnership are not protected characteristics that are considered when investigating the motivation behind a hate crime so there is no recorded data available.</p>	<p>(Red = negative. Amber = neutral. Green = positive impact)</p>	<p>The policy doesn't explicitly call out that marriage and civil partnership is a protected characteristic when categorising a hate crime as there would require to be further research undertaken in relation to the existence of these links to strictly call this out as a risk.</p> <p>Wraparound supports are available to all.</p>

			We will encourage completion of our hate crime e-learning module.
Pregnancy/ maternity*	<p>0.6% of customers confirmed they were pregnant in our equality sample and 0.9% said they have taken maternity leave.</p> <p>Pregnancy and maternity are not protected characteristics that are considered when investigating the motivation behind a hate crime so there is no recorded data available.</p>	(Red = negative. Amber = neutral. Green = positive impact)	<p>The policy doesn't explicitly call out that pregnancy/maternity is a protected characteristic when categorising a hate crime as there would require to be further research undertaken in relation to the existence of these links to strictly call this out as a risk.</p> <p>Wraparound supports are available to all.</p> <p>We will encourage completion of our hate crime e-learning module.</p>
Race	<p>According to the Crown Office & Procurator Fiscal Service on Hate Crime in Scotland 2022-23, racial crime remains the most commonly reported hate crime. In total 3,145 charges relating to race crime were reported in 2022-23, a decrease of 2% compared to 2021-22. The 2022-23 total is the lowest figure</p>	(Red = negative. Amber = neutral. Green = positive impact)	<p>Ensure that staff and customers understand that racist hate crime includes crime motivated by prejudice based on race, ethnicity, nationality and/or other</p>

	<p>since 2019-20 and is 31% lower than the peak in such charges in 2011-12 when 4,547 were reported.</p> <p>Court proceedings were raised in respect of 89% of the total charges in 2022-23 and of that, 70% were for offences reported with a racial aggravation related to charges of threatening or abusive behaviour under section 38 of the Criminal Justice and Licensing (Scotland) Act 2010. No action was taken in 2% of the charges.</p> <p>A recent Shelter Scotland report² found that the occurrence and fear of racial harassment were common for people from minoritised ethnic communities living in social housing and recommended a more effective zero-tolerance approach against perpetrators of racial harassment. Our Hate Crime policy, approach and training will therefore have a positive impact for our customers;</p> <p>73.9% of customers who responded to our equality survey identified as white Scottish, with the remaining 26.1% comprising other ethnicities including Black British/Scottish, Chinese British/Scottish/Other and Arab British/Scottish/Other.</p> <p>Of the 157 cases of hate crime recorded across group in 2022/23, 55% (87 cases) were racially aggravated.</p> <p>The policy outlines that this customer segment is considered at greater risk of being a victim of hate crime and has the highest number of reports within our communities, therefore, raising awareness within staff to ensure they can support and respond</p>		<p>characteristics associated with race or ethnicity</p> <p>Ensure that reports of hate crime are taken seriously by our staff and are treated as our most severe categorization of offence by our ASBIP & CIP teams.</p> <p>Ensure we have clear referral pathways and signposting for victims of hate crime such as Victim Support Scotland who have dedicated support and advice.</p> <p>Ensure staff at our Third Party Reporting Centres are fully trained to enable them to support victims who report to them.</p> <p>Ensure that housing options are discussed in the most severe cases when a victim has been forced to leave an area or feels too unsafe to remain in their home.</p>
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² Shelter Scotland: Minoritised ethnic groups' access to social housing in Scotland June 2023

	<p>to any customers who reports a hate crime to them. It also outlines that we will deal robustly with hate crime to help continue to foster positive, inclusive, and welcoming communities for all.</p> <p>Focus groups were held in consultation with New Scots to gather feedback and suggestions to inform the Hate Crime Policy. This included engaging with ethnic minority groups and facilitating a women's-only focus group to help increase participation from ethnic minority women. Feedback from these groups was positive in regards to our approach and aims of the Hate Crime policy, feeling this will give a greater understanding of what a Hate Crime is and also encourage people to report when they have been a victim.</p>		<p>Wraparound supports are available to all.</p> <p>We will encourage completion of our hate crime e-learning module and also the New Scots e-learning module when it becomes available as racism has an impact on people going through the immigration process.</p>
Religion or Belief	<p>There were 576 charges with a religious aggravation reported in 2022-23, 8% more than in 2021-22. Over the last five years, the number of religious charges reported has fluctuated between around 530 and 670 per year (Hate Crime in Scotland 2022-23).</p> <p>In total, 91% of charges reported in 2022-23 led to court proceedings and no action was taken in 1% of the charges. 81% of offences reported with a religious aggravation related to charges of threatening or abusive behaviour under section 38 of the Criminal Justice and Licensing (Scotland) Act 2010.</p> <p>Of the 9,456 who answered the religious belief question on our equality survey, 40% have faith with the Church of Scotland, 25% are Roman Catholic and 20% had no specific belief or religion. The remaining participants preferred not to say, were 'Other Christian', Muslim or Buddhist.</p>	(Red = negative. Amber = neutral. Green = positive impact)	<p>Ensure all staff and customers are aware that religious hate crime includes crime motivated by prejudice based on religion or faith, including having no faith, or being a member of a religious sect.</p> <p>Wraparound support services are available to all customers.</p> <p>Hate Crime Training is available to all staff across group to ensure they are fully</p>

Equality Impact Assessment (EIA)

	<p>Of the 157 cases of hate crime recorded across group in 2022/23, 18% (28 cases) were in relation to sectarianism and 3% (4 cases) were in relation to faith and religion.</p> <p>The policy outlines that we have received reports of hate crime against people because of their religion or faith. It also outlines that a key element in a hate crime or hate incident is the perception of the perpetrator when they perceive that a person belongs to a faith group or religion and use this as the motivation for the incident.</p>		<p>aware of this issue and how to support anyone impacted.</p> <p>New Scots Training is due to be launched within the coming weeks, which will further enhance knowledge and understanding of our staff around asylum seekers and refugees and the barriers/challenges they face and what support is required specifically to meet their needs and circumstances.</p>
Sex	<p>Sex is not currently a protected characteristic included in the definition of what a hate crime is. The Hate Crime and Public Order (Scotland) Act 2021 is new legislation which was passed by the Scottish Parliament on 11 March 2021 and it received Royal Assent on 23 April 2021. No commencement date has been confirmed for the provisions within the Act and therefore all existing hate crime legislation remains in force.</p> <p>The Act seeks to modernise, consolidate and extend hate crime legislation in Scotland. The Act will add two new groups to the list of protected characteristics currently covered by hate crime legislation: Age and Variations in Sex Characteristics. All the aggravations will operate in the same way as those currently in existence.</p>	<p>(Red = negative. Amber = neutral. Green = positive impact)</p>	<p>The policy doesn't explicitly call out that sex is a protected characteristic when categorising a hate crime as there would require to be further research undertaken in relation to the existence of these links to strictly call this out as a risk.</p> <p>Wraparound supports are available to all.</p> <p>We will encourage completion of our hate crime e-learning module.</p>

	<p>There is no data available in relation to people being targeted because of their sex. What is available is in relation to the sex of the people being charged with a hate crime. In 2022-23, of the 5,738 accused in charges which contained at least one hate crime element, 4,503 or 79% were male. Accused were most likely to be male for religiously aggravated charges (89%) and least likely to be male for transgender identity charges (64%).</p> <p>The policy outlines that we will use a variety of communications to raise awareness of hate crime and convey our message that any form is intolerable and will be dealt with by the Group in a direct and robust manner.</p>		
Sexual orientation	<p>In the Hate Crime in Scotland 2022-23 by COPFS, Sexual orientation aggravated crime is the second most commonly reported type of hate crime. The number of charges reported increased by 2% in 2022-23 to 1,884. The number of charges reported has increased each year since 2014-15.</p> <p>In total, 92% of charges reported in 2022-23 led to court proceedings and no action was taken in 1% of the charges. 86% of offences reported with a sexual orientation aggravation related to charges of threatening or abusive behaviour under section 38 of the Criminal Justice and Licensing (Scotland) Act 2010.</p> <p>Of the 9,421 participants who answered the question on sexual orientation in our equality survey, 96% identify as straight/heterosexual, 1.95% identify as a gay man, 1.1%</p>	<p>(Red = negative. Amber = neutral. Green = positive impact)</p>	<p>Ensure that all staff and customers are that homophobic hate crime is based on sexual orientation, includes crimes motivated by prejudice against lesbian, gay and/or bisexual people.</p> <p>Wraparound supports are available to all.</p> <p>We will encourage completion of our hate crime e-learning module.</p> <p>We will use Hate Crime Awareness Week (14-</p>

	<p>identify as bisexual, 0.5% identify as lesbian and 0.4% identify as other.</p> <p>Of the 157 cases of hate crime recorded across group in 2022/23, 17% (26 cases) were in relation to homophobia. We had no reports of any Transgender hate crimes during this period.</p> <p>The policy outlines that intersectionality can significantly impact how people experience hate crime (e.g where they have a combination of protected characteristics that are targeted such as racial and sexual orientation).</p> <p>The policy was developed in consultation with key stakeholders, including our Different Together Community of Excellence and our staff networking groups including the LGBTQ+ and Disability and Neurodiversity groups.</p>		<p>21/10/2023) to encourage learning of what hate crime or hate incident is and we will use this opportunity to share our message that hate crime will not be tolerated.</p>
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*where policy is HR related

Socio - economic disadvantage	<p>Socio -economic disadvantage is not a protected characteristic that is considered when investigating the motivation behind a hate crime so there is no recorded data available.</p>	<p>(Red = negative. Amber = neutral. Green = positive impact)</p>	<p>The policy doesn't explicitly call out that socio-economic disadvantage is a protected characteristic when categorising a hate crime as there would require to be further research undertaken in relation to the existence of these links to strictly call this out as a risk.</p> <p>Wraparound supports are available to all.</p>
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			We will encourage completion of our hate crime e-learning module.
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5. Who will be consulted internally on this EIA?

Group Protection
Different Together Community of Excellence - LGBTQ+, Disability and Neurodiversity network groups
CIP
Governance

6. Who will be consulted externally on this EIA?

Police Scotland
Local Authority hate crime lead for Glasgow City Council
New Scots focus group feedback

7. What recommended steps should we take to improve the policy/strategy/project and monitor its equality impact?

In developing an action plan below, project leads should balance how to maximise the positive impact of the policy or practice on all people who share the protected characteristics; with the requirement to maximise the core outcomes of the policy/practice (i.e., recommendations should be proportional and relevant.) The assessment should take steps to embed ways of monitoring the ongoing impact of the policy and practice.

Action	Strategic theme	Who is impacted?	Responsibility	Timeline
Launch Hate Crime Policy so that staff are aware of their role and responsibility in dealing with a hate crime.	1, 2, 3, 4, 5	All	Anne Marie Kite	From October 2023 – post policy approval
Promote hate crime e-learning module.	1, 3, 4	All	Anne Marie Kite	Launched January 2023 – promote with policy launch
Policy and EIA review by external partners – Hate Crime Working Group	1, 2, 3	All	Anne Marie Kite	Completed June 2023

8. Formal approval

	Sign off	Date
Assessment created by:	Anne Marie Kite, Group Protection Co-ordinator	July 2023
Assessment reviewed by:	Morgan English, Governance Projects and Policy Lead	August 2023
Assessment signed off by:	Jennifer Anderson, Wheatley 360 Lead	August 2023
Assessment signed off by:	Board of Directors received and approved	

Report

To: Wheatley Homes Glasgow Board

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

Approved by: Steven Henderson, Group Chief Executive

Subject: Governance update

Date of Meeting: 15 September 2023

1. Purpose

- 1.1 To update the Board and, where applicable, seek Board approval on the following governance related matters:
- Proposed 2024 meeting dates;
 - Modern slavery statement; and
 - Charities (Regulation and Administration) (Scotland) Act.

2. Authorising and strategic context

- 2.1 This report covers three distinct areas, each with a separate authorising context.
- 2.2 Under our Rules and the Scottish Housing Regulator's Regulatory Framework we are required to hold a minimum of six Board meetings a year.
- 2.3 As a business with a turnover higher than £35m, we are required under the Modern Slavery Act 2015 to prepare a modern slavery statement. Since we are part of a group, it is acceptable for the statement to be made at a group level.
- 2.4 We are regulated Scottish charity and our Board members are trustees who require to adhere to charity law and any regulatory guidance issued by OSCR.

3. Background

- 3.1 We are a large Scottish charity and as such we have a strong commitment to Board succession planning and ensuring we have an appropriate balance of skills and experience on our Board. The Board has received updates on the proposed retiral of Bernadette Hewitt as our Chair and of the proposal to elect Marueen Dowden as the new Chair.
- 3.2 There are a number of annual processes associated with our own and the wider group's governance. These include setting the schedule of meetings for the calendar year and the submission of a Group Modern Slavery Statement.

4. Discussion

2024 Meeting Schedule

4.1 We have now prepared the proposed calendar of meetings for 2024. These are:

- 1) Friday 09 February at 10.30am
- 2) Friday 22 March at 10.30am (followed by stock tour)
- 3) Friday 17 May at 09.00-13.00 (Board + strategy workshop)
- 4) Friday 16 August at 10.30am
- 5) Friday 13 September at 10.30am (AGM at 10am)
- 6) Friday 15 November at 10.30am

4.2 As with previous years, for convenience we have combined the stock tour with the day of the March meeting and the strategy workshop with the May meeting. We are reviewing our calendar of CPD events and will take account of feedback from the Board appraisal discussions prior to finalising the format of these for next year.

Modern Slavery Statement

4.3 The Modern Slavery Act 2015 was developed by the UK Government to help combat a growing concern about poor ethical practices. The Act came into force on 29 October 2015 and requires all organisations with a turnover in excess of £36m to prepare and publish a statement setting out the steps taken during the financial year to ensure that slavery and human trafficking are not taking place in any part of their supply chains or business. For organisations that are part of a group, a group-wide statement can be made covering each relevant entity.

4.4 A copy of the Group statement is attached at Appendix 1. This has not materially changed from the statement agreed last year. The statement was approved on our behalf by the Group Board at its meeting on 30 August 2023 and is applicable to the Group, our organisation and our partner organisations. It will be published on our website and submitted to the Government's modern slavery statement registry.

4.5 We have assessed the risk of slavery and human trafficking in the Group and its supply chain as low for the following reasons:

- We do not operate a large global supply chain;
- We pay the minimum wage and we, as the Group's largest employer, are an accredited Glasgow Living Wage employer;
- We have a specialist procurement team which aims to drive up standards within our suppliers through Wheatley pledge and community benefits clauses;
- We have introduced a requirement into our contracts that obliges suppliers to confirm their adherence to the Act; and
- We enjoy a high public profile and are aware of the need to ensure that we engage suppliers that demonstrate a commitment to the highest ethical standards.

Charities (Regulation and Administration) (Scotland) Act ("the Act")

- 4.6 The new Charities (Regulation and Administration) (Scotland) Act ("the Act") received Royal Assent on 9 August 2023. The purpose of the Act is to strengthen current charity law by increasing transparency and accountability; making improvements to OSCR's powers; and generally bringing Scottish charity law up to date and more consistent with that in England, Wales and Northern Ireland. A strong focus of the Act is on trustees and those tasked with running charities.
- 4.7 The following is a summary of the key provisions of the Act:
- Gives OSCR wider powers to investigate charities and charity trustees;
 - Amends the rules on who can be a charity trustee or a senior officeholder in a charity;
 - Increases the information that OSCR holds about charity trustees;
 - Updates the information which needs to be included on the Scottish Charity Register; and
 - Creates a register of charities that have merged, to allow charitable assets to be tracked.
- 4.8 The changes introduced are some of the first since the Charities and Trustee Investment Scotland Act 2005 came into force. Since these relate to how charities are governed and managed then it is important that Board members are informed about them. As a Registered Society under the Co-operative and Community Benefit Societies Act and as a Registered Social Landlord, we are already required to adhere to other legal and regulatory requirements that are similar in nature to those introduced by the 2023 Act. For example, we operate with a high degree of transparency and already publish unredacted accounts through the SHR's website, our website and on the public register held by the FCA (as registration body for Registered Societies). Similarly, we are also required to publish information about our trustees on our website.
- 4.10 The Act also introduces a range of offences and situations that result in automatic disqualification of charity trustees, such as a conviction under bribery or proceeds of crime legislation. This brings Scottish charity law more in line with the requirements of company law and the law applicable to Registered Societies. For example, our Board members are already subject to the Company Directors Disqualification Act 1986.
- 4.11 In summary, it is important that our Board has an understanding of the new the Act; however, as we are already subject to a number of layers of regulation then it is not anticipated that this will materially change how we operate or arrange our business. Further information on the Act can be provided by the Director of Governance upon request.

5. Customer engagement

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

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

- 8.1 There are no finance and value for money implications contained within this report.

9. Legal, regulatory and charitable implications

- 9.1 We are legally required to produce a Modern Slavery Statement, which must be published within 6 months of the end of the financial year.
- 9.2 A summary of the main legal implications arising from the new Charities (Regulation and Administration) (Scotland) Act 2023 are set out in the report above.

10. Risk appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

- 12.1 The report covers key standing processes within our governance arrangements.
- 12.2 We have assessed the risk of modern slavery in our business as low

13. Recommendations

- 13.1 The Board is asked to:
- 1) Approve the schedule of meetings for 2024;
 - 2) Note the Modern Slavery Statement, approved by the Group Board on our behalf; and
 - 3) Note the update on the new Charities (Regulation and Administration) (Scotland) Act 2023.

List of Appendices

Appendix 1 – Modern Slavery Statement [redacted] available [here](#)