



LORETTO HOUSING ASSOCIATION

BOARD MEETING (+ stock tour 11am)

**Monday 24 March 2025 at 1.30pm
Wheatley House Glasgow**

AGENDA

1. Apologies for absence
2. Declarations of interest
3. a) Minute of meeting held on 3 February 2025 and matters arising
b) Action list

Main Business Items

4. Chair and Managing Director update
5. Home safety building compliance update
6. a) 2025/26 Budget
b) Finance report
7. Scrutiny Panel: environmental thematic update (presentation)

Other business

8. Group Procurement – annual strategy and policy updates
9. Governance update
10. AOCB

Date of next meeting: 19 May 2025

| Agenda item | Action | Owner | Due | Status |
|---|--|--------------------------|-------------------|-----------------|
| Rent and Service charges 2025/26 | Amend the recommendation section of the Board report to reflect 2025/26 timelines. | Managing Director | March 2025 | Complete |

Report

To: Loretto Housing Board

By: Brian Stewart, Director of Investment & Compliance

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

Subject: Home Safety Building Compliance update

Date of Meeting: 24 March 2025

1. Purpose

- 1.1 This report provides an update on our home safety building compliance work streams during 2024/25.

2. Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for the ongoing monitoring and scrutiny of performance against agreed targets. This report provides an update on our compliance work programmes and our performance against those programme targets.
- 2.2 In line with our strategy we will maintain our commitment to “make the most of our homes and assets”. We will ensure through our home safety compliance programmes that we protect and maintain our existing assets.
- 2.3 Compliance is also one of the five drivers, and our priority for investment, within our strategic asset investment and management plan which the Board approved in September 2024.

3. Background

- 3.1 Our compliance work programmes include gas servicing, lift servicing, thermostatic mixing valves (TMVs), asbestos surveying, water management including legionella prevention and electrical works such as electrical inspections and smoke and heat detector renewals/replacements.
- 3.2 Landlords have a legal duty to repair and maintain gas pipework, flues and appliances in a safe condition, to ensure an annual gas safety check on each appliance and flue, and to keep a record of each safety check.
- 3.3 Landlords also have other obligations under legislation or approved codes of practice (“**ACOPs**”) for a variety of building maintenance and inspection activities for example firefighting equipment (dry risers/sprinklers), lifting equipment, and alarm systems. As well as a mandatory responsibility for electrical safety including carrying out electrical inspections, commonly referred to as Electrical Installation Condition Reports (“**EICR**”) or Fixed Installation Testing (“**FIT**”).

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

| Work Stream | Cycle | Status |
|--|--|--------------------------|
| Gas Servicing | Annual (10-month cycle) | Rolling annual programme |
| Smoke and Heat Detector re-life programme | Every 10 years but is dictated <i>annually</i> by build date / Detector install date | Rolling annual programme |
| EICRs | Five-yearly | Rolling annual programme |
| TMVs qualifying households | Annual | Rolling annual programme |
| Lift Insurance Inspections | Six-monthly | Rolling annual programme |
| Proactive Lift Maintenance | Monthly checks | Ongoing programme |
| Mechanical and Electrical (M&E) Works | Subject to asset requirements: examples are CCTV. Pumps, aerials, hoists, fire alarms, intruder alarms | Ongoing programme |
| Water Management | Site-by-site basis requirement, works include tank inspections, bacterial testing, legionella testing | Ongoing programme |
| Asbestos Surveying | Annual | Ongoing programme |
| Fire Door Servicing Dwellings | Six-monthly | Ongoing Programme |

One and done approach

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

| Type of Package | Stock Targeted | Type of works |
|---|--|--|
| Home Safety Bundle 1: Gas and Water Management works | Gas properties | <ul style="list-style-type: none"> ▪ Annual gas servicing ▪ Temperature checks at water outlets ▪ TMV works ▪ Test/servicing of smoke/heat/carbon monoxide detectors ▪ Complete all certification |
| Home Safety Bundle 2: Electrical installs and servicing | All properties | <ul style="list-style-type: none"> ▪ Installation of smoke and heat detectors (re-life programme) ▪ Carry out EICR inspections |
| Home Safety Bundle 3: Joinery and electrical | Electric-only (no gas) low-rise properties | <ul style="list-style-type: none"> ▪ Test/servicing of smoke and heat detectors ▪ Service void dwelling windows and doors |

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

4. Discussion

- 4.1 We continually monitor and report progress against our various compliance workstreams to ensure our obligations are met and to provide an early indication if progress is not as planned. The remainder of this report provides the Board with details on progress against core compliance programmes during 2024/25.

Gas Safety

- 4.2 All our gas safety inspection records (CP12s) are up to date and fully compliant. Achieving this requires an annual inspection of every property with gas. We have **2,367** homes with gas.
- 4.3 To support **100%** compliance we send appointment letters to all customers and carry out proactive outbound calling to maximise access to our tenant's homes. Tenants can change appointments to suit their needs by contacting our 24Hr Customer First Centre. We also manage individual cases where there are complex issues or housing management challenges that impact access.
- 4.4 As a last resort - after we have exhausted all reasonable efforts to obtain access through communication and liaison - we move to a "forced appointment". Our forced appointment process involves:
- Delivery of a forced access appointment letter one week before appointment;
 - Doorstep discussion if tenant is present at delivery of letter to negotiate access;
 - Completion of officer pre-appointment checklist & Health & Safety checklist;
 - Liaison with Housing Officer for any additional knowledge of tenant;

- Wheatley representative joint attendance with CBG Gas Engineer and Joiner; and
- Liaison at forced access appointment as required to reach successful completion of gas service and achieve compliance.

Smoke and Heat Detectors LD2

- 4.5 All of our **2,867** properties have compliant LD2 smoke and heat detectors. These were installed at the time the home was constructed (for newly built homes) or as an upgrade as part of our rolling programme of re-life works (10-year cycle). All customers are offered a minimum of two appointments to enable the work to be completed at a convenient time for them. As a last resort, we move to a forced appointment, to ensure we maintain 100% compliance in this area.

Periodic Electrical Testing (EICR)

- 4.6 Periodic electrical inspections are required in all properties on a cycle of no more than 5 years. Landlords must make “reasonable efforts” to ensure that homes are accessed to carry out the inspection.
- 4.7 The outstanding addresses are currently being managed by our Housing Team to find solutions to the current housing management issues preventing the EICR from being carried out. Both are complex cases which we are addressing, providing support and potential solutions for. Once resolved these addresses can be quickly programmed for completion.

| Stock in EICR programme | EICR valid / completed | Total EICR Inspections Outstanding | Percentage completion |
|-------------------------|------------------------|------------------------------------|-----------------------|
| 2,867 | 2,865 | 2 | 99.93% |

TMV Servicing – Qualifying households

- 4.8 Our TMV programme is a best practice approach that involves a rolling annual programme focused on homes with residents under 5 or over 75, and care sites / specialist housing locations.
- 4.9 Of the 135 properties in the programme we have completed 134 inspections so far. This is a completion rate of **99.26%**.
- 4.10 The programme is reliant on customers permitting access. To encourage this, we include TMV servicing alongside gas servicing appointments, where possible, which has significantly improved our access rate above. We also offer flexibility to amend appointments, proactively contact customers and make up to three access attempts.
- 4.11 Where access is not achieved, we send letters to customers informing them of our attempts and inviting them to contact us to make a follow up appointment. Forced appointments are not undertaken in keeping with the non-mandatory nature of the programme.

Lift Inspections and Maintenance

- 4.12 Proactive servicing of our lifts are carried out monthly via our approved maintenance contractor with supplementary six-monthly inspections by our insurance company.
- 4.13 Lift performance, such as time to complete any minor defects or major repairs, is routinely monitored and managed within set Service Level Agreement (SLA) timescales. Examples of these SLAs include one-hour for trapped passengers and all other emergencies within four hours.

| No. of passenger lifts | Total Inspections Complete | Percentage completion |
|------------------------|----------------------------|-----------------------|
| 25 | 25 | 100% |

| No. of stair lifts | Total Inspections Complete | Percentage completion |
|--------------------|----------------------------|-----------------------|
| 1 | 1 | 100% |

- 4.14 Our lifts are part of our wider digital switchover project preparing for the Public Switched Telephone Network (PSTN) switch off. Transitioning to digital provides several benefits, beyond ensuring continued operation after switch-off, including cost savings, increased management information, better reliability and the ability to integrate with other digital services. 17 of our 25 lifts need to be upgraded from PSTN connections to digital systems. Of these, five have been upgraded so far, with the remainder expected to be completed by July 2025, well in advance of the PSTN switch-off which is currently planned for December 2025.

Mechanical and Electrical Works (M&E)

- 4.15 Equans is our M&E framework contractor. They carry out preventative maintenance activities across 264 blocks, ensuring building compliance safety for 566 individual homes. This extensive maintenance program covers a range of critical services, including water management, dry risers, sprinkler systems, fire alarm systems, automatic vent opening services, and ventilation services.
- 4.16 The programme ensures M&E compliance across our specialised housing and new build stock where these services are increasingly prevalent through Building Regulations. The table below provides some examples of the scale involved across the M&E asset programme.

| Loretto – Task | Numbers |
|--|---------|
| CWST/Water systems | 70 |
| TMVs (<i>monthly temp checks etc in specialised housing</i>) | 2704 |
| Sprinklers | 8 |
| Fire alarm systems | 42 |
| AOVs | 29 |
| Ventilation systems | 149 |

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

Water Management

- 4.19 Our water management regime varies on a site-by-site basis taking into consideration the water system installed, the type of property and the customer demographic.
- 4.20 Not all works can be carried out simultaneously at a property in a single visit and works can include visual inspections of the communal tanks, risk assessments, temperature checks of both the water inlet and of resting water within the tank, bacterial testing which checks the water supply for various bacteria including e-coli and legionella to ensure that water meets the relevant water quality standards as set by the Water Supply (Water Quality) (Scotland) Regulations 2001.
- 4.21 We have **100%** completions for all specialised housing such as Livingwell blocks and all Relevant Premises, which include non-domestic property, such as offices and houses of multiple occupancy (HMOs).
- 4.22 The table below provides details of progress with the overall rolling annual programme. Currently there are six properties that require six water management tasks, subject to access we expect to complete these by 31 March 2025.

| Inspections/tasks completed so far | Total Inspections/tasks Required | Percentage completion |
|------------------------------------|----------------------------------|-----------------------|
| 202 | 208 | 97.12% |

Asbestos Surveying

- 4.23 Asbestos inspections of communal areas are in an annual programme to ensure any potential risk/damage to existing asbestos is identified and can be remediated as required. Annual inspections are carried out by the CBG asbestos team. Following inspections, the asbestos survey report, for each block, is uploaded to our asset management system PIMSS. The table below shows the current position with this programme.

| No. Communal areas | Total Inspections/tasks Required | Percentage completion |
|--------------------|----------------------------------|-----------------------|
| 35 | 35 | 100% |

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

- 4.25 Where asbestos is identified that requires a minor repair, a process is followed that ensures this is managed and correct working procedures are carried out. If there is ever uncertainty on the presence of asbestos, sampling is undertaken before work begins using a licenced asbestos contractor, with remedial works carried out as necessary.
- 4.26 During our 2024/25 inspection programme we carried out minor asbestos repair works to **0** properties of the **35** properties surveyed, the condition was good, and no minor damage or change had occurred since the last inspection.

Fire Door Servicing (6 Storey plus)

- 4.27 The current Scottish Government Guidance on Fire Safety in High Rise buildings recommends a six-monthly inspection of dwelling fire doors in any building over 18m in height (MSFs). We do not have any buildings in our stock that meet this criteria. However, during 2024/25, we commenced a programme of dwelling Fire Door checks on our six storey blocks to be prudent because they are just below the 18-meter threshold. Tenants are offered two appointments with the opportunity to rearrange if they are not suitable.
- 4.29 We have visited **100%** of our 107 doors that required inspections, with a total of 61 doors accessed. Doors where tenants have not given access, are now subject to a second attempt, and any doors remaining after this will form part of our next six months programme which will also include moving to forced appointments. Of the doors, inspected, six have required a minor repair. These repairs are carried out at the inspection with repairs to letterboxes being the most common work.

| Inspections completed so far | Total Inspections Required | Percentage (access) completion |
|------------------------------|----------------------------|--------------------------------|
| 61 | 107 | 57 % |

As above 107 doors received a first appointment and were visited

Radon Gas Monitoring

- 4.30 We are continually looking to enhance our approach to home safety and this year we plan to pilot a new testing programme for radon gas. Our approach will be focused on properties with the potentially highest concentration of radon gas based on the UK Health Security Agency's map of radon probability. Based on this mapping, Loretto has **76** properties in geographic areas identified as having higher (above 10%) probability of radon. These properties will form the basis of the pilot.
- 4.31 Radon is a naturally occurring radioactive gas that can be found in high concentrations in indoor environments, such as homes and workplaces. It is created when uranium decays in the ground and seeps to the surface and can get indoors through floors.
- 4.32 Radon levels in the ground are usually low, but some parts of Scotland may have higher levels depending on the ground type/conditions
- 4.33 As there are no warning signs for the presence of radon, testing for radon is the only way to get evidence of levels and ensure there is no danger from exposure to residents.

- 4.34 If radon is identified, cost-effective mitigation measures will be carried out including ventilating the solum of the property and on-going monitoring.
- 4.35 The compliance activities set out above and our on-going commitment to this, including as our key priority through our asset investment strategy and plans, means that we are meeting our required compliance obligations, and our wider commitment to helping to keep our tenants safe in their homes.

5. Customer Engagement

- 5.1 Engaging with our customers and ensuring they understand the importance and benefits of compliance works to keep them safe in their homes is crucial in successfully delivering our home safety compliance programmes.
- 5.2 We emphasise the importance of allowing access for compliance activities during routine interactions with our customers including through our Customer First Centre, at the annual tenant visit and in programme specific letters, texts, calls and visits.
- 5.3 Achieving compliance across our wide range of home safety programmes involves significant planning and liaison between customers, and our teams, particularly if we are required to escalate to a forced access appointment.
- 5.4 We also advocate for our customers with other third party's such as utility companies and external support providers to resolve issues so that we can complete our compliance obligations in our homes and keep our customers and properties safe.

6. Environmental and sustainability implications

- 6.1 There are no direct environmental and sustainability implications associated with this report.
- 6.2 Our approach to carrying out associated compliance works in one visit wherever practical will as a result lead to fewer travel visits by engineers and trade staff across our assets.

7. Digital transformation alignment

- 7.1 We are developing a multi-year programme to enhance our compliance system, management, monitoring and reporting that will see data from multiple sources brought together and closer integration with our various suppliers. This will ensure we continue to develop our existing systems and approaches, as we have been doing, to ensure consistency of management and reporting.

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

- 10.1 Our risk appetite relating to building compliance work streams is minimal” i.e. preference for ultra-safe business delivery options that have a low degree of inherent risk and only have a potential for limited reward.
- 10.2 The compliance activities and the progress against them discussed in this report ensure that the risk is managed in line with our agreed risk appetite.
- 10.3 Some compliance activities, for example, gas servicing, and electrical safety are embedded in the Scottish Housing Regulator’s reporting return requirements.

11. Equalities implications

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

12. Key issues and conclusions

- 12.1 We are continuing to deliver our agreed compliance programmes. These programmes ensure we meet our statutory and regulatory obligations as a landlord relating to gas, electricity, water management, lifts, asbestos and fire. We also undertake other programmes as part of our compliance activities that, while not legally required, are necessary to ensure we help to keep our customers safe. These programmes include TMV servicing, asbestos surveying, water management and annual smoke alarm servicing out with our mandatory five-yearly EICR and 10-year LD2 rolling programmes.
- 12.2 Our “one and done” approach continues to be offered where possible for similar related compliance activities subject to asset cycles, property attributes and customer requirements. Ensuring we remain agile and alert to any changing legislation or best practice is key to maintaining our commitment to provide a robust level of landlord assurance across the various compliance activities.
- 12.3 We also continue to robustly monitor and manage the performance of CBG and our M&E contractor to ensure tasks are delivered on time and to the required standards.
- 12.4 As in previous years, the delivery of our compliance programmes is making sure that we meet our obligations and responsibilities as a landlord.

13. Recommendations

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

LIST OF APPENDICES:

None

Report

To: Loretto Housing Board

By: Lyndsay Brown, Director of Financial Reporting

Approved by: Pauline Turnock, Group Director of Finance

Subject: 2025/26 Budget

Date of Meeting: 24 March 2025

1. Purpose

- 1.1 The purpose of this paper is to seek the Board's approval for the 2025/26 budget.

2. Authorising and strategic context

- 2.1 Under the terms of the Intra-Group Agreement between Loretto Housing and the Wheatley Group, as well as the Terms of Reference, the Board is responsible for the on-going monitoring of performance against agreed targets. This includes the on-going performance of its finances.

3. Background

- 3.1 At the previous meeting in February 2025 the Board were presented with the detailed five-year financial projections and agreed that the 2025/26 figures would form the basis of the 2025/26 annual budget, which is presented in Appendix 1.

4. Discussion

- 4.1 The budget is summarised below and compared against the financial projections.

| | Budget 2025/26 | | |
|--------------------------------|-----------------|------------------------------------|-------------------|
| | Budget £'000 | Financial Projections* £'000 | Variance £'000 |
| Turnover | 28,623 | 28,388 | 235 |
| Operating expenditure | (18,290) | (18,290) | - |
| Operating surplus | 10,333 | 10,098 | 235 |
| <i>Operating margin</i> | 36.1% | 35.6% | 0.5% |
| Net interest payable | (4,185) | (4,185) | - |
| Surplus | 6,148 | 5,913 | 235 |
| Net Capital Expenditure | 9,451 | 9,214 | (237) |

**Excluding property valuation movements, which do not form part of the management accounts*

- 4.2 The 2025/26 budget reports an operating surplus of £10,333k and a statutory surplus of £6,148k, both £235k higher than the financial projections approved in February 2025.
- The movement is due to the recognition of gift aid [REDACTED] [REDACTED] with corresponding higher costs in new build spend. Profit is generated in WDS through the mark up of 5% added to new build costs and is passed back to the RSLs through a year end Gift Aid distribution. This is an intra-group item which has a nil effect on the consolidated results for both the RSL Borrower Group and the full Wheatley Group.
- 4.3 The adjustments to the budget compared to the financial projections have no impact on underlying surplus as shown on page 3 of Appendix 1.
- 4.4 Keeping rents affordable remains a key strategic aim but it is important that we strike an appropriate balance between affordability for our tenants whilst ensuring the ongoing financial viability of our operations and the appropriate levels of investment in our homes and services to customers. The 2025/26 budget reflects the annual rent and service charge consultation that concluded with the Board approving a 6.9% increase in rent and service charge levels.
- 4.5 Allocations for repairs and investment continue to be at the core of our financial projections. During the year, as part of our asset strategy discussions, we agreed the investment priorities set out in our neighbourhood plans be reflected in our rent-setting proposals together with the creation of a provision to fund energy efficiency improvements in our homes which will be required to meet the new Scottish Housing Net Zero Standard (SHNZS). In the 2025/26 budget, our investment programme spend of £4,497k on existing homes includes £615k of neighbourhood investment works.
- 4.6 The budget also recognises the sustained demand and cost pressures on repairs with £4,969k provision for revenue repairs and maintenance included in the 2025/26 budget. Through our collaboration with City Building Glasgow, we remain focussed on improvements to the customer journey, utilising technology to align our services, improve monitoring of service levels and modernise the delivery of the repairs service.
- 4.6 Our frontline housing, customer first centre and neighbourhood environmental teams (“Nets”) and the Wheatley 360 wraparound service remain key elements of our service provision. Support for vulnerable customers is prioritised through our Wheatley Foundation, and our Livingwell offer for older customers. Our “Helping Hand Fund” will continue to offer support to customers with this particularly focused on help with paying rent.

5. Customer Engagement

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

6. Environmental and sustainability implications

- 6.1 Our planned investment includes £1m spend in 2025/26 to improve energy efficiency in 320 homes through new windows, doors, external wall insulation and efficiency heating systems.

7. Digital transformation alignment

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

8. Financial and value for money implications

- 8.1 The financial projections incorporate cost efficiency measures, which are a key element of continuing to demonstrate value for money. These are reflected in the annual budget and performance will be monitored against budget each month.
- 8.2 Financial covenants are assessed for the RSLs within the WFL1 borrowing group as a whole. In preparing the 2025/26 budgets across the RSL borrower group, the overall budgeted operating surplus and covenant compliance for the WFL1 borrowers is in line with the RSL financial projections.

9. Legal, regulatory and charitable implications

- 9.1 There are no direct legal, regulatory, and charitable implications arising from this paper.

10. Risk Appetite and assessment

- 10.1 The Board's agreed risk appetite for business planning and budgeting assumptions is "open". This level of risk tolerance is defined as "prepared to invest for reward and minimise the possibility of financial loss by managing the risks to a tolerable level".
- 10.2 Delivery of financial results within approved budgetary limits is a key element in delivering our strategy and maintaining the confidence of investors.

11. Equalities implications

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

12. Key issues and conclusions

- 12.1 This paper presents the proposed 2025/26 budget.

13. Recommendations

The Board is requested to approve the proposed 2025/26 budget.

LIST OF APPENDICES:

Appendix 1: Loretto Budget 2025/26



Loretto Housing

Budget 2025/26



Operating Statement

| | 2025/26 Budget £ks | 2025/26 Financial Projections £ks | Budget Variance to FP £ks |
|--|--------------------------|--|------------------------------------|
| INCOME | | | |
| Rental Income | 18,652 | 18,652 | - |
| Void Losses | (422) | (422) | - |
| Net Rental Income | 18,230 | 18,230 | - |
| Grant Income New Build | 9,922 | 9,922 | - |
| Grant Income Other | 120 | 120 | - |
| Other Income | 351 | 116 | 235 |
| TOTAL INCOME | 28,623 | 28,388 | 235 |
| EXPENDITURE | | | |
| Employee Costs - Direct | 1,548 | 1,548 | - |
| Employee Costs - Group Services | 1,015 | 1,015 | - |
| ER/VR | - | - | - |
| Direct Running Costs | 2,079 | 2,079 | - |
| Running Costs - Group Services | 606 | 606 | - |
| Revenue Repairs and Maintenance | 4,969 | 4,969 | - |
| Bad Debts | 266 | 266 | - |
| Depreciation | 7,807 | 7,807 | - |
| TOTAL EXPENDITURE | 18,290 | 18,290 | - |
| NET OPERATING SURPLUS / (DEFICIT) | 10,333 | 10,098 | 235 |
| <i>Operating Margin</i> | <i>36.1%</i> | <i>35.6%</i> | <i>0.5%</i> |
| Interest payable | (4,185) | (4,185) | - |
| STATUTORY SURPLUS / (DEFICIT) | 6,148 | 5,913 | 235 |
| INVESTMENT | | | |
| Total Capital Investment Income | 1,885 | 1,885 | - |
| Investment Works | 4,497 | 4,497 | - |
| New Build | 6,537 | 6,300 | (237) |
| Other Capital Expenditure | 302 | 302 | - |
| TOTAL CAPITAL EXPENDITURE | 11,336 | 11,099 | (237) |
| NET CAPITAL EXPENDITURE | 9,451 | 9,214 | (237) |

Key comments

The 2025/26 budget reports a net operating surplus of £10,333k and statutory surplus of £6,148k, which are both £235k favourable to the financial projections. The movement is due to the recognition of intra group gift aid [REDACTED]

- Budgeted **net rental income** of £18,230k is in line with the financial projections with the provision for void losses of 2.3%, prudent compared to current year performance (1.85%).
- Grant Income** recognised on completion of new build units is budgeted at £9,922k with completion of 85 social rent units anticipated in 2025/26.
- Other Grant Income** of £120k for medical adaptations is provided for in the budget.
- Other income** includes the recognition of the gift aid payment from [REDACTED] of £235k, reflecting the management charge income received from Loretto in [REDACTED] net of running costs incurred by [REDACTED] (£2k). This is an intra-group item and has a net nil impact at an RSL Borrower Group level.

Expenditure is in line with the financial projections previously presented with analysis for employee costs, running costs and repairs and maintenance shown on pages 5 and 6:

- Repairs and maintenance** costs of £4,969k are in line with the financial projections and include £2,547k for responsive repairs and £1,914k for compliance.
- Bad debt** costs of £266k are based on prudent assumptions.
- Capital Investment Income** (grant) of £1,885k is expected to be received in the year for the new build programme (£1,765k) and adaptations (£120k).
- Investment** expenditure has been budgeted at £4,497k, which includes provision for continued investment in our housing stock including £615k on investment priorities set out in our neighbourhood plans, capitalised employee costs in relation to investment staff.
- New build** expenditure of £6,537k has been included in the budget, £237k higher than the financial projections due to recognition of a 5% management charge on the design and build services provided by [REDACTED]. These additional costs are reimbursed to Loretto through gift aid recognised in Other Income.

Underlying surplus

Comments

- The Operating Statement (Income and Expenditure Account) on page 2 is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2014).
- However, the inclusion of grant income on new build developments creates volatility in the results and does not reflect the underlying cash surplus/deficit on our letting activity.
- The table below shows a measure of underlying surplus/ (deficit) for the 2025/26 budget which adjusts our net operating surplus by excluding the accounting adjustments for the recognition of grant income, gift aid and depreciation, but including capital expenditure on our existing properties.
- An underlying deficit of £699k is budgeted compared to an underlying surplus of £558k in 2024/25. The movement is driven by the additional investment in our existing assets including £615k on investment priorities set out in our neighbourhood plans. The movement can be accommodated within the RSL Borrower Group, where an overall underlying surplus is budgeted.

| LHA Underlying Surplus | | | |
|-------------------------------------|-------------------------------|--------------------------|-------------------------------|
| | 2024/25 Q3 Forecast £ks | 2025/26 Budget £ks | 2025/26 Projections £ks |
| Net operating surplus | 6,005 | 10,333 | 10,098 |
| add back: | | | |
| Depreciation | 7,156 | 7,807 | 7,807 |
| less: | | | |
| Grant income | (4,591) | (9,922) | (9,922) |
| Gift aid income | (625) | (235) | 0 |
| Net interest payable | (3,841) | (4,185) | (4,185) |
| Total expenditure on Core Programme | (3,546) | (4,497) | (4,497) |
| Underlying surplus/(deficit) | 558 | (699) | (699) |

Rental and Other Income

| | 2025/26 |
|-------------------------------|---------------|
| Rental Income (£'000) | Budget |
| Rent Receivable | 18,652 |
| Void Losses | (422) |
| Net Rental Income | 18,230 |
| <i>Void Loss %</i> | 2.3% |
| Average Stock | 2,841 |
| Average Rent per Property (£) | 6,565 |

| | 2025/26 |
|-----------------------------|---------------|
| Other Income (£'000) | Budget |
| Garages and lockups | 20 |
| Gift aid income | 235 |
| Mid-market rent | 96 |
| | 351 |

| | 2025/26 |
|-----------------------------|---------------|
| Grant Income (£'000) | Budget |
| New build | 9,922 |
| <i>Other</i> | |
| Adaptations | 120 |
| | 120 |

Comments

- The 2025/26 rental income budget has been set at £18,652k. The budget applies the approved rent increase of 6.9% for 2024/25.
- 2025/26 budgeted void losses of £422k equates to a void rate of 2.3%, which is prudent based on current year performance.
- Other Income is budgeted at £351k for 2025/26 and includes recognition of gift aid paid to Loretto [REDACTED]
- New build grant income is recognised in the Operating Statement upon completion of units. During 2025/26, we expect 24 units to complete at East Lane (Paisley), 44 units at South Crosshill (Bishopbriggs), and 17 unit at Bank St (Coatbridge).
- Other grant income relates to medical adaptations.

Employee and Running Costs

| | 2025/26 Budget |
|--|-------------------|
| Employee Costs (£'000) | |
| Employee Costs - Direct | 1,548 |
| Employee Costs - Group Services | 1,015 |
| Employee Costs (Net of Capitalisation) | 2,563 |
| ER-VR Costs | - |
| Total Employee Costs | 2,563 |

| | 2025/26 Budget |
|-------------------------------------|-------------------|
| Direct Running Costs (£'000) | |
| Employee related | 35 |
| Running costs | 1,098 |
| Property costs | 785 |
| Initiatives | 127 |
| Bank Charges | 34 |
| Total Running Costs - Direct | 2,079 |
| Running Costs - Group Services | 606 |
| Total Running Costs | 2,685 |

| | 2025/26 Budget |
|---|-------------------|
| Breakdown of Initiatives (£'000) | |
| Donation to Wheatley Foundation | 87 |
| Helping Hand Fund Livingwell | 5 |
| Think Yes | 35 |
| | 127 |

Comments

Employee Costs

- The total 2025/26 budget for employee costs (net of capitalisation) has been set at £2,563k.
- The 2025/26 budget reflects the cost of living uplift for both direct and group services employee costs, the additional national insurance announced in the UK Government Autumn 2024 budget and the continued reduction in SPF employer pension contributions agreed for 2025/26.
- Direct employee costs include Frontline housing staff (£721k), the Nets service (£539k), W-360 services (£49k), Compliance (including MyRepairs) & investment team (£201k) and SHAPS scheme expenses (£38k).
- There is no provision for ER/VR costs in the 2025/26 budget.

Running Costs

- Total running costs (Direct and Group services) are budgeted at £2,685k for 2025/26.
- Approximately a third of the direct running costs budget relates to group recharges and is comprised of recharges from WH Glasgow for Loretto's share of: 1) Nets service running costs (mainly vehicles, equipment, materials and depot costs); 2) Compliance, including MyRepairs and Investment team running costs and 3) Wheatley 360 running costs; in addition to payment of service charge income generated from temporary accommodation and Livingwell sites to Wheatley Care for services provided by Wheatley Care at these sites, adjusted for property costs paid by Loretto on Wheatley Care's behalf.
- Insurance comprises a significant proportion of property costs. Other key property costs include cleaning costs associated with supported properties, factoring charges and rent to external lease providers.
- Initiatives costs include provision for Think Yes. Here For You support will continue through Wheatley Foundation in 2025/26, with part of the 2025/26 donation from Loretto contributing to the Fund.

Repairs and Maintenance

| | 2025/26 |
|--|--------------|
| Repair & Maintenance Expenditure (£'000) | Budget |
| Responsive Repairs | 2,547 |
| Property cyclical | 119 |
| Compliance cyclical* | 1,914 |
| Housing Property Utilities | 389 |
| | 4,969 |
| *Includes gas servicing, M&E equipment servicing, electrical testing and TMVs. | |

Comments

- Budgeted repairs and maintenance expenditure on our properties is £4,969k for 2025/26.
- The budget reflects an inflationary uplift in cost with demand levels for reactive repairs assumed to be similar to 2024/25.

Capital Expenditure

| | 2025/26 Budget |
|--|-------------------|
| Capital Expenditure (£'000) | |
| Investment Works - Grant | |
| Medical adaptations | 120 |
| | 120 |
| Investment Works | |
| Core programme | 3,268 |
| Medical adaptations | 120 |
| Capitalised repairs and voids | 726 |
| Capitalised employee costs | 383 |
| | 4,497 |
| New Build Development - Grant | |
| Various sites | 1,765 |
| | 1,765 |
| New Build Development - Cost | |
| New build development programme | 5,534 |
| Development fund | 75 |
| Capitalised employee, insurance and interest costs | 928 |
| | 6,537 |
| Other Capital Investment | |
| Group IT Investment | 302 |
| | 302 |
| TOTAL CAPITAL EXPENDITURE | 11,336 |
| NET CAPITAL EXPENDITURE | 9,451 |

Comments

- Net capital expenditure is budgeted at £9,451k for 2025/26, and provides for significant investment in new build and existing properties.
- **Investment works** of £4,497k includes £3,268k for core programme works (low rise fabric, kitchens, bathrooms etc.) inclusive of related fees and includes £615k on investment priorities set out in our neighbourhood plans. In addition, provision for capitalisation of large repair jobs and void repairs, including the NETs void squad is included.
- The total budget includes capitalised employee costs of £383k, which relates to staff who are directly linked to the investment programme or maintaining the value of our housing stock.
- **New build spend and grant income** are budgeted at £6,537k and £1,765k, respectively. Spend includes £237k for a 5% management charge on the design and build services provided by WDS.
- The budget includes developments at Bank St (Coatbridge), South Crosshill (Bishopbriggs) and Forfar Avenue (Glasgow), in addition to the refurbishment of Duke Street.
- **Other capital investment** of £302k includes Loretto's share of Group IT capital projects.

Report

To: Loretto Housing Board

By: Lyndsay Brown, Director of Financial Reporting

Approved by: Pauline Turnock, Group Director of Finance

Subject: Finance report

Date of Meeting: 24 March 2025

1. Purpose

- 1.1 The purpose of this report is to:
- Provide an overview of the management accounts for the period to 28 February 2025; and
 - Seek approval of a proposed new debt facility of £7.3m with Allia Social Impacts Investments Limited ("Allia").

2. Authorising and strategic context

- 2.1 Under the terms of the Intra-Group Agreement between Loretto Housing and the Wheatley Group, as well as the Terms of Reference, the Board is responsible for the on-going monitoring of performance against agreed targets. This includes the on-going performance of its finances.
- 2.2 Under the Group Standing Orders, the Board is required to approve borrowing levels and any associated loan agreements, covenant returns and granting of security in line with the Board's terms of reference.
- 2.3 The Group Board and the Wheatley Funding No.1 Limited ("WFL1") Board have approved a new loan of up to £13m from Allia at their February Board meetings. The amount of funding available has now been confirmed at £7.3m.

3. Background

3.1 Financial performance

The results for the period to 28 February 2025 are summarised below.

| | Actual £000 | Budget £000 | Variance £000 |
|--------------------------------|----------------|----------------|------------------|
| Turnover | 17,245 | 15,418 | 1,827 |
| Operating expenditure | (14,600) | (14,843) | 243 |
| Operating surplus | 2,645 | 575 | 2,070 |
| <i>Operating margin</i> | <i>15.3%</i> | <i>3.7%</i> | <i>11.6%</i> |
| Net interest payable | (3,419) | (3,680) | 261 |
| Deficit | (774) | (3,105) | 2,331 |
| Net Capital Expenditure | 13,391 | 12,786 | (605) |

4. Discussion

- 4.1 A statutory deficit of £774k has been reported for the period to 28 February 2025, which is £2,331k favourable to budget. The favourable position is mainly due to the additional grant income from earlier than budgeted new build completions at Croy, and a favourable expenditure position compared to budget.

Key points to note:

- Within income, our strong letting performance continues with a year-to-date void rate of 1.81% reported compared to the budgeted rate of 2.51% providing £108k additional rental income compared to budget.
- In operating costs, total costs are £243k favourable to budget:
 - Employee costs are £13k favourable to budget linked to a vacancy in the team earlier in the year, partly offset with additional spend from Wheatley Solutions for group employee costs.
 - Total running costs are £81k favourable to budget, linked to efficiency savings in cleaning and lower group recharges due to efficiency savings in IT running costs and several Wheatley Solutions departments currently reporting lower costs.
 - Revenue repairs and maintenance spend is being managed within the overall budget envelope and reports spend £117k lower than budget. Within the total repairs spend, responsive & cyclical repairs are £220k favourable to budget, partly offset by compliance spend being £103k higher than budget due additional M&E costs.
- Net capital expenditure is £605k higher than budget, mainly due to the full grant for South Crosshill being received in the previous year, but the spend occurring in 2024/25 as planned. This is partially offset with lower spend at Duke Street, due to the timing of the budget. In our core programme a total of £2,959k has been invested in tenants' homes in the year to date which is £285k lower than budget due to the profiling of the programme in the fourth quarter.

Allia Loan

- 4.2 We most recently arranged a £40m loan with Allia with funds drawn in October 2023 in the name of Wheatley Funding No.1 Limited ("WFL1"), the treasury funding vehicle for the Group RSLs and WDSL. Allia provides financing to the Scottish social housing sector, acting as an intermediary for the Scottish Government's 'charitable bond' programme to fund the construction of affordable homes. Loans are arranged on a fixed rate basis.
- 4.3 The Group's funding strategy was set out in a paper presented to Group Board in June 2024, including the RSL Borrower Group's requirement to raise new funding to support the delivery of our new build programme. Allia debt is provided on an unsecured basis with interest payments deferred until maturity, conferring a cashflow benefit during the term of the loan. There is no interest cover covenant requirement.

- 6.2 The Allia loan does not have a direct sustainability link. It is a requirement from Scottish Government that the loan is used to fund the supply of new social and mid-market rent homes which meet stretching energy efficiency standards.

7. Digital transformation alignment

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

8. Financial and value for money implications

- 8.1 The statutory deficit for the period to 28 February 2025 is £2,331k favourable to budget. Delivery of our cost efficiency targets embedded within the 2024/25 budget is a key element of continuing to demonstrate value for money.
- 8.2 After adjusting the net operating surplus for new build grant income, depreciation, one-off payments not related to underlying surplus, and including capital expenditure in our properties, an underlying surplus of £1,098k is reported which is £907k favourable to budget driven by an improved net operating surplus position due to higher net rental income, lower expenditure and the timing of investment spend.
- 8.3 The Group's ability to successfully deliver new build housing helps strengthen the income streams in our business plan and supports our RSLs' charitable objectives to address housing need. As set out in paragraph 4.6, the pricing of the new loan is better than our assumed cost of funding in our financial projections and other sources of funding currently available to us.

9. Legal, regulatory and charitable implications

- 9.1 There are no direct legal, regulatory and charitable implications arising from this report.
- 9.2 We have been advised by Brodies in respect of the Allia funding agreement. The Allia agreement is unsecured saving time and legal fees. The SHR will be updated about the new loan in our regular quarterly meetings. There are no charitable implications arising from the new loan facility.

10. Risk Appetite and assessment

- 10.1 The Board's agreed risk appetite for business planning and budgeting assumptions is "open". This level of risk tolerance is defined as "prepared to invest for reward and minimise the possibility of financial loss by managing the risks to a tolerable level".
- 10.2 Delivery of financial results within approved budgetary limits is a key element in delivering our strategy and maintaining the confidence of investors.
- 10.3 Raising funding to support our ambitions is a key Strategic Outcome. Our agreed risk appetite for the operational delivery of raising funding is cautious, preferring safe delivery options that have a low degree of inherent risk. The previous track record of dealing with Allia, the associated pricing and the unsecured nature of the loan meets this risk criteria.

11. Equalities implications

11.1 There are no equalities implications arising from this report.

12. Key issues and conclusions

12.1 This paper presents the financial performance for the period to 28 February 2025.

12.2 The proposal to borrow £7.3m [REDACTED] until October 2032 through the Scottish Government Charitable Bond Programme provides us with an opportunity to take advantage of well-priced, unsecured debt under existing documentation. It can be delivered at a rate lower than the assumed cost of funds in our current financial projections and alternative sources of funding currently available to us.

13. Recommendations

13.1 The Board is requested to:

- 1) Note the Finance Report for the period ended 28 February 2025 at Appendix 1.
- 2) Approve the new £7.3m Allia facility to fund delivery of new affordable homes

LIST OF APPENDICES:

Appendix 1: Period 11 – 28 February 2025 Finance Report

[REDACTED]



Loretto
Housing

Period to 28 February 2025

Finance Report

 Wheatley
Group

1a. Operating Statement – Period to 28 February 2025

| | Period To 28 February 2025 | | | Full Year |
|--------------------------------------|----------------------------|----------------|----------------|---------------|
| | Actual £k | Budget £k | Variance £k | Budget £k |
| INCOME | | | | |
| Rental Income | 15,678 | 15,666 | 12 | 17,103 |
| Void Losses | (284) | (392) | 108 | (423) |
| Net Rental Income | 15,394 | 15,274 | 120 | 16,680 |
| Grant Income | 1,709 | 0 | 1,709 | 5,766 |
| Other Grant Income | 41 | 41 | 0 | 117 |
| Other Income | 101 | 103 | (2) | 815 |
| Total Income | 17,245 | 15,418 | 1,827 | 23,378 |
| EXPENDITURE | | | | |
| Employee Costs - Direct | 1,123 | 1,142 | 19 | 1,246 |
| Employee Costs - Group Services | 816 | 810 | (6) | 885 |
| ER / VR | 0 | 0 | 0 | 0 |
| Direct Running Costs | 1,678 | 1,735 | 57 | 1,905 |
| Running Costs - Group Services | 434 | 458 | 24 | 507 |
| Revenue Repairs and Maintenance | 3,883 | 4,000 | 117 | 4,464 |
| Bad debts | 126 | 158 | 32 | 172 |
| Depreciation | 6,540 | 6,540 | 0 | 7,156 |
| TOTAL EXPENDITURE | 14,600 | 14,843 | 243 | 16,335 |
| OPERATING SURPLUS / (DEFICIT) | 2,645 | 575 | 2,070 | 7,043 |
| <i>Net operating margin</i> | <i>15.3%</i> | <i>3.7%</i> | <i>11.6%</i> | |
| Interest Payable | (3,419) | (3,680) | 261 | (4,157) |
| STATUTORY SURPLUS / (DEFICIT) | (774) | (3,105) | 2,331 | 3,124 |

Income and Expenditure account – key points

A net operating surplus of £2,645k, £2,070k favourable to budget and a statutory deficit of £774k, £2,331k favourable to budget is reported. Grant income from earlier than budgeted new build completions and a favourable expenditure position compared to budget is contributing to the favourable performance.

- Net rental income is £120k favourable to budget largely due to void losses of 1.81% in the year to date compared to the budgeted 2.5%.
- Grant income is £1,709k favourable to budget with Constarry Road, Croy (15 SR units) completing ahead of schedule. The development was budgeted to complete in 2025/26.
- Other grant income includes £39k of medical adaptation grant funding.
- Total employee costs (direct and group services) are £13k favourable to budget linked to a vacancy in the team earlier in the year, partly offset with additional spend from Wheatley Solutions for group employee costs.
- Total running costs are £81k favourable to budget, linked to a saving in cleaning costs. Group recharges are favourable to budget due to savings in IT running costs and several other departments reporting lower costs across Wheatley Solutions.
- Revenue repairs and maintenance is £117k favourable to budget. Responsive repairs are £201k favourable to budget, offset by compliance spend being £103k higher than budget due to additional M&E costs.
- Bad debts are £32k favourable to budget. A prudent approach was taken when setting the budget.
- Net Interest payable is £261k favourable due to the timing of loan drawdowns and lower base rate on the variable loans compared to budget.

Net capital expenditure of £13,391k is £605k higher than budget.

- Capital investment income (grant) is £8,525k lower than budget due to the timing of new build grant claims at Forfar, which is not yet on site, and South Crosshill, which was received in full in the prior year.
- Investment programme expenditure of £2,959k relates to core programme works, capitalised repairs and voids. A favourable variance is reported due to the timing of core programme works.
- New build spend is £7,632k lower than budget due to the timing of spend for Forfar and Duke Street, which is partially offset with spend at Bank Street, South Crosshill and Constarry Road being ahead of budget.
- Other capital expenditure of £352k relates to Loretto's contribution to Wheatley Group IT costs.

| | Period To 28 February 2025 | | | Full Year |
|--|----------------------------|---------------|----------------|---------------|
| | Actual £k | Budget £k | Variance £k | Budget £k |
| INVESTMENT | | | | |
| Total Capital Investment Income | 5,366 | 13,891 | (8,525) | 14,933 |
| Investment Programme | 2,959 | 3,244 | 285 | 3,496 |
| New Build Programme | 15,446 | 23,078 | 7,632 | 24,959 |
| Other Capital Expenditure | 352 | 355 | 3 | 387 |
| TOTAL CAPITAL EXPENDITURE | 18,757 | 26,677 | 7,920 | 28,842 |
| NET CAPITAL EXPENDITURE | 13,391 | 12,786 | (605) | 13,909 |

1b. Underlying surplus – Period to 28 February 2025

Key comments:

- The Operating Statement (Income and Expenditure Account) on page 2 is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2014).
- However, the inclusion of grant income on new build developments creates volatility in the results and does not reflect the underlying cash surplus/deficit on our letting activity.
- The chart below therefore shows a measure of underlying surplus which adjusts our net operating surplus by excluding the accounting adjustments for the recognition of grant income and depreciation, including capital expenditure on our existing properties.
- At February, the underlying surplus is £1,098k, £907k favourable to budget. The variance to budget is primarily driven by an improved net operating surplus position due to a higher net rental income, lower operating expenditure, lower loan interest and the timing of investment spend.

| Loretto Underlying Surplus - February 2025 | | | | |
|--|------------------|------------------|--------------------|-----------------|
| | YTD Actual £k | YTD Budget £k | YTD Variance £k | FY Budget £k |
| Net operating surplus | 2,645 | 575 | 2,070 | 7,043 |
| add back: | | | | |
| Depreciation | 6,540 | 6,540 | 0 | 7,156 |
| less: | | | | |
| Grant income | (1,709) | 0 | (1,709) | (5,766) |
| WDS gift aid income | 0 | 0 | 0 | (703) |
| Net interest payable | (3,419) | (3,680) | 261 | (4,157) |
| Total expenditure on Investment Programme | (2,959) | (3,244) | 285 | (3,496) |
| Underlying surplus | 1,098 | 191 | 907 | 77 |
| | | | | |

2a. Repairs & Investment Programme – YTD February 2025

| Repairs & Maintenance Expenditure | 1 April 2024 - 28 February 2025 | | |
|-----------------------------------|---------------------------------|--------------|-------------|
| | Actual £k | Budget £k | Variance £k |
| Responsive Repairs | 2,020 | 2,221 | 201 |
| Cyclical (local) | 61 | 80 | 19 |
| Compliance Revenue | 1,802 | 1,699 | (103) |
| Total | 3,883 | 4,000 | 117 |

| 2024/25 Budget £k |
|----------------------|
| 2,439 |
| 94 |
| 1,931 |
| 4,464 |

Repairs and maintenance

- Revenue repairs and maintenance spend of £3,883k is £117k favourable to budget.
- Responsive repairs are £201k favourable to budget noting we continue to closely monitor job numbers and cost.
- Overall revenue compliance costs are £103k unfavourable to budget mainly due to additional Equans M&E costs.
- All legislative requirements are met within the required timescale.

| Investment Programme | 1 April 2024 - 28 February 2025 | | |
|--|---------------------------------|--------------|-------------|
| | Actual £k | Budget £k | Variance £k |
| Investment Programme Grant Income | | | |
| Adaptations | 39 | 41 | (2) |
| Empty Homes | 2 | 0 | 2 |
| Total | 41 | 41 | 0 |
| Investment Programme Expenditure | | | |
| Adaptations | 101 | 106 | 5 |
| Empty Homes | 3 | 0 | (3) |
| Core programme | 1,807 | 2,239 | 432 |
| Capitalised repairs | 344 | 261 | (83) |
| Capitalised staff | 334 | 332 | (2) |
| Void repairs | 370 | 306 | (64) |
| Total | 2,959 | 3,244 | 285 |

| 2024/25 Budget £k |
|----------------------|
| 117 |
| 0 |
| 117 |
| 117 |
| 0 |
| 2,394 |
| 287 |
| 362 |
| 336 |
| 3,496 |

Investment Programme

- Investment Programme expenditure of £2,959k in the year is £285k favourable to the budget.
- Core programme works are £432k favourable to budget, mainly due to the timing of the windows and doors programme.
- Empty homes works relates to unbudgeted grant funded spend on properties to bring them back into habitable condition as part of increasing provision of homes to families experiencing homelessness including ex office conversions to dwellings.
- Higher spend is reported in in adaptations, capitalised repairs, capitalised staff and void repairs and our repairs and housing teams are closely monitoring the spend to manage the spend within the overall budget.

2b. New Build Programme – Period to 28 February 2025

| | *Status | Contractor | Period To February 2025 | | | Full Year |
|---|-----------------|-----------------|-------------------------|---------------|----------------|---------------|
| | | | Actual | Budget | Variance | Budget |
| Vellore Road | Complete | Lovell | 0 | 36 | 36 | 36 |
| East Lane | On site | JR Group | 5,188 | 5,033 | (155) | 5,054 |
| Forfar Avenue | Approved | McTaggart | 16 | 4,450 | 4,434 | 4,793 |
| South Crosshill | On site | BWD Trading | 4,944 | 4,493 | (451) | 4,804 |
| Constarry Road, Croy | Complete | Miller Homes | 2,746 | 2,021 | (725) | 2,149 |
| Barrhill | Feasibility | Cala West | 0 | 1 | 1 | 2 |
| Dargavel North | Feasibility | Taylor Wimpey | 0 | 824 | 824 | 1,151 |
| Bank Street | On site | McTaggart | 1,888 | 1,665 | (223) | 1,936 |
| Jackton Green | Feasibility | Avant Homes | 0 | 22 | 22 | 32 |
| Manse Avenue | Not Progressing | Not Progressing | 0 | 224 | 224 | 342 |
| Duke St | TBC | TBC | 60 | 3,637 | 3,577 | 3,813 |
| Prior Year | - | - | 49 | 0 | (49) | 0 |
| Total Social Rent | | | 14,891 | 22,406 | 7,515 | 24,112 |
| Land Acquisition | - | - | 0 | 92 | 92 | 100 |
| Capitalised Insurance | - | - | 7 | 9 | 2 | 10 |
| Capitalised Interest | - | - | 0 | 0 | 0 | 114 |
| Capitalised Staff Costs | - | - | 548 | 571 | 23 | 623 |
| Total New Build Investment | | | 15,446 | 23,078 | 7,632 | 24,959 |
| Grant Income | | | 5,326 | 13,850 | (8,524) | 14,816 |
| Net New Build Costs | | | 10,120 | 9,228 | (892) | 10,143 |
| Grant Income Completions (Recognised in OPS) | | | 1,709 | 0 | 1,709 | 5,766 |

Capital Investment Income

Grant income reported within the capital budget represents the cash received in the year and outstanding claims accrued.

New Build Expenditure

East Lane, Paisley: 48 units social rent. Board approved in November 2022 and an above benchmark grant was awarded. The project started on site in May 2023, but then paused to deal with additional Council queries. Works resumed in November 2023. Completions were budgeted for March 2025, forecast position assumes 24 units in March and 24 at the start of 2025/26.

Forfar Avenue: 30 units for Livingwell. WDS Board approved in November 2023 and grant funding approved in February 2024. Building warrant and planning consent received in June 2024. Grant to fund the development is not available in 2024/25 so site start remains deferred pending a funding route being agreed with GCC.

South Crosshill Rd, Bishopbriggs: s75 project with Barratt Homes for 44 social rent units. WDS Board approved in August 2023 with grant awarded February 2024. Full grant funding from Allia received mid-May. Second and final Golden Brick payment made in April 2024. Handovers budgeted for completion in 2025/26.

Constarry Road, Croy: 15 units social rent. Board approved in November 2023 and grant awarded February 2024. Site start was March 2024 with all units completing in December 2024 ahead of programme (due early 2025/26).

Barrhill: s75 with Cala for 18 social units. Planning public consultations occurred in 2023. Cala delayed the project pending a Council consultation (ended 21 February 2025) on developer contributions. No timescales yet for consultation outcomes.

Dargavel North: s75 opportunity for 20 social rent units with Taylor Wimpey who intend buying the affordable land tranche in Q2 2025/26. Plan is to conclude contracts in Q2 2025/26.

Bank Street, Coatbridge: 17 units social rent. Board approved in February 2024 for the land acquisition and tender. Land acquisition and building contract concluded in August 2024 with works on site also starting August 2024. Project completion scheduled for November 2025.

Duke Street: 19 units social rent. An alternative delivery route is now being progressed through our Frameworks.

Dargavel Phase 3: Dundas Estates acquired the site from the administrators for Stewart Milne and are working with us to progress the project supported by Renfrewshire Council. WDS Board approved in January 2025 subject to a satisfactory grant offer, which has been received and accepted, and conclusion of legal agreements.

3. Balance Sheet

| | 28 February 2025 £k | 31 March 2024 £k |
|-------------------------------------|------------------------|---------------------|
| Tangible Fixed Assets | | |
| Housing Properties | 173,076 | 160,975 |
| Investment Properties | 1,190 | 1,190 |
| Other Assets | 1,495 | 1,378 |
| | <u>175,761</u> | <u>163,543</u> |
| Current Assets | | |
| Rent and service charge arrears | 640 | 551 |
| less: Provision for rent arrears | (396) | (385) |
| Prepayments and accrued income | 223 | 3 |
| Intercompany balances | 353 | 43 |
| Other debtors | 1,291 | 2,650 |
| | <u>2,111</u> | <u>2,862</u> |
| Cash at Bank and in Hand | 672 | 714 |
| | <u>2,783</u> | <u>3,576</u> |
| Short Term Creditors | | |
| Trade creditors | (138) | (254) |
| Accruals | (1,520) | (2,581) |
| Deferred income | (5,769) | (3,611) |
| Rent and service charges in advance | (1,329) | (1,294) |
| Intercompany balances | (5,108) | (3,562) |
| Other creditors | (413) | (485) |
| | <u>(14,277)</u> | <u>(11,787)</u> |
| Net Current Assets | (11,494) | (8,211) |
| Long Term Creditors | | |
| Amounts due after one year | (86,178) | (77,928) |
| Deferred Income | (6,591) | (5,132) |
| Pension Liability | (3,304) | (3,304) |
| | <u></u> | <u></u> |
| Net Assets | 68,194 | 68,968 |
| Capital and Reserves | | |
| Share Capital | - | - |
| Revenue Reserve - b/fwd | 72,272 | 59,987 |
| Current year surplus/(deficit) | (774) | 12,285 |
| Pension Reserves | (3,304) | (3,304) |
| | <u></u> | <u></u> |
| Association's Funds | 68,194 | 68,968 |

Key Comments

The balance sheet as at 31 March 2024 reflects the audited position.

- **Fixed Assets** - Expenditure is capitalised in accordance with our accounting policy.
- **Investment Properties** –Barclay Street Mid-Market Rent properties, leased to Lowther Homes.
- **Current Assets (excluding cash)**– Currents assets are £751k lower than the March 2024 position, due to the timing of other debtors settlements, partly offset by an increase in net rent arrears (due to the timing of HB receipts), prepayments and intercompany balances.
- **Short Term Creditors** – Amount due within 1 year are £2,490k higher than the March 2024 position, mainly due to the timing of intercompany settlements and the increase in deferred income, partially offset by a reduction in accruals due to timing.
- **Deferred income (ST and LT)** – This relates to grant income for schemes currently on site. Upon completion of the properties this income will be released to the I&E as grant income.
- **Long-Term Creditors** - This includes £86.2m of loans due to Wheatley Funding No 1 Ltd, excluding deferred loan fees.

Report

To: Loretto Housing Board

By: Laurie Carberry, Director of Procurement

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

Subject: Group Procurement - Annual Strategy and policy updates

Date of Meeting: 24 March 2025

1. Purpose

- 1.1 This report presents the revised Group Procurement policy and an update on the changes made as part of the annual review of our Group Procurement Strategy 2025, Group Sustainable Procurement Statement and Group Community Benefits Statement.
- 1.2 This report will also detail Loretto Housing Procurement specific updates and performance information from 2023-2024.

2. Authorising and Strategic Context

- 2.1 The approval of policies being designated as applying Group-wide is reserved to the Group board under the Intra Group Agreement. From time to time the Group board may delegate such authority to a subsidiary Board or a Group Committee.
- 2.2 Under its Terms of Reference, set out in the Group Standing Orders, the Wheatley Solutions Board has delegated authority to approve the Group procurement strategy and policy. Under our Terms of Reference we are required to implement and comply with Group-wide policies.
- 2.3 Our procurement strategy and policy is a lever to support us in achieving strategic objectives within our strategy, such as creating job and training opportunities more widely, and maximising value for money.

3. Background

- 3.1 As a Contracting Authority, we must comply with legislative requirements for procurement and contracting arrangements. In total 99.38% of our expenditure is via formally contracted routes.
- 3.2 Our size and scale continue to be a significant driver for procurement activity within the Group, with Group-wide contracts leveraging it to help deliver better value for the wider Group.

4. Discussion

Procurement approach

- 4.1 This year, the suite of procurement documents has been updated to reflect the upcoming implementation of the Procurement Act 2023, effective February 2025. This legislation primarily affects the UK, excluding Scotland. Procurement is a devolved matter, and therefore, changes under the new legislation that impact Scottish procuring authorities are limited.
- 4.2 Moving forward, the provisions of the new legislation will only impact us when it draws from new national frameworks, such as those provided by Crown Commercial Services. The transition provisions in the legislation suggest that we are unlikely to begin drawing from national frameworks to which the new legislation applies until later in 2025 or even in 2026.
- 4.3 The Procurement Strategy is the wider Group plan for achieving the objectives of all Group members as well as the Scottish Government's commitments to efficient and effective procurement. It also considers legislative changes to ensure alignment with Scottish Government procurement legislation and best practices.
- 4.4 To deliver consistent and effective practices and procedures related to procurement, the Procurement Policy, Sustainability Statement, and Community Benefit Statement were developed as part of the overall Procurement Strategy. The documents must be reviewed annually.

Procurement Strategy

- 4.5 There were minimal alterations to be made to the Procurement Strategy 2025-2027 as we strive to fulfil our commitments. We have made updates to the Procurement Strategy to include references to the Procurement Act 2023, which will take effect from February 2025. Additionally, the pipeline has been updated to reflect the contracts procured over the past 12 months and the upcoming procurements for the next 24 months.
- 4.6 The Procurement Strategy notes the tender thresholds from January 1 2025: £5,372,609 for Works, £214,904 for Goods and Services, and £663,540 for 'Light Touch Regime' Services, excluding VAT. These thresholds remain unchanged from 2024. A copy of the revised Strategy document is available on request.

Procurement Policy

- 4.7 The Procurement Policy 2025 now features an enhanced Equity, Diversity, and Inclusion (“**EDI**”) policy reflecting our ongoing commitment to fostering an inclusive and equitable environment. This includes the commitment to mandate suppliers to adhere to the guidelines set by the Living Wage Foundation, which align with Fair Work First principles and incorporate recent legal changes that include a zero-tolerance approach to sexual harassment. It should also be noted that the Procurement Policy now contains references to the Procurement Act 2023, effective from February 2025.

- 4.8 We have further strengthened the procurement approach by reinforcing our commitment to Ethical, Social, and Environmental Responsibilities. This ensures that our tendering process is designed to deliver optimal results for our communities, promoting sustainability and social value from procurement activities. The policy now references our newly developed Contract Supplier Management (“**CSM**”) guidance, which sits alongside the Group Contract Risk Matrix, providing robust frameworks for managing contracts and assessing risks. A track changed copy is attached at Appendix 1.

Group Sustainable Procurement Statement

- 4.9 The Group Sustainable Procurement Statement 2025, outlines updates to our long-term sustainability targets. These include working towards becoming carbon neutral across our corporate estate, eliminating fuel poverty and reducing carbon emissions from our homes. Procurement will actively support these ambitions by sustainably sourcing goods, services and materials, whilst ensuring that our supply chains also work towards these targets.
- 4.10 Over the past year, we have begun surveying our supply chain through the Contract Management System (“**CMS**”) to determine which of our suppliers have a Sustainability/Net Zero strategy or are in the process of developing one. This monitoring and surveying will continue throughout 2025, enabling us to gain a more comprehensive understanding of our supply chain's sustainability achievements and goals, with a particular focus on Scope 3 emissions.

Community Benefits Statement

- 4.11 The Community Benefits Statement 2025 considers Scottish Government Guidance, legislation and proportionality, in line with Scottish Procurement Laws. The Community Benefits Statement has undergone significant changes from the previous year's document. It has been streamlined to enhance efficiency by the use of CMS for data gathering with a reduction of paperwork processing. However, what we are delivering remains materially unchanged, and we continue to provide similar outputs as before.
- 4.12 Our approach for community benefits through the CMS is used for conversations, campaigns, and data-gathering exercises. For example, the CMS enabled us to effectively engage with our supply chain on behalf of our ‘Better Christmas’ appeal. Moreover, the CMS has proved a vital resource in recording information, providing a means to collate community benefit returns from suppliers in line with Scottish Government requirements.
- 4.13 Furthermore, the statement has been updated to underscore the contract owner’s responsibility more clearly in collecting community benefits, as per the CSM Guidance, ensuring that all contractual obligations regarding community benefits are effectively managed and delivered.

Contract Management System

- 4.14 We have implemented the CMS to digitise our contracts and assist Contract Owners with their contract management responsibilities. A contract management training course has been rolled out for all contract owners. All supplier changes (bank details, addresses) and additions are now undertaken via the CMS and are subject to the two-part authentication.

- 4.15 Wider business intelligence is being collated on the CMS regarding route to market, providing insight to direct awards vs. market engagement. Additionally, we gather further insight from our supply chain by sending Requests for Information (“**RFIs**”) regarding their compliance on matters such as Health and Safety, Community Benefits, EDI and adherence to Group policies such as No PO, No Pay. Further RFIs will be issued on Sustainability and Cyber Security in the coming months.

5. Customer Engagement

- 5.1 All procurement exercises will consider customer engagement. Customer consultation will be conducted when applicable. Community benefit delivery outcomes will also include our key customer engagement activities.

6. Environmental and sustainability implications

- 6.1 Sustainability outcomes will be measured against Group targets. Procurement will actively be supporting these goals through sustainable sourcing of goods, services, materials and supply chains.

7. Digital transformation alignment

- 7.1 Helping to support the Group's wider digital transformation the CMS enables the digitisation of contracts providing a platform for real-time conversations and data gathering.

8. Financial and value for money implications

- 8.1 We continue to leverage our own and the wider Group's size and scale to ensure we deliver greater value for money for our customers. Effective procurement plays a role in meeting our sustainability and cost efficiency objectives.

9. Legal, regulatory and charitable implications

- 9.1 By publishing the Group Procurement Strategy by March 2025, we are meeting our legal obligation and adhering to government requirements. All procurement within the Group adheres to legislative procurement requirements.

10. Risk Appetite and Assessment

- 10.1 Our agreed risk appetite relating to laws and regulations is “**Averse**”. This level of risk tolerance is defined, as “Avoidance of risk and uncertainty is a key organisational objective.”
- 10.2 The key procurement strategic risk (“**SSR15**”) for the Group is Non-Compliance with current Scottish Procurement Legislation/Regulation relating to procurement and award of contracts. In order to mitigate any risks to the Group the following measures are embedded:
- Compliance with Group and subsidiary standing orders;
 - Annually reviewed Group procurement policy;
 - Visibility of our Contract Register;
 - Mandatory training for all staff authorised to procure ‘Passport to Procure’ eLearning tool;
 - Procurement plans for above-threshold procurements; and
 - Dedicated Procurement team with specialist knowledge/training Support from legal advice as required.

- 10.3 The Procurement Policy 2025, the updated Procurement Strategy 2025, Sustainable Procurement Statement 2025 and Community Benefits Statement 2025 help us mitigate the risks of non-compliance with regulation and legislation.

11. Equalities Implications

- 11.1 The Procurement Team promotes EDI across all areas of procurement business through its approach, relationships with Group-wide and local suppliers, and awareness of equalities legislation. Updates to our Procurement Policy and Community Benefits approach support our EDI aims as a Group.
- 11.2 Furthermore, our procurement strategy ensures an inclusive process through Equal Treatment, Non-Discrimination, Transparency and Proportionality, Prevention of Modern Slavery, Fair and Ethical trading, the Living Wage, and support for SMEs and social enterprises.

12. Key issues and conclusions

- 12.1 We must comply with legislative requirements for procurement and contracting arrangements due to the classification of Contracting Authority. Our procurement strategy, policy and associated processes and procedures allow us to meet our compliance requirements.
- 12.2 Within the context of meeting our compliance obligations, we still seek to use our procurement as a mechanism to deliver benefits for our community, support our organisational objectives such as sustainability and fair pay and conditions in our supply chain.

13. Recommendations

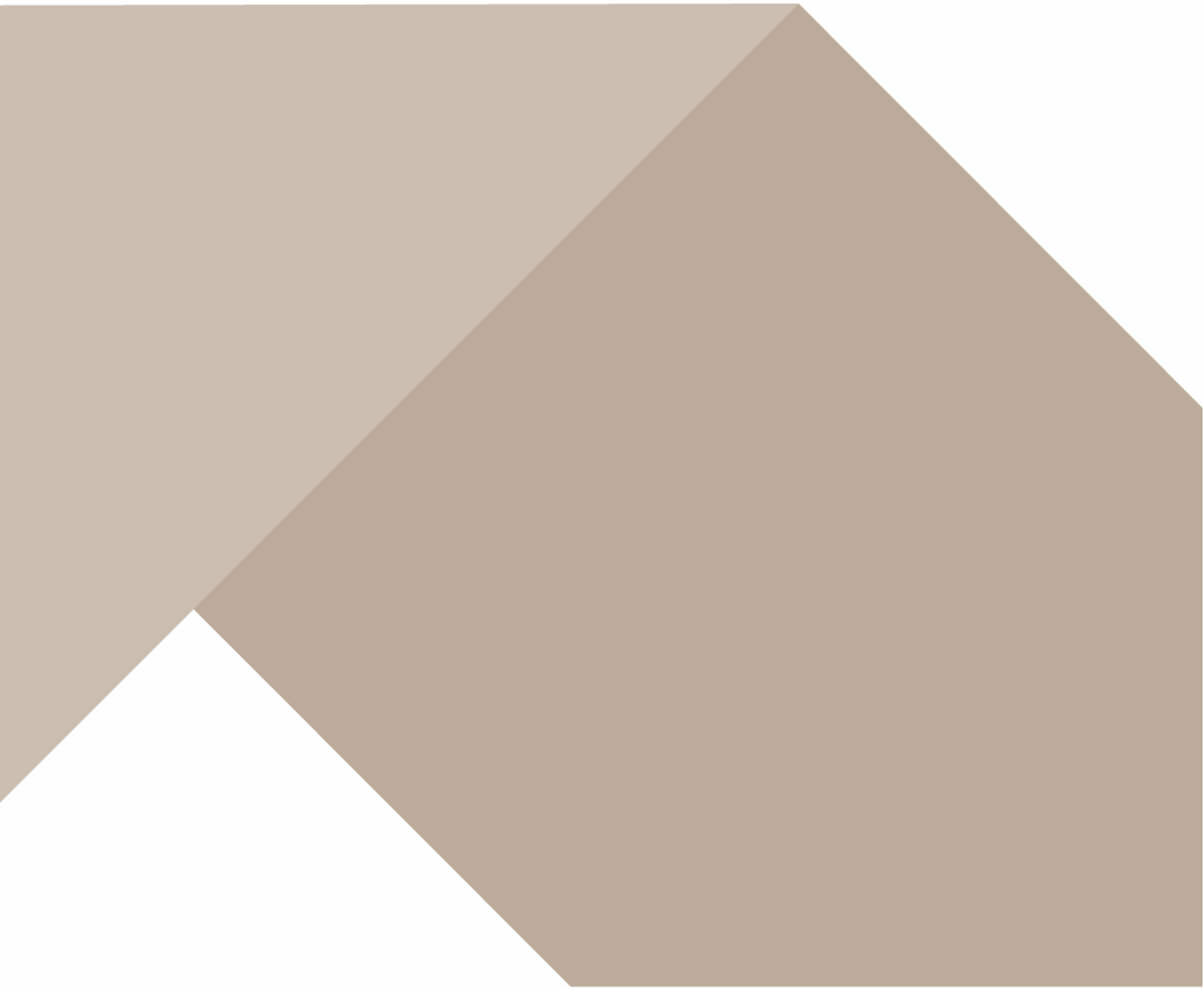
- 13.1 The Board is asked to note the revised Group Procurement policy.

LIST OF APPENDICES:

Appendix 1 - Group Procurement Policy 2025 final version
Appendix 1a – Group Procurement Policy (*tracked for review*)

Wheatley Group Group Procurement Policy 2025

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

The bottom half of the page features a large, abstract geometric design. It consists of several overlapping triangles and quadrilaterals in various shades of brown and tan, creating a modern, architectural look.

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

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

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

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو

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| | |
|---------------------------------|--------------------------|
| Approval body | Wheatley Solutions Board |
| Date of approval | February 2025 |
| Review Year | January 2026 |
| Customer engagement required | No |
| Trade union engagement required | No |
| Equality Impact Assessment | No |

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Schedule of Definitions

| Procurement Terminology | Definition |
|---|--|
| Board Member | A member of the governing body of an organisation, responsible for making key decisions and overseeing the management and operations of the organisation. |
| Collaborative Contracts | When two or more groups of people or organisations engage in procurement work together for mutual benefit. |
| Commodity | A raw material or primary product that is bought and sold e.g. copper, coffee. |
| Contract | An agreement between two or more parties that is legally binding. |
| Contract Award Notice | A publication which confirms the details of a contract which has been awarded to a supplier. |
| Contract Notice | A publication which advertises a procurement requirement. |
| Contract and Supplier Management | The process of monitoring supplier performance on a contract. |
| Contract Register | A published list of contracts put in place by a public sector organisation. This is a legislative requirement. |
| Contract Value | This is an estimate of the value of a contract over the whole period of the contract e.g. if the contract is for £50k per year for 3 years the contract value is £150k. The contract value should include any extension periods. |
| Freedom of Information (Scotland) Act (FOISA) | This legislation gives individuals access to information held by public authorities. |
| Frameworks or Framework Agreements | An agreement or other arrangement between one or more contracting authorities and one or more economic operators which establishes the terms (in particular the terms as to price and, where appropriate, quantity) under which the economic operator will enter into one or more contracts with a contracting authority in the period during which the framework agreement applies. |
| Key Suppliers | Those suppliers identified as business critical in terms of risk/value and business continuity. |
| KPIs | Key Performance Indicators. Measures put in place as part of the contract to evaluate how effective the contract is. |
| Life Cycle of Goods/Assets | How much money will be spent on an asset over the cost of its life. |
| Local Authority | A term used for councils in Scotland. |

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|---|--|
| Lots | Grouping similar requirements within a procurement e.g. by geographical location. |
| Negotiated Procurement Without Prior Publication | A procurement procedure which can be used, in limited circumstances, by public sector buyers to procure goods or services without advertisement. |
| Procurement Capability Improvement Programme (PCIP) | The Procurement Capability Improvement Programme (PCIP) drives procurement performance by assessing public sector organisations and identifying areas for continuous improvement. |
| Prior Information Notice (PIN) | A method of giving advanced notice of future planned procurement exercises. |
| Procurement Process | A procurement procedure can be run in a number of ways (procurement processes) e.g. a Framework Agreement. |
| Procurement Category Specialist | The name given to the role/person who is a buyer. They are an individual who spends the majority of their time working in a role that adds value to the quality, cost and effectiveness of the procurement or acquisition of goods and services. |
| Procurement Law | Comprises of the Procurement Reform (Scotland) Act 2014, the Procurement (Scotland) Regulations 2016 and the Public Contracts (Scotland) Regulations 2015 which apply to Wheatley and the Public Contracts Regulations 2015 and Procurement Act 2023 (coming into force at the end of February 2025) which are only relevant where Wheatley uses framework arrangements or dynamic markets put in place by contracting authorities outwith Scotland. |
| Procurement Strategy | It is mandatory document for a Scottish public sector organisation, which estimates it will spend greater than or equal to £5,000,000 on regulated procurements to publish a Procurement Strategy which is proportionate and relevant to its organisation. |
| Public Sector Body | All organisations which are subject to public procurement laws. This includes government, councils, universities and colleges, the NHS and registered social landlords. |
| Public Contracts Scotland (PCS) Portal | The national portal used by the Scottish public sector to advertise all regulated procurement opportunities and awards. |
| Quick Quote | A process used by public sector buyers in Public Contracts Scotland for low value/low risk procurement requirements (normally under £50k in value). |
| Regulated Procurement | A procurement whose value is greater than £50,000 excluding VAT for goods and/or services for the full life of the contract. Or greater than £2m for Works contracts. |

| | |
|--------------------------------|---|
| Risk Management | Activities undertaken to minimise negative impact. |
| Single Point of Enquiry (SPoE) | An impartial point of contact where suppliers can seek advice or raise concerns if they are dissatisfied with specific public procurement practices in Scotland. |
| Small Medium Enterprise (SME) | A small or medium-sized enterprise with fewer than 250 employees and a turnover of less than £36 million. They are further categorised as: <ul style="list-style-type: none"> ▪ Micro – 1–9 employees; ▪ Small – 10–49 employees; ▪ Medium – 50–250 employees; |
| Stakeholder | Any person or group who has a vested interest in the success of the procurement activity, i.e. either provides services to it, or receives services from it. |
| Supply Chain | All activities, resources, products etc. involved in creating and moving a product or service from the supplier to the procurer. |
| Supported Business | An organisation whose main aim is the social and professional integration of disabled and disadvantaged workers and where at least 30% of their workforce are classed as disabled or disadvantaged. |
| Tender | The term used to describe the procurement process of advertising, requesting and awarding a contract. |
| Threshold | Values that apply to public procurement exercises. |
| UK GDPR | General Data Protection Regulation legislates how personal data is handled and stored. |
| Value for Money (VfM) | An economic assessment by the public sector as to whether a project represents value for money; the optimum combination of cost and quality to provide the required service. |
| Waiver | The process which allows procurements to be achieved without following the full tendering procedures. This is typically used when a purchase is time-critical, there are no other suppliers available, or continuity is required. |

Within the above list of definitions, those relevant to procurement processes pick up the terminology under Procurement Law in Scotland. In 2005, new terminology will begin to be used for, for example, "contract notices" under the Procurement Act 2023 once in force. The Procurement Act 2023 will, however, only be relevant to Wheatley Group's call-off arrangements under collaborative procurement arrangements.

1. Introduction

Wheatley Housing Group ('The Group') is Scotland's leading housing, care and property management group. We are an organisation which currently comprises of four Registered Social Landlords, a Care Partner, a Charitable Foundation a Repairs Division and commercial subsidiaries.

The Group currently spans 19 Local Authority areas across Scotland.

Our Group partners are:

- Wheatley Homes Glasgow
- Wheatley Homes South
- Wheatley Homes East
- Loretto Housing Association
- Lowther Homes
- Wheatley Care
- Wheatley Solutions
- Wheatley Foundation
- *City Building (Glasgow)

We refer to the 50/50 Joint Venture with Glasgow City Council, City Building (Glasgow), as a Partner Organisation, although City Building (Glasgow) have their own governance procedures and undertake their own procurement processes for the supply of all goods and services.

This Procurement Policy applies to all employees in the Group and its subsidiaries in any situation where they are involved in a purchasing process. 'Purchasing' includes all procurement activities including leasing and hiring and may where appropriate include other activities accompanying the life cycle of goods (or service contracts) and the end-of-life disposal of goods which have been procured (whether or not they remain in our ownership). Adherence to the Procurement Policy is both an individual and a corporate responsibility; failure to comply may result in disciplinary action.

The purpose of the Procurement Policy is to set out the general operating principles covering the activities and objectives of Procurement within the Group. The document explains the principles under which Procurement throughout the Group will be undertaken and proactively managed such that the stakeholders' requirements for supplies, works and services are efficiently and effectively sourced at the lowest sustainable 'total' cost whilst delivering best value for money.

The Procurement Team is responsible for managing procurement on behalf of the Group ethically and in compliance with legislation. It is responsible for providing guidance and support across the Group and to support staff who procure on behalf of their subsidiary. Should you require any assistance or guidance with any procurement matter please contact procurement@wheatley-group.com.

Wheatley Housing Group / City Building (Glasgow) Joint Working Principles

In April 2017 the Group entered into a joint venture with Glasgow City Council. The Group became the 50/50 joint owner of City Building (Glasgow) (CBG) which delivers

investment, repairs and general maintenance work within the Group's Registered Social Landlords in the west of Scotland (including Wheatley Homes Glasgow, Wheatley Homes South and Loretto), the Group's commercial housing subsidiary Lowther Homes and its property management function.

We operate a collaborative approach to managing procurement across the Group with CBG. This will continue to be developed and agreed in line with the Group's compliance and legislation principles, reflecting best value and sustainability through the supply chain, determining the most effective route to market, jointly supporting SMEs, effectively benefiting the customer through the efficient management of Community Benefits and ultimately promoting excellence in procurement.

2. Principles, Aims and Objectives

Procurement activities must comply with all applicable UK laws and regulations. In particular all procurement must comply with, as relevant, the Public Contracts (Scotland) Regulations 2015, The Procurement (Scotland) Regulations 2016, Procurement Reform (Scotland) Act 2014, Concession Contract (Scotland) Regulations 2016 and the Housing (Scotland) Act 2001.¹

All procurement activity aims to achieve Best Value for the Group. Best Value includes not only the initial purchase price, but also continuing costs throughout the life cycle of equipment, materials works and services, such as financing and depreciation, maintenance requirements and energy usage. Best value also includes the quality and reliability of the supplies, works or services and the punctuality and reliability of their execution.

The Group will work collaboratively with suppliers wherever possible to create relationships within which the Procurement Team can learn how to make it easier for suppliers to meet stakeholder requirements and to further encourage suppliers to improve their products, prices, quality and service level delivery.

The Group will work with Government bodies and other public sector organisations to utilise collaborative procurement arrangements where they offer value for money. In addition, the Group will consider including collaborative arrangements within its contracts to enable other public sector bodies to benefit from its rates, learn methods and scope of work.

All procurement for supplies, works and services that the Group undertakes and the methods it uses to procure them must not infringe upon laws applicable at the time of the procurement, and must conform to applicable ethical, social and environmental standards.

¹ Going forward, pursuant to the coming into force of the Procurement Act 2023 on 24th and 25th February 2025, which applied predominantly outwith Scotland, where the Group undertakes call-offs from collaborative procurement approaches put in place under the Procurement Act 2023 the Group will require also to ensure compliance. With transition arrangements, this is not likely to impact materially in 2025.

3. Equity, diversity and inclusion (EDI)

We are dedicated to ensuring fair treatment for all our stakeholders and conducting business in a manner that actively promotes equality of opportunity while championing diversity and inclusion. The Group requires to comply with the Equality Act 2010 and moreover is committed to ensuring that no one is excluded or discriminated against based on religion or belief, race, age, sex, gender reassignment, sexual orientation, marriage or civil partnership, family circumstances, pregnancy and maternity, or disability in line. The Group has a zero-tolerance approach to bullying, harassment and victimisation and works to ensure that employees are safe within the workplace from such treatment including sexual harassment.

We also prioritise the highest standards of worker protection, focusing on the safety, well-being, and fair treatment of all our employees in line with the Worker's Protection Act 2023. This Act enhances the Equality Act 2010 by further strengthening provisions aimed at ensuring fair treatment and non-discrimination in the workplace. While the Equality Act 2010 consolidates and updates previous anti-discrimination laws to protect individuals from unfair treatment, the Worker's Protection Act builds on this foundation by introducing additional measures to safeguard workers' rights.

Real Living Wage

The Group are an accredited Real Living Wage employer who are dedicated to ensuring that our employees receive fair compensation for their hard work. We pay and are committed to paying the real Living Wage, as a minimum, to all our employees. In addition to our internal commitment, we actively encourage our suppliers to adopt the same standard. We believe that fair wages are essential for fostering a motivated and productive workforce, and we expect our suppliers to share this ethos. By promoting the real living wage throughout our supply chain, we aim to create a positive impact on the broader community and support the well-being of workers at all levels.

Fair Work First

Fair Work First is the Scottish Government's flagship policy for driving high quality and fair work across the labour market in Scotland by applying fair work criteria to grants, other funding and contracts being awarded by and across the public sector, where it is relevant to do so. Through this approach, the Scottish Government is asking employers to adopt fair working practices, specifically:

- Payment of at least the real Living Wage.
- Providing appropriate channels for effective workers' voice, such as trade union recognition.
- Investment in workforce development.
- No inappropriate use of zero hours contracts.
- Action to tackle the gender pay gap and create a more diverse and inclusive workplace.

- Offer flexible and family friendly working practices for all workers from day one of employment
- Opposing the use of fire and rehire practices

The Group values the culture of partnership working that has been established with Trade Union Colleagues and will continue to work together to develop transparent mechanisms for employee voice and engagement founded on trust and respect.

The Groups values and the priorities are aligned to the Fair Work First principles.

Although not directly applicable to us, we are also considerate of the Fairer Scotland Duty, as set out in part one of the Equality Act 2010. This places a legal responsibility on public bodies in Scotland to actively consider and ‘pay due regard to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making strategic decisions’²

Social mobility is a key theme threaded through our EDI actions. The Group recognises the role it plays in our local economies and is focused on targeting underlying weaknesses which include underemployment, above average levels of youth unemployment and low levels of qualifications. As a result, it shall support its stakeholders by seeking to provide education/employment opportunities via Group business activity and its supply chain. This includes the social value created by contracting with Supported Businesses.

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

Through our Contract Management System, we survey our suppliers to find out more about their commitment to EDI, their policies, and encourage our suppliers to detail how they reflect our EDI aspirations within their working practices.

You can access the Group’s EDI and Human Rights policy [here](#).

² [About the Duty - Fairer Scotland Duty: guidance for public bodies - gov.scot \(www.gov.scot\)](#)

4. Data Protection

The Group holds a wide range of sensitive information, both of a personal and a commercial nature. We have a duty to protect this information and ensure it is not seen or accessed by people (whether internal or external to the Group) without the legal authority to do so.

The Group's policy position in respect of data protection is reflected in the Group's Data Protection Policy.

The Group must comply with all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR, the Data Protection Act 2018 (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003 (SI 2003 No. 2426) as amended, and the guidance and codes of practice issued by the Information Commissioner.

The Group will continue to carry out Data Privacy Impact Assessments (DPIA) when required to do so by law or good practice, on all activities which involve personal data or the exchange of personal data to help us identify the most effective way to comply with our data protection obligations and meet individuals' expectations of privacy. The UK GDPR requires us to undertake DPIAs in circumstances where we: -

- use systematic and extensive profiling with significant effects;
- process special category or criminal offence data on a large scale; or
- systematically monitor publicly accessible places on a large scale.

The Information Commissioner requires data controllers to undertake a DPIA if they plan to:

- use systematic and extensive profiling or automated decision-making to make significant decisions about people;
- process special-category data or criminal-offence data on a large scale;
- systematically monitor a publicly accessible place on a large scale;
- use innovative technology in combination with any of the criteria in the European guidelines;
- use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit;
- carry out profiling on a large scale;
- process biometric or genetic data in combination with any of the criteria in the European guidelines;
- combine, compare or match data from multiple sources;
- process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;
- process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines; and

- process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them.

DPIAs help the Group to identify and reduce the privacy risks of a project and document any mitigations we are required to put in place. The purpose of a DPIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met wherever possible. The Group also has a duty to be accountable under the UK GDPR and requires DPIAs to be retained and updated by the contract owner where appropriate for audit and compliance purposes.

It is a standard condition of all our contracts that our suppliers and sub-contractors will comply with all data protection legislation and applicable regulations, including the UK GDPR, the Data Protection Act 2018, and all guidance and/or Codes of Practice published by the Information Commissioner's Office.

The requirement for DPIA will be considered within all relevant future procurement activities.

5. Ethical, Social and Environmental Responsibility

Fair and Equal Treatment of Suppliers

All procurement will be conducted such that all suppliers with the necessary abilities have a fair and equal opportunity to secure Group business including seeking to enable market access opportunities for Small & Medium Sized Enterprises (SMEs).

This includes, within the constraints of the regulated environment in which we operate and carrying out tendering in line with Procurement Law and relevant Scottish Government Statutory Guidance, conducting our procurements in a transparent manner, utilising public dynamic purchasing systems, frameworks and procurement processes that promote supplier diversity.

In practice, this enables a diverse range of suppliers to bid for contracts with us. Tender evaluations are conducted in line with Procurement Law. The Group is also committed to improving access to our contracts and empowering staff, in accordance with Procurement Law, to promote sustainability, for example through seeking to buy locally for low risk, low value purchases thus contributing to our local communities.

We shall appropriately review and evaluate all above-threshold and regulated contracts, considering the geographical location and the option of splitting them into smaller Lots, which may encourage SME participation. This will not be appropriate in every circumstance, and we retain our discretion not to Lot or retain larger value contracts as one Lot, determined by the best interests of the Group.

In particular, the Group will seek, where possible to promote local economic development and regeneration by actively encouraging fair and open competition across a varied supply base thus making it easier for all suppliers regardless of size to bid for contracts.

Prior to commencing a procurement exercise, we may seek to carry out market testing. To be open and transparent in our dealings we will only do this by going out to the market using the appropriate Prior Information Notice (PIN) on the Public Contract Scotland procurement portal, as applicable to regulated spend thresholds. Any improper approaches, whether in the form of inducements or threats from suppliers, must be reported to line managers, even if they are sufficiently ambiguous to allow for an innocent interpretation.

To ensure transparency and fair treatment of all suppliers during the tendering process and in compliance with the formal procurement process, all communication with suppliers will be carried out through the Public Contract Scotland portal and in accordance with arrangements set out in the Procurement Guidance section on the staff intranet, W.E. Connect, which staff must follow.

Ethical Standards of Staff

The Group insists on suppliers adhering to strict ethical standards and behaviour, in return the Group will also demonstrate the highest level of ethical standards. The Group will be fair, honest and transparent in all dealings with suppliers and avoid any conduct which may be adversely interpreted.

Persons engaged in any aspect of procurement on behalf of the Group will not use their authority for personal gain. Adhering to this policy will also help ensure that we comply with the requirements of The Bribery Act 2010, which makes it an offence to:

- Bribe another person (e.g. offer, promise, or give financial or other advantage to induce or reward improper performance of a function);
- Receive bribes from another person (e.g. agreeing to receive or accept a financial or other advantage for improper performance of a function);
- Bribe foreign officials; and
- Fail to prevent bribery.

Further details are available in the Group Fraud, Corruption and Bribery Policy.

Social and Environmental Responsibility

Effective procurement will complement our goals for maintaining awareness of sustainability issues amongst staff and customers. We expect our suppliers to meet our standards for sustainability as set out in the Group Sustainable Procurement Strategy.

The Group is committed to compliance with the Health and Safety at Work etc. Act 1974, and all related provisions and we expect all of our suppliers to comply with the legislation and promote good working practices throughout the supply chain.

Gifts and Hospitality

All staff involved in procurement must comply with the Group's policy on Gifts, Hospitality, Payments and Benefits which sets out guiding principles for employees and Board Members to follow to ensure that we meet legal and regulatory requirements. This serves to protect our integrity and avoid the potential for any perception that our procurement processes can be unduly influenced.

All staff have a duty to act with honesty and integrity and must never accept a gift, favorable treatment or incentive in exchange for acting in a certain way.

Conflicts of Interest

The Group contributes to the economies of the areas we work in and has commercial and business relationships with many different companies, contractors, suppliers and service providers. In order to comply with Regulation 25 of the Public Contracts (Scotland) Regulations 2015 we are required to take appropriate measures to prevent, identify and remedy conflicts of interest arising in the conduct of procurement procedures so as to avoid any distortion of competition and to ensure equal treatment of all economic operators and equivalent provisions apply under other areas of Procurement Law.

All staff must report connections as outlined in the Group's Gifts, Hospitality, Payments and Benefits Policy to their direct Line Manager and complete the relevant Declaration

of Interest form, forwarding this to the Governance Team for entry into the Group's staff register of interests. Board Members must follow the Group Non-Executive Conflicts of Interest policy. For the avoidance of doubt this includes any situation where an employee or Board Member has directly or indirectly a financial, economic or other personal interest which might be perceived to compromise their impartiality and independence in the context of the procurement procedure.

Any Employee or Board Member involved in a decision-making process in respect of any matter covered by this policy shall be required to ensure that, to the best of their knowledge, there has been no conflict of interest and the decision making process has been open and transparent. Alternatively, they shall be required to declare a conflict of interest immediately upon becoming aware of such an interest and where there is a conflict will be removed from the decision-making process.

In order to protect our reputation and demonstrate that we conduct our affairs with openness, honesty and integrity we maintain a staff Register of Interests. As a matter of good practice, all Board Members and Senior Leaders are required to complete a Registration of Interests form annually. All other Employees are required to exercise their discretion and complete such a form if they consider themselves to have a registrable interest. All forms should be passed on to the Governance Team who has the responsibility for maintaining and auditing the register. The Governance Team may contact you regarding the interest you are declaring.

Connections/ Interests will not necessarily prevent the Group trading with the supplier concerned but in the interest of ensuring the decision-making process is open and transparent, declarations of interest must be made and retained by the Procurement Category Specialists.

Group employees should avoid, as far as possible, dealings with Group suppliers in their private affairs, particularly if this is likely to put them under some obligation to the supplier. Where such arrangements are unavoidable, it is essential that they are not offered any deal, which could be construed as a reward for actions taken in the course of their employment.

It is the responsibility of Employees and Board Members to manage conflicts of interest that arise between their own personal or business interests and their duties to us, in accordance with the employee and governing body Codes of Conduct. Employees and Board Members give a written undertaking to act in accordance at all times with the Employee terms and conditions of contract and the Board Member Code of Conduct, which exemplify good governance and reflect relevant legal and regulatory requirements.

Further information can be found in our Group Gifts, Hospitality, Payment and Benefits and Group Non-Executive Director Conflicts of Interest policies.

Criminal Convictions and Serious and Organised Crime

We view criminal conduct of our suppliers very seriously and work closely with Police Scotland with whom we have an Information Sharing Protocol. All suppliers are required, as a standard term of contract to complete a Declaration of Non-Involvement in Serious and Organised Crime.

In compliance with the Procurement Reform (Scotland) Act 2014 and Public Contracts (Scotland) Regulations 2015 we are required to exclude a business from bidding if it, or someone who holds a senior position within it, has been convicted of specific offences as detailed in the 2015 Regulations, the Procurement (Scotland) Regulations 2016 and relevant to future collaborative procurement approaches, the Procurement Act 2023) unless there are exceptional circumstances.

We are also entitled to exclude bidders should they attempt to distort competition. All staff involved in the procurement of goods, works or services should be aware of the potential for bidders to be acting together in order to fix market prices – this is highlighted within our Passport 2 Procure training which staff involved in procurement are required to complete. Any such arrangement is illegal. Staff may also become aware of potentially fraudulent activity throughout the life of any procurement. Any such suspicions must be reported in writing (together with any supporting evidence) to the Director of Assurance who will investigate and pass to the appropriate department for further investigation if necessary. All reporting of anti-competitive behaviour and fraud will be dealt with in accordance with the Group Fraud, Corruption and Bribery Policy and Group Anti Money-laundering and Counter Terrorism Financing Policy.

Slavery & Human Trafficking

We are committed to the highest ethical standards of business and ensuring there is no slavery or human trafficking in any part of our Business or Supply Chain.

We are committed to developing the economies of the areas we work in and building strong relationships with local Suppliers. We operate solely within Scotland and do not have a large global Supply Chain.

The Group is committed to compliance of the Modern Slavery Act 2015 and related legislation such as the Proceeds of Crime Act 2002 as reflected in the Group Anti Money-laundering and Counter Terrorism Financing Policy. We expect all our Suppliers to comply with the legislation and promote good working practices throughout the Supply Chain.

We review and present our Group Modern Slavery Statement annually to our Group Board for approval. We publish our statement on our website and are also required to enter this into the UK Government's modern slavery statement registry.

6. Business Continuity and Disaster Recovery

As part of the Group business continuity management arrangements, the Group has identified essential activities and levels of service to be prioritised. These activities and levels of service have been identified through a business impact assessment against the following criteria:

- whether it is a life and limb service;
- the financial impact should the service be disrupted;
- whether it is a legislative requirement; and
- the reputational damage should the service be disrupted.

The loss of a Supplier is identified by the Group as a key risk as the ability to maintain these essential activities and levels of service may depend on the continuation of suppliers, services and products. Further identified risks for our Supply Chain include pandemic, loss of premises, loss of ICT, fuel shortage, severe weather, loss of key staff and disruption to critical infrastructure.

If a supplier is unable to provide its contracted service or product to the Group, this may have an impact on the Group's delivery of its own services. Therefore, ensuring that these Suppliers have their own effective business continuity arrangements (details of which must be included within their Service Level Agreement) in place is an important step in helping to ensure that they have considered incidents which could impact their service provision and have put contingencies in place to mitigate any potential disruption. Relevant Suppliers should also confirm their plan, exercise, or programme that demonstrates their plans have been tested and provide the results of those tests. The Group may invite key suppliers to take part in the testing of the Group's own plans, and we may also request to take part in the supplier's exercise of their plans. In addition, suppliers may be asked to confirm what help they may be able to offer the Group in the event of disruption to the Group's business as it relates to the supplier.

7. Route to Market

All Group procurements should be carried out in line with the authority as detailed in the table below. Procurements deemed to be of high business risk political or reputational nature must be reported to the Executive Team (ET) as a minimum.

| Financial Value | Process | No. of Suppliers | Responsibility | Authorisation |
|---|---|--|---------------------------------------|--|
| Below £25,000 | Guidance on W.E. Connect that must be followed to achieve best value. Quick Quote process via PCS (quality/price) may be followed if the contract is deemed to be of medium risk or higher. | N/A unless Quick Quote is used. if so, 3 – 5 suppliers must be invited to quote. | Business with advice from Procurement | Budget Holder |
| £25,000-£50,000 | Quick Quote process via PCS (quality / price) | 3 - 5 | Business with advice from Procurement | Budget Holder |
| £50,000 (Goods and Services) £2m (Works) and above up to PCSR Thresholds | Tender process via PCS – quality / price in accordance with the requirements of the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016 | As per specific procurement route. Seek advice. | Procurement | Budget Holder/ Business Leader/ Executive Team |
| Above PCSR Thresholds | Tender process in accordance with the requirements of the PCSR | As per specific procurement route in the PCSR. Seek advice. | Procurement | Budget Holder/ Business Leader/ Executive Team May also require Group Board approval. |
| Beneath £50,000 (Goods and Services) and £2m (Works) where a competitive tender process is not possible | Waiver Approval Form | Single Supplier | Procurement | Budget Holder/ Business Leader/ Executive Team May also require Group Board approval. |
| Above £50,000 (Goods and Services and £2m (Works) where a competitive tender process is not possible | Negotiated Procurement without prior publication of a Contract Notice | Single Supplier | Procurement | Budget Holder/ Business Leader/ Executive Tea May also require Group Board approval. |

Separate to the above, it may be that the procurement route involves use of a collaborative procurement approach in the form of a framework agreement or dynamic purchasing system, in which case the relevant process will be dictated by the detail of the relevant collaborative procurement approach.

Contracts with a value of less than £50,000 are not subject to Procurement Law and do not require to be publicly advertised. Below this threshold staff will be offered training and support including an introduction to the Group's 'Passport to Procurement' program to use the 'Quick Quote' process via Public Contracts Scotland as good practice to achieve value for money.

The Quick Quote process is operated through the Public Contract Scotland Quick Quote facility and requires a minimum of 3 quotes from suppliers, who are independently invited to quote. Staff should be mindful when completing the Quick Quote process that they should not simply revert to previous suppliers. Furthermore, staff must ensure that the chosen supplier is appropriate, and that due diligence has been carried out in terms of financial standing and references and the procurement is carried out in line with Group Standing Orders and guidance relating to spend under £50,000.

The rules of aggregation on contracts apply. This means that the contract value must be calculated over the duration of the contract. This can be reached by:

- The Group having requirements with several suppliers for goods or services, with similar characteristics, which in total exceed the Regulated threshold or;
- The Group having requirements with the same supplier over a period of time which exceed the threshold.

Contracts with a value in excess of £50,000 or where it is considered that advertising would be advantageous in terms of obtaining value for money, all contracts shall be advertised on the Public Contracts Scotland Portal.

Regulated: £50k and over (Goods and Services) £2m and over (Works)

The procurement regime for works contracts over £2m and supply/service contracts over £50,000 and the relevant thresholds under the Public Contracts (Scotland) Regulations 2015 (see next section) is governed by the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016. Contracts of this value and nature must be advertised on Public Contracts Scotland using a contract notice or PIN in order to comply with S.23 of the Act.

(Scotland) Act 2014 will continue to be procured as Regulated Contracts. The current thresholds for the PCSR 2015 and the Procurement Reform Scotland Act in relation to Wheatley are set out below:

Public Contracts (Scotland) Regulations 2015 Thresholds

| PCSR 2015 | From 1 January 2025 (inclusive of VAT) |
|---|--|
| Works | £5,372,609 |
| Concessions – Works and Services | £5,372,609 |
| Services and Supplies (non Schedule 1 Entities) | £214,904 |
| Light Touch Regime | £663,540 |
| Small Lots (works) | £884,720 |
| Small Lots (supplies and services) | £70,778 |

Procurements for beneath the regulated thresholds can be undertaken by the Waiver process, these types of procurements are for goods, services & works where a contract is awarded to a single supplier which is deemed to be in the 'Best interests of the Group' and the Waiver Approval Form sets out the full background and justification to support the approval process, including any associated risks.

Procurements above the regulated thresholds, where the supplies or services can only be provided by a particular supplier shall be subject to a Negotiated Procedure without Prior Publication. This can be in the following circumstances:

- The Procurement's aim is the creation or purchase of a unique work of art or artistic performance;
- Competition is absent for technical reasons such that only one supplier can deliver;
- The availability of competition is absent on account of exclusive rights; or
- There is urgency, not of the contracting authority's making.

Payment Approval

Payments to suppliers will be made in accordance with the terms of the particular contract. Our standard payment terms are within 30 days of receipt of a completed and valid invoice. Staff should note that payment terms will vary depending on the commodity being procured and, in particular, construction contracts must follow the payment provision approaches as set out in the Scottish Procurement Construction Policy Note (CPN) 1/2019. In order to ensure payments throughout the supply chain are made in accordance with the 2015 Regulations, contractual obligations contained within the terms and conditions of engagement will be monitored and reported via KPIs.

Statutory Reporting

In order to comply with S.18 Procurement Reform (Scotland) Act 2014, the Group will publish an annual report concerning the Group's regulated Procurement activities of the previous financial year. The Group shall notify the Scottish Ministers of the completion of the report and said report shall be published on the Group's website. The Procurement Team shall be responsible for completing the required annual report.

Contract Register

In order to comply with S.35 Procurement Reform (Scotland) Act 2014, the Group will publish our Contracts Register on our website. The Register is a live document and is updated on a regular basis.

Delegated Authority to Procure

All procurement will be undertaken in accordance with the procedures set out within this Procurement Policy and read in conjunction with Group Standing Orders.

Staff may undertake the Group's 'Quick Quote' for procurement below £50,000 once they have completed the Group's 'Passport to Procurement' program. Where staff wish to procure goods, services or works above £50,000, they must refer to the Procurement Team for tendering purposes. With the exception of the Waiver process, the Procurement Team shall be responsible for managing all procurement above £50,000. Staff should refer to the table above outlining appropriate delegation of responsibility.

Contract Approval

Approval to award contracts for goods, services and works will be in accordance with the Scheme of Financial Delegation and the Procurement Policy.

Collaborative Procurement

The Group shall seek out opportunities to use collaborative contracts established by other organisations where it offers us better value for money than conducting our own procurement and meets our business needs.

As a result of the Group's size and scale we will use our leverage in the market to procure on behalf of other organisations in the housing sectors where value for money can be offered through collaborative procurements. We will use our strength to assist in the development of the Group by identifying opportunities to consolidate suppliers to gain economies of scale and to support transition for new procurement on contract expiry. We will seek to establish and develop Group wide frameworks, in accordance with the Scottish Procurement Construction Policy Note (CPN) 3/2017 guidance on frameworks, where appropriate.

As an associate member of Scotland Excel, the Group has access to a wide range of corporate and capital frameworks. This access to framework contracts has delivered

efficiencies and financial benefit to the Group. The Group is also a participant on the West Territory Hub through Scottish Futures Trust. Other framework providers being used by the Group include the Scottish Procurement Alliance (SPA), Northern Housing Consortium (NHC), Health Trust Europe, Places for People, Crown Commercial Service, ESPO, Scottish Government and Procurement for Housing (PfH). The Group's procurement programme has been aligned with framework and dynamic purchasing systems availability to ensure contracting for optimal solutions with the best placed suppliers is realised. The overarching requirement to achieve Value for Money remains our key focus.

Plans for PCIP and Internal Audit

The Group Assurance function provides an internal appraisal service that reviews internal control systems in place across the Group's operations (e.g. Procurement). Internal Audit activity is aligned to the risk profile of the Group and provides assurance over the design and operating effectiveness of the controls put in place by management to manage known risks. A Procurement Risk Register is in place and is monitored regularly by Procurement management to ensure it continues to reflect the current procurement risk profile.

Procurement is a Group-wide function which is subject to periodic internal audit activity.

External accreditation is sought on a regular basis via Scotland Excel Procurement & Commercial Improvement Programme (PCIP) external audit.

8. Contract and Supplier Management

A Contract and Supplier Management (CSM) approach will be used by Contract Owners across the Wheatley Group. The aim of this approach is to provide a consistent and robust focus to the Group's contracting activities.

This approach will enhance the value derived from both new and existing contracts by boosting supplier performance, fostering continuous improvement, achieving mutual efficiencies, and improving supplier engagement. It will facilitate the development of strategic partnerships with key suppliers, leading to tangible contract savings.

Consequently, a CSM Guidance document is included with this policy for use across the Group.³ The document provides comprehensive instructions on managing contracts and suppliers effectively to ensure the delivery of outcomes, value for money, and additional community benefits. This guidance aims to ensure that contracts deliver the best value outcomes for customers and service users by focusing on continuous improvement, compliance, risk management, and sustainable service delivery. Key points include:

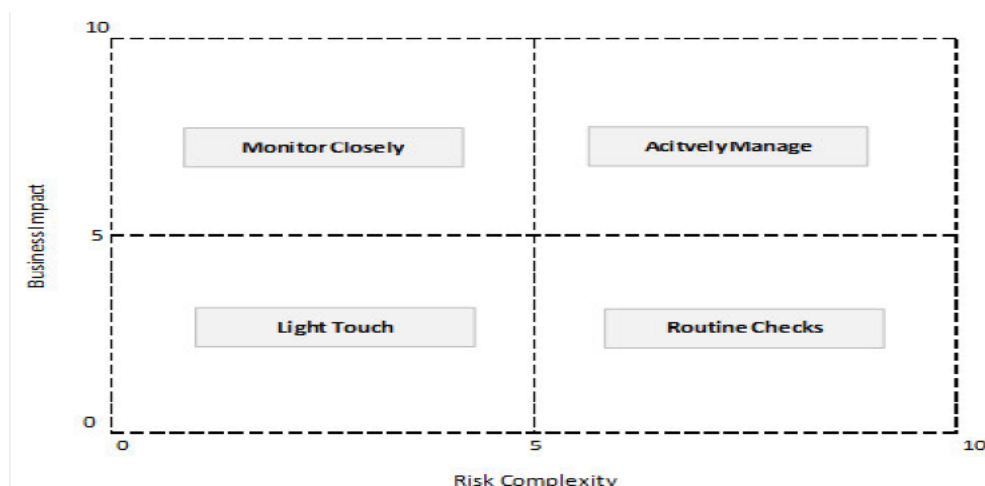
- **Contract Ownership:** Contract Owners, typically directors or managers, are responsible for managing contracts and suppliers in accordance with the guidance.
- **Procurement Planning:** The Procurement Team assists in identifying the appropriate route to market and developing procurement strategies.
- **Risk and Resilience:** High-risk contracts require a Risk Assessment and consideration of disaster recovery and business continuity processes.
- **Supply Chain Security:** Ensuring suppliers meet technical and security requirements is crucial for contracts involving technology services.
- **Cyber Security:** The contract owner should be aware of the security measures and protocols for contracts involving technology services and the processing of corporate and personal data. The primary goal is to ensure that suppliers meet the minimum technical and security requirements, adhere to key cybersecurity KPIs, and manage specific cyber risks that could impact the Group's network, systems, or data throughout the contract by regular engagement and service review meetings.
- **Stakeholder Involvement:** Relevant stakeholders should be identified and involved in the procurement process to prepare specifications, technical questions, and pricing schedules.
- **Contract Administration:** This involves maintaining the mechanics of the relationship between the Contract Owner and supplier, including contract maintenance, change control, and risk mitigation.
- **Supplier Development:** Working with suppliers to optimise service delivery and maximise mutual benefits is encouraged.

The Procurement Team will assist Contract Managers in effectively utilising this guidance to manage their contracts. All staff with Contract Management responsibilities will receive training on relevant CMS procedures and software.

³ <https://wheatley.interactgo.com/Interact/Pages/Content/Document.aspx?id=55048>

Supply Chain Risk

A Group Contracts Risk Matrix has recently been established and is available on W.E. Connect.⁴ The Risk Matrix is a crucial tool for managing contracts within the organisation. It helps identify and assess potential risks associated with contracts, ensuring that we can mitigate and manage these risks effectively. The matrix categorises risks into various types, such as: financial, compliance, environmental, geopolitical, technological, logistical, and operational. It also scores these risks based on their impact and complexity, placing contracts into one of the four quadrants below:



| Category | Characteristics | Minimum requirements |
|------------------------|---|---|
| Light Touch | Commodities that are found in abundance and/or in low-risk supply markets (e.g. office stationery / PPE wear). | Annual review |
| Routine Checks | Commodities/Services that are important but sourced from low-risk markets (e.g. Legal Services / Technical Consultancy) with solid supply but would have an impact on service if supply were disrupted. | Contracts must include supplier risk for discussion as a minimum annual contract review. |
| Monitor Closely | Service and Goods with a high business impact in economic terms, and where supply continuity is at risk (e.g. new build contractors/insurance providers) | Contract supplier discussions as a minimum every six months (contract review, you may also need VSA and H&S checks) Finance checks, Equifax report will be run centrally. |
| Actively Manage | Services and Works contracts that are important both in terms of economic impact and for supply conditions from complex and/or risky markets (e.g. Servitor) | Contract supplier discussions as a minimum every quarter (contract review, you may also need VSA and H&S checks) Finance checks, Equifax report will be run centrally |

⁴ <https://wheatley.interactgo.com/Interact/Pages/Content/Document.aspx?id=55066>

This scoring system guides our approach to supplier management and contract oversight.

All contract owners for actively managed contracts will be invited to quarterly meetings led by the Procurement Team. These meetings aim to ensure that all documentation, such as DPIAs, H&S, VSAs, and insurance documents, are up to date. Additionally, the meetings will address any challenges or issues and provide an open forum for discussion and technical support.

Contract Management System (CMS)

Procurement have implemented a Contract Management System (CMS) to digitise our contracts which are now held on an electronic contract register and assist Contract Owners with their contract management responsibilities.

All Contract Owners will receive log in details to the CMS and will have access to administer, monitor and manage their suppliers/contracts. The CMS has two modules:

- Sourcing – Used to add new suppliers, amend supplier details and routinely check supplier information (insurances, bank details etc). For sole use of Procurement currently. This module is also used to issue Requests for Information (RFI) to suppliers. Examples are Health and Safety and Equality, Diversity and Inclusion (EDI) compliance checks.
- Contract Management – this module is where contracts are set up and documentation is uploaded to ensure that all information relevant to the contract can be viewed in one place. To be used by both Procurement and Contract Owners (predominantly Procurement)

Procurement shall work with Contract Owners to set up their contracts in the first instance and maximise the CMS' functionality. Contract Owner shall be responsible for contract/supplier interactions thereafter. The CMS will alert the Contract Owner when an action is due and will repeat the alert until action is taken.

9. Policy Review

This policy shall be reviewed annually and presented for approval to the relevant governing Board. However regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our website at www.wheatley-group.com and it is also available on request. Customers may also request a translated copy of the policy or in alternative formats.

10. Customer Service

Confidentiality

Confidentiality is not only a basis of trust in business relationships but also impacts on the protection of the Group's own interests in terms of retaining competitive advantage. It is the responsibility of any member of staff conducting procurement on behalf of the Group to ensure that third party information, which is of a commercially sensitive and confidential nature, is properly safeguarded. This may require that the supplier or agent of the Group signs a confidentiality agreement.

All personal information given by customers and suppliers in relation to this policy will be treated in accordance with data protection legislation.

The Group complies with the Environmental Information (Scotland) Regulations 2004 and is subject to the Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 which extends the Freedom of Information (Scotland) Act 2002 to cover Registered Social Landlords (RSLs) and their subsidiaries in respect of certain functions. This means that we respond to any request for information in accordance with the requirements of these regulations and this legislation. It is a standard condition of all our contracts that suppliers will assist the Group in complying with its obligations in terms of Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

Complaints Policy

Our aim is to get it right first time. However, if you are dissatisfied with this policy, its operation or otherwise wish to raise a complaint the Group has a Complaints Policy. A copy of the complaints policy can be found on our websites and the staff intranet, or a copy can be requested by contacting the Wheatley Group on 0800 479 79 79. As with all our policies, a copy can be made available on tape, in Braille, in large print or in translation.

Where a complaint relates to the conduct of procurement under The Public Contracts (Scotland) Regulations 2015 the procedures outlined in the Regulations will be followed. The complaint will also be logged in accordance with the Group's Complaints Policy.

A Single Point of Enquiry (SPoE) has been established at the Scottish Government Procurement Directorate to which suppliers can address concerns about public funded procurement practices. Further information can be found at: <http://www.gov.scot/Topics/Government/Procurement/Selling/supplier-enquiries>

As set out on the website the supplier is expected to liaise with the contracting authority in the first instance to seek resolution or clarification

11. Relationship to Other Policies

This policy should be read in conjunction with the following documents which can be found on the staff intranet:

- Procurement Guidance Page on WE Connect
- Group Procurement Strategy
- Group Sustainable Procurement Policy
- Scheme of Financial Delegation
- Group Standing Orders
- Gifts, Hospitality, Payments and Benefits Policy
- Non-Executive Director Conflicts of Interest Policy
- Group EDI and Human Rights Policy
- Group Sustainability Framework
- Group Whistleblowing Policy
- Code of Conduct
- Group Fraud Corruption and Bribery Policy
- Group Anti Money-Laundering and Counter Terrorism Financing Policy
- Group Data Protection Policy
- Group Freedom of Information Policy

Would you like more information?

Freephone 0800 479 7979

Visit: <http://www.wheatley-group.com/>

Email: procurement@wheatley-group.com

Wheatley Housing Group Limited is a company limited by guarantee and registered in Scotland under the Companies Acts, having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL. It is registered with The Scottish Housing Regulator as a registered social landlord. Company registration no. SC426094 Social Landlord no. 363

Group Procurement Policy

January 2024

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1. Preamble

We can produce information on request in large print, Braille, tape and on disk. It is also available in other languages. If you need information in any of these formats please contact us on Freephone 0800 479 7979.

如果你向我們提出要求，我們可以為你提供本資訊的其他語言的版本，或者是盲文或磁帶。如果你需要本資訊的任何一種這些版式的版本，請聯繫我們，電話號碼是 0800 479 7979.

Si vous nous le demandez, nous pouvons vous remettre ces informations en d'autres langues, en braille ou sur cassette. Si vous souhaitez que ces informations vous soient fournies sous l'un de ces formats, contactez-nous en composant le 0800 479 7979.

چنانچه مایل باشید می‌توانید این مطالب را به فارسی یا زبان‌های دیگر و همچنین بریل و یا بر روی نوار کاست دریافت دارید. در صورت نیاز خواهشمندیم با شماره تلفن 0800 479 7979 با ما تماس بگیرید.

ਜੇ ਤੁਸੀਂ ਸਾਨੂੰ ਬੇਨਤੀ ਕਰੋ ਤਾਂ ਅਸੀਂ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਹੋਰ ਭਾਸ਼ਾਵਾਂ, ਬ੍ਰੇਲ (ਨੋਤ੍ਰਹੀਣਾ ਲਈ ਭਾਸ਼ਾ) ਵਿੱਚ, ਜਾਂ ਟੇਪ ਉੱਪਰ ਦੇ ਸਕਦੇ ਹਾਂ। ਜੇ ਤੁਹਾਨੂੰ ਇਨ੍ਹਾਂ ਵਿੱਚੋਂ ਕਿਸੇ ਰੂਪ ਵਿੱਚ ਚਾਹੀਦੀ ਹੋਵੇ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ 0800 479 7979 ਨੰਬਰ ਤੇ ਸੰਪਰਕ ਕਰੋ।

Na Pana/Pani życzenie możemy zapewnić te informacje w innych językach, alfabetem Braille'a lub na kasecie. Jeśli chciał(a)by Pan(i) uzyskać te informacje w którejś z tych form, prosimy skontaktować się z nami pod numerem telefonu 0800 479 7979.

Haddii aad na weydiisato waxaanu warbixintan kugu siin karaa iyadoo ku qoran luuqad kale, farta ay dadka indhaha la' akhriyaan ama cajalad ku duuban. Haddii aad jeclaan lahayd in warbixintan lagugu siiyo mid ka mid ah qaababkaas, fadlan nagala soo xidhiidh telefoonka 0800 479 7979.

По вашей просьбе данная информация может быть предоставлена на других языках, шрифтом Брайля или в аудиозаписи. Если вам требуется информация в одном из этих форматов, позвоните нам по номеру 0800 479 7979.

Wheatley Group Group Procurement Policy 2025

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

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

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

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

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

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

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو

برائے کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

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|---------------------------------|-----------------------------------|
| Approval body | <i>Wheatley Solutions Board</i> |
| Date of approval | <i>February 2024⁴⁵</i> |
| Review Year | <i>January 2025⁴⁶</i> |
| Customer engagement required | <i>No</i> |
| Trade union engagement required | <i>No</i> |
| Equality Impact Assessment | <i>No</i> |

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Schedule of Definitions

| Procurement Terminology | Definition |
|---|--|
| <u>Board Member</u> | <u>A member of the governing body of an organisation, responsible for making key decisions and overseeing the management and operations of the organisation.</u> |
| Collaborative Contracts | When two or more groups of people or organisations engage in procurement work together for mutual benefit. |
| Commodity | A raw material or primary product that is bought and sold e.g. copper, coffee. |
| Contract | An agreement between two or more parties that is legally binding. |
| Contract Award Notice | A publication which confirms the details of a contract which has been awarded to a supplier. |
| Contract Notice | A publication which advertises a procurement requirement. |
| Contract and Supplier Management | The process of monitoring supplier performance on a contract. |
| Contract Register | A published list of contracts put in place by a public sector organisation. -This is a legislative requirement. |
| Contract Value | This is an estimate of the value of a contract over the whole period of the contract e.g. if the contract is for £50k per year for 3 years the contract value is £150k. The contract value should include any extension periods. |
| Freedom of Information (Scotland) Act (FOISA) | This legislation gives individuals access to information held by public authorities. |
| Frameworks or Framework Agreements | An agreement or other arrangement between one or more contracting authorities and one or more economic operators which establishes the terms (in particular the terms as to price and, where appropriate, quantity) under which the economic operator will enter into one or more contracts with a contracting authority in the period during which the framework agreement applies. |
| Key Suppliers | Those suppliers identified as business critical in terms of risk/value and business continuity. |
| KPIs | Key Performance Indicators. Measures put in place as part of the contract to evaluate how effective the contract is. |
| Life Cycle of Goods/Assets | How much money will be spent on an asset over the cost of its life. |
| Local Authority | A term used for councils in Scotland. |

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| Lots | Grouping similar requirements within a procurement e.g. by geographical location. |
| Negotiated Procurement Without Prior Publication | A procurement procedure which can be used, <u>in limited circumstances</u> , by public sector buyers to procure goods or services- <u>without advertisement</u> . |
| Procurement Capability Improvement Programme (PCIP) | <u>The</u> Procurement Capability Improvement Programme (PCIP) drives procurement performance by assessing public sector organisations and identifying areas for continuous improvement. |
| Prior Information Notice (PIN) | A method of giving advanced notice of future planned procurement exercises. |
| Procurement Process | A procurement procedure can be run in a number of ways (procurement processes) e.g. a Framework Agreement. |
| Procurement Advisor <u>Category Specialist</u> | The name given to the role/person who is a buyer. They are an individual who spends the majority of their time working in a role that adds value to the quality, cost and effectiveness of the procurement or acquisition of goods and services. |
| <u>Procurement Law</u> | <u>Comprises of the Procurement Reform (Scotland) Act 2014, the Procurement (Scotland) Regulations 2016 and the Public Contracts (Scotland) Regulations 2015 which apply to Wheatley and the Public Contracts Regulations 2015 and Procurement Act 2023 (coming into force at the end of February 2025) which are only relevant where Wheatley uses framework arrangements or dynamic markets put in place by contracting authorities outwith Scotland.</u> |
| Procurement Strategy | It is mandatory document for a <u>Scottish</u> public sector organisation, which estimates it will spend greater than or equal to £5,000,000 on regulated procurements to publish a Procurement Strategy which is proportionate and relevant to its organisation. |
| Public Sector Body | All organisations which are subject to public procurement laws. This includes government, councils, universities and colleges, the NHS and registered social landlords. |
| Public Contracts Scotland (PCS) Portal | The national portal used by the Scottish public sector to advertise all regulated procurement opportunities and awards. |
| Quick Quote | A process used by public sector buyers in Public Contracts Scotland to advertise for low value/low risk procurement requirements (normally under £50k in value). |
| Regulated Procurement | A procurement whose value is greater than £50,000 excluding VAT for goods and/or services for the full life of the contract. Or greater than £2m for Works contracts. |

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| Risk Management | Activities undertaken to minimise negative impact. |
| Single Point of Enquiry (SPoE) | An impartial point of contact where suppliers can seek advice or raise concerns if they are dissatisfied with specific public procurement practices <u>in Scotland</u> . |
| Small Medium Enterprise (SME) | The category of micro, A small and/or medium-sized enterprises (SMEs) is made up of enterprises which employ <u>enterprise with fewer than 250 personsemployees and which have an annual turnover not exceeding 50of less than £36 million-euro and/or an annual balance sheet total not exceeding 43 million-euro-. They are further categorised as:</u> <ul style="list-style-type: none"> ▪ <u>Micro – 1–9 employees;</u> ▪ <u>Small – 10–49 employees;</u> ▪ <u>Medium – 50–250 employees;</u> |
| Stakeholder | Any person or group who has a vested interest in the success of the procurement activity, i.e. either provides services to it, or receives services from it. |
| Supply Chain | All activities, resources, products etc. involved in creating and moving a product or service from the supplier to the procurer. |
| Supported Business | An organisation whose main aim is the social and professional integration of disabled and disadvantaged workers and where at least 30% of their workforce are classed as disabled or disadvantaged. |
| Tender | The term used to describe the procurement process of advertising, requesting and awarding a contract. |
| Threshold | Values that apply to public procurement exercises. |
| UK GDPR | General Data Protection Regulation legislates how personal data is handled and stored. |
| Value for Money (VfM) | An economic assessment by the public sector as to whether a project represents value for money; the optimum combination of cost and quality to provide the required service. |

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| <u>Waiver</u> | <u>The process which allows procurements to be achieved without following the full tendering procedures. This is typically used when a purchase is time-critical, there are no other suppliers available, or continuity is required.</u> |
|---------------|--|

Within the above list of definitions, those relevant to procurement processes pick up the terminology under Procurement Law in Scotland. In 2005, new terminology will begin to be used for, for example, "contract notices" under the Procurement Act 2023 once in force. The Procurement Act 2023 will, however, only be relevant to Wheatley Group's call-off arrangements under collaborative procurement arrangements.

2.1. Introduction

Wheatley Housing Group ('The Group') is Scotland's leading housing, care and property management group. We are ~~a dynamic and growing~~an organisation which currently comprises ~~six of four~~ Registered Social Landlords, a Care Partner, a Charitable Foundation a Repairs Division and commercial subsidiaryies.

The Group currently spans 19 Local Authority areas across Scotland.

Our Group partners are:

- Wheatley Homes Glasgow
- Wheatley Homes South
- Wheatley Homes East
- Loretto Housing Association
- Lowther Homes
- Wheatley Care
- Wheatley Solutions
- Wheatley Foundation
- *City Building (Glasgow)

We refer to the 50/50 Joint Venture with Glasgow City Council, City Building (Glasgow), as a Partner Organisation, although City Building (Glasgow) have their own governance procedures and undertake their own procurement processes for the supply of all goods and services.

This Procurement Policy applies to all employees in the Group and its subsidiaries in any situation where they are involved in a purchasing process. 'Purchasing' includes all procurement activities including leasing and hiring and may where appropriate include other activities accompanying the life cycle of goods (or service contracts) and the end-of-life disposal of goods which have been procured (whether or not they remain in our ownership). Adherence to the Procurement Policy is both an individual and a corporate responsibility; failure to comply may result in disciplinary action.

The purpose of the Procurement Policy is to set out the general operating principles covering the activities and objectives of Procurement within the Group. The document explains the principles under which Procurement throughout the Group will be undertaken and proactively managed such that the stakeholders' requirements for supplies, works and services are efficiently and effectively sourced at the lowest sustainable 'total' cost whilst delivering best value for money.

The Procurement Team is responsible for managing procurement on behalf of the Group ethically and in compliance with legislation. It is responsible for providing guidance and support across the Group and to support staff who procure on behalf of their subsidiary. Should you require any assistance or guidance with any procurement matter please contact procurement@wheatley-group.com.

Wheatley Housing Group / City Building (Glasgow) Joint Working Principles

In April 2017 the Group entered into a joint venture with Glasgow City Council. The Group became the 50/50 joint owner of City Building (Glasgow) (CBG) which delivers investment, repairs and general maintenance work within the Group's Registered Social Landlords in the west of Scotland (including Wheatley Homes Glasgow, Wheatley Homes South and Loretto), the Group's commercial housing subsidiary Lowther Homes and its property management function.

We operate a collaborative approach to managing procurement across the Group with CBG. This will continue to be developed and agreed in line with the Group's compliance and legislation principles, reflecting best value and sustainability through the supply chain, determining the most effective route to market, jointly supporting SMEs, effectively benefiting the customer through the efficient management of Community Benefits and ~~the Wheatley Pledge and~~ ultimately promoting excellence in procurement.

3.2. Principles, Aims and Objectives

Procurement activities must comply with all applicable UK laws and regulations. In particular all procurement must comply with, as relevant, the Public Contracts (Scotland) Regulations 2015, The Procurement (Scotland) Regulations 2016, Procurement Reform (Scotland) Act 2014, Concession Contract (Scotland) Regulations 2016 and the Housing (Scotland) Act 2001.¹

All procurement activity aims to achieve Best Value for the Group. Best Value includes not only the initial purchase price, but also continuing costs throughout the life cycle of equipment, materials works and services, such as financing and depreciation, maintenance requirements and energy usage. Best value also includes the quality and reliability of the supplies, works or services and the punctuality and reliability of their execution.

The Group will work collaboratively with suppliers wherever possible to create relationships within which the Procurement Team can learn how to make it easier for suppliers to meet stakeholder requirements and to further encourage suppliers to improve their products, prices, quality and service level delivery.

The Group will work with Government bodies and other public sector organisations to utilise collaborative procurement arrangements where they offer value for money. In addition, the Group will consider including collaborative arrangements within its contracts to enable other public sector bodies to benefit from its rates, learn methods and scope of work.

All procurement for supplies, works and services that the Group undertakes and the methods it uses to procure them must not infringe upon laws applicable at the time of the procurement, and must conform to applicable ethical, social and environmental standards.

¹ Going forward, pursuant to the coming into force of the Procurement Act 2023 on 24th and 25th February 2025, which applied predominantly outwith Scotland, where the Group undertakes call-offs from collaborative procurement approaches put in place under the Procurement Act 2023 the Group will require also to ensure compliance. With transition arrangements, this is not likely to impact materially in 2025.

4.3. Equity, diversity and inclusion (EDI)

We are ~~committed~~dedicated to ~~providing~~ensuring fair treatment for all ~~of our~~ stakeholders and ~~in the way we conduct~~conducting business ~~by positively promoting in~~a manner that actively promotes equality of opportunity ~~and while~~ championing diversity and inclusion. The Group ~~is committed~~requires to comply with the with the Equality Act 2010 and moreover is committed to ensuring that no ~~one~~ is excluded or discriminated against ~~based on the grounds of~~ religion or belief, race, age, sex, gender reassignment, sexual orientation, marriage or civil partnership, family circumstances, pregnancy and maternity, ~~and disability—~~or disability in line. The Group has a zero-tolerance approach to bullying, harassment and victimisation and works to ensure that employees are safe within the workplace from such treatment including sexual harassment.

We also prioritise the highest standards of worker protection, focusing on the safety, well-being, and fair treatment of all our employees in line with the Worker's Protection Act 2023. This Act enhances the Equality Act 2010 by further strengthening provisions aimed at ensuring fair treatment and non-discrimination in the workplace. While the Equality Act 2010 consolidates and updates previous anti-discrimination laws to protect individuals from unfair treatment, the Worker's Protection Act builds on this foundation by introducing additional measures to safeguard workers' rights.

Real Living Wage

The Group are an accredited Real Living Wage employer who are dedicated to ensuring that our employees receive fair compensation for their hard work. We pay and are committed to paying the real Living Wage, as a minimum, to all our employees. In addition to our internal commitment, we actively encourage our suppliers to adopt the same standard. We believe that fair wages are essential for fostering a motivated and productive workforce, and we expect our suppliers to share this ethos. By promoting the real living wage throughout our supply chain, we aim to create a positive impact on the broader community and support the well-being of workers at all levels.

Fair Work First

Fair Work First is the Scottish Government's flagship policy for driving high quality and fair work across the labour market in Scotland by applying fair work criteria to grants, other funding and contracts being awarded by and across the public sector, where it is relevant to do so. Through this approach, the Scottish Government is asking employers to adopt fair working practices, specifically:

- Payment of at least the real Living Wage.
- Providing appropriate channels for effective workers' voice, such as trade union recognition.
- Investment in workforce development.
- No inappropriate use of zero hours contracts.
- Action to tackle the gender pay gap and create a more diverse and inclusive workplace.
- Offer flexible and family friendly working practices for all workers from day one of employment
- Opposing the use of fire and rehire practices

The Group values the culture of partnership working that has been established with Trade Union Colleagues and will continue to work together to develop transparent mechanisms for employee voice and engagement founded on trust and respect.

The Groups values and the priorities are aligned to the Fair Work First principles.

Although not directly applicable to us, we are also considerate of the Fairer Scotland Duty, as set out in part one of the Equality Act 2010. This places a legal responsibility on public bodies in Scotland to actively consider and 'pay due regard to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making strategic decisions'²

Social mobility is a key theme threaded through our EDI actions. The Group recognises the role it plays in our local economies and is focused on targeting underlying weaknesses which include underemployment, above average levels of youth unemployment and low levels of qualifications. As a result, it shall support its stakeholders by seeking to provide education/employment opportunities via Group business activity and its supply chain. This includes the social value created by contracting with Supported Businesses.

Our focus goes beyond our legislative duties; to signal our commitment to EDI, when procuring ~~it is desirable~~we generally seek that our suppliers and contractors demonstrate the existence of their own EDI policy ~~as well as sign up to our Wheatley Pledge~~. Where our suppliers / contractors do not have an EDI policy, we encourage them to consider how EDI can inform their working practices and be considered within their own organisations.

² [About the Duty - Fairer Scotland Duty: guidance for public bodies - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/fairer-scotland-duty/guidance-for-public-bodies/pages/11.aspx)

~~We may, through~~Through our Contract Management System, we survey our suppliers to find out more about their commitment to EDI, their policies, and encourage our suppliers to detail how they reflect our EDI aspirations within their working practices.

You can access the Group's EDI and Human Rights policy ~~here and read more about Wheatley's commitment to EDI~~ here.

5.4. Data Protection

The Group holds a wide range of sensitive information, both of a personal and a commercial nature. We have a duty to protect this information and ensure it is not seen or accessed by people (whether internal or external to the Group) without the legal authority to do so.

The Group's policy position in respect of data protection is reflected in the Group's Data Protection Policy.

~~In light of Brexit, the requirements of~~The Group must comply with all applicable data protection and privacy legislation in force from time to time in the UK including the General Data Protection Regulation (UK GDPR) and, the Data Protection Act 2018 are now enshrined in "The Data Protection, (and regulations made thereunder) and the Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (known 2003 (SI 2003 No. 2426) as the UK GDPR) amended, and stay largely the same as prior to Brexit. guidance and codes of practice issued by the Information Commissioner.

The Group will continue to carry out ~~a~~Data Privacy Impact Assessments (DPIA) when required to do so by law or good practice, on all activities which involve personal data or the exchange of personal data to help us identify the most effective way to comply with our data protection obligations and meet individuals' expectations of privacy.

The UK GDPR requires us to undertake DPIAs in circumstances where we: -

- use systematic and extensive profiling with significant effects;
- process special category or criminal offence data on a large scale; or
- systematically monitor publicly accessible places on a large scale.

The Information Commissioner requires data controllers to undertake a DPIA if they plan to:

- use systematic and extensive profiling or automated decision-making to make significant decisions about people;
- process special-category data or criminal-offence data on a large scale;
- systematically monitor a publicly accessible place on a large scale;
- use innovative technology in combination with any of the criteria in the European guidelines;
- use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit;
- carry out profiling on a large scale;
- process biometric or genetic data in combination with any of the criteria in the European guidelines;
- combine, compare or match data from multiple sources;
- process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;
- process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines; and
- process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them.

DPIAs help the Group to identify and reduce the privacy risks of a project and document any mitigations we are required to put in place. The purpose of a DPIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met wherever possible. The Group also has a duty to be accountable under the UK GDPR and requires DPIAs to be retained and updated by the contract owner where appropriate for audit and compliance purposes.

It is a standard condition of all our contracts that our suppliers and sub-contractors will comply with all data protection legislation and applicable regulations, including the UK GDPR, the Data Protection Act 2018, and all guidance and/or Codes of Practice published by the Information Commissioner's Office.

The requirement for DPIA will be considered within all relevant future procurement activities.

6.5. Ethical, Social and Environmental Responsibility

Fair and Equal Treatment of Suppliers

All procurement will be conducted such that all suppliers with the necessary abilities have a fair and equal opportunity to secure Group business including ~~maximising support~~seeking to enable market access opportunities for Small & Medium Sized Enterprises (SMEs).

This includes, within the constraints of the regulated environment in which we operate and carrying out tendering in line with Procurement Law and relevant Scottish Government Regulations. Conducting Statutory Guidance, conducting our procurements in a transparent manner, utilising public dynamic purchasing systems, frameworks and procurement processes that promote supplier diversity.

In practice, this ~~allows~~enables a diverse range of suppliers to bid for contracts with us. Tender evaluations are conducted in line with ~~regulations.~~Procurement Law. The Group is also committed to improving access to our contracts and empowering staff, in accordance with Procurement Law, to promote sustainability, for example through seeking to buy locally for low risk, low value purchases thus contributing to our local communities.

We shall appropriately review and evaluate all above-threshold and regulated contracts, considering the geographical location and the option of splitting them into smaller Lots, which may encourage SME participation. This will not be appropriate in every circumstance, and we retain our discretion not to Lot or retain larger value contracts as one Lot, determined by the best interests of the Group.

In particular, the Group will seek, where possible to promote local economic development and regeneration by actively encouraging fair and open competition across a varied supply base thus making it easier for all suppliers regardless of size to bid for contracts.

Prior to commencing a procurement exercise, we may seek to carry out market testing. To be open and transparent in our dealings we will only do this by going out to the market using the appropriate Prior Information Notice (PIN) on the Public Contract Scotland procurement portal, as applicable to regulated spend thresholds. Any improper approaches, whether in the form of inducements or threats from suppliers, must be reported to line managers, even if they are sufficiently ambiguous to allow for an innocent interpretation.

To ensure transparency and fair treatment of all suppliers during the tendering process and in compliance with the formal procurement process, all communication with suppliers will be carried out through the Public Contract Scotland portal and in accordance with arrangements set out in the Procurement Guidance section on the staff intranet, W.E. Connect, which staff must follow.

Ethical Standards of Staff

The Group insists on suppliers adhering to strict ethical standards and behaviour, in return the Group will also demonstrate the highest level of ethical standards. The Group will be fair, honest and transparent in all dealings with suppliers and avoid any conduct which may be adversely interpreted.

Persons engaged in any aspect of procurement on behalf of the Group will not use their authority for personal gain. Adhering to this policy will also help ensure that we comply with the requirements of The Bribery Act 2010, which makes it an offence to:

- Bribe another person (e.g. offer, promise, or give financial or other advantage to induce or reward improper performance of a function);
- Receive bribes from another person (e.g. agreeing to receive or accept a financial or other advantage for improper performance of a function);
- Bribe foreign officials; and
- Fail to prevent bribery.

Further ~~detail is~~details are available in the Group Fraud, Corruption and Bribery Policy.

Social and Environmental Responsibility

Effective procurement will complement our goals for maintaining awareness of sustainability issues amongst staff and customers. We expect our suppliers to meet our standards for sustainability as set out in the Group Sustainable Procurement Strategy.

The Group is committed to compliance with the Health and Safety at Work etc. Act 1974, and all related provisions and we expect all of our suppliers to comply with the legislation and promote good working practices throughout the supply chain.

Gifts and Hospitality

All staff involved in procurement must comply with the Group's policy on Gifts, Hospitality, Payments and Benefits which sets out guiding principles for employees and Board Members to follow to ensure that we meet legal and regulatory requirements. This serves to protect our integrity and avoid the potential for any perception that our procurement processes can be unduly influenced.

All staff have a duty to act with honesty and integrity and must never accept a gift, favorable treatment or incentive in exchange for acting in a certain way.

Conflicts of Interest

The Group contributes to the economies of the areas we work in and has commercial and business relationships with many different companies, contractors, suppliers and service providers. —In order to comply with Regulation 25 of the Public Contracts (Scotland) Regulations 2015 we are required to take appropriate measures to prevent, identify and remedy conflicts of interest arising in the conduct of procurement procedures so as to avoid any distortion of competition and to ensure equal treatment of all economic operators.— and equivalent provisions apply under other areas of Procurement Law.

All staff must report connections as outlined in the Group's Gifts, Hospitality, Payments and Benefits Policy to their direct Line Manager and complete the relevant Declaration of Interest form, forwarding this to the Governance Team for entry into the Group's staff register of interests. —Board ~~m~~Members must follow the Group Non-Executive Conflicts of Interest policy. For the avoidance of doubt this includes any situation where an employee or Board Member has directly or indirectly a financial, economic or other personal interest which might be perceived to compromise their impartiality and independence in the context of the procurement procedure.

Any Employee or Board Member involved in a decision-making process in respect of any matter covered by this policy shall be required to ensure that, to the best of their knowledge, there has been no conflict of interest and the decision making process has been open and transparent. Alternatively, they shall be required to declare a conflict of interest immediately upon becoming aware of such an interest and where there is a conflict will be removed from the decision-making process.

In order to protect our reputation and demonstrate that we conduct our affairs with openness, honesty and integrity we maintain a staff Register of Interests. As a matter of good practice, all Board Members and Senior Leaders are required to complete a Registration of Interests form annually. All other Employees are required to exercise their discretion and complete such a form if they consider themselves to have a

registrable interest. All forms should be passed on to the Governance Team who has the responsibility for maintaining and auditing the register. ~~They can be emailed to the #Board and committee's mailbox.~~ The Governance Team may contact you regarding the interest you are declaring.

~~Such connections~~ Connections/ Interests will not necessarily prevent the Group trading with the supplier concerned but in the interests of ensuring the decision-making process is open and transparent, ~~such~~ declarations of interest must be made and retained by the ~~Lead~~ Procurement ~~Adviser~~ Category Specialists.

Group employees should avoid, as far as possible, dealings with Group suppliers in their private affairs, particularly if this is likely to put them under some obligation to the supplier. Where such arrangements are unavoidable, it is essential that they are not offered any deal, which could be construed as a reward for actions taken in the course of their employment.

It is the responsibility of Employees and Board Members to manage conflicts of interest that arise between their own personal or business interests and their duties to us, in accordance with the employee and governing body Codes of Conduct. Employees and Board Members give a written undertaking to act in accordance at all times with the Employee terms and conditions of contract and the Board Member Code of Conduct, which exemplify good governance and reflect relevant legal and regulatory requirements.

Further information can be found in our Group Gifts, Hospitality, Payment and Benefits and Group Non-Executive Director Conflicts of Interest policies.

Criminal Convictions and Serious and Organised Crime

We view criminal conduct of our suppliers very seriously and work closely with Police Scotland with whom we have an Information Sharing Protocol. All suppliers are required, as a standard term of contract to complete a Declaration of Non-Involvement in Serious and Organised Crime.

In compliance with the Procurement Reform (Scotland) Act 2014 and Public Contracts (Scotland) Regulations 2015 we are required to exclude a business from bidding if it, or someone who holds a senior position within it, has been convicted of specific offences as detailed in the 2015 Regulations, the Procurement (Scotland) Regulations 2016 and relevant to future collaborative procurement approaches, the Procurement Act 2023 unless there are exceptional circumstances.

We are also entitled to exclude bidders should they attempt to distort competition. All staff involved in the procurement of goods, works or services should be aware of the potential for bidders to be acting together in order to fix market prices – this is highlighted within our Passport 2 Procure training which staff involved in procurement are required to complete. Any such arrangement is illegal. Staff may also become

aware of potentially fraudulent activity throughout the life of any procurement. Any such suspicions must be reported in writing (together with any supporting evidence) to the Director of Assurance who will investigate and pass to the appropriate department for further investigation if necessary. All reporting of anti-competitive behaviour and fraud will be dealt with in accordance with the Group Fraud, Corruption and Bribery Policy and Group Anti Money-laundering and Counter Terrorism Financing Policy.

Slavery & Human Trafficking

We are committed to the highest ethical standards of business and ensuring there is no slavery or human trafficking in any part of our Business or Supply Chain.

We are committed to developing the economies of the areas we work in and building strong relationships with local Suppliers. We operate solely within Scotland and do not have a large global Supply Chain.

The Group is committed to compliance of the Modern Slavery Act 2015 and related legislation such as the Proceeds of Crime Act 2002 as reflected in the Group Anti Money-laundering and Counter Terrorism Financing Policy. We expect all our Suppliers to comply with the legislation and promote good working practices throughout the Supply Chain.

We review and present our Group Modern Slavery Statement annually to our Group Board for approval. We publish our statement on our website and are also required to enter this into the UK Government's modern slavery statement registry.

7.6. Business Continuity and Disaster Recovery

As part of the Group business continuity management arrangements, the Group has identified essential activities and levels of service to be prioritised. These activities and levels of service have been identified through a business impact assessment against the following criteria:

- whether it is a life and limb service;
- the financial impact should the service be disrupted;
- whether it is a legislative requirement; and
- the reputational damage should the service be disrupted.

The loss of a Supplier is identified by the Group as a key risk as the ability to maintain these essential activities and levels of service may depend on the continuation of suppliers, services and products. Further identified risks for our Supply Chain include pandemic, loss of premises, loss of ICT, fuel shortage, severe weather, loss of key staff and disruption to critical infrastructure.

If a supplier is unable to provide its contracted service or product to the Group, this may have an impact on the Group's delivery of its own services. Therefore, ensuring that these Suppliers have their own effective business continuity arrangements (details of which must be included within their Service Level Agreement) in place is an important step in helping to ensure that they have considered incidents which could impact their service provision and have put contingencies in place to mitigate any potential disruption. Relevant Suppliers should also confirm their plan, exercise, or programme that demonstrates ~~that~~ their plans have been tested and ~~what~~ provide the results of those tests ~~are~~. The Group may invite key suppliers to take part in the testing of the Group's own plans, and we may also request to take part in the supplier's exercise of their plans. In addition, suppliers may be asked to confirm what help they may be able to offer the Group in the event of disruption to the Group's business as it relates to the supplier.

8.7. Route to Market

All Group procurements should be carried out in line with the authority as detailed in the table below. Procurements deemed to be of high business risk political or reputational nature must be reported to the Executive Team (ET) as a minimum.

| Financial Value | Process | No. of Suppliers | Responsibility | Authorisation |
|-----------------|---|--|---------------------------------------|---------------|
| Below £25,000 | Guidance on WEW.E Connect that must be followed to achieve best value. Quick Quote process via PCS (quality/price) may be followed if the contract is deemed to be of medium risk or higher. | N/A unless Quick Quote is used. if so, 3 – 5 suppliers must be invited to quote. | Business with advice from Procurement | Budget Holder |

| | | | | |
|---|--|---|---------------------------------------|--|
| £25,000-£50,000 | Quick Quote process via PCS (quality / price) | 3 - 5 | Business with advice from Procurement | Budget Holder |
| £50,000 (Goods and Services) £2m (Works) and above up to PCSR Thresholds | Tender process via PCS – quality / price in accordance with the requirements of the Procurement Reform (Scotland) Act 2014 and the Procurement (Scotland) Regulations 2016 | As per specific procurement route. Seek advice. | Procurement | Budget Holder/ Business Leader/ Executive Team |
| Above PCSR Thresholds | Tender process in accordance with the requirements of the PCSR | As per specific procurement route in the PCSR. Seek advice. | Procurement | Budget Holder/ Business Leader/ Executive Team May also require Group Board approval. |
| Beneath £50,000 (Goods and Services) and £2m (Works) where a competitive tender process is not possible | Waiver Approval Form | Single Supplier | Procurement | Budget Holder/ Business Leader/ Executive Team May also require Group Board approval. |
| Above £50,000 (Goods and Services and £2m (Works) where a competitive tender process is not possible | Negotiated Procurement without prior publication of a Contract Notice | Single Supplier | Procurement | Budget Holder/ Business Leader/ Executive Tea May also require Group Board approval. |

Separate to the above, it may be that the procurement route involves use of a collaborative procurement approach in the form of a framework agreement or dynamic purchasing system, in which case the relevant process will be dictated by the detail of the relevant collaborative procurement approach.

Contracts with a value of less than £50,000 are not subject to Procurement Law and ~~are of a low complexity, in line with Scottish Government Guidance~~, do not require to be publicly advertised. Below this threshold staff will be offered training and support including an introduction to the Group's 'Passport to Procurement' program to use the 'Quick Quote' process via Public Contracts Scotland as good practice to achieve value for money.

The Quick Quote process is operated through the Public Contract Scotland Quick Quote facility and requires a minimum of 3 quotes from suppliers, who are independently invited to quote. Staff should be mindful when completing the Quick Quote process that they should not simply revert to previous suppliers. Furthermore,

staff must ensure that the chosen supplier is appropriate, and that due diligence has been carried out in terms of financial standing and references and the procurement is carried out in line with Group Standing Orders and guidance relating to spend under £50,000.

The rules of aggregation on contracts apply. This means that the contract value must be calculated over the duration of the contract. This can be reached by:

- The Group having requirements with several suppliers for goods or services, with similar characteristics, which in total exceed the Regulated threshold or;
- The Group having requirements with the same supplier over a period of time which exceed the threshold.

Contracts with a value in excess of £50,000 or where it is considered that advertising would be advantageous in terms of obtaining value for money, all contracts shall be advertised on the Public Contracts Scotland Portal.

~~Slice (Regulated):~~ £50k and over (Goods and Services) £2m and over (Works)

~~Slice is the~~ The procurement regime for Regulated ~~works~~ contracts over £2m and supply/service contracts over £50,000 and the relevant thresholds under the Public Contracts ~~for Works as legislated under the (Scotland) Regulations 2015 (see next section) is governed by the~~ Procurement Reform (Scotland) Act 2014 and ~~contracts~~ the Procurement (Scotland) Regulations 2016. Contracts of this value and nature must be advertised on Public Contracts Scotland using a contract notice or PIN in order to comply with S.23 of the Act.

~~Following the United Kingdom's withdrawal from the European Union (Brexit) on 31st January 2020 and the expiry of the transition period on 31 December 2020, the Public Contracts (Scotland) Regulations 2015 (PCSR 2015) have been amended to address the UK's exit from the European Union and the accession of the United Kingdom into the World Trade Organisation's Agreement on Government Procurement. Much of the processes and procedures to be followed in the PCSR 2015 remain unchanged. From Wheatley's perspective, one of the key differences is that we are no longer required to publish Contract Notices and Contract Award Notices via the Official Journal of the European Union and must instead publish them on Public Contracts Scotland. In addition, contracts which are below the thresholds in the PCSR 2015, but which are in excess of the thresholds for the application of the Procurement Reform (Scotland) Act 2014 will continue to be procured as Regulated Contracts. The current thresholds for the PCSR 2015 and the Procurement Reform Scotland Act in relation to Wheatley are set out below:~~

Public Contracts (Scotland) Regulations 2015 Thresholds

| PCSR 2015 | From 1 January 202 3 ⁵ (inclusive of VAT) |
|---|---|
| Works | £5,372,609 |
| Concessions – Works and Services | £5,372,609 |
| Services and Supplies (non Schedule 1 Entities) | £214,904 |
| Light Touch Regime | £663,540 |
| Small Lots (works) | £884,720 |
| Small Lots (supplies and services) | £70,778 |

Procurements for beneath the regulated ~~(slice)~~ thresholds can be undertaken by the Waiver process, these types of procurements are for goods, services & works where a contract is awarded to a single supplier which is deemed to be in the 'Best interests of the Group' and the Waiver Approval Form sets out the full background and justification to support the approval process, including any associated risks.

Procurements above the regulated ~~(slice)~~ thresholds, where the supplies or services can only be provided by a particular supplier shall be subject to a Negotiated Procedure without Prior Publication. This ~~is subject to~~can be in the following circumstances:

- The Procurement's aim is the creation or purchase of a unique work of art or artistic performance;
- Competition is absent for technical reasons. This applies such that only if one supplier can deliver;
- The availability of competition has been reduced artificially and no reasonable alternative or substitute exists; and is absent on account of exclusive rights; or The protection of exclusive rights, including intellectual property rights. This applies only if competition has been reduced artificially and no reasonable alternative or substitute exists.
- There is urgency, not of the contracting authority's making.

Payment Approval

Payments to suppliers will be made in accordance with the terms of the particular contract. Our standard payment terms are within 30 days of receipt of a completed and valid invoice. Staff should note that payment terms will vary depending on the commodity being procured and, in particular, construction contracts must ~~include~~for follow the ~~new legislation~~payment provision approaches as set out in the Scottish Procurement Construction Policy Note (CPN) 1/2019. In order to ensure payments throughout the supply chain are made in accordance with the 2015 Regulations,

contractual obligations contained within the terms and conditions of engagement will be monitored and reported via KPIs.

Statutory Reporting

In order to comply with S.18 Procurement Reform (Scotland) Act 2014, the Group will publish an annual report concerning the Group's regulated Procurement activities of the previous financial year. The Group shall notify the Scottish Ministers of the completion of the report and said report shall be published on the Group's website. The Procurement Team shall be responsible for completing the required annual report.

Contract Register

In order to comply with S.35 Procurement Reform (Scotland) Act 2014, the Group will publish our Contracts Register on our website. The Register is a live document and is updated on a regular basis.

Delegated Authority to Procure

All procurement will be undertaken in accordance with the procedures set out within this Procurement Policy and read in conjunction with Group Standing Orders.

Staff may undertake the Group's 'Quick Quote' for procurement below £50,000 once they have completed the Group's 'Passport to Procurement' program. Where staff wish to procure goods, services or works above £50,000, they must refer to the Procurement Team for tendering purposes. With the exception of the Waiver process, the Procurement Team shall be responsible for managing all procurement above £50,000. Staff should refer to the table above outlining appropriate delegation of responsibility.

Contract Approval

Approval to award contracts for goods, services and works will be in accordance with the Scheme of Financial Delegation and the Procurement Policy.

Collaborative Procurement

The Group shall seek out opportunities to use collaborative contracts established by other organisations where it offers us better value for money than conducting our own procurement and meets our business needs.

As a result of the Group's size and scale we will use our leverage in the market to procure on behalf of other organisations in the housing sectors where value for money can be offered through collaborative procurements. We will use our strength to assist in the development of the Group by identifying opportunities to consolidate suppliers to gain economies of scale and to support transition for new procurement on contract expiry. We will seek to establish and develop Group wide frameworks, in accordance with the Scottish Procurement Construction Policy Note (CPN) 3/2017 guidance on frameworks, where appropriate.

As an associate member of Scotland Excel, the Group has access to a wide range of corporate and capital frameworks. This access to framework contracts has delivered efficiencies and financial benefit to the Group. The Group is also a participant on the West Territory Hub through Scottish Futures Trust. Other framework providers being used by the Group include the Scottish Procurement Alliance (SPA), Northern Housing Consortium (NHC), Health Trust Europe, Places for People, Crown Commercial Service, ESPO, Scottish Government and Procurement for Housing (PfH). The Group's procurement programme has been aligned with framework and dynamic purchasing systems availability to ensure contracting for optimal solutions with the best placed suppliers is realised. The overarching requirement to achieve Value for Money remains our key focus.

Plans for PCIP and Internal Audit

The Group Assurance function provides an internal appraisal service that reviews internal control systems in place across the Group's operations (e.g. Procurement). Internal Audit activity is aligned to the risk profile of the Group and provides assurance over the design and operating effectiveness of the controls put in place by management to manage known risks. A Procurement Risk Register is in place and is monitored regularly by Procurement management to ensure it continues to reflect the current procurement risk profile.

Procurement is a Group-wide function which is subject to periodic internal audit activity.

External accreditation is sought on a regular basis via Scotland Excel Procurement & Commercial Improvement Programme (PCIP) external audit.

9.8. Contract and Supplier Management

A Contract and Supplier Management (CSM) approach will be used by Contract Owners across the Wheatley Group. The aim of this approach is to provide a consistent and robust focus to the Group's contracting activities.

This approach will ~~drive~~enhance the value derived from both new and existing contracts ~~through increased~~by boosting supplier performance, fostering continuous improvement ~~cycles,~~ achieving mutual efficiencies, and ~~improved~~improving supplier engagement ~~with our suppliers. This enables.~~ It will facilitate the development of strategic partnerships to develop with key suppliers and can deliver, leading to tangible contract savings. As

Consequently, a result, CSM Guidance ~~Noted document~~ is ~~appended to included with this policy for use across the Group and the.~~³The document provides comprehensive instructions on managing contracts and suppliers effectively to ensure the delivery of outcomes, value for money, and additional community benefits. This guidance aims to ensure that contracts deliver the best value outcomes for customers and service users by focusing on continuous improvement, compliance, risk management, and sustainable service delivery. Key points include:

- Contract Ownership: Contract Owners, typically directors or managers, are responsible for managing contracts and suppliers in accordance with the guidance.
- Procurement Planning: The Procurement Team assists in identifying the appropriate route to market and developing procurement strategies.
- Risk and Resilience: High-risk contracts require a Risk Assessment and consideration of disaster recovery and business continuity processes.
- Supply Chain Security: Ensuring suppliers meet technical and security requirements is crucial for contracts involving technology services.
- Cyber Security: The contract owner should be aware of the security measures and protocols for contracts involving technology services and the processing of corporate and personal data. The primary goal is to ensure that suppliers meet the minimum technical and security requirements, adhere to key cybersecurity KPIs, and manage specific cyber risks that could impact the Group's network, systems, or data throughout the contract by regular engagement and service review meetings.

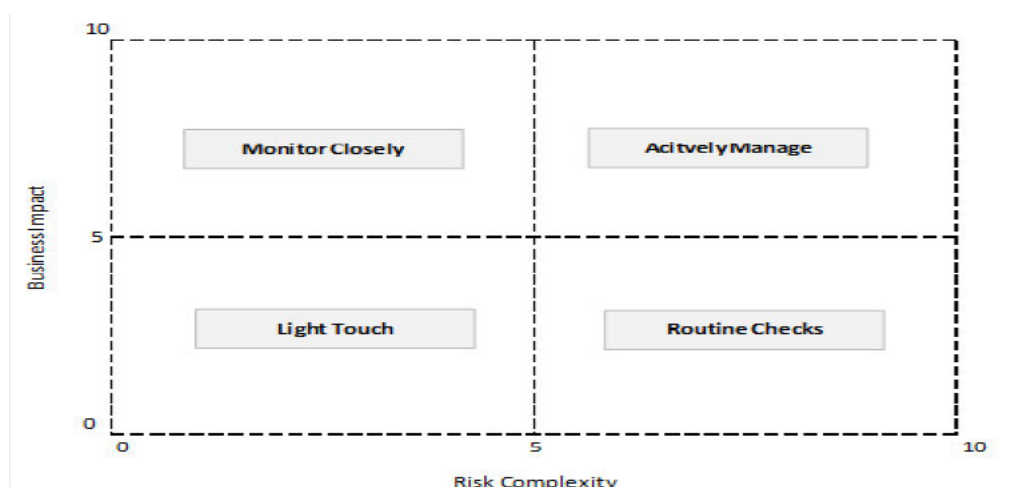
³ <https://wheatley.interactgo.com/Interact/Pages/Content/Document.aspx?id=55048>

- Stakeholder Involvement: Relevant stakeholders should be identified and involved in the procurement process to prepare specifications, technical questions, and pricing schedules.
- Contract Administration: This involves maintaining the mechanics of the relationship between the Contract Owner and supplier, including contract maintenance, change control, and risk mitigation.
- Supplier Development: Working with suppliers to optimise service delivery and maximise mutual benefits is encouraged.

The Procurement Team will ~~support~~assist Contract Managers in ~~using~~effectively utilising this guidance to manage their contracts ~~effectively~~. All staff with Contract Management responsibilities will receive training ~~in respect of~~ on relevant CMS procedures and software.

Supply Chain Risk

A Group Contracts Risk Matrix has recently been established and is available on W.E. Connect. ⁴ The Risk Matrix is a crucial tool for managing contracts within the organisation. It helps identify and assess potential risks associated with contracts, ensuring that we can mitigate and manage these risks effectively. The matrix categorises risks into various types, such as: financial, compliance, environmental, geopolitical, technological, logistical, and operational. It also scores these risks based on their impact and complexity, placing contracts into one of the four quadrants below:



| Category | Characteristics | Minimum requirements |
|-----------------------|--|---|
| <u>Light Touch</u> | <u>Commodities that are found in abundance and/or in low-risk supply markets (e.g. office stationery / PPE wear).</u> | <u>Annual review</u> |
| <u>Routine Checks</u> | <u>Commodities/Services that are important but sourced from low-risk markets (e.g. Legal Services / Technical Consultancy) with solid supply but would have an impact on service if supply were disrupted.</u> | <u>Contracts must include supplier risk for discussion as a minimum annual contract review.</u> |

⁴ <https://wheatley.interactgo.com/Interact/Pages/Content/Document.aspx?id=55066>

| | | |
|-------------------------------|--|--|
| <u>Monitor Closely</u> | <u>Service and Goods with a high business impact in economic terms, and where supply continuity is at risk (e.g. new build contractors/insurance providers)</u> | <u>Contract supplier discussions as a minimum every six months (contract review, you may also need VSA and H&S checks) Finance checks, Equifax report will be run centrally.</u> |
| <u>Actively Manage</u> | <u>Services and Works contracts that are important both in terms of economic impact and for supply conditions from complex and/or risky markets (e.g. Servitor)</u> | <u>Contract supplier discussions as a minimum every quarter (contract review, you may also need VSA and H&S checks)</u> <u>Finance checks, Equifax report will be run centrally</u> |

This scoring system guides our approach to supplier management and contract oversight.

All contract owners for actively managed contracts will be invited to quarterly meetings led by the Procurement Team. These meetings aim to ensure that all documentation, such as DPIAs, H&S, VSAs, and insurance documents, are up to date. Additionally, the meetings will address any challenges or issues and provide an open forum for discussion and technical support.

Contract Management System (CMS)

Procurement have implemented a Contract Management System (CMS) to digitise our contracts which are now held on an electronic contract register and assist Contract Owners with their contract management responsibilities.

All Contract Owners will receive log in details to the CMS and will have access to administer, monitor and manage their suppliers/contracts. The CMS has ~~three~~two modules:

- Sourcing – Used to add new suppliers, amend supplier details and routinely check supplier information (insurances, bank details etc). For sole use of Procurement currently. This module is also used to issue Requests for Information (RFI) to suppliers. Examples are Health and Safety and Equality, Diversity and Inclusion (EDI) compliance checks.
- Contract Management – this module is where contracts are set up and documentation is uploaded to ensure that all information relevant to the contract can be viewed in one place. To be used by both Procurement and Contract Owners (predominantly Procurement)
- ~~▪ Supplier Relationship Management (SRM) – this module is used to collate supplier performance via scheduled supplier requests aimed at understanding performance against pre-determined Key Performance Indicators (KPIs) or~~

~~other performance targets. To be used by both Procurement and Contract Owners (predominantly Contract Owners).~~

Procurement shall work with Contract Owners to set up their contracts in the first instance and maximise the CMS' functionality. Contract Owner shall be responsible for contract/supplier interactions thereafter. The CMS will alert the Contract Owner when an action is due and will repeat the alert until action is taken.

:-

10.9. Policy Review

This policy shall be reviewed annually and presented for approval to the relevant governing Board. However regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard and good practice changes.

We will publish this policy on our website at www.wheatley-group.com and it is also available on request. Customers may also request a translated copy of the policy or in alternative formats.

11.10. Customer Service

Confidentiality

Confidentiality is not only a basis of trust in business relationships but also impacts on the protection of the Group's own interests in terms of retaining competitive advantage. It is the responsibility of any member of staff conducting procurement on behalf of the Group to ensure that third party information, which is of a commercially sensitive and confidential nature, is properly safeguarded. This may require that the supplier or agent of the Group signs a confidentiality agreement.

All personal information given by customers and suppliers in relation to this policy will be treated in accordance with data protection legislation.

The Group complies with the Environmental Information (Scotland) Regulations 2004 and is subject to the Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 which extends the Freedom of Information (Scotland) Act 2002 to cover Registered Social Landlords (RSLs) and their subsidiaries in respect of certain functions. This means that we respond to any request for information in accordance with the requirements of these regulations and this legislation. It is a standard condition of all our contracts that suppliers will assist the Group in complying with its obligations in terms of Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

Complaints Policy

Our aim is to get it right first time. However, if you are dissatisfied with this policy, its operation or otherwise wish to raise a complaint the Group has a Complaints Policy. A copy of the complaints policy can be found on our websites and the staff intranet, or a copy can be requested by contacting the Wheatley Group on 0800 479 79 79. As with all our policies, a copy can be made available on tape, in Braille, in large print or in translation.

Where a complaint relates to the conduct of procurement under The Public Contracts (Scotland) Regulations 2015 the procedures outlined in the Regulations will be followed. The complaint will also be logged in accordance with the Group's Complaints Policy.

A Single Point of Enquiry (SPoE) has been established at the Scottish Government Procurement Directorate to which suppliers can address concerns about public funded procurement practices. Further information can be found at: <http://www.gov.scot/Topics/Government/Procurement/Selling/supplier-enquiries>

As set out on the website the supplier is expected to liaise with the contracting authority in the first instance to seek resolution or clarification

42.11. Relationship to Other Policies

This policy should be read in conjunction with the following documents which can be found on the staff intranet:

- Procurement Guidance Page on WE Connect
- Group Procurement Strategy
- Group Sustainable Procurement Policy
- Scheme of Financial Delegation
- Group Standing Orders
- Gifts, Hospitality, Payments and Benefits Policy
- Non-Executive Director Conflicts of Interest Policy
- Group EDI and Human Rights Policy
- Group Sustainability Framework
- Group Whistleblowing Policy
- Code of Conduct
- Group Fraud Corruption and Bribery Policy
- Group Anti Money-Laundering and Counter Terrorism Financing Policy
- Group Data Protection Policy
- Group Freedom of Information Policy

Would you like more information?

Freephone 0800 479 7979

Visit: <http://www.wheatley-group.com/>

Email: procurement@wheatley-group.com

Wheatley Housing Group Limited is a company limited by guarantee and registered in Scotland under the Companies Acts, having its registered office at Wheatley House, 25 Cochrane Street, Glasgow, G1 1HL. It is registered with The Scottish Housing Regulator as a registered social landlord. Company registration no. SC426094 Social Landlord no. 363

Report

To: Loretto Housing Board

By: Anne-Marie Hallett, Head of Governance

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

Subject: Governance update

Date of Meeting: 24 March 2025

1. Purpose

1.1 To update the Board on the following governance-related matters:

- An updated Board agenda planner; and
- Board member recruitment.

2. Authorising and strategic context

2.1 Our Board is responsible for overseeing and implementing our recruitment, succession plan. This approach ensures that we have Board Members with the skills and experience required to effectively govern our Board and in turn supports us to achieve each of our strategic outcomes.

3. Background

3.1 In order to ensure the Board has visibility and direct input into its areas of focus, we routinely provide the Board with a forward planner setting out the core items assumed for future meetings. This includes decisions regarding Board recruitment and succession being planned in based on the agreed three-year succession plan

4. Discussion

2025 Agenda Planner

4.1 Our Board agenda planner is developed to take into account the following:

- Legal and regulatory requirements such as our financial statements and regulatory returns such as the Annual Return on the Charter;
- The time of year eg Performance targets, budgets and business plans for the year ahead;
- Agreed strategic project milestones;
- Scheduled or cyclical reviews e.g. policy updates; and
- Specific Board requests.

- 4.2 In addition to this, Board agendas dynamically respond to changes or topical issues in our external operating environment and issues arising at Group level, but relevant to us.
- 4.3 The draft Board agenda planner for the remainder of 2025/26, to be refreshed at the August Board, is attached for Board feedback and approval at Appendix 1.

Board recruitment

- 4.4 Following a comprehensive recruitment process, including interview with the Chair and approval by the Group Remuneration, Appointment, Appraisal Governance Committee, two candidates. Kerry Mackie and Elaine Harvey have been appointed to the Board. These appointments enhance the Board's composition, contributing to a balance representation of skills and gender.
- 4.5 We currently have a vacancy for a Board member following Jackie Brock taking up a position on the Wheatley Care Board. Jackie had agreed to stay on this Board until a suitable candidate is recruited.
- 4.6 A potential Board member has been identified. We are currently in the process of arranging for the candidate to meet the Chair. The Board is asked to delegate authority to the Chair to approve the appointment. This would allow us to progress their appointment and for them to attend the May strategy workshop and Board meeting, otherwise it would delay the appointment until August based on our cycle of meetings.

5. Customer engagement

- 5.1 As internal governance related matters, the content of the report is reserved to the Board.

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 financial implications associated with this report.

9. Legal, regulatory and charitable implications

- 9.1 Under the SHR's Standards of Governance Financial Management there is a requirement for "*The governing body... to have the skills and knowledge they need to be effective*".
- 9.2 The proposals in the report support us to achieve this, by ensuring we have opportunities for our Board Members to continually develop the skills and knowledge required to govern our business.

10. Risk appetite and assessment

- 10.1 There is no single risk appetite covering the matters in this report; however across our related strategic outcomes/risk categories, our risk tolerance for legal/compliance ranges from cautious to averse; reflecting our preference of low inherent risk with limited potential for reward vs avoidance of risk and uncertainty with a priority for tight management controls and oversight.
- 10.2 The proposals set out in the report seek to support us in addressing risk that could impact effective governance or our compliance with the SHR's Standards of Governance and Financial Management.

11. Equalities implications

- 11.1 Our approach to the recruitment of Board members reflects our Equality, Diversity and Inclusion policy, including ensuring that the process itself is inclusive and that we take into account individual circumstances throughout the process.

12. Key issues and conclusions

- 12.3 Our Board planner plays a role in ensuring the Board has continued oversight and the mechanism to drive and direct its focus. It will remain under review to reflect the dynamic of our operating context as well as any Board feedback at future meetings.
- 12.4 The recruitment to our vacancy will allow us to have the broadest skills and experience informing Board discussions and in its decision making. The delegated authority being sought is on the basis that our May strategy workshop is a particularly important discussion to have a full complement of Board members.

13. Recommendations

- 13.1 The Board is asked to:
 - 1) Provide feedback on and agree the agenda planner for the remainder of 2025, subject to a further review at the August meeting; and
 - 2) Delegate authority to the Chair to approve the appointment to the existing Board Member vacancy

LIST OF APPENDICES:

Appendix 1: 2025/26 Board Agenda Planner.

| Date of meeting | Items |
|-------------------|---|
| 19 May 2025 | <p>2024/25 year-end performance updates and Annual Return on the Charter 2025/26 Delivery Plan and performance measures Supporting our customers and communities-Wheatley Foundation Annual report 2024/25 Fire prevention and mitigation: year-end report Health and Safety: year-end report Finance report Group Assurance update Governance update</p> <p>Policies for review Garage and Lock up policy</p> |
| 18 August 2025 | <p>Repairs update Homelessness update Performance report 2024/25 Financial Statements Annual Internal Audit Report and opinion Finance report Funding update Governance update</p> <p>Policies for review Group Disposal and Acquisitions Policy Framework</p> |
| 15 September 2025 | <p>Strategic asset investment plan and strategy update Sustainability update New build development: mid-year review and strategy Equity, Diversity and Inclusion and Human Rights Action /update Governance update</p> <p>Policies for review Advice, Information and Letting policy</p> |
| 24 November 2025 | <p>2025/26 rent setting and service charges Performance report Fire safety update Health and Safety performance update Finance report Risk Register</p> <p>Policies for review: Arrears and Debtors Policy review</p> |
| February 2026 | <p>Rent and service charges 2026/267 Financial projections 2026/27 Five-year Development Programme Five-year Capital Investment Plan Finance report Performance report Group Assurance update Governance update (verbal)</p> |
| March 2026 | <p>Home safety building compliance update 2026/27 Budget Finance report Governance update Scrutiny Panel update (presentation) Gender Pay Gap (presentation) Group Procurement – annual strategy and policy</p> |
| Unallocated | |