



**LORETTO HOUSING ASSOCIATION
BOARD MEETING**

**Monday 24 November 2025 at 2pm
Wheatley House Glasgow**

AGENDA

1. Apologies for absence
2. Declarations of interest
3. a) Minute of meeting held on 15 September 2025 and matters arising
b) Minute of AGM meeting held on 15 September 2025 (for noting)
c) Action list

4. Chair and Managing Director update

Main Business Items

5. 2026-31 Strategy update
6. Repairs Improvement (presentation)
7. 2026/27 Rent setting and service charges
8. Housing Bill update
9. EDI Action Plan update and 24/25 Annual Equalities report
10. Performance report

Other business

11. Finance report
12. Risk Register
13. Group Unacceptable Actions Policy update



15. AOCB

Board CPD: Group Funding Structures

Meeting:				
Agenda item	Action	Owner	Due	Status
Repairs improvement plan	Agenda item 7: Presentation to November Board meeting.	Laura Henderson, Managing Director	November 2025	Complete
CPD Session	CPD session on funding update (postponed from previous meeting).	Sam Bett, Director of Treasury	November 2025	Complete

Report

To: Loretto Housing Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: 2026-2031 Strategy update

Date of meeting: 21 November 2025

1. Purpose

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

2. Authorising and strategic context

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

3. Background

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

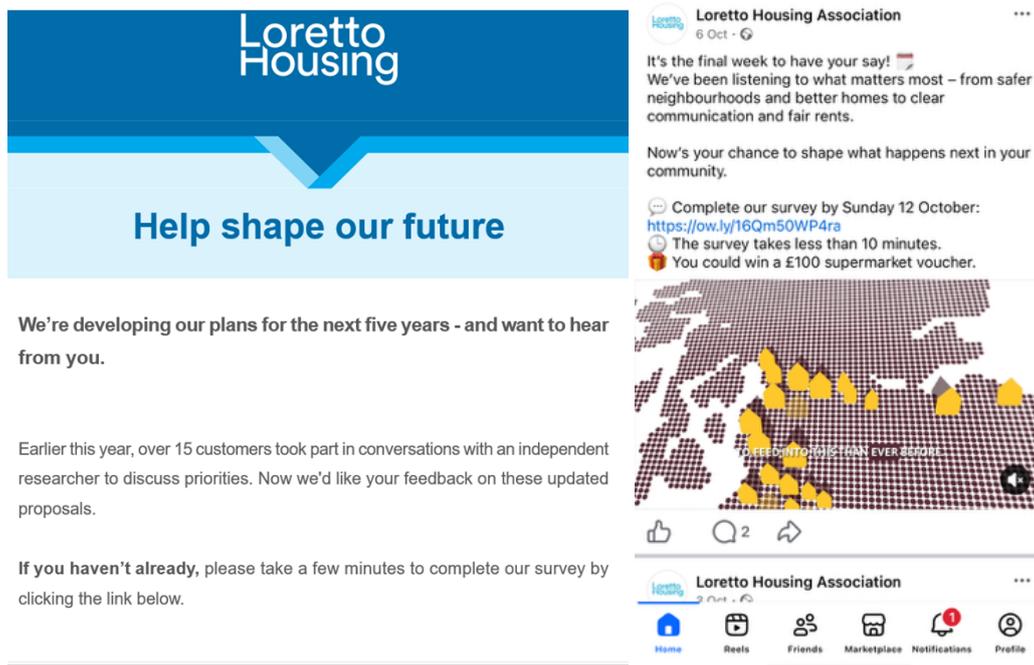
3.2 The Board agreed in principle that the key themes and the associated areas of focus reflected the strategic direction we want to set out for 2026-2031.

3.3 Our strategy development has been informed by extensive engagement including insight from our staff, customers as well as discussion from our May Board strategy workshop.

3.4 In September and through October, we developed our strategic themes through cross-team staff workshops. In tandem, we launched a phase 2 digital survey with our customers, and prospective customers, to garner further feedback about our proposals.

4. Discussion

- 4.1 Following feedback from the Board in August 2025, we have continued to develop our next strategy. As proposed to the Board, we launched a digital survey to understand if our response to identified customer priorities actually met priorities.
- 4.2 We had an ambitious target to engage with or receive feedback from at least 50 customers through all our strategy engagement and were targeting around 30 responses from the digital survey. **Over 200** customers completed the survey. We also issued a similar survey to those on our waiting lists to capture future customer insight.
- 4.3 This means in total, considering both phases of engagement and discussion through our Group Scrutiny Panel and stronger voices structures, nearly **230** customer voices have helped shape our future.
- 4.4 The survey was primarily promoted through digital channels, including our social media and website with video content which brought to life how we had used customer insight to develop our proposals. Our Housing Officers and Stronger Voices Officers were also briefed to support customers to provide feedback, and we undertook an email campaign with a link to a digital survey, which drove responses.



- 4.5 Feedback from this phase 2 engagement showed the vast majority (around 90%) supported our proposals, with strong agreement on the importance of keeping rent fair and transparent, investing in existing homes, and improving the repairs experience.
- 4.6 Open text responses asking customer to consider 'what's missing' reaffirmed our areas of focus - safety, repairs, and maintaining a clean, secure area were the most frequently mentioned personal priorities. From the survey, it is evident customers prefer being kept informed about personal queries, replying to online surveys via text or email, and updates on social media.

- 4.7 Many customers also value opportunities to participate in walkabouts and policy discussions. This insight is also valuable to inform our Group customer engagement framework review, being refreshed to align with our future strategy.

Strategy development

- 4.8 The content under each proposed theme in the strategy has been developed, informed by our customer engagement and extensive staff engagement through cross-team workshops. These workshops included key staff who will be particularly involved in delivering our objectives.
- 4.9 Following the workshops and customer engagement, the draft strategy at Appendix 1 has been developed for consideration by the Board. Objectives under each theme have evolved to more clearly demonstrate our goal as set out below:

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

4.10 The strongest themes and headline areas of focus throughout the strategy include:

- **Tenant Satisfaction** – customer insight driving our services and customer satisfaction as the key barometer of our success;
- **Defining a Wheatley Standard for our homes** which embodies our determination to improve the quality of our homes beyond published Scottish Government requirements;
- **Tackling damp and mould** a clear commitment to exceed the requirements of Awaab’s law;
- **Partnership working** our commitment to play our part, in partnership with others, in helping to address the underlying drivers of poverty in our homes; and
- **Leading the way in homelessness** - our continuing ambition to lead in addressing homelessness.

4.11 We have also considered feedback from the Board, as well as our staff and other Boards across the Group, and refined our vision, more succinct, as follows:

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

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

5. Customer engagement

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

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory, and charitable implications

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

10. Risk appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

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

13. Recommendations

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

Appendix 1: Draft Loretto 2026-31 Strategy

Loretto
Housing

Making
homes
and lives
better



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

A customer focused culture

Retained Customer Service Excellence

Reducing homelessness

Nearly 500 homes to homeless households

High tenant satisfaction

90%+ tenant satisfaction

Delivering much needed new homes

Developed nearly 400 new affordable homes

A strong customer voice

A redefined, reshaped approach to customer engagement

New ways of working

Successfully introduced a new operating model

Financially resilient

A+ Credit rating retained

A workforce that feels valued

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

Strategic context

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

Demand for affordable homes in Scotland continues to outstrip supply and homelessness services are under acute pressures with over 31,500 homelessness cases and over 17,000 households in temporary accommodation across the country. This pressure will continue and building new homes alone will not be enough. Acquisitions, investing to bring long term voids back to a lettable standard and converting buildings to housing will also need to be part of the solution.

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

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

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

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

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

How we developed our strategy

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

Over 230 customers engaged with us about what their priorities are for this strategy, ranging from small, independently facilitated focus groups, through our existing engagement and scrutiny structures and a survey open to all customers and prospective customers.

We identified clear priorities for our customers during this engagement:

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

The priorities identified by our customers were echoed by our staff, governing bodies and partners and have directly influenced the priorities within the strategy. We held local strategy workshops with staff, with feedback showing the top priority for our people is investment in our neighbourhoods, with repairs and value for money also being the most discussed themes.

Beyond this, we also recognise and reflect the needs of our people and partners in this strategy.

Our purpose, vision and values

Our Purpose

Making homes and lives better

Our Vision

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

Our Values

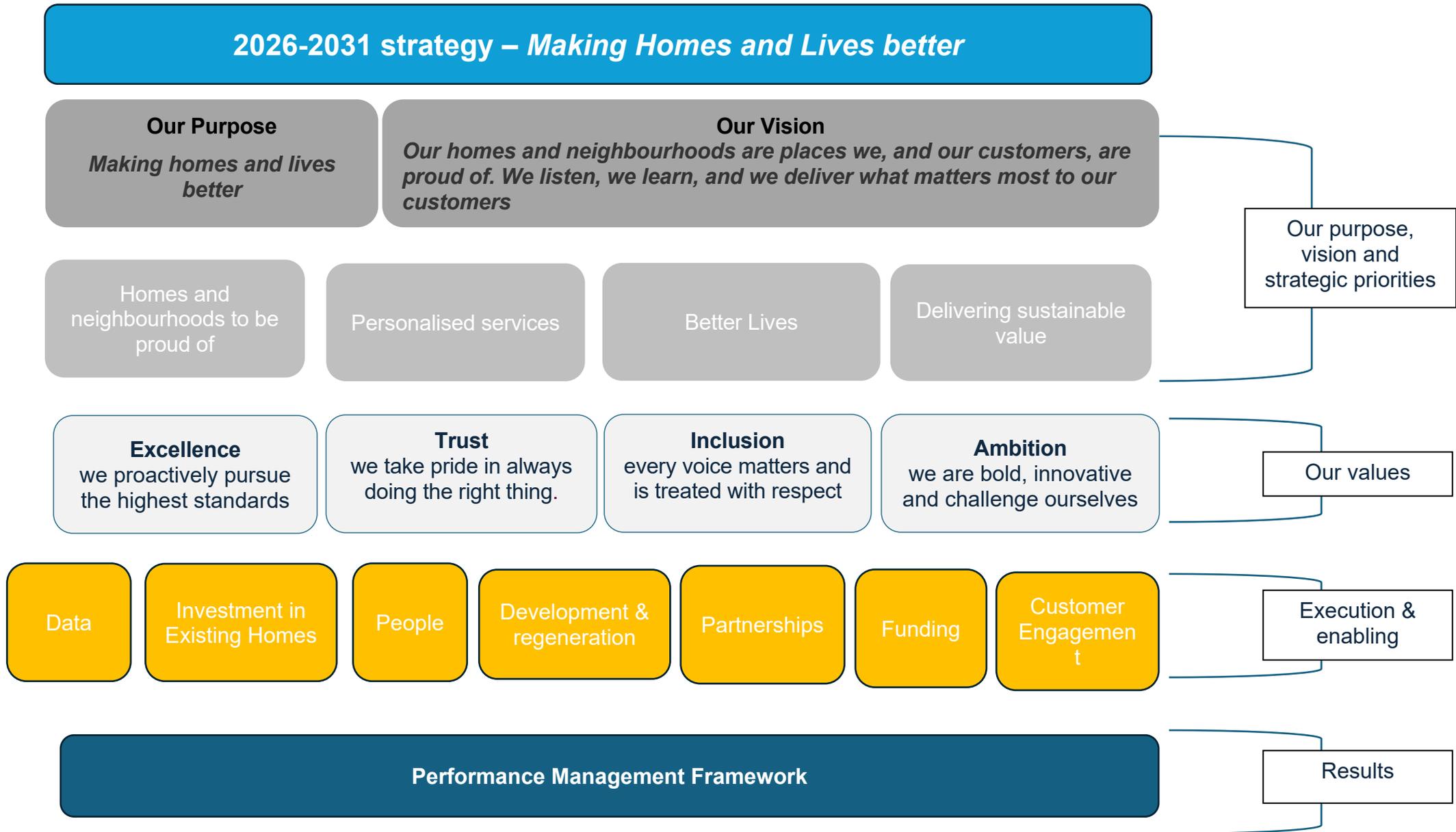
Excellence: we proactively pursue the highest standards.

Inclusion: every voice matters and is treated with respect.

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

Ambition: we are bold, innovative and challenge ourselves

Our strategic plan.....in a page



Our strategic themes and objectives to 2031

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

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

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

Key strategic results:

90%+ customer satisfaction

500 homes allocated to homeless households

At least 425 new homes

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

liP Platinum retained with staff satisfaction over 90%

Theme 1: Homes and neighbourhoods to be proud of

Our customer engagement and insight consistently identified that investment in homes is a key priority, particularly to deliver energy efficiency, upgraded doors and windows, and new kitchens and bathrooms. Our previous strategy committed to investing £14.2m in improving and modernising our existing homes. We now want to build on this.

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

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

Loretto Housing in 2031:

In 2031, our customers will be clear on the quality of home they can expect from us, through a Wheatley Standard, and we will know how our homes measure up to this demanding standard. Warm, safe, and decent homes, in thriving neighbourhoods where customers feel proud and secure, will be synonymous with Loretto. This will be achieved through targeted investment, strategic asset management, extensive new build, a proactive approach to repairs, regeneration, and community engagement, and leveraging our relationship with local authority partners.

Our key objectives over the next 5 years:



Maintain and enhance homes to meet the Wheatley standard



Create thriving neighbourhoods, collaborating with customers and partners



Lead the way in expanding supply of affordable, quality homes.

Establish the Wheatley Standard and enhance homes to meet it

We recognise that current published Scottish Government standards for social housing do not align with our customers' expectations of a home to be proud of.

That is why we will create an ambitious Wheatley Standard, recognising that not all our homes will meet and that the aspiration this provides is essential in driving improvement. For a home to meet the Wheatley Standard it must:

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



Maintain and enhance homes to meet the Wheatley standard

Wheatley Standard baseline	<ul style="list-style-type: none">➤ Design an assessment framework and criteria, reflecting the Wheatley Standard against which each property can be assessed➤ Systematically assess each property – using data from diverse sources including repairs history, stock condition and energy performance to provide a ‘consistent view’ of each property - against the Wheatley Standard, and develop a road map for each property to achieve and maintain the standard➤ Publish in the first year of the strategy our assessment of the number of properties that meet the standard, and details of areas where investment is needed to bring those that do not to meet it. Use this assessment as the baseline for measuring progress and more efficiently direct our Strategic Asset Investment Plan.➤ Reduce the number of homes not meeting the Wheatley Standard from the baseline each year➤ Reflecting the investment requirements to meet the Wheatley Standard in the Business Plan
Homes where our customers can feel safe	<ul style="list-style-type: none">➤ Continue to deliver our building safety requirements including annual gas safety checks, 5 yearly electrical inspections, checks to common plant such as lifts and water tanks, and specialist condition and fire safety inspections.➤ Proactively address damp and mould, including through integrating smart monitoring devices and workforce training to ensure early identification and resolution.➤ Update our policy approach to damp and mould to reflect requirements from Awaab’s law and enshrine specific Tenants Rights to request further investigation➤ Work with the Scottish Government as it develops its approach to Single Building Assessment, and implement these requirements in a structured and phased manner
Energy efficient homes	<ul style="list-style-type: none">➤ Unless it is technically or economically not possible, deliver investment to ensure all our homes meet the minimum fabric requirements in SHNZ once finalised, and, in advance of this, ensure our homes are at least EPC C by 2031.➤ Where it is not technically or economically feasible to meet the SHNZ requirement or in advance of this EPC C, maximise the delivery of achievable fabric improvement works➤ Explore modern, affordable future heating options, including district heating and links to wider heating networks.➤ Ensure the heating systems in our homes are easy to operate and cost, effective for our customer, while recognising constraints such as availability of suitable alternative heating options, future net-zero requirements and energy market considerations

Investing in customers' homes	<ul style="list-style-type: none">➤ Develop and deliver targeted investment strategies for specific property types or issues, including achieving the Wheatley Standard, to address damp and mould, and properties in mixed tenure blocks.➤ Make sure we strike the right balance between investment and keeping rents affordable through a needs-based investment approach, based on up-to-date information on stock condition.➤ Deliver upgrades so no properties have internal components beyond what a stock condition assessment would consider to be their reasonable economic life.➤ Develop and consistently deploy cyclic maintenance programmes including gutter cleaning, fence, door, soffits and facias painting, and explore models that maximise impact for money available➤ Ensure customer engagement continues to inform priorities, and that our asset investment, aligns with Neighbourhood Plans which we will publish and deliver with partners as required.
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Create thriving neighbourhoods, collaborating with customers and partners

Pride in place and community	<ul style="list-style-type: none">➤ Develop, with customers and partners a common understanding of 'neighbourhood', recognising this will differ according to localities or property type.➤ Enhance our neighbourhood approach by developing standards informed by local priorities, customer engagement and data (e.g. Keep Scotland Beautiful assessments).➤ Reduce anti-social behaviour, fly-tipping, and underused green spaces in partnership with councils and community groups.
Safe and welcoming communities	<ul style="list-style-type: none">➤ Review our anti-social behaviour approach and Community Improvement Partnership (CIP) to ensure it is delivering sustained impact in our neighbourhoods for the benefit of customers.➤ Through partnership, CIP and local policing, work closer than ever to share knowledge and intelligence, co-ordinate services and provide support so our customers feel safe and secure. We will do this through enhanced structures and shared resources including our Neighbourhood Forums and through Communities of Excellence.➤ Expand environmental service offering and support community-led initiatives, with priorities driven by customer-led walkabouts, engagement and real time feedback.➤ Explore and expand the support we can provide together with local partners, being particularly mindful of customers who require extra help, recognising the diversity of our customer base and their needs.➤ Strengthen multi-agency partnerships including with local government and community groups, to address waste management, green space maintenance, and vacant land.➤ Evolve community safety partnerships including with Scottish Violence Reduction Unit and Scottish Community Safety Network to better understand issues affecting our neighbourhoods and co-create solutions.➤ Look to extend sharing and use of neighbourhood data with key partners and undertake experiments to trial new approaches to solve issues faced by our customers.➤ Take a resolute approach to preventing and addressing discrimination and harassment in our neighbourhoods, fostering environments where everyone feels respected and safe.
Empowered customers	<ul style="list-style-type: none">➤ Increase engagement with customers, including new and younger household members, through education awareness and capacity raising exercises.➤ Deepen our understanding of customer behaviours utilising and enhancing our customer insight mechanisms and develop key messaging to provide clarity around our services and responsibilities➤ Work closely with Police Scotland and Local Authorities to promote and support good neighbourliness and responsibility for maintaining welcoming and safe communal spaces.



Expand supply of affordable, quality homes

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

Outcomes:

<p>Customer priorities met:</p>	<p>Safety and Security Invest in Existing Homes Create Pride in Place</p>
<p>Outcomes:</p> 	<p>Strategic result: 90% customer satisfaction with the quality of their home</p> <p>We will measure success through:</p> <ul style="list-style-type: none"> ▪ At least 99.9% of our homes meeting SHQS ▪ The percentage of homes that meet the Wheatley Standard ▪ All our homes, except where it is not technically or economically possible, being EPC C by 2031 unless this measure is replaced through the SHNZ
	<p>Overall result: 90% of customers are satisfied with our contribution to the management of their neighbourhood by 2031.</p> <p>We will measure success through:</p> <ul style="list-style-type: none"> ▪ The percentage of our customers that feel safe and secure in their home ▪ 100% neighbourhoods maintaining KSB 5-star rating
	<p>Overall result: Net increase of affordable homes by at least 425 by 2031</p> <p>We will measure success through:</p> <ul style="list-style-type: none"> ▪ Annual progress with our development programme against both social and mid-market targets ▪ Satisfaction with new homes annually with a target of 95%.

Theme 2: Personalised Services

Our previous strategy focused on tailoring services for an exceptional customer experience, using local teams and a geographic approach. We strengthened wraparound services, launched the Customer First Centre, and enhanced repairs through specialist teams and partnership with our repairs provider, City Building (Glasgow).

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

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

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

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

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

Our objectives over the next 5 years:



Connect with customers through proactive, tailored communication



Enhance and apply what we learn to drive customer focused services



Deliver seamless services to meet customer needs

Our roadmap to achieving our objectives:



Connect with customers through proactive, tailored communication

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



Enhance and apply what we learn to drive customer focused services

<p>Listen, learn and act - customer insight driven service improvement</p>	<ul style="list-style-type: none"> ➤ Continue to refine and expand the ways we garner customer insight through a combination of real-time digital feedback, annual tenant complaints, satisfaction surveys and customer engagement. ➤ Deepen understanding of future needs including through analysis of consumer trends and engagement with our potential future customers, including younger household members or younger people living in our communities, acknowledging the potential for lifetime association through Wheatley Group tenures. ➤ Enhance information flows and review our people processes to help test and pilot learning, supported by a 'culture of curiosity' and innovation. ➤ Integrate all forms of customer feedback into a single insight platform, enabling learning, targeted interventions and personalised engagement. ➤ Communicate the impact of customer input through "You said, we did" reporting and regular storytelling. This will support us to demonstrate value for money. ➤ Use data to inform the architecture of a 'single view of the customer' empowering staff to respond to customer insight and embed every day, continuous learning. ➤ Explore segmentation mapping to ensure services are responsive to the needs of all customer groups, including those who are hard to reach or particularly disadvantaged or vulnerable.
<p>A strong, engaged, influential tenant voice</p>	<ul style="list-style-type: none"> ➤ Launch our refreshed engagement framework including in collaboration with community partners, to expand opportunities for customers to participate in shaping services, including digital and in-person engagement, with a focus on accessibility and inclusion. ➤ Continue to identify and engage with hard to reach and disadvantaged groups, including specific approaches to support homeless customers, New Scots, and those supported by our charity partner, the Wheatley Foundation.
<p>Customers will see clear evidence that their voices are heard and acted upon.</p>	<ul style="list-style-type: none"> ➤ Communicate the impact of customer input through "You said, we did" reporting and regular storytelling. This will support us to demonstrate value for money. ➤ Use data to inform the architecture of a 'single view of the customer' empowering staff to respond to customer insight and embed every day, continuous learning. ➤ Explore segmentation mapping to ensure services are responsive to the needs of all customer groups, including those who are hard to reach or particularly disadvantaged or vulnerable.



Deliver seamless services to meet customer needs

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

Outcomes:

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

Theme 3: Better Lives

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

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

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

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

Our objectives over the next 5 years:



Contribute to ending homelessness:



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

Our roadmap to achieving our objectives and the outcomes delivered



Contribute to ending homelessness

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



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

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

Outcomes:

Customer priorities met:	Create Pride in Place Keep Rent Fair and Transparent
Outcomes: 	Strategic result: Housing at least 500 homeless households We will measure success through: <ul style="list-style-type: none">▪ Over 90% tenancy sustainment
	Strategic result: Reduce the number of families in poverty We will measure success through: <ul style="list-style-type: none">▪ Reduce the value of arrears and number of customers in debt with us;▪ On average, keeping our rent levels below 30% of disposable income; and▪ Number of jobs, apprentice and training places created for our customers

Theme 4: Delivering sustainable value

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

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

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

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

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

Our objectives over the next 5 years:



Nurture and invest in our people, recognising their contribution



Drive effective solutions, harnessing digital capabilities and data assets



Ensure financial efficiency today, prepared for tomorrow



Grow our reputation as an ethical, trusted business

Our roadmap to achieving our objectives

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

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





Drive effective solutions, harnessing digital capabilities and data assets

<p>Building single view of the customer and home, consolidating systems and streamlining processes</p>	<ul style="list-style-type: none">➤ Prioritise the development of integrated data and technology platforms that enable a unified view of our customers and assets to support smarter decision-making and allow staff to deliver services more efficiently and effectively.➤ Bespoke digital and data roadmaps will be co-developed for each major service area, setting out clear pathways to better data accessibility and stronger, digitally enabled processes. These will be delivered through robust project and change management programmes to ensure meaningful transformation.➤ Actively consolidate our technology platforms to establish a single source of core data and consistent ways of working. A key priority will be deeper integration with City Building (Glasgow), transitioning to common platforms where appropriate.➤ A comprehensive view of our assets and customers and overarching data analytics platform will lay the foundation for enhanced predictive analytics and Artificial Intelligence integration.
<p>Embedding Artificial Intelligence ethically and sustainably, focussing on enhanced experiences</p>	<ul style="list-style-type: none">➤ Adopt Artificial Intelligence selectively and ethically, targeting manual workflows that can be automated to free up staff for customer-focused, value-added work. Initial focus areas will include teams that support us in Wheatley Solutions and the Customer First Centre, with learning shared across Loretto Housing and the wider Group.➤ Artificial Intelligence will be limited in areas requiring significant human judgment until we are confident there is low risk; smart data applications such as in-home sensors, diagnostic tools, and real-time communications will be explored to manage our portfolio more effectively.➤ Working with external partners we will deliver our digital maturity roadmap aligned with the Group's data strategy. This will focus not only on systems but also on developing staff skills and fostering a culture of data ownership, stewardship, and literacy.➤ Enhanced data capability and understanding of our customers will inform and influence the activities of our charity partner of choice, the Wheatley Foundation, to support our communities and better equip us to measure impact.
<p>Safely cultivating innovation, for the benefit of our communities</p>	<ul style="list-style-type: none">➤ Develop programmes to encourage and support innovation thinking and approaches, as part of developing and improving the services we provide.➤ Collaborate with acknowledged leaders, including from industry and academia, in the field of emerging technologies and innovation to develop new solutions that meet our and our customers' needs.➤ Embed accountability for innovation in the responsibilities of our senior staff.

	<ul style="list-style-type: none"> ➤ Take an open and ambitious approach to exploring new ways of working, while also applying robust frameworks to ensure there is evidence that such innovation will deliver benefits for our customers and our business before large scale deployment. ➤ Prioritise strong data governance to ensure ethical use including as new technologies including AI evolve ➤ Support customers who may be disadvantaged by the increasing shift to digitisation, such as through the potential introduction of digital identities in welfare and public services. ➤ Achieve Cyber Essentials accreditation across Loretto Housing, demonstrating our commitment to safeguarding systems, protecting customer data, and maintaining business continuity.
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Ensure financial efficiency today, prepared for tomorrow

<p>Maintaining financial strength and flexibility</p>	<ul style="list-style-type: none"> ➤ Retain our externally accredited A+ credit rating and adhere to our financial ‘Golden Rules’, ensuring Loretto Housing remains a trusted organisation in the eyes of funders, stakeholders, and customers. ➤ Evaluate governance and funding models to unlock new capacity—particularly for new build development—through joint ventures and non-traditional finance approaches. ➤ Mobilise through a flexible working model to allow us to respond quickly to emerging opportunities, adapting our financial strategy to meet changing market conditions through to 2031.
<p>Championing transparency and customer trust</p>	<ul style="list-style-type: none"> ➤ Demonstrate financial transparency by publishing clearer information on how rent is spent, including through our annual rent consultation. Customer feedback will continue to shape decisions before any rent increase is applied. ➤ Explore expanding financial support for tenants, tailoring assistance to meet diverse needs and helping customers navigate the cost-of-living crisis.
<p>Future proofing through data and insight</p>	<ul style="list-style-type: none"> ➤ Increase our use of predictive analytics to support business continuity planning, improve supply chain resilience, and anticipate future risks. ➤ Our data-driven finance approach will help us make informed decisions, optimise resource allocation, and ensure long-term sustainability.



Grow our reputation as an ethical, trusted business

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

Outcomes:

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

Report

To: Loretto Housing Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: 2026/27 Rent setting and service charges

Date of Meeting: 24 November 2025

1. Purpose

1.1 This report:

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

2. Authorising and strategic context

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

3. Background

Economic context

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

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

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

4. Discussion

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

Affordability

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

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

RSL	Average Weekly Rent					Total Lettable Units	Overall Average Weekly Rent
	1 Apt	2 Apt	3 Apt	4 Apt	5 Apt		
Loretto HA	£137.48	£112.69	£114.31	£123.49	£145.98	2676	£116.41
GROUP	£89.91	£104.07	£109.62	£123.64	£136.65	61646	£111.11

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

Table 2: Average Rents as a percentage of income

Customer Group	1 Apt	2 Apt	3 Apt	4 Apt
Single Person	36.6%	31.0%		
Couple 1PT 1FT/ Pensioner couple		20.6%		
Couple 2FT		15.5%		
Single parent (2 Children)			19.0%	20.5%
Small family (2 Children)			14.5%	15.6%

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

- 4.7 This shows that consistent with previous years, 1-apartment bedsits (including supported communal living) and one-bedroom properties occupied by single people in Loretto appear to have higher rent to income ratios marginally above 30%.
- 4.8 Loretto’s figures can be skewed by the levels of service charges for specialist supported accommodation. These are paid for in almost all cases by housing benefit and for tenants not in receipt of benefits. We will continue to have funding available in 2026/27 to support those experiencing financial difficulties and will make this clear throughout our consultation.
- 4.9 When compared with other specialist RSL providers that focus on older people/supported housing such as Viewpoint, Loretto compares favourably as shown in the table below.

4.10 **Table 3: Specialist provider average rents + service charges 2024/25 with 25/26 increase applied (Source ARC 2023/24)**

Loretto - Supported Social Landlord	Average weekly rent by House Size				
	1 Apt	2 Apt	3 Apt	4 Apt	5+ Apt
Ark HA	£108.38	£120.70	£129.69	£128.26	£132.52
Bield Housing and Care	£185.00	£196.00	£184.98	£176.49	£149.17
Hanover (Scotland) HA	£162.81	£153.71	£161.13	£142.05	£148.16
Loretto HA	£137.48	£112.69	£114.31	£123.49	£145.98
Viewpoint HA	£127.81	£147.22	£153.47	£192.34	

Comparability

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

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

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

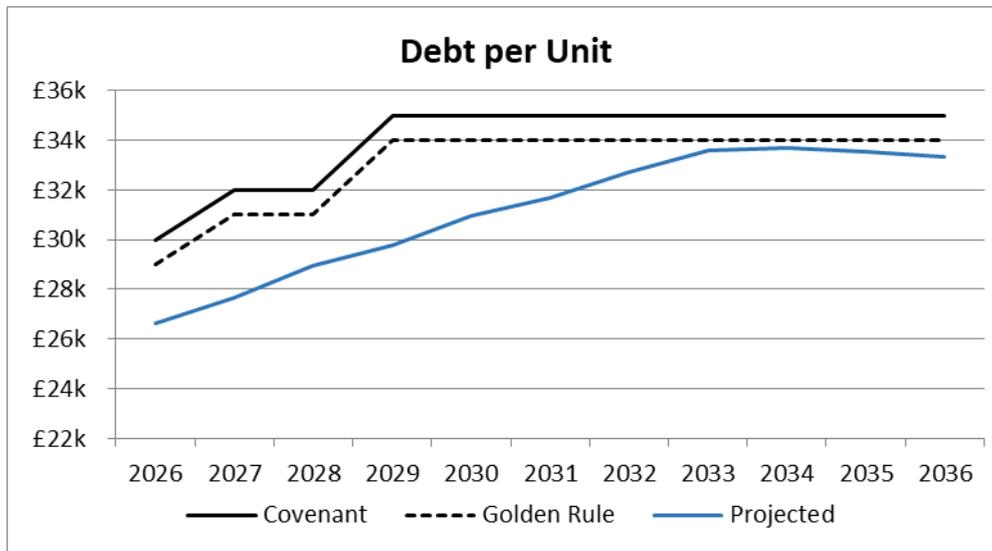
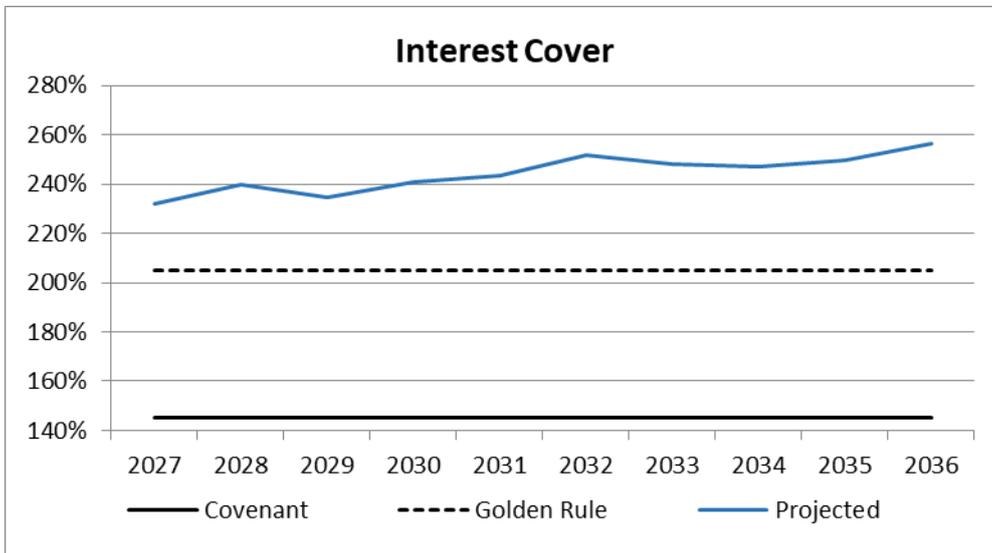
4.13 The rent consultations, as expected, reference the same drivers and financial pressures being faced as we and the wider sector do and the level of proposed increases reflects this.

- 4.14 We will provide a further update on the latest information available on comparator RSL and Local Authority rent proposals for 2026/27 to the Group Board at their December meeting.
- 4.15 Table 3 above shows the most recent available comparison of RSL rents from supported living landlords in the ARC published data with the 2025/26 increase applied.
- 4.16 In Loretto's latest independent tenant satisfaction survey, undertaken in 2023/24, 93% of the 331 tenants surveyed said that they agreed that rent represented good value for money. This compares to a Scottish average for 2023/24 and 2024/25 of 82%.

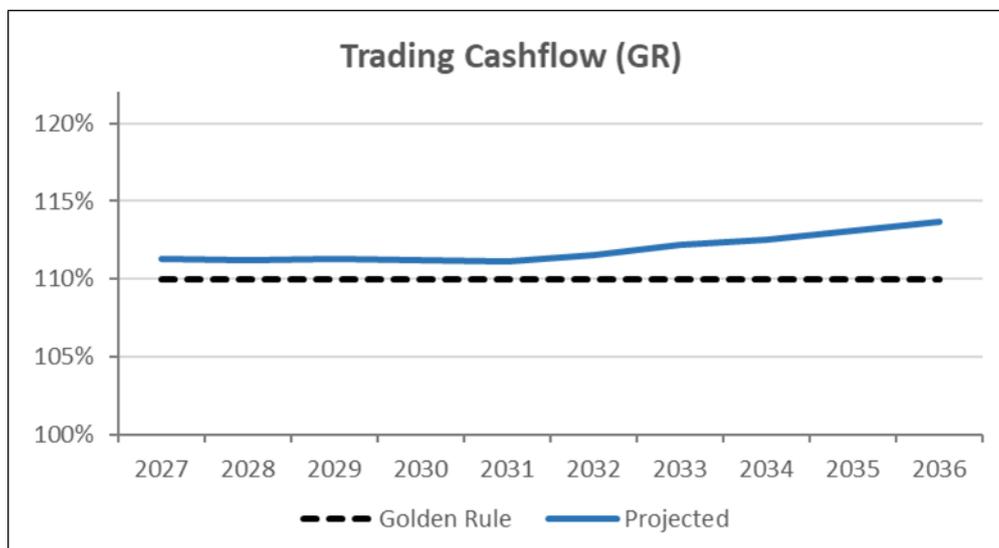
Financial Viability - RSLs

- 4.17 We and our Group partner RSLs together form a borrowing group, and we assess the key financial indicators of the RSLs aggregated together. Over recent years, the financial capacity within our business plan has been subject to external pressures such as general cost inflation, specific rates of higher inflation for repairs, employers' national insurance increases and interest rate increases.
- 4.18 This has been coupled with a sustained increase in demand for repairs, additional legislative compliance obligations including fire remediation preventative works and our commitment to increase investment in our homes and neighbourhoods beyond core compliance and lifecycle replacements.
- 4.19 Scottish legislation for social housing includes the Housing (Scotland) Act 2014 and the recently passed Housing (Scotland) Bill which introduces new statutory duties for landlords across the social rented sector. For social landlords, these changes represent a move from discretionary good practice to mandatory compliance.
- 4.20 This includes new powers for Ministers to set enforceable expectations around damp and mould remediation (Awaab's Law provisions), a clearer responsibility for social landlords to help prevent homelessness and strengthens tenants' rights against eviction for rent arrears. For social landlords, these changes represent a move from discretionary good practice to mandatory compliance.
- 4.21 Our business plan requires us to strike the right balance between keeping our rents affordable, maintaining the standard of our homes, investing in our services, meeting all our legislative obligations and ensuring the organisation remains financially viable.
- 4.22 With our financial projections having been subject to notable prolonged external pressures outlined above, cost efficiencies and rent increases are key drivers in growing the financial capacity within the business. Driving overhead efficiencies from our Group structure we have provided real savings at a Group level in staff and running costs of £13.0m after adjusting for the effects of inflation over the four completed years of our 2021-2026 strategy. For Loretto, we have achieved a real reduction in overhead costs of £0.5m since 2021/22.

- 4.23 Our financial projections which were approved in February 2025 and included an assumed rent increase of 5.0% for 2026/27. Since then, several key financial pressures have emerged namely:
- Higher levels of repairs and maintenance inflation which is currently running above 7% and a higher pay award in CBG linked to the COSLA settlement;
 - Higher interest rates increase the longer-term cost of borrowing; and
 - Persistent higher levels of general inflation across our cost base, most notably driving higher wage inflation with the previously assumed cost of living increase of 2.5% not likely to be achievable with inflation forecast to remain above 3.5% in Q1 2026.
- 4.24 Taking these factors into account, a rent increase of 6.9% is needed to preserve the investment programme which was agreed as part of our asset strategy and to allow us to:
- Continue to fulfil and grow the planned funding for our legislation and lifecycle replacement investment programme in 2026/27;
 - Start to create additional capacity for more investment to deliver planned improvements more quickly and to develop specific approaches to key stock types to extend their useful lives;
 - Maintain the delivery of our neighbourhood plans and a programme of environmental improvements; and
 - Continue to build capacity to fund a programme of energy efficiency improvements to meet the zero targets in the new SHNZS.
- 4.25 The additional funding from the rent increase is supplemented by cost efficiency targets for Group savings of £3.8m over the next 5 years. This proposal allows us to maintain a prudent financial approach to protect long-term viability and all loan covenant commitments are met.
- 4.26 We would continue with the Helping Hand Fund which assists tenants experiencing difficulties in keeping their rent accounts up to date and have assumed a provision of £45k for a 2026/27 Helping Hand Fund.
- 4.27 Our key indicators of interest cover, which measures the extent to which our operating surplus after deducting grant income on new build covers our interest costs, and debt per unit which relates to our borrowing capacity, are both covenant measures in our loan agreements.
- 4.28 Taking the rent increase of 6.9% and associated changes to running costs and investment spend, the charts below show that we continue to maintain our minimum headroom in line with our Golden Rules of 60% to the interest cover covenant and £1,000 of debt per unit and remain fully compliant with loan covenants.



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



Consultation and approval – timing and approach

- 4.30 The consultation with tenants has in the previous two years provided proposals including two options for the increase, considering feedback from initial focus groups to simplify the consultation. This is followed by writing to all tenants to confirm the increase at least 28 days before this is applied.
- 4.31 It is proposed that the focus groups would again be independently facilitated discussions on:
- Two options of 6.9% and 7.4% and why the base level is necessary;
 - The proposed approach to the options – with a higher level of community investment with the additional money from the higher rent option; and
 - The draft rent brochure and how well it explains the above.
- 4.32 The key outcomes we will be seeking from the focus groups would be:
- qualitative feedback on the proposed rent increase range;
 - clear messaging in the final brochure on why the base level is what it is; and
 - clear, specific proposals in the final brochure on how additional options would be deployed in practice.
- 4.33 It is intended that we will seek to engage at least 12 tenants through two focus groups. The focus groups will be one in person and one online to allow more opportunities to participate. The attendees will be drawn from our Customer Voices, with priority given to those who have not previously attended.
- 4.34 A draft rent consultation booklet is attached in Appendix 1. Based on feedback from last year, we have continued to reduce the amount of text whilst retaining the key messages and tailored, geographical information and imagery. This helps bring the proposals to life for customers and demonstrates clearly and transparently how we spend rent to improve our communities. We know from customer engagement that perception of value for money and evidencing investment and improvements is important to ensure a meaningful consultation.
- 4.35 Last year, we provided more information than ever about investment proposals and this was well received. We will continue to do this and provide examples of how we have delivered on investment promises in the last year.
- 4.36 In terms of the formal consultation and when and how we agree where within the 6.9%-7.4% range we consult the proposed approach is as follows:

Key action	Timescale
Group Board approved rent increase range	12/11
Our Board approve the rent increase range and delegate authority to the Chair to agree final level (between 6.9% and 7.4%)	24/11
Independently facilitated rent Focus Groups	1/12 – 5/12
Group Board approve final consultation levels – taking into account focus group feedback and available comparability data	17/12
Chair confirm to our Board the consultation increase options	17/12
Consultation with tenants (subject to mail drops but a minimum of 2 weeks)	12-26/01/26

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

5. Customer Engagement

- 5.1 The rent focus groups will seek customer feedback on the main mechanism for customer engagement, the rent consultation booklet. Thereafter, every tenant will be formally consulted as part of the rent setting process.
- 5.2 We consider customer insight throughout the year to inform decisions around spending and investment priorities. Our recent customer strategy survey, which received nearly 230 responses, re-emphasised keeping rents fair and transparent as a top priority for customers with 90% of responses agreeing that our proposals for our next strategy meet customer expectations around this theme. Within this, affordability, visible improvements and value for money and transparent communication are important to customers.

6. Environmental and sustainability implications

- 6.1 No implications noted.

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

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

13. Recommendations

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

LIST OF APPENDICES:

Appendix 1: Draft rent consultation booklet

Investing in your community

Consultation on rent and service charges
for Loretto Housing 2026-27



DRAFT



Rent consultation

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

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

This rent and service charge consultation booklet will:

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

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

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



TO BE APPROVED

Message from the Chair



At Loretto Housing, we are here to deliver outstanding services for our tenants.

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

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

We are delighted that 93.05% of tenants who took part in our latest satisfaction survey said their rent represented good value for money, above the Scottish average of 81.7%. Delivering value for money is always important to us, and a key element of this is our annual rent setting and the proposals we present to tenants through our rent consultation.

In addition to feedback from our tenants, we asked independent customer insight organisation Research Resource to hold focus groups with our Customer Voices. Their views were central to the contents of this brochure and the rent setting proposals for 2026-27. We understand the difficult economic circumstances our tenants face, with energy costs and food prices continuing to rise. At the same time, the average cost of repairs and maintenance rose by **7.8%** in September 2025.

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

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

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

Iain Macaulay
Loretto Chair

We're here for you

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

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

If you are worried about your rent, please get in touch. We are here to support you. Call us on **0800 952 9292**.



Financial challenges ahead

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

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

Here are some of the challenges we face.

Investing to improve your home and community

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

Repairs and maintenance

We are doing everything we can to make our repairs and maintenance service more efficient but it makes up one of the biggest parts of our spending. Costs, such as materials, are increasing. In September 2025, the annual average rate of inflation for repairs was 7.8%.

Legislation

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

Interest rates

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

Rent options for 2026-27



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

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

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

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

Option 1 6.9%

This option would allow us to keep repairs and building safety spending at current levels and invest more money improving your home and community. You'll find details of our investment plans in your local area on page 7.

As an example, this option would mean an average increase of £7.78 per week on an average two-bedroom home.

Option 2 7.4%

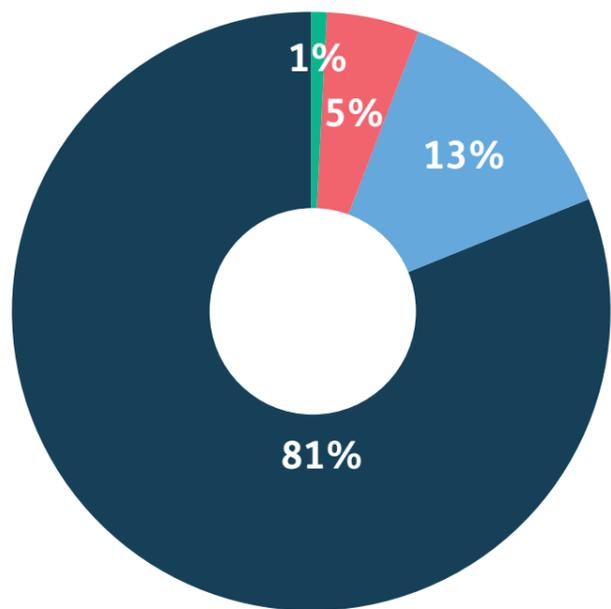
This option would deliver all of Option 1 as well as further investment of £90,000 each year in homes and communities in your local area.

As an example, this option would mean an average increase of £8.34 per week on an average two-bedroom home.

What your money pays for

We always work hard to keep our overheads low and offer you value for money.

The pie chart below shows how income was spent in the financial year 2024-25.



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

Investment and maintenance

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

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

The remaining money allows us to focus on tenants' priorities, including making homes warmer, continuing to improve our repairs service, and keeping neighbourhoods clean and tidy.

In 2024-25, across our communities, we:

- carried out **13,711** repairs
- spent **£3.2m** improving existing homes
- spent **£5.4m** on repairs and maintenance

Staffing and admin costs

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

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

- had **65** involved in Stronger Voices tenant engagement projects
- handled **20,611** calls at the CFC

Investing in your community across Loretto neighbourhoods

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

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



Over the next three years we will invest over **£9.6m** in your local area to deliver:

- new kitchens in **250** homes and new bathrooms in **150** properties;
- new pitched roof coverings in over **20** homes;
- nearly **250** new front or back doors;
- over **50** new close doors;
- new windows in around **10** closes;
- extra energy efficiency improvements, including **10** new electric heating systems and **750** new gas boilers;
- environmental improvement works to closes and other common areas such as external insulation, upgraded paths, external painting and gutter replacements in **160** homes; and
- insulation improvements in **200** homes.



Have your say

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

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

The consultation closes on 26 January 2026.

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

What happens next?

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

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

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

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

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

Visit www.lorettoha.co.uk or phone us on 0800 952 9292.

Report

To: Loretto Housing Board

By: Laura Henderson, Managing Director

Approved by: Laura Pluck, Group Director, Communities

Subject: Housing (Scotland) Bill 2025

Date of meeting: 21 November 2025

1. Purpose

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

2. Authorising and strategic context

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

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

3. Background

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

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

4. Discussion

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

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

Statutory Duties for Homelessness Prevention

- 4.3 The timescale associated with being threatened with homelessness has been extended from two to six months. Section 41 of the Bill confers on relevant bodies a responsibility to ‘ask’ a person about their housing situation when they are carrying out their normal business and to ‘act’ if the person is homeless or at risk of homelessness.
- 4.4 The ‘Ask and Act’ approach is aimed at shifting focus from crisis intervention to early prevention, preventing the trauma and disruption that homelessness can cause and ensuring that people receive help before they reach a crisis point.
- 4.5 Alongside RSLs and Local Authorities, the Bill will require bodies such as health boards, the police and the prison service to take reasonable steps to prevent homelessness. At this early stage, it is unclear what the implications of the requirements on these bodies might have for us, for example, in terms of collaboration and information sharing.
- 4.6 To support the implementation of these new duties, the Scottish Government has established a *Test and Learn Prevention Pilot Fund*, providing up to £4 million in funding. The Fund will be administered by Advice Direct Scotland (“**ADS**”) and the pilots will ‘develop, test, scale and cost the new prevention duties in real-world settings’. ADS have set out the types of approaches it is seeking to support via the fund as follows:
- Early intervention and targeted prevention activity;
 - Multi-agency approaches to support people navigating housing, health and social care services;
 - Partnership models and processes that can be replicated and scaled;
 - Collaborations involving shared resources, data and transitional or referred services;
 - Initiatives that centre people at risk of homelessness and/or people with direct experience of homelessness in the design and delivery of the service; and
 - Initiatives that target groups at risk of homelessness at critical points in service pathways that have been identified as leading to homelessness.
- 4.7 In addition to closely monitoring the pilot, we are reviewing how the range of activity we currently undertake to support preventing homelessness, such as through housing options and more general tenancy management advice, wraparound services in areas such as financial management and welfare benefit advice are documented to allow us to evidence our compliance with the ‘ask’ and ‘act’ elements. We are also exploring how we could further refine our approach to tenancy sustainment support.

Domestic Abuse

- 4.8 The Bill has a specific focus on those tenants affected by domestic abuse. The measures within the Bill are designed to reduce homelessness amongst women and children who are disproportionately affected by domestic abuse.

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

Awaab's Law

- 4.16 The Bill includes provisions to implement Awaab's Law, aimed at protecting tenants from health hazards like damp and mould. The Bill gives Scottish Ministers the authority to set legally binding timeframes for social landlords to:
- Investigate reports of disrepair (especially damp and mould); and
 - Begin and complete necessary repairs.

- 4.17 We expect Awaab's Law to be effective from March 2026, subject to parliamentary approval. The Scottish Government is expected to also seek to extend Awaab's law to the private rented sector, which we expect would cover all of Lowther Homes' rental properties.
- 4.18 We attended a Scottish Government stakeholder engagement roundtable discussion on 22 September on their proposed approach for implementing an equivalent of Awaab's law in Scotland. We subsequently also received a delegation from the Scottish Government, who spent time with our Healthy Homes team to understand what is involved in managing damp and mould cases.
- 4.19 We understand the Scottish Government is, at this stage, still minded to mirror the key requirements from England, which are as follows:
- Investigate any potential hazards within 10 working days of becoming aware of them;
 - Produce a written summary of investigation findings and provide this to tenants within 3 working days of the investigation;
 - Take action to make the home safe (using temporary measures if necessary) within 5 working days of the end of the investigation;
 - Begin, or take steps to begin, any further required works within 5 working days of the investigation concluding, if the investigation identifies a significant or emergency hazard. If steps cannot be taken to begin work within 5 working days, this must be done as soon as possible, and work must be physically started within 12 weeks;
 - Satisfactorily complete repairs within a reasonable time period, without unreasonable delays;
 - Investigate and act on all emergency hazards as soon as possible and within 24 hours; and
 - Provide suitable alternative accommodation if the landlord is unable to complete work to make the home safe within 5 working days, or 24 hours in emergency situations.
- 4.20 We are currently undertaking a detailed review of our damp and mould processes, supported by a recent review by Internal Audit alongside preparing for the expected requirements of Awaab's Law. As part of this, we are engaging with a number of large English Housing Associations to identify any lessons or good practice for their preparation for the English equivalent, the first phase of which is in effect.
- 4.21 We will update our policy in early 2026 to reflect the requirements of Awaab's Law and this will be presented to the Board at its February meeting. It should however be noted that our existing approach significantly exceeds the requirements of the expected requirements of Awaab's Law, for example:
- Inspections undertaken within two working days or within three hours for emergencies;
 - A report left with tenants after the inspection;
 - Making the home safe or initiating a decant at the inspection stage; and
 - A target for repairs to be completed within 15 days.

Rent controls

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

Evictions

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

Pets

- 4.27 The Bill strengthens tenants’ rights in relation to keeping a pet. This is currently at the discretion of landlords; however, measures in the Bill will allow a tenant to make a request to keep a pet in their home and for that to not be unreasonably refused by their landlord.
- 4.28 Our current approach does, in some cases, mean we do not grant permission based on property type or circumstance rather than on a case-by-case basis.
- 4.29 We have commenced a review of our approach with a view to moving towards a single approach across the Group as well as reflecting the requirements of the legislation. This will include having clearly documented guidance for how we assess an application to keep a pet and demonstrating that any refusal is reasonable.

Other changes

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

5. Customer Engagement

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

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

- 12.1 The Bill introduces new statutory duties for RSLs, particularly around homelessness prevention and housing standards. Key changes include the 'Ask and Act' duty to identify and support those at risk of homelessness earlier, and the introduction of Awaab's Law, which sets strict timelines for addressing hazards like damp and mould. Work is underway to review and standardise our approach to pet ownership.

12.2 While many provisions require further consultation, we are proactively reviewing current practices, engaging with stakeholders, and preparing to update processes and policies to ensure compliance. Our existing approach to damp and mould already exceeds expected standards.

13. Recommendations

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

LIST OF APPENDICES:

None

Report

To: Loretto Housing Board

By: Elizabeth Cuthbertson, Director of Performance and Strategy

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

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

Date of Meeting: 24 November 2025

1. Purpose

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

2. Authorising and strategic context

2.1 Our current Group strategy sets out our desire to increasingly tailor services across the Group to suit the needs of our customers, diversify our Customer Voices and consider how our workforce will more closely reflect our communities.

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

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

3. Background

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

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

4. Discussion

EDI update

4.1 Key Group EDI actions progressed recently includes:

Outcome 1: Different together with you

- **Engagement:** Ensuring customers directly shape our service design in a key consideration in our EDI approach. Recognising the work of our Group Scrutiny Panel, we received the 'Best Practice in Involving Tenants in Shaping Service' award at the Tenant Participation Advisory Service (TPAS Scotland) National Good Practice awards in June. We have also been shortlisted for Scottish Housing Awards 'Excellence in tenant scrutiny' category; winners will be announced 14 November. The Group Scrutiny Panel includes 3 Loretto customers at present;
- We also engaged nearly 220 current and future customers in phase two of our **strategy engagement**, ensuring our future 2026-31 plans are shaped by more customer insight than ever from our wide reaching and diverse communities. Delivering services informed by need, providing support for vulnerable customers and supporting neighbourhoods to be thriving, cohesive and safe communities were key themes through which we must take an EDI approach. A separate agenda item provides more information;
- **Hate Crime:** The Group continue to monitor Hate Crime figures, with, at Group level, 48 reports in quarter one of 2025/26 and 45 in quarter 2, and we compare these against national trends using figures published by Police Scotland. There has been a slight increase in Hate Crimes this financial year compared to previous years. We are reviewing the Group policy to align with updated legislation, informed by an updated equality impact assessment. We will be relaunching this with staff with an updated action plan and e-learning;
- To ensure we are meeting **long term housing needs**, we are working with Local Authorities to reach our Group target of flipping 500 temporary flats to permanent by end of March 2026 – we are on track to meet this with 450 completed and 21 currently in progress.
- We are also reviewing Scottish Housing Emergency actions plans to inform our own Group **Homelessness** Policy review, which is due next year to align with our updated Group and Loretto strategy. To ensure this is informed by lived experience, we have engaged our waiting list prospective customers, as well as key stakeholders and our own staff. Leading the way nationally to eradicate homelessness will continue to be a key strategic focus for us over the next five years, which intrinsically requires a strong EDI approach to support this customer group and their specific needs.

Outcome 2: Different Together in our Group

- Representatives from our Group disability and neurodiversity network attended a **Neurodiversity in the Workplace** conference and marked Global Accessibility Day in May with accessibility software sessions led by Microsoft with 40 colleagues across the Group attending sessions. They also held MacMillan Coffee mornings in October in our Centres of Excellence;

- The **LGBTQ+** network ran events on Different Together and being your authentic self with guest speaker Zander Murray. This was well received by staff as Zander shared his story about being an openly gay professional footballer in Scotland carrying important messages on why feeling psychologically safe and a sense of belonging at work matters; and
- The Group supported over 30 young people aged 16-19 to gain experience in the world of work through our paid two-week **Summer Work Programme** in July, including our own customers. Recognising younger people is a group we see underrepresented in our engagement, some of the customers have expressed interest in getting involved in shaping our services by joining our Group Scrutiny Panel, including a Loretto customer.

Outcome 3: Evolving our data

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



- Our efforts have also been acknowledged by the Scottish Housing Awards, shortlisting the 'Marion Gibbs award for equality in housing' recognising how we have used EDI data to inform our Different Together approach. The winner will be announced mid-November.

Annual Equalities Report

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

TIDE result and BITC Responsible Business

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

- 4.8 We are engaged with BITC to support our ambitions to be a Responsible Business (“RB”). We have seen tangible impacts delivered from this partnership, for example, the Group is now working with Greggs to support employability programmes.
- 4.10 BITC has an RB tool that allows members to measure progress using a clear framework, assessing current RB maturity level and identifying how to improve. This encourages business to assess their overall RB strategy and focuses on the following six topics that BITC view as key to being a responsible business: **Health and Wellbeing, Inclusion, Employment and Skills, Circular Economy, Climate Action, Nature Stewardship**. The map below shows how BITC group these into three categories, Healthy Communities, Healthy Environment and Health Business.



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

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

5. Customer Engagement

- 5.1 'Enhancing our Stronger Voices approach through Different Together' is a section within the action plan, under outcome 1. Customer engagement is a key part of embedding our EDI approach, for example, engaging with groups of different characteristics to inform policy development and EIAs. Ensuring a diverse range of customers informs our next five-year strategic priorities has been a key focus of our engagement.
- 5.2 The collection of equality data required extensive customer engagement as we were required to ask all waiting list applicants, new tenants and existing tenants for protected characteristic data. Our Group Annual Equalities Report details how this data is used.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

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

13. Recommendations

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

LIST OF APPENDICES:

Appendix 1: 2024/25 Annual Equalities Report

One Group, Many Voices

Group Annual Equalities Report
September 2025

DRAFT

different
together



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Foreword

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

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

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

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

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

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

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

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

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

Introduction

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

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

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

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

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

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

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

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

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

– BITC Advancing Social Mobility in Scotland Report June 2025

Introduction

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

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



Our subsidiaries

Wheatley Homes Glasgow (WHG)

Wheatley Homes South (WHS)

Wheatley Homes East (WHE)

Loretto Housing (LHA)

Lowther (LOW)

Wheatley Care (WC)

Housing applicants

- MyHousing and Edindex

Housing applicants

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

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

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

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

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

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

Key figures

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

Housing applicants

Disability

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

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

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

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

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



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

Housing applicants

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



Housing applicants

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

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

Ethnicity

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

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

Housing applicants

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

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

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

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

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



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

Housing applicants

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

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

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

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



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

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

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

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

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

Housing applicants

Age

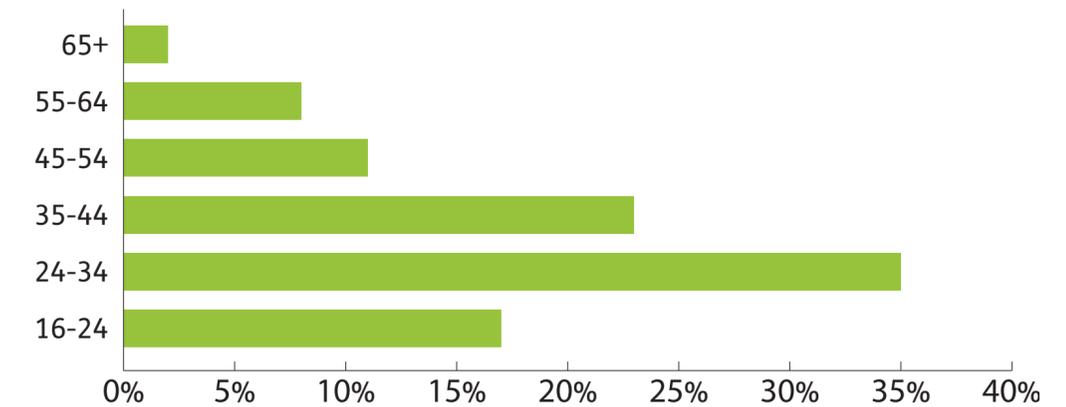
In evolving our data we have this year, for the first time, analysed the age of our housing applicants. We see representation across all age ranges, with less applicants from older age groups. This contrasts with our 2022 RSL customer data in which the number of respondents from older age groups was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

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

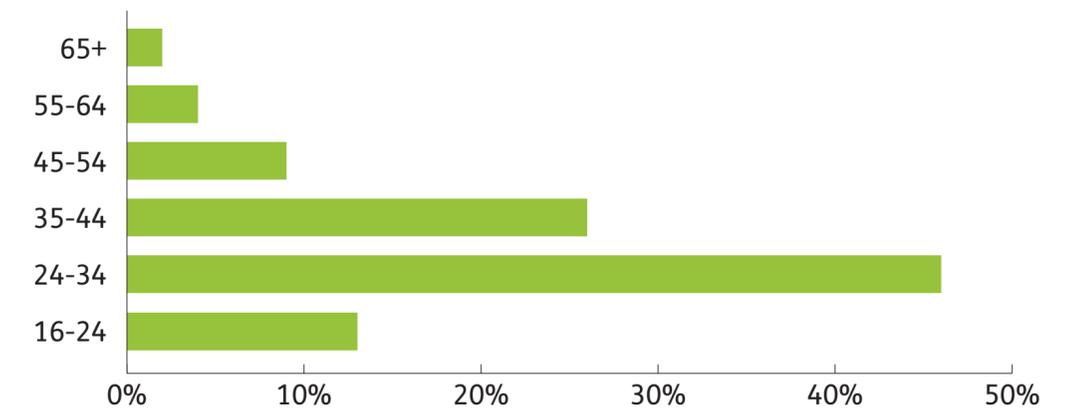
with 18 live cases in progress. This has made a number of larger homes available to homeless households and families, forming part of our response to the housing emergency.

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

Age groups proportions across RSLs



Age groups proportions across Lowther



source - MyHousing 2024/25

Stronger Voices

Stronger Voices



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

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

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

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

Stronger Voices

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

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

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

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



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

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

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

Stronger Voices

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

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

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

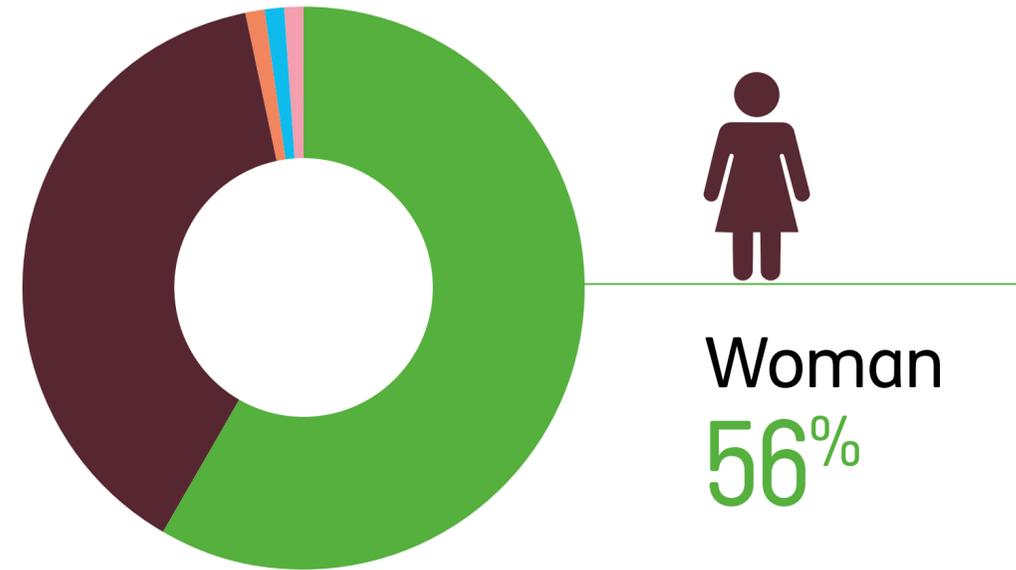
Tackling food poverty and supporting social mobility is another priority for us. In 2024/25, our Wheatley Foundation worked with our Stronger Voices team and supported the launch of two community larders (in Drumchapel and Knightswood) and supported over 830 people to access larder provision throughout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

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

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

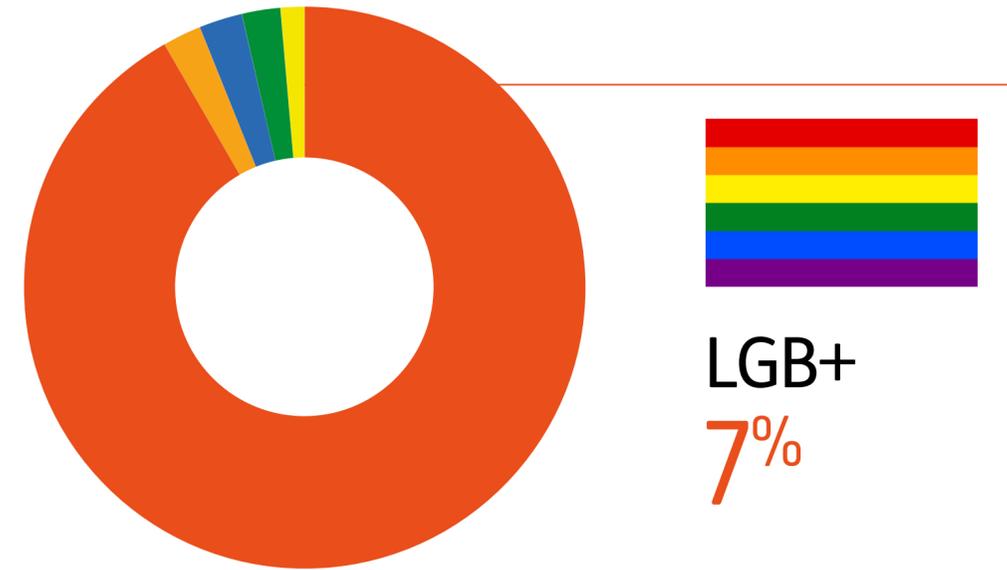
Stronger Voices

Gender identity



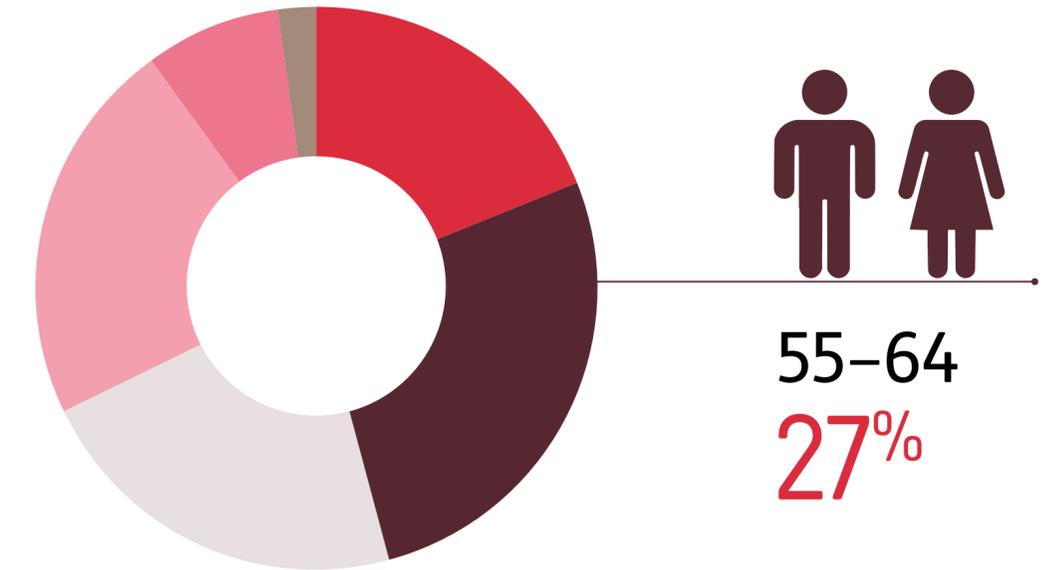
	23/24	24/25
Woman	59%	56%
Man	36%	37%
Non-binary	>1%	>1%
Trans man	>1%	>1%
Trans woman	>1%	>1%

Sexual orientation



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

Age

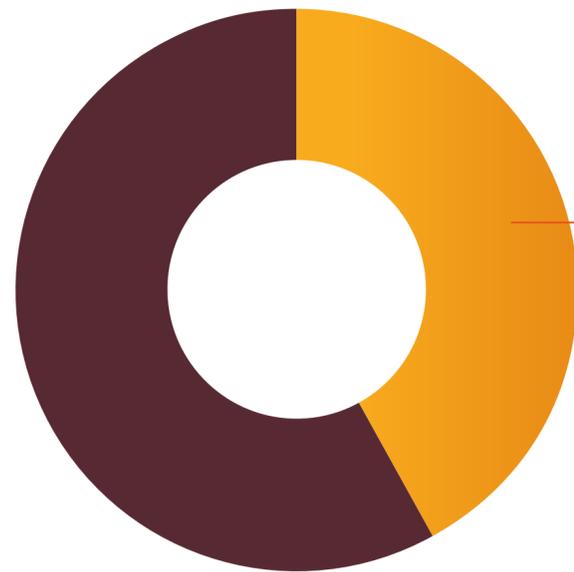


	23/24	24/25
65+	20%	19%
55-64	29%	27%
45-54	22.5%	22%
35-44	16%	22%
25-34	7%	8%
16-24	2%	2%

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

Stronger Voices

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



Yes
42%

- Yes 42%
- No 45%

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

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

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

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



Stronger Voices

Ethnicity

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

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

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



Wheatley Foundation

Wheatley Foundation



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

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

Employability programmes

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

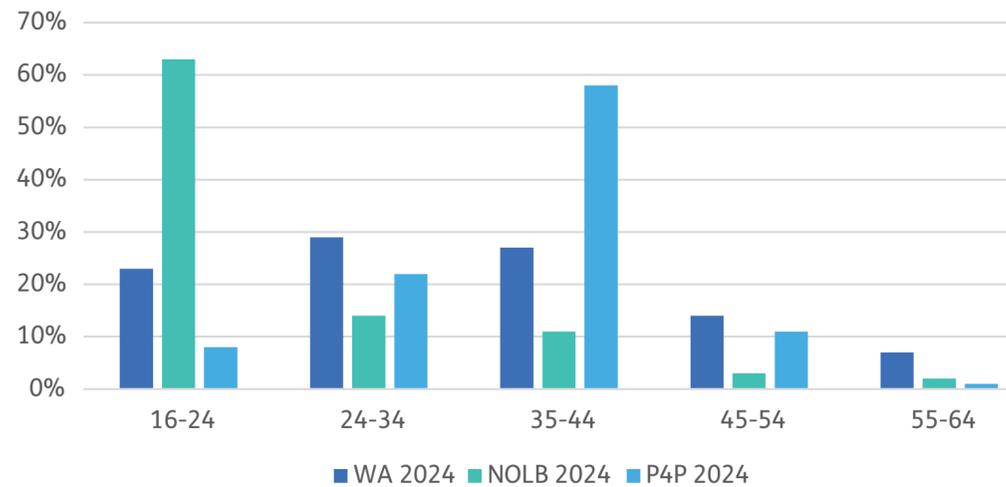
In total for 2024/25 we had 56 referrals for NOLB, 138 for WA and 104 for P4P.

Wheatley Foundation

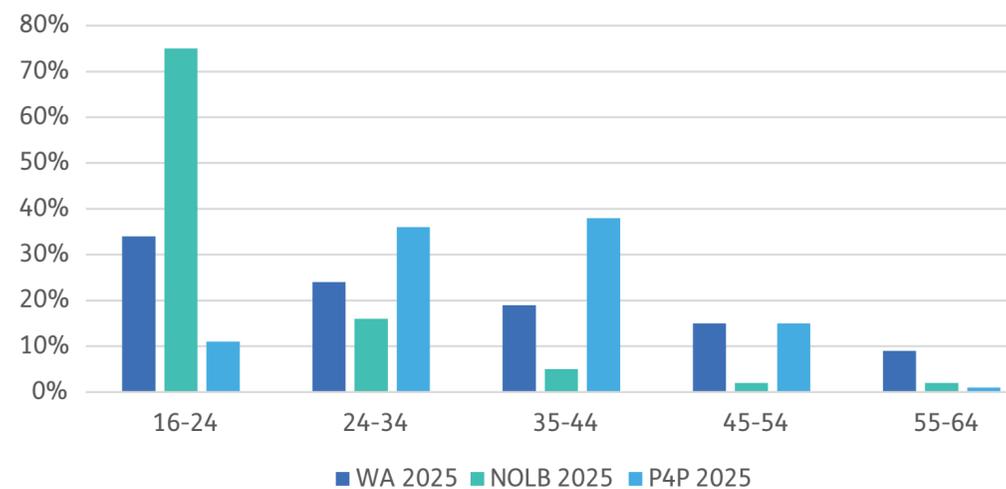
Age

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

Employability referrals 23/24 – Age



Employability referrals 24/25 – Age



Source - Wheatley Foundation employability programme data



Wheatley Foundation

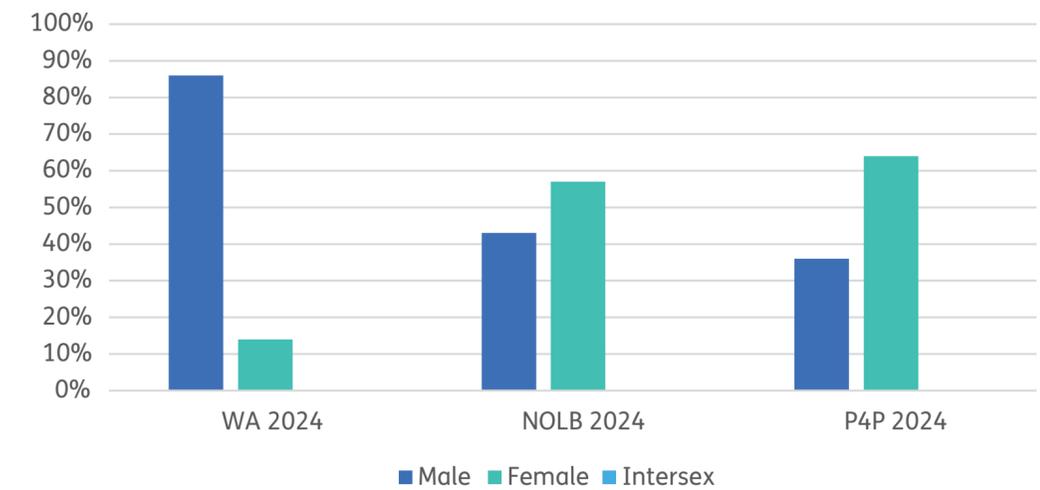
Sex

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

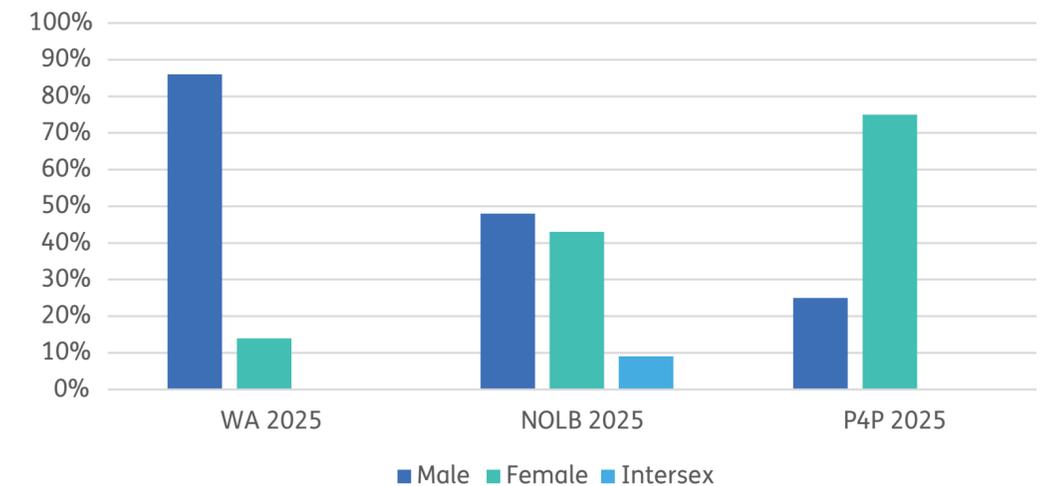
We also saw a more representative spread in sexes for NOLB, however an above average intersex response (nationally this group represents less than 2% of the population) – we believe this may be due to a misunderstanding in answering the question e.g. answering for both mixed-sex parents.



Employability referrals 23/24 – Sex



Employability referrals 24/25 – Sex

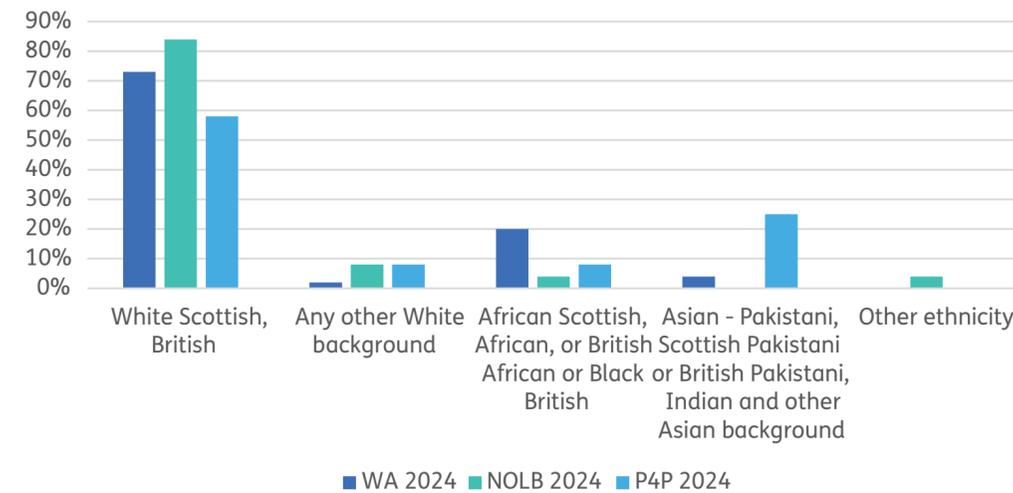


Wheatley Foundation

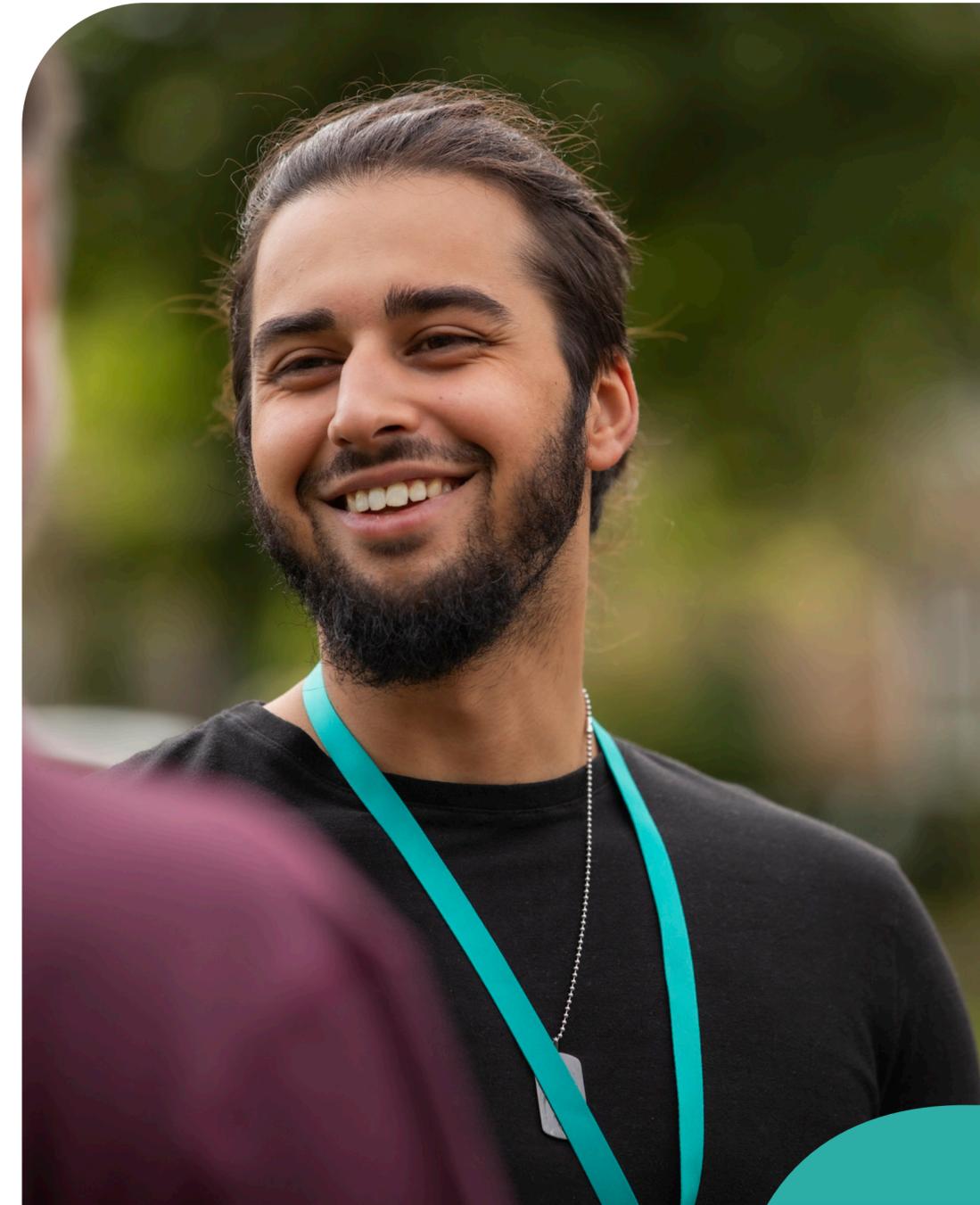
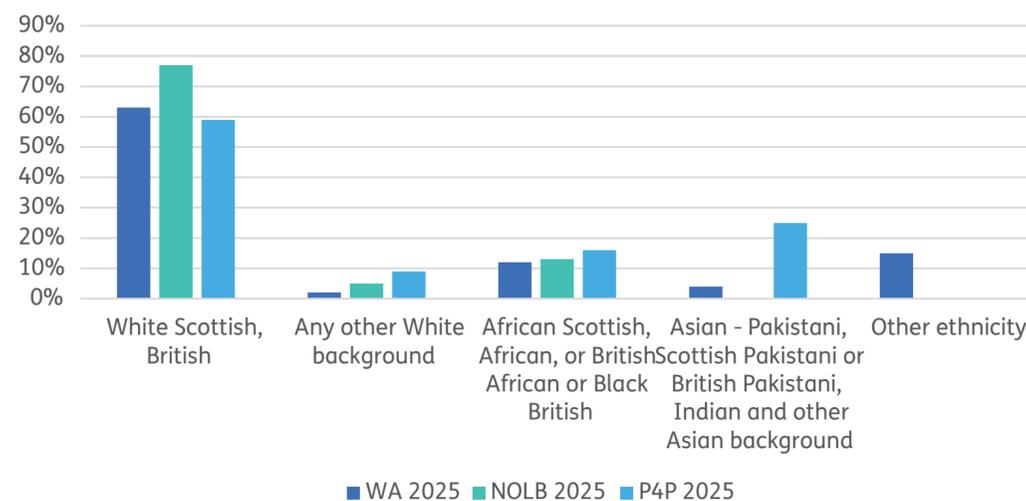
Ethnicity

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

Employability referrals 23/24 – Ethnicity



Employability referrals 24/25 – Ethnicity



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

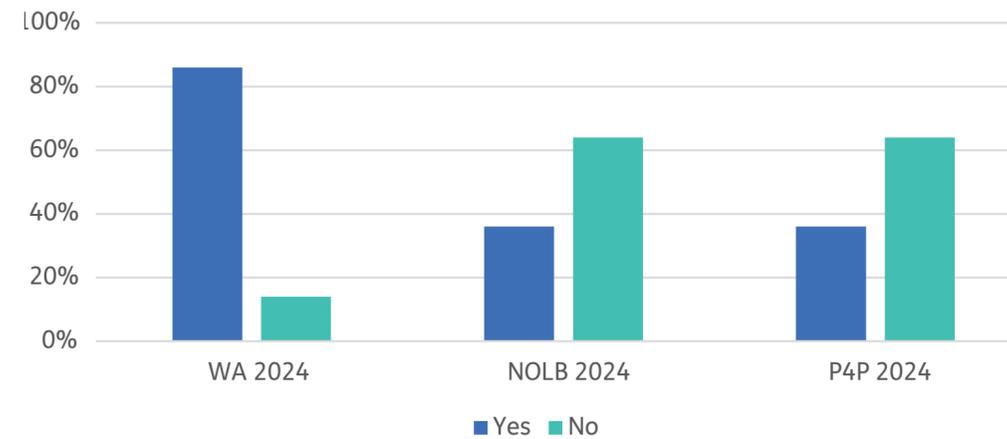
Wheatley Foundation

Disability

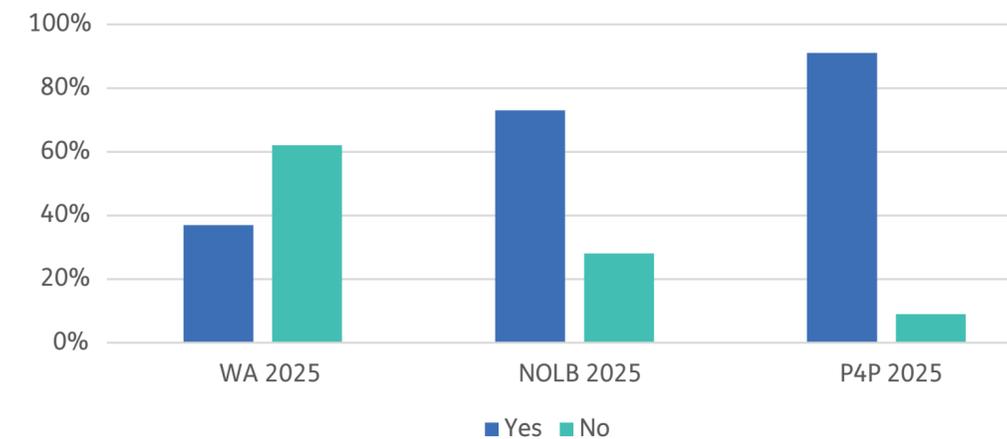
This year, for P4P and NOLB we again saw an increase in referrals from those indicating they have a disability (again we believe the impact of our targeted advertising), with mental health being particularly high and neurodiversity increasing. Although WA has seen a decrease in referrals from disabled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

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

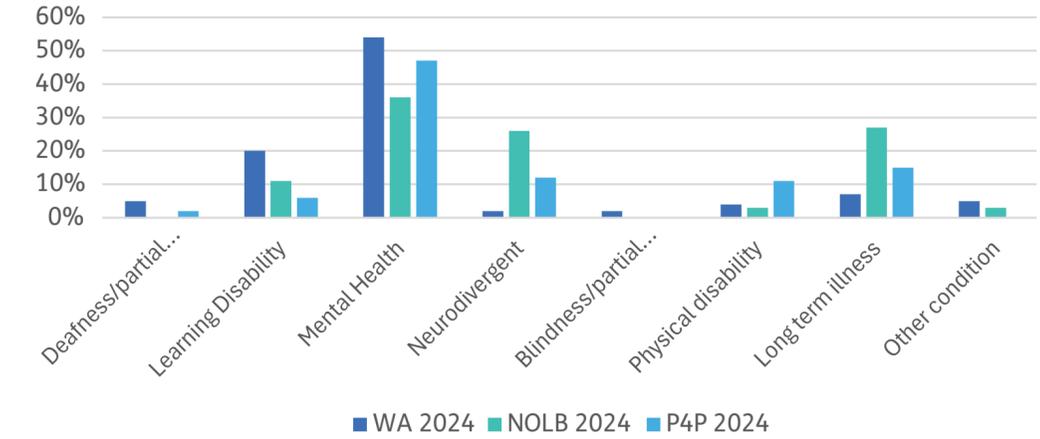
Employability referrals 23/24 - Disability



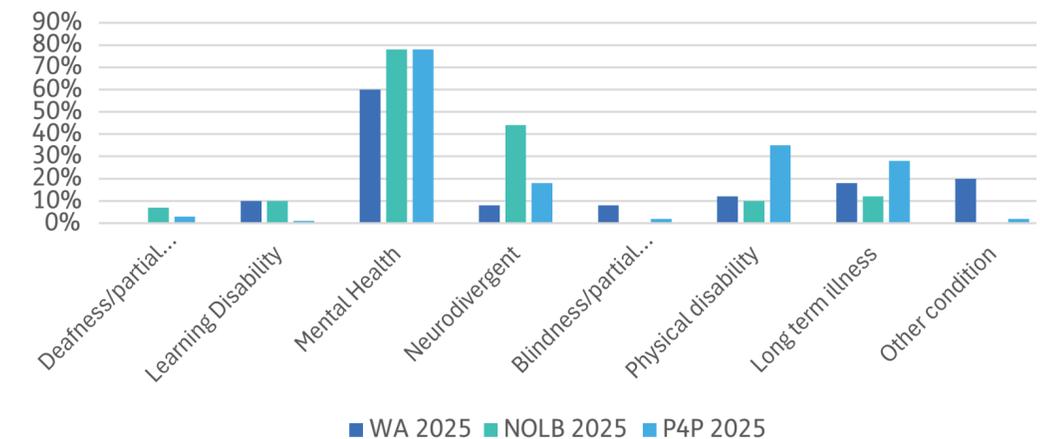
Employability referrals 24/25 - Disability



Employability referrals 23/24 - Type of disability



Employability referrals 24/25 - Type of disability



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

Wheatley Foundation

Financial wellbeing

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

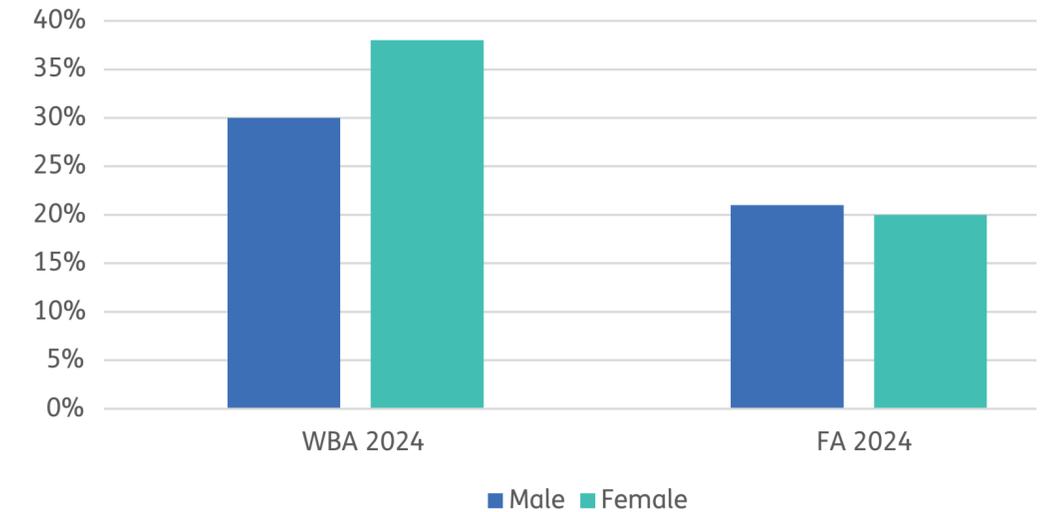
Age

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

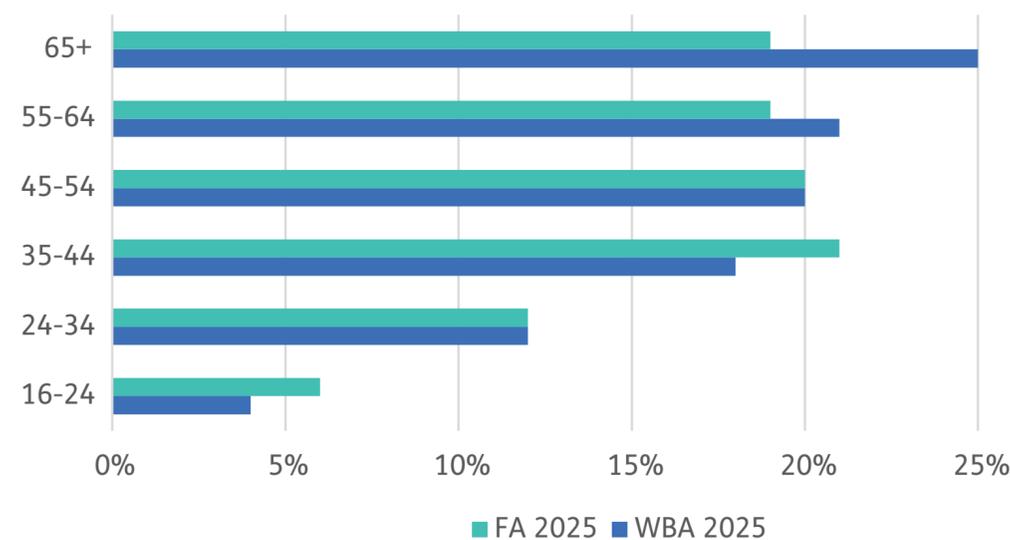
Financial wellbeing 23/24 - Age



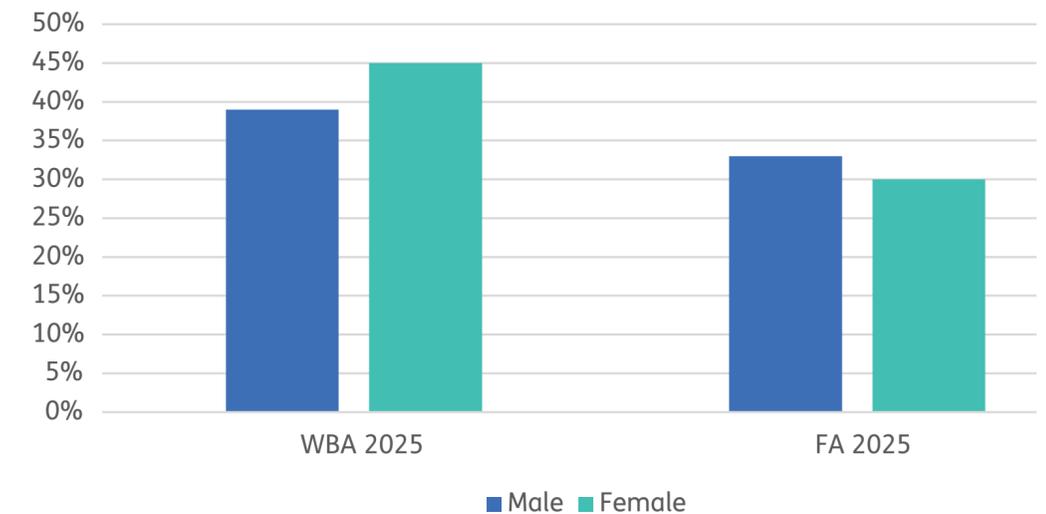
Financial wellbeing 23/24 - Sex



Financial wellbeing 24/25 - Age



Financial wellbeing 24/25 - Sex



Source – Fuel advice and welfare benefit advice (AdvicePro)

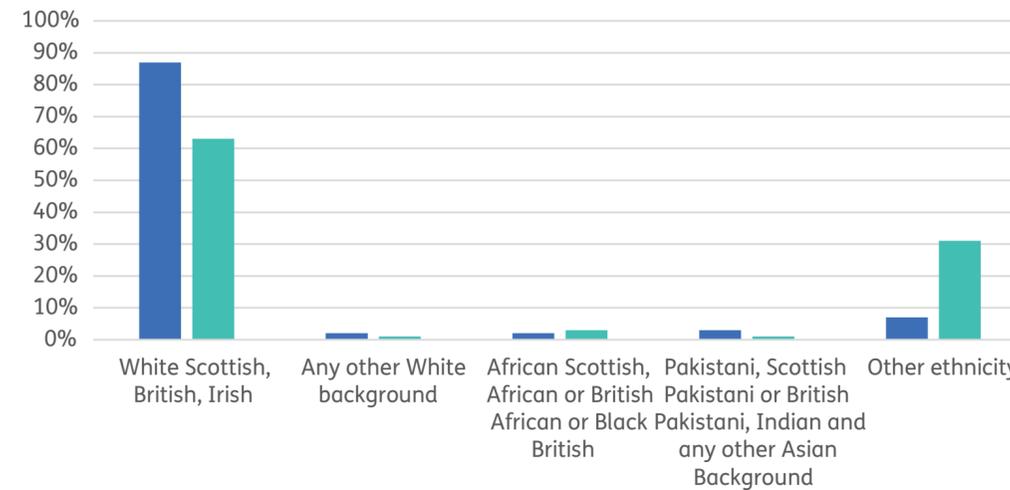
We worked to improve sex data, and in Quarter 4 we had this fully answered and showed a fairly even split between men and women.

Wheatley Foundation

Disability

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

Financial wellbeing 23/24 - Ethnicity



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

Ethnicity

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

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



Wheatley Foundation

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

Bursary – 2024/25 programme

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

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

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

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

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

Wheatley Foundation

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

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

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

Partnership to tackle social mobility

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

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

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

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



Techshare

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

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

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

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



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

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

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

Our people

Our people

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

Embedding an inclusive culture through engagement

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

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

sponsor from our Executive and Senior Leadership teams.

Our people networks are:

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

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

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

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



Our people

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

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

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



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

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

Our people

Making best use of our EDI data

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

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

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

From our new questions, we found:

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



Our people – Workforce profile

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



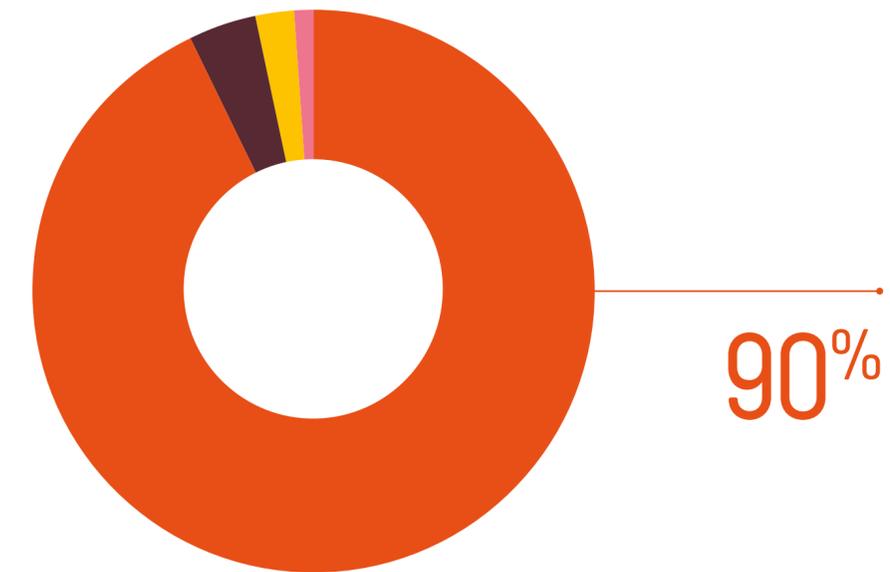
Age

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

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

Sexual orientation

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



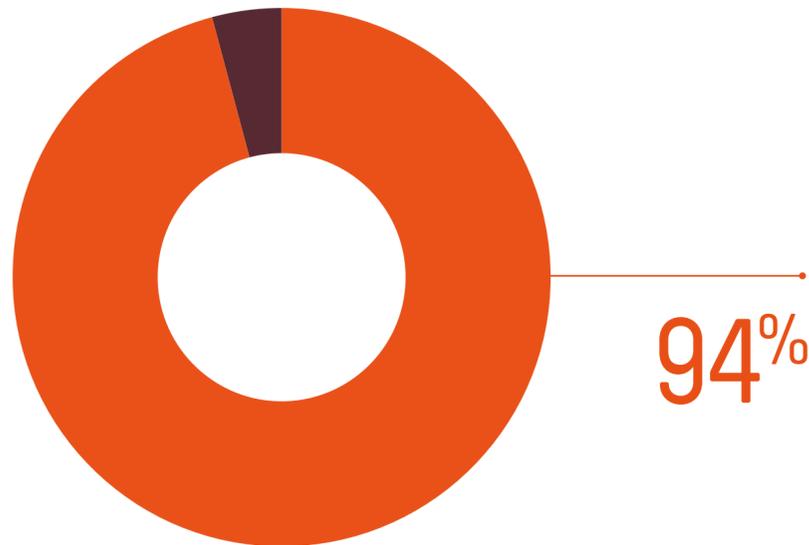
- Heterosexual / straight – 90%
- Gay/Lesbian – 3%
- Bisexual – 2%
- Other – less than 1%

Source - 2024 staff survey

Our people – Workforce profile

Ethnicity

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



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

Disability

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

Numbers of staff reporting:

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

Carers

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

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

Our people – Workforce profile



Customers

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

Social mobility

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

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

Commitment to diversity

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

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

Our people – Workforce profile

Group Leadership Diversity Profile

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

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

▶ Caring

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

▶ Disability

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

▶ Ethnicity

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

▶ Sex

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

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



Source - 2024 staff survey

Our people – diverse recruitment

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

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

Ethnicity

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

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



18%
ethnic minority
applicants in
2023/24

23%
ethnic minority
applicants in
2024/25

Disability

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

113
disability applicants
in 2023/24

150
disability applicants
in 2024/25

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

Our people – diverse recruitment

Attracting young people

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

721

16-24 applicants
in 2023/24

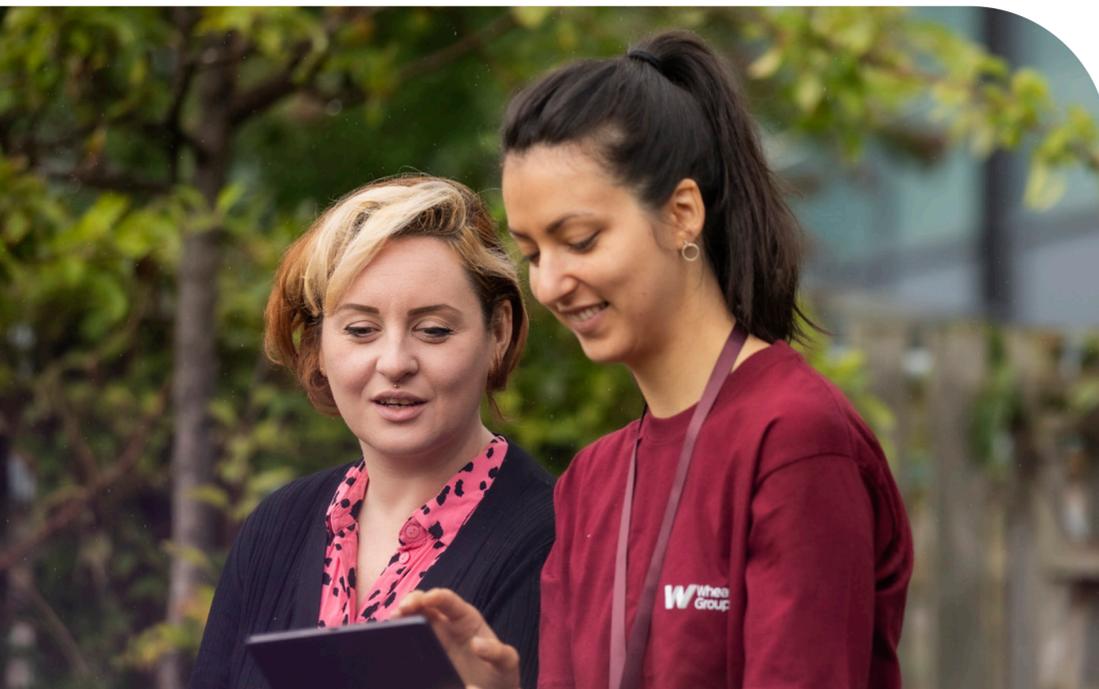
731

16-24 applicants
in 2024/25

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

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

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

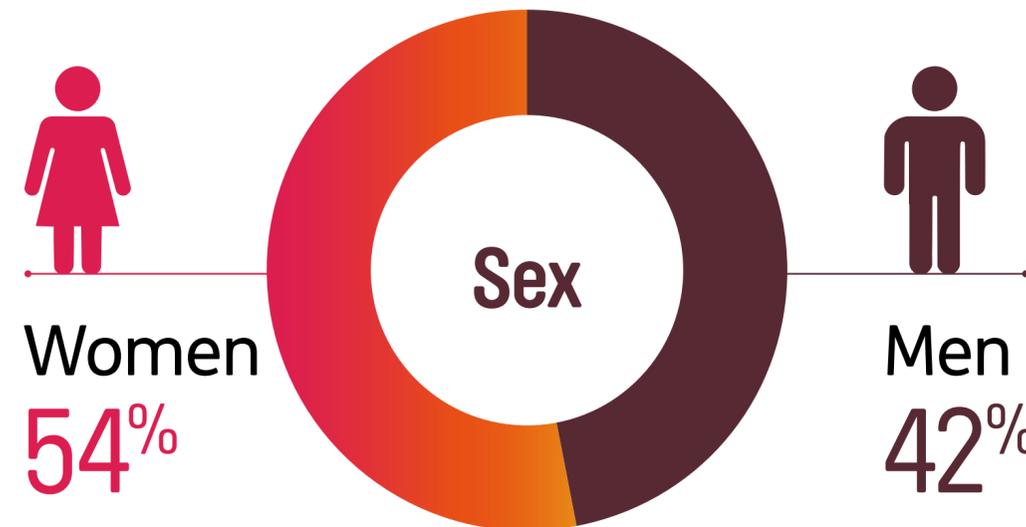


Board members

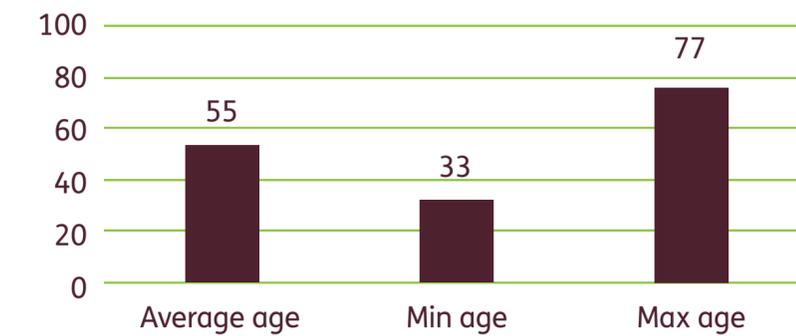
Board members

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

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



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



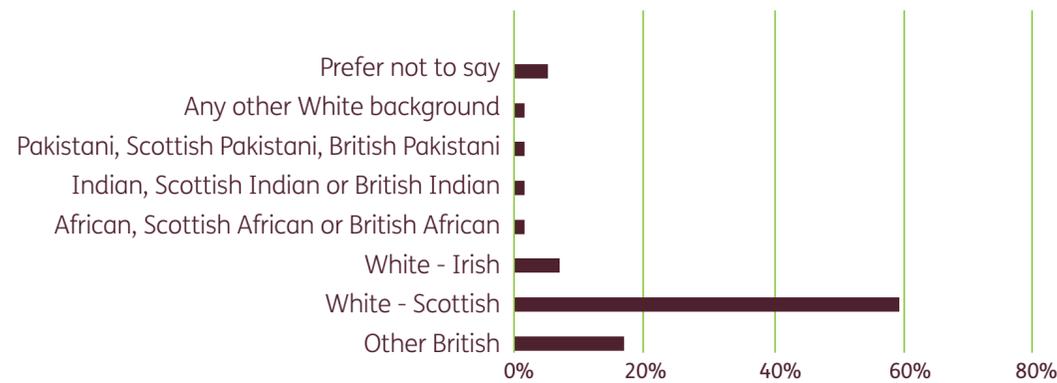
- ▶ **Disability** – 12% of our Board members indicated they had a disability. Slightly up from 11% reported last year.

* this relates to biological sex

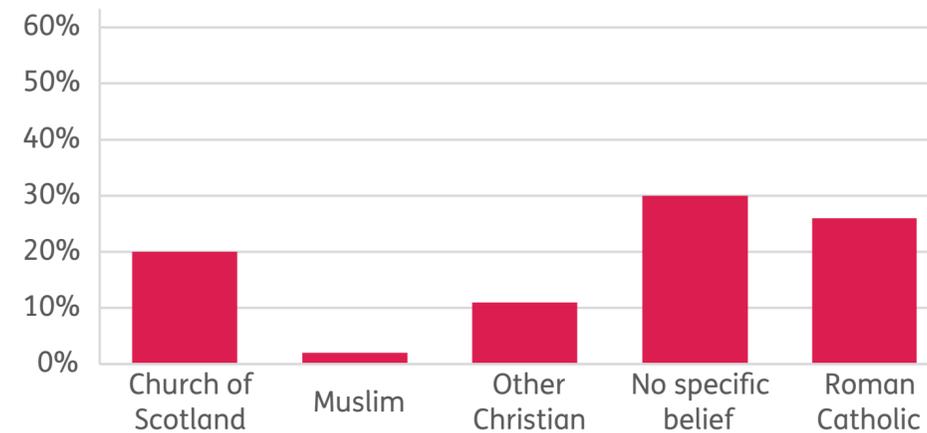
Source - Wheatley Group Board member data 2024/25. Not including 'prefer not to say'.

Board members

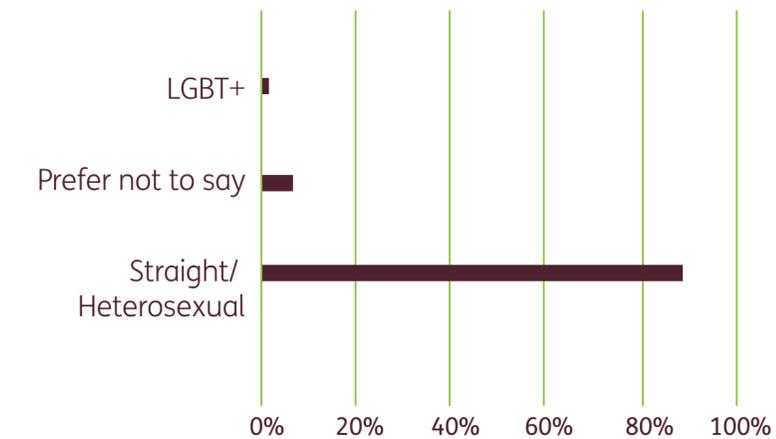
► **Ethnicity** – 6% of our Board members are from racially and ethnically underrepresented communities; comparatively the 2022 Scottish Census found that approximately 7% of the Scottish population was from an ethnically diverse background.



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



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

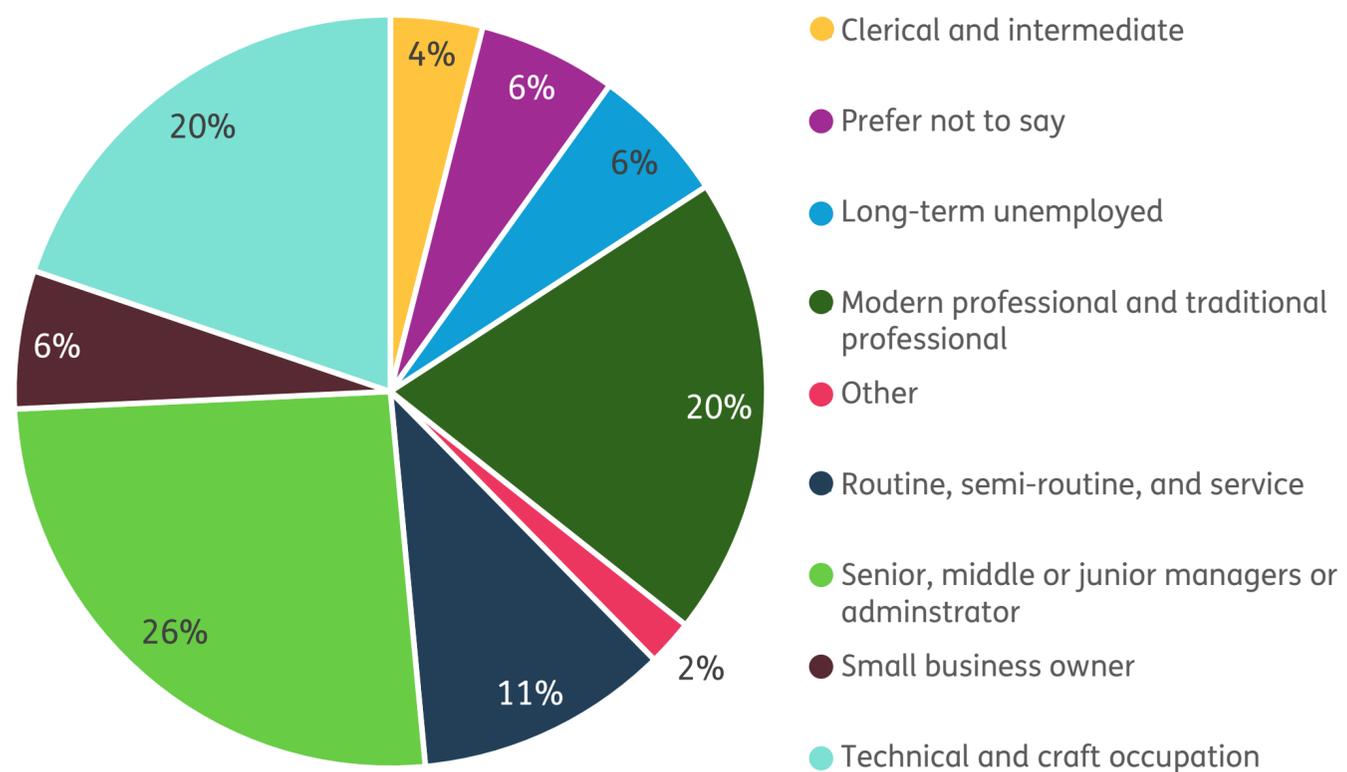


Source - Wheatley Group Board member data 2024/25.

Board members

▶ Board member parental occupation

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



Suppliers

Suppliers

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

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

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

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

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



Next steps

Next steps

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

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

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

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



Want more details?

➤ **Get in touch**

email: morgan.english@wheatley-group.com

different
together

Report

To: Loretto Housing Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: Performance Report Quarter Two 2025/26

Date of Meeting: 24 November 2025

1. Purpose

- 1.1 The purpose of this report is to provide an update on:
- Sector comparisons for Annual Return on the Charter (“**ARC**”) indicators following the publication of 2024/25 sector-wide data by the Scottish Housing Regulator (“**SHR**”); and
 - Performance against targets and strategic projects for 2025/26 to the end of quarter two.

2. Authorising and strategic context

- 2.1 Under our Terms of Reference, the Board is responsible for monitoring performance against agreed targets. We measure progress with the implementation of our five-year strategy via the Group Performance Management Framework.
- 2.2 The Group Board agreed an updated programme of strategic projects and performance measures and targets at its meeting in April 2025. Our Board subsequently agreed our own specific performance measures and targets at its meeting on 19 May 2025.

3. Background

- 3.1 This report outlines our performance against targets and strategic projects for 2025/26. Unless specified otherwise, results for all measures are based on year-to-date (“**YTD**”) figures. This includes progress with those measures that will be reportable to the Scottish Housing Regulator (“**SHR**”) as part of the Annual Return on the Charter (“**ARC**”) 2025/26.

4. Discussion



Charter 2024/25 Sector Comparison

4.1 The SHR published the national report including Scottish averages for 2024/25 in late August 2025. The comparison with our performance provides a very positive picture of 2024/25, with 83% (24) of the total number of tenant-related indicators (29) across our Registered Social Landlord (“RSL”) better than the Scottish average.

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

Table 1

	Number of ARC indicators above Scottish average	% above Scottish average
Loretto	24	83%

4.3 Highlights from these comparisons are:

- The Scottish average time to re-let properties increased from 56.7 days to 60.6 days, on average 51 days longer than our results;
- We responded to Stage Two complaints, on average, 6 days more quickly than the Scottish average, which has increased from 17.5 days to 21.3 days;
- Our performance from the time taken to complete emergency repairs remains better than the Scottish average at 3.50 hours, whilst the Scottish average reduced from 4 hours to 3.9 hours; and
- While SHR acknowledged the financial challenge for tenants, the Scottish average Gross Rent arrears reduced from 6.7% to 6.2%, we are significantly lower than this at 3.38% at the end of 2024/25.

4.4 There were areas we are already focused on driving improvement that were below the Scottish average, in particular rent collection and owner satisfaction. There were also areas where we improved performance from below the Scottish average to exceed it, particularly our repairs completed right first time and repairs satisfaction.

4.5 Several of these Scottish average 2024/25 comparisons are referenced through this paper for the relevant Charter indicators, alongside an update to quarter two.

4.6 The following sections present a summary of key measures and strategic projects. Strategic and Other key measures can be found in Appendices 1 and 2 respectively, strategic projects are found in Appendix 3 and SPSO and ARC results in Appendix 4.



Delivering Exceptional Customer Experience

Customer First Centre (“CFC”)

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

Table 2

Measure	2025/26		
	Value YTD	Target	Status
Loretto - CSAT score (customer satisfaction)	4.55	4.5	
Loretto - Call abandonment rate - those waited over 30secs and abandoned	9.41%	5%	
Group - % of contacts to CFC resolved within CFC	89.67%	95%	

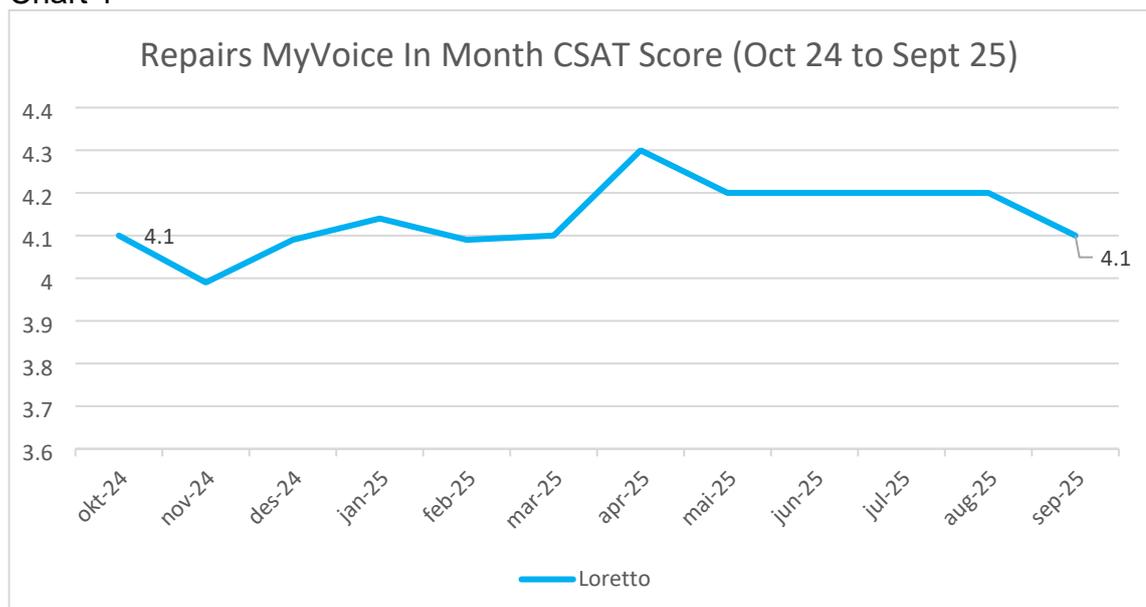
- 4.8 Customer satisfaction with the CFC (known as “**CFC CSAT**”) remains the key measure, ensuring we place our customers’ voices at the heart of performance management. Our overall CFC CSAT score YTD is achieving target at 4.55 at the end of quarter two with September achieving 4.63. Although still on target, this is a slight reduction from 4.62 at the end of quarter one. In quarter performance was 4.5/5 compared to 4.6/5 in quarter one.
- 4.9 The introduction of a new Interactive Voice Response (“**IVR**”) callback option in late August has had an immediate and significant effect, reducing abandonment rates to well within target. Customers can now opt for a callback earlier in their journey, minimising dissatisfaction. Early indications suggest this improvement is sustainable, but we will continue to monitor it’s impact.
- 4.10 The call abandonment rate after 30 seconds, whereby our customers waited over 30 seconds and then abandoned their call. This is 9.41% at the end of quarter two, against a 5% target, an improvement from the end of quarter one which was 11.95%, as set out above, changes have been made to improve performance with in month abandonment rate for September and October sitting at 6.86% and 4.71% respectively.
- 4.11 The percentage of contacts to the CFC resolved within the CFC, without the need to be passed to either Housing Teams or My Repairs Team, was 89.67% against a 95% target at the end of quarter two, an improvement on the 89.47% at the end of quarter one. This includes resolution on the phone, by the CFC specialist teams and via digital contact.
- 4.12 As Housing Officers (“**HO**”) continue to pursue contact with all customers through the Annual Tenant Visits (“**ATV**”) programme, where the visit results in no access, the customer is requested to contact us. This has led to an efficient increase in successful ATV appointments being rescheduled with tenants.

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

Repairs Satisfaction and Rate It

- 4.14 Tenant satisfaction with our repairs service and individual repair experiences continues to be a key driver when it comes to overall customer satisfaction. In addition to our independent satisfaction surveys undertaken at least every three years, we also use in-house surveys on an ongoing basis throughout the year to assess and monitor how well we are doing.
- 4.15 Our digital survey of customers, through MyVoice surveys, gauges customer satisfaction 1-2 weeks after the repairs have been completed, known as “Repairs CSAT. At the end of quarter two satisfaction is 4.1/5, down from quarter one 4.2/5, from an average response rate of almost 17%. Customers provide a score from 1 to 5, and any customer who provides a score of one or two is contacted by our My Repairs Team to see how we can quickly resolve any issues they may have experienced.

Chart 1



- 4.16 ‘Book It, Track It, Rate It’ was introduced in June 2023 to improve visibility and communication through the Book It, Track It element, with the Rate It element an opportunity for customer feedback on their experience on the day of a repair. For quarter two the Rate It score – which provides tenants an opportunity to rate their experience of the repair appointment – is 4.7 out of 5 (from 663, representing 18% of the feedback links generated to all customers with contact information).

- 4.17 Our analysis of the feedback from Rate It and our My Voice survey has indicated that there is no clear benefit to having both and that the My Voice survey gives us a greater level of actionable customer insight. Based on this, we will transition to only undertaking the My Voice survey this month.
- 4.18 Feedback is monitored and we contact customers with low satisfaction to discuss how their issues can be resolved. The results of these surveys are also discussed at monthly Customer Insight meetings to learn from any issues and, where appropriate, take action to address them.

Volume of Emergency Repairs

- 4.19 The table below shows our position against the strategic result to reduce the volume of emergency repairs by 10% by 2026 compared to the updated baseline year of 2022/23. The target for 2025/26 is a reduction of 3.34%.
- 4.20 Emergency repair numbers are 327 more repairs at the end of quarter two than the same point in 2024/25, a variance of 16.6% and above target. For context, 2,297 emergency repairs in quarter one this year is 32.36% of all responsive repairs completed and compares to 30.7% at the same point last year.
- 4.21 Emergency repairs volumes are a consequence of customer reports and are affected by external factors such as weather conditions. We will continue to review the raising of emergencies locally with the CFC teams to ensure that repairs being raised are appropriately diagnosed as emergencies.

Table 3

Completed repairs	emergency	YTD 24/25	YTD 25/26	Variance
Loretto		1,970	2,297	16.60

Repairs Timescales and Right First Time

- 4.22 Our average time taken for emergency repairs is 2.77 hours at the end of quarter two, within the 3-hour target. This is an improvement compared to 2.97 hours last quarter. The average time taken for non-emergency repairs was 8.99 days, above this year’s target of 7.5 days. This is an improvement on last quarter (10.34 days). There remains a focus on improving this timescale and we have seen month on month reductions between May and September.
- 4.23 The Scottish average for 2024/25 for emergency repairs is 3.9 hours and 9.1 days for non-emergency repairs timescales and we are ahead of both benchmarks.

Table 4

Repairs completion timescales (Charter)	Emergency (hours)		Non-emergency (days)	
	Target	YTD Value	Target	YTD Value
Loretto	3.00	2.77	7.5	8.99

- 4.24 As previously advised, the Right First Time indicator was subject to a change in recording guidance from the SHR. Previously, repairs which were overdue were not considered as Right First Time, however, this is no longer the case. Under the guidance, the only repairs which are now not Right First Time are those repairs completed during the reporting year where the repair is ‘reported again’ within the same reporting year.

- 4.25 This change in methodology has led to an improvement in the reported statistic, given that overdue repairs are now excluded. Our performance year to date is 98.16% completed right first time with 62 repairs reported again by customers year to date. This is in comparison to performance of 86.83% at the end of 2024/25. While we have to report according to the SHR's definition, we recognise this is not a realistic measure of the quality of our repairs service, since it does not capture those cases where a tenant is dissatisfied and does not consider the repair was right first time, but does not report this again. The MyVoice scores and independent doorstep satisfaction surveys, which are in the 80%-90% range, being a better indicator.
- 4.26 We have reaffirmed our process for identifying a repair that was 'reported again' with the CFC, MyRepairs and our Repairs Specialist Team to ensure this measure is accurately recorded. Our main focus remains on achieving high customer satisfaction, identifying any issues at an early stage through monitoring My Voice customer feedback, including any repair a customer reports as not right first time, and addressing those issues.

Damp and Mould

- 4.27 It remains our priority to respond quickly to reports of damp or mould and ensure that issues are resolved by our staff teams, in close collaboration with the customer.
- 4.28 We have completed 60.95% of damp and mould inspections within two days, at an average of 3.40 days. 46% of these delays are due to customer choice where they ask for inspections out with the two working day target. There are also some inspections that will require specialised equipment to ensure all the mould seen in the property is treated.
- 4.29 15% of inspections record no mould. Where mould is found, 99% had the lowest severity rating of Category three, where the mould can ordinarily be treated in a single visit.

Table 5

By Severity Category		
Cat 3 – Mild	Cat 2 – Moderate	Cat 3 – Severe
98.87%	1.13%	0.00%

- 4.30 Where required, we have completed 81% of all damp and mould remedial works within 15 days, at an average of 12.15 days. Remedial works which take longer than this average are impacted by customer choice on appointment dates, delays where we are unable to gain access and also some with more complex fixes required.
- 4.31 In terms of end-to-end damp and/or mould cases required to be submitted to SHR for the first time in the ARC 2025/26, we have completed 201 damp and/or mould cases to the end of quarter two. These have an average end to end time, from the customer reporting it through the inspection and remedial repair(s) being completed, of 12.97 days, below our target of 17 days.

- 4.32 We report these damp and/or mould cases to SHR broken down by causation, shown below.

Table 6

Damp and/or Mould Cases Q2		By Causation		
		Condensation	Structural	Other
Number complete	201	110	9	82
Average days to complete	12.97 days	16.14 days	2.01 days	9.93 days

- 4.33 Condensation is our largest causation reason, with almost 55% of cases categorised as being caused by condensation. Of those categorised as ‘Other’, this has included issues caused by leaks, external flooding, or where additional technical support may be required to understand the issue. The full breakdown is shown in the table below.
- 4.34 Structural cases in damp and mould are a small proportion of overall cases and have often had an easily identifiable cause that can be rectified quickly, such as a missing roof tile, and therefore have quicker resolution times. In contrast, cases caused by condensation require more extensive investigations to determine the underlying cause and may need the development of a comprehensive ventilation strategy, such as installation of additional ventilation fans.

Introduction of Awaab’s Law

- 4.35 The Wheatley Group’s Healthy Homes team is actively progressing work to ensure full alignment with Awaab’s Law, aimed at protecting tenants from health hazards like damp and mould. This bill gives Scottish Ministers the authority to set legally binding timeframes for social landlords to investigate reports of disrepair (especially damp and mould); and begin and complete necessary repairs. Our readiness includes close engagement with the Scottish Government policy team as they develop the equivalent legislation for Scotland, following the law’s implementation in England on 27 October 2025.
- 4.36 To strengthen our approach, we have undertaken learning visits to other Housing Associations across the UK to understand their responses to Awaab’s Law. We will continue these sector-wide conversations to stay ahead of emerging challenges and best practice.
- 4.37 These visits have confirmed that the Wheatley Group’s existing policies and procedures already exceed many of the requirements set out in Awaab’s Law. As a result, we are confident that the organisation is well-positioned to meet any future legislative requirements in Scotland once timelines and details are confirmed.

Tenancy Sustainment

- 4.38 Tenancy Sustainment is the measure of new tenancies commenced in the previous reporting year where the customer remains in their home for more than a year. As well as new customers benefiting from remaining in their tenancy for longer, improvement in this measure reduces lost rent and resources required for re-letting.
- 4.39 We continue to support our new customers to sustain their tenancies and to exceed targets in both the Charter and revised measures (the revised measure excludes deaths and transfers to other homes within the Group).
- 4.40 We also perform better than the new Scottish average of 91.6% recently published for 2024/25.

Table 7

Tenancy Sustainment	Charter – All lets	2025/26 Target - Charter	Charter – Homeless Lets	Revised	2025/26 Target - Revised
Loretto	92.45%	90%	95.60%	94.16%	91%

Allocations CSAT

- 4.41 Our Allocations MyVoice survey measures customer satisfaction with the process of getting their new home. We remain well ahead of the 4.5 target at 4.8 for the rolling year.
- 4.42 Positive feedback from our customers recognises housing officers as supportive and professional, appreciating how clearly the process was explained and sign up managed quickly and smoothly. Satisfied customers found staff approachable and reassuring.

Table 8

Allocations CSAT	2025/26 – Rolling year	2025/26 Target
Loretto	4.8	4.5



Making the Most of Our Homes and Assets

Development Programme

- 4.43 Our target is to deliver 85 new social homes in 2025/26. Year-to-date to the end of quarter two, we had 44 units completed against a year-to-date target of 24.

Table 9

Sites	Handovers (YTD)	Target (YTD)	Difference and handovers to 30 th June
Loretto	44	24	+20
South Crosshill Rd (Social)	44	0	+44
East Lane (Social)	0	24	-24
Bank Street (Social)	0	0	0
Totals	44	24	+20

Medical Adaptations

- 4.44 Time to complete medical adaptations remains well within the 25-day target year-to-date, with the average days to complete at 11 days. We have completed 16 adaptations year-to-date and have five household waiting.

Table 10

Medical Adaptations (Charter)	Current Households Waiting	Number Completed YTD	Average Days to Complete YTD	Target
Loretto	5	16	11.00	25

Gas Safety

- 4.45 We continue to be 100% compliant position for gas safety, with no expired gas certificates and expect this to remain the same for the remainder of the performance year.

Compliance

- 4.46 We have made good progress in the second quarter of the year. All of our relevant properties (51) are compliant with Legionella assessment requirements. All safety checks have been completed on passenger and domestic lifts.
- 4.47 We are making strong progress with inspections of electrical installation certificates due to expire before the end of 2025/26, with 77.43% already complete. At the end of quarter two, we have only two properties without a valid Electrical Installation Condition Report (“EICR”). Both the remaining properties are complex cases, staff are supporting the customers and working with partner agencies to get to a position that we can get access to complete the work. We are also progressing legal action with both cases, to be used as a last resort, if required.

Health and Safety

- 4.48 We continue with the positive position of no reportable RIDDOR incidents in 2025/26. We have not lost any days this year due to work-related accidents.
- 4.49 We also have no Health and Safety Executive or local authority environmental team interventions this year, the same position that we have maintained since the measure started in 2021.
- 4.50 We have received no new employee liability claims in the first quarter this year, maintaining none since the measure started in 2021.

Workplace Fires and Flat Entrance Door Checks

- 4.51 We have not had any workplace fires to the end of quarter two and have not recorded any since the measure started in 2021.

- 4.52 Our rolling programme for carrying out flat entrance door inspections in all properties six floors and higher has visited all 107 flats in each six-month period (April – September and October – March), with all having had a visual inspection since the initial programme commenced.
- 4.53 Where we gain access, photographic evidence is kept on file and the inspections verify that doors close properly, seals are intact, and hardware (hinges, locks, self-closers) function as intended. Between April and September, we completed 61 successful inspections.
- 4.54 This programme continues to present challenges in gaining access inside the properties. The Board previously agreed that we would force access to complete the check where there is “clear evidence that the flat entrance door has no qualities of fire resistance, or there is clear evidence that the fire resistance of the door has been compromised due to a repair”. We have had none that fit these criteria in the April – September 6 month period.
- 4.55 This programme is delivered by CBG who sub-contract this work. In early 2026, this will be brought in house which should help support the improvement of the no access rates as the in-house teams will work closely with the housing teams.

 **Changing Lives and Communities**

Peaceful Neighbourhoods

- 4.56 Our strategic measure is for over 80% of customers across our Group to live in neighbourhoods categorised as peaceful by the end of the strategy period. At the end of quarter two, the Group-wide percentage of tenancies categorised as Peaceful reduced from 75.91% at the end of quarter one 2024/25 to 73.30% in quarter two.

Anti-Social Behaviour (“ASB”) Resolved

- 4.57 By the end of quarter two, the resolution rate for our ASB cases has remained at 100%, the highest in Group.

Table 11

ASB Resolution Rate	YTD	2025/26 Target
Loretto	100%	100%

- 4.58 ASB resolution and timescales remain a strong performance focus over the coming periods to maintain this performance.

Repeat Anti-Social Behaviour cases – number of repeat addresses

- 4.59 Year-to-date to the end of quarter two, ASB was recorded at 23 repeat addresses. This compares to 24 at the same time last year, and 50 for the full year 2024/25. Less than 1% of our properties have issues with repeat incidences of ASB.

Accidental Dwelling Fires (“ADFs”)

- 4.60 Year-to-date to September, we have had three minor ADFs compared to five for all of 2024/25.

Table 12

Number of recorded accidental dwelling fires	2025/26 YTD	2024/25
Loretto	3	5

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

Table 13

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

- 4.63 As at the end of quarter two, we had two overdue mandatory actions, all of which have now been completed.

Reducing Homelessness

- 4.64 We have provided 56 homes to homeless households this year-to-date. Our percentage of relevant lets made to homeless applicants is 61.90% (relevant lets exclude LivingWell and sheltered properties, nominations and social work referrals which we are limited to let to homeless applicants).

Table 14

Reducing Homelessness	2025/26 Number of lets to homeless applicants (ARC) - YTD	2024/25 Number of lets to homeless applicants (ARC) – full year
Loretto	56	122

Jobs and Opportunities

Table 15

Indicator	Target YTD	2025/26 YTD	2024/25
Number of children and young people benefiting from targeted Foundation programmes in Wheatley Communities	27	53 	71 
Total number of jobs, training places or apprenticeships created for customers and communities	2	24 	27 
Number of people accessing services which help alleviate poverty in Wheatley Communities	175	185 	422 

- 4.65 53 children and young people from our homes have been supported this year. This exceeds the quarter two target of 27. This support included young people benefitting from the Imagination Library, receiving free monthly books, and others engaging in digital learning and workshops through the John Wheatley Learning Network youth access programmes.
- 4.66 To the end of September, the Wheatley Works staff have supported 24 training and employment opportunities for people in our homes and communities. This exceeds the quarter two target of two. These opportunities included work placements and employment linked to new build programmes with McTaggart Construction.
- 4.67 185 people from our homes and communities accessed support to alleviate the impacts of poverty, exceeding the year-to-date target of 175. Over 150 households received tailored support from the Financial Wellbeing service, resulting in over £0.5m of Client Financial Gain.
- 4.68 Percentage of planned jobs, training places or apprenticeships created which are secured by our customers across the Group YTD is at 73.9% (552/747) exceeding the 60% target.
- 4.69 For 2025/26 there have been 32 Community Benefit jobs and training opportunities arising through the spend associated with new home construction and our investment programme that have been secured by Wheatley customers. Performance to the end of quarter two is 57.14%, exceeding the 30% target for 2025/26.



Developing our Shared Capability

Sickness Absence

- 4.70 Our sickness rate to the end of quarter two was over target at 7.65% year-to-date, an increase from 3.12% at the end of quarter one. Sickness absence has spiked in July (14.97%), August (10.16%) and September (10.82%).
- 4.71 This is due to three staff absences, two relate to post operation recovery and the third is a long term non work related absence.

Table 16

Sickness Rate	2024/25	2025/26 YTD	Target
Loretto	0.33% ■	7.65% ■	3%

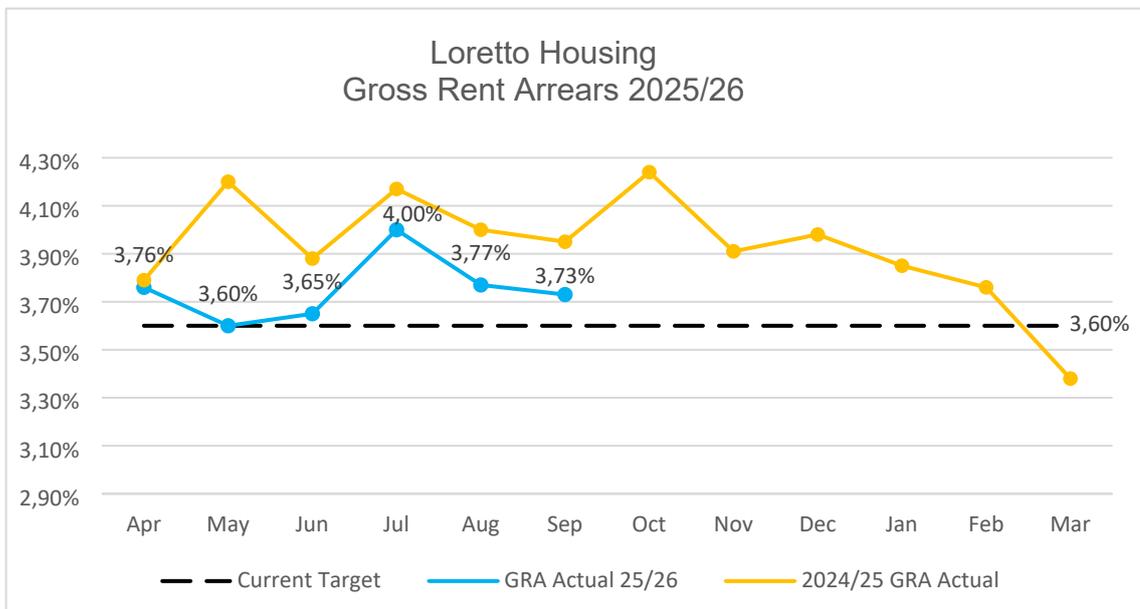


Enabling our Ambitions

Gross Rent Arrears (“GRA”)

- 4.72 At 3.73% for gross rent arrears, we remain the best performing RSL in the Group at the end of quarter two, and in a better position than 3.95% at this point last year.
- 4.73 Our arrears performance this year is impacted by the Department of Work and Pensions’ (“DWP”) accelerated programme of migrating our customers onto Universal Credit (“UC”). At this time last year we had 976 UC customers, this has now increased by 28% to 1,246, almost 44% of our customers
- 4.74 The recently published Scottish average for GRA in 2024/25 is 6.20%, the second consecutive improvement recorded for the sector from the high of 6.9% in 2022/23. We continue to perform favourably against this benchmark.

Chart 2



Average Days to Re-Let (Charter)

- 4.75 Our average days to re-let (Charter) for this year to date to the end of quarter two has improved to 10.98 days compared to 12.83 days at the end of quarter one. Note that from 2025/26, our Charter performance includes days lost to health and safety related meter issues where we consider the property unsafe/unfit to occupy.
- 4.76 Meter issues include, for example, where a tampered meter results in a property having no power or where the supply has been cut off and we are awaiting reconnection (energy companies are not prioritising this work due to the property being void), both issues mean we cannot undertake crucial safety checks prior to letting.
- 4.77 We had no reported meter issues in 2024/25. We have however been impacted for the first half of this year, with revised average re-letting times improving to 6.69 days year-to-date when excluded.

- 4.78 As reported by the Regulator at the end of August 2025, the Scottish average for 2024/25 for the Charter average days to re-let has risen for the third year in a row to 60.6 days. We continue to perform significantly better than this benchmark.

Table 17

Average days to re-let	ARC 2025/26 YTD (including meter issues)	2025/26 Target	2024/25 (including meter issues)	Revised 2025/26 YTD (excluding meter issues)	Revised 2024/25 (excluding meter issues)
Loretto	10.98	16	9.72	6.69	9.72

Invoice Payments

- 4.79 Year-to-date 86.79% of invoices were paid in 30 days or fewer in quarter two against the 96% target, a decrease from the end of quarter one (95.51%).

Procurement

- 4.80 By the end of quarter two, 99.40% of contracted expenditure was compliant with procurement rules and better than the 99% target, and an improvement from the end of quarter one which was 99.34%.



Summary of Strategic Project Delivery

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

Table 18

Complete	On track	Slippage	Overdue
0	5	0	0

5. Customer engagement

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

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

- 12.1 We have strong performance against our targets to the end of quarter two of 2025/26 in several key areas including average days to re-let, tenancy sustainment, CFC and allocations CSAT scores, emergency repair completion timescales, repairs completed right first time, medical adaptation timescales, jobs and training places created, the number of children and young people benefitting from targeted Foundation programmes and the number of people accessing services to help alleviate poverty.
- 12.2 Completion of annual tenant visits, average time to complete non-emergency repairs, arrears and sickness absence remain key areas of focus.

13. Recommendations

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

LIST OF APPENDICES:

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

Appendix 1 - Loretto Housing Board - Delivery Plan 25/26 - Strategic Measures

1. Delivering Exceptional Customer Experience

Measure	2024/25	YTD 2025/26		
	2024	2025		
	Value	Value	Target	Status
% Annual Tenant Visits	84.46%	82.34%	100%	
% new tenancies sustained for more than a year - overall	96.23%	92.45%	90%	
% new tenancies sustained for more than a year - homeless	96.97%	95.6%	Contextual	
% new tenancies sustained for more than a year - revised	96.2%	94.16%	91%	
Group - % of contacts to CFC resolved within CFC	89.79%	89.67%	95%	
CFC CSAT	4.6	4.55	4.5	
Allocations CSAT	4.8	4.8	4.5	
Call abandonment rate after 30 secs	5.34%	9.41%	5%	

2. Making the Most of Our Homes and Assets

Measure	2024/25	YTD 2025/26		
	2024	2025		
	Value	Value	Target	Status
Average time taken to complete emergency repairs (hours) – make safe	3.5	2.77	3	
Average time taken to complete non-emergency repairs (working days)	9.06	8.99	7.5	
% reactive repairs completed right first time	86.83%	98.16%	90%	

Measure	2024/25	YTD 2025/26		
	2024	2025		
	Value	Value	Target	Status
Number of gas safety checks not met	0	0	0	
Average time to complete approved applications for medical adaptations (calendar days)	17.13	11	25	
Legionella - percentage of applicable properties with a valid risk assessment in place	100%	100%	100%	
Number of electrical installation inspections completed and number due to be completed	97%	77.43%	100%	
Percentage of properties with an EICR certificate up to 5 years old	99.93%	99.93%	100%	
Number of domestic stair and through floor lifts with a completed annual inspection and test against the number due to be completed	100%	100%	100%	
Number of passenger lifts with a completed six-month inspection and test against the number due to be completed	100%	100%	100%	
New build completions - Social Housing	63	44	24	
Number of RIDDOR	0	0	Contextual	
Number of HSE or LA environmental team interventions	0	0	0	
Number of accidental fires in workplace	0	0	0	
Number of accidental dwelling fires recorded by Scottish Fire and Rescue	5	3	Contextual	
Number of new employee liability claims received	0	0	Contextual	
Group - Number of open employee liability claims	10	10	Contextual	
Number of days lost due to work related accidents	0	0	Contextual	

3. Changing Lives and Communities

Measure	2024/25	YTD 2025/26		
	2024	2025		Status
	Value	Value	Target	
% ASB resolved	100%	100%	100%	
% Lets Homeless Applicants - overall	59.51%	51.38%	Contextual	
% Relevant lets to Homeless Applicants	62.5%	61.9%	Contextual	
Group - Percentage of Community Benefit job and training opportunities arising through the spend associated with new home construction and our investment programme that have been secured by Wheatley customers	69.77%	57.14%	30%	
Group - % planned jobs, training places or apprenticeships created which are secured by our customers	73.19%	63.46%	60%	
Total number of jobs, training places or apprenticeships created for customers and communities	27	24	2	
Number of children and young people benefiting from targeted Foundation programmes in Wheatley Communities	71	53	27	
Number of people accessing services which help alleviate poverty in Wheatley Communities	422	185	175	
Group - % of Communities Classified as Peaceful	74.05%	73.3%	75%	
Loretto - % of Communities Classified as Peaceful	90.72%	92.16%	75%	
Group - Repeat antisocial behaviour cases in period – number of repeat addresses	935	505	447	
Group - The percentage of HMOs that have a current fire risk assessment in place	100%	100%	100%	
Group RSLs - Number of accidental dwelling fires (reduce by 10% by 2025/26) (Upper limit 195 for 2024/25)	95	54	195	

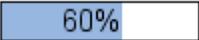
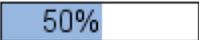
4. Developing Our Shared Capacity

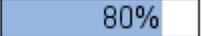
Measure	2024/25	YTD 2025/26		
	2024	2025		
	Value	Value	Target	Status
Sickness Rate	0.33%	7.65%	3%	

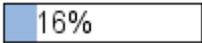
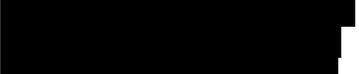
5. Enabling Our Ambitions

Measure	2024/25	YTD 2025/26		
	2024	2025		
	Value	Value	Target	Status
% lettable houses that became vacant	5.39%	5.28%	8%	
Average time to re-let properties (excluding meter issues)	9.72	6.69	16	
Average time to re-let properties (ARC)	9.72	10.98	16	
Loretto C - Gross rent arrears (all tenants) as a % of rent due	3.38%	3.73%	3.6%	
Loretto A - Gross rent arrears (all tenants) as a % of rent due	3.6%	4.06%	Contextual	
Loretto B - Gross rent arrears (all tenants) as a % of rent due	3.08%	3.26%	Contextual	
% of payments made within the reporting period which were paid in 30 days or fewer (from the date the business receives a valid invoice)	96.44%	86.79%	96%	
% of contracted expenditure compliant with procurement rules	99.38%	99.4%	99%	

Appendix 2 - Loretto Housing Board - Delivery Plan 25/26 - Strategic Projects

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
Asset Compliance and Data Strategy Programme (b)	30-Nov-2025			01. PIMSS Platform - Architecture and SAAS review	31-May-2025	Yes	A 3 to 5 year road map has been agreed within the project with the roadmap is with the vendor for costs and contract and will then be finalised across quarter 4 for commercial contract and approval. The final two milestones were re-profiled to 31st March following agreement by the Group Board on 12/11.
				02. 2 (FRA + Lifts) - process map and to-be design	30-Jun-2025	Yes	
				03. PIMMS/Group 3 year roadmap - review and define with vendor input	31-Aug-2025	Yes	
				04. Group business and Assurance approach review	31-March 2026	No	
				05. ET end of Q2 Programme Update	30-March 2026	No	
Providing safe, secure tenancies to support independent living (external interdependency) (b)	28-Feb-2026			01. Complete the build and allocation of the 19 West Craigs properties	31-Jul-2025	Yes	Care held a brief discussion with representatives from DGHSCP on 10 October on use of technology in our services, particularly Livingwell. Also on this date, Care and Housing attended DGC Strategic Housing and Health and Social Care Meeting. An initial discussion held here (following on from earlier tech meeting) on Care presenting to the Group on our current and future offerings for Livingwell ahead of new development opening in 2027, so that there can be sufficient lead
				02. Engage with Glasgow and Dumfries and Galloway Health and Social Care Partnerships to showcase the potential for new build supporting hospital discharges into independent living	31-Oct-2025	Yes	
				03. Engage with Glasgow and Dumfries and Galloway Health and Social Care Partnerships and Councils to explore the potential for a similar approach	31-Jan-2026	No	
				04. Update to the Group Board on the engagement and	28-Feb-2026	No	

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
				any associated implications for our future development programme			times to develop a collaborative housing, health and care approach. DGHSPC to come back to us on named person for these discussions. COO for HSCP and Deputy Head of Strategic Planning and Commissioning for NHS visiting West Craigs, Fullarton Care Home and Fordneuk sites in late October. EL from Development Team will join us the Fullarton. Agreement with GHSPC to visit West Craigs on 28 Nov 25 to discuss the model with them.
Engagement 2.0: Maturing customer engagement and performance measures as part of our customer insight approach (b)	31-Dec-2025			01. Trial a new method of managing engagement - MS Dynamics in WHG South area - and evaluate its impact	30-Jun-2025	Yes	Phase two customer engagement on our strategy development launched w/c 1 September for six weeks. A high response and strong support for how we propose to respond to customer priorities has been recorded, as have preferred ways to engage in the future. Our Stronger Voices Community of Excellence considered this feedback and the emerging strategy on 29 October; alongside staff experience
				02. Undertake a review of the existing Stronger Voices framework and operation of the existing structures	31-Jul-2025	Yes	
				03. Gather customer perspective and ideas on how our approach to engagement could evolve through the 2026-31 strategy development phase 2	30-Sep-2025	Yes	
				04. Review the existing framework based on the	31-Oct-2025	Yes	

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
				review of its effectiveness to date and feedback from customers			and insight, this has further informed our future approach.
				05. Recommendations for Stronger Voices Framework 2.0 in support of our emerging Strategy 2026-31 agreed by RSL and Group Boards	31-Dec-2025	No	
Tenant Web Self-Service	31-Mar-2027			01. Business Case development and approved by the Executive Team	31-May-2025	Yes	Discussions are underway around commercials and pre contract agreements, with scopes being completed by project team. Agreed with Lowther being priority WSS, contract will be agreed however project will re-commence in April 26. This was approved by the Wheatley Solutions Board.
				02. Preferred vendor engagement pre contract	30-Nov-2025	No	
				03. Contract award	31-Jan-2026	No	
				04. Project commencement	31-Mar-2026	No	
				05. NEC Project Plan approved	30-Jun-2026	No	
							 for approval.
							
							
							

Delivery Plan Project	Delivery Date	Status	% Progress	Milestone	Due Date	Completed	Progress Note
				recommendation to the Group Board where applicable			

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

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

Charter (ARC) Measures

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

Loretto – complaints received						
* excluding complaints carried over						
	*2024/25			2025/26 YTD		
	Stage 1	Stage 2	All	Stage 1	Stage 2	All
Loretto	297	36	333	165	15	179

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

Charter - average time for a full response to complaints (working days)				
Subsidiary	2024/25 Stage 1 - 5-day target, Stage 2 – 20-day target		2025/26 – YTD Stage 1 - 5-day target, Stage 2 – 20-day target	
	Stage 1	Stage 2	Stage 1	Stage 2
Loretto	3.59 	15.66 	3.58 	16.56 

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

Charter - average time for a full response to complaints (working days)			
Subsidiary	2024/25 Target – not targeted	YTD 2025/26 – 6 days	
Loretto	4.89	4.75 	

SPSO Measures

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

1.9 Stages of complaints are defined as:

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

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

Indicator 1 - total number of complaints received.

1.11 Both Stage 1 and Stage 2 numbers have increased compared to the same period in 2024/25. Year to date to the end of Q2 2024/25 the Group had received 156 Stage 1 and one Stage 2 complaint. In Q2 2025/26 Loretto has received 165 Stage 1 complaints (5.77% increase) and three Stage 2 complaints (200% increase).

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

SPSO Indicator 1 - total number of complaints received - YTD						
	2024/25 YTD to September			2025/26 YTD		
	Stage 1	Stage 2 (Direct)	Escalated Complaints	Stage 1	Stage 2 (Direct)	Escalated Complaints
Loretto	297	2	34	165	3	12

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

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

SPSO Indicator 2 - number and % of complaints at each stage that were fully closed within timescales of 5 and 20 working days						
Subsidiary	Stage 1 - responded to within 5 working days		Stage 2 - responded to within 20 working days		Escalated complaints - responded to within 20 working days	
	2024/25	YTD 2025/26	2024/25	YTD 2025/26	2024/25	YTD 2025/26
Loretto	99.66%	99.38%	100.00%	100.00%	100.00%	100.00%

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

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

SPSO Indicator 3 - the average time in working days for a full response to the complaints at each stage – YTD 2025/26			
Subsidiary	Stage 1 - responded to within 5 working days	Stage 2 - average time in working days to respond to complaint	Escalated complaints - Average time to respond to complaints after escalation from Stage 1 to Stage 2
Loretto	3.58	16.33	16.22

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

SPSO Indicator 4 - the outcome of complaints as a % of overall complaints YTD 2025/26				
Subsidiary	Stage 1 - upheld	Stage 1 - partially upheld	Stage 1 - not upheld	Stage 1 - resolved
Loretto	43.21%	9.26%	32.10%	15.43%
	Stage 2 - upheld	Stage 2 - partially upheld	Stage 2 - not upheld	Stage 2 - resolved
Loretto	0.00%	0.00%	100.00%	0.00%
	Escalated complaints - upheld	Escalated complaints - partially upheld	Escalated complaints - not upheld	Escalated complaints - resolved
Loretto	15.38%	46.15%	38.46%	0.00%

Report

To: Loretto Housing Board

By: Lyndsay Brown, Director of Financial Reporting

Approved by: Pauline Turnock, Group Director of Finance

Subject: Finance Report to 30 September 2025

Date of Meeting: 24 November 2025

1. Purpose

- 1.1 The purpose of this report is to provide the Board with:
- an overview of the Finance Report for the period to 30 September 2025 and Q2 forecast financial out-turn;
 - an overview of the revision to the target rate of return for social and mid-market rent new build developments; and
 - an update on the SHAPS DB Pension Scheme deficit.

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 Loretto 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, Loretto 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.

3. Background

3.1 Financial performance

The results for the period to 30 September 2025 are summarised below.

	Actual £000	Budget £000	Variance £000
Turnover	13,674	11,988	1,686
Operating expenditure	(8,795)	(8,834)	39
Operating surplus	4,879	3,154	1,725
<i>Operating margin</i>	<i>35.7%</i>	<i>26.3%</i>	
Net interest payable	(1,953)	(1,990)	37
Surplus	2,926	1,164	1,762
Net Capital Expenditure	3,661	5,024	1,363

4. Discussion

4.1 Period to 30 September 2025

Our financial results report a statutory surplus of £2,926k for the period to 30 September 2025 and, overall, Loretto reports an underlying surplus of £834k, both favourable to budget. The favourable position to budget for the statutory surplus largely is due to the early recognition of new build grant income, supported by additional rental income generated by the early completions, and strong letting performance with lower voids and bad debts.

Key points to note:

- New build grant income is £1,583k favourable to budget, with the impact of the early completion of East Lane units in 2024/25 budgeted for 2025/26 being offset by early completion in 2025/26 of 44 units at South Crosshill, budgeted for later in the financial year.
- In operating costs, total costs are £39k favourable to budget:
 - Total running costs are £36k favourable to budget due to the timing of spend, with several departments across Wheatley Solutions reporting lower spend.
 - Revenue repairs and maintenance reports spend £54k higher than budget, with responsive & cyclical repairs £50k unfavourable to budget and compliance £4k unfavourable to budget. The higher responsive spend is linked to an increase in completed jobs of 377 YTD and reduction in the cancellation rate, due to an increase in demand and a reduction in outstanding jobs.
 - Bad debts are £54k favourable to budget reflecting the prudent budget assumptions.

4.2 Net capital expenditure is £1,363k lower than budget, mainly due lower spend on the South Crosshill and East Lane developments following accelerated spend in 2024/25. The underspend is partly offset by additional spend at Forfar Avenue, which started on site ahead of the budgeted date. Investment spend reports 359k favourable to budget. The lower spend is mainly due to the timing of the programme works, noting that spend will increase over the coming months in line with forecast.

4.3 Q2 Forecast Out-turn

	FY Out-turn (Q2)		
	Actual £000	Budget £000	Variance £000
Turnover	25,825	28,623	(2,798)
Operating expenditure	(18,187)	(18,290)	103
Operating surplus	7,638	10,333	(2,695)
<i>Net operating margin</i>	<i>29.6%</i>	<i>36.1%</i>	
Net interest payable	(4,040)	(4,185)	145
Surplus	3,598	6,148	(2,550)
Net Capital Expenditure	8,901	9,431	728

The forecast reports a statutory surplus of £3,598k for the full year out-turn is £2,550k unfavourable to budget, with the early recognition of new build grant on the completion of the 24 East Lane new build units in March 2025 being the key driver for the movement. The forecast underlying deficit is £220k lower than the budgeted full year deficit with capacity created through additional net rental income and an overall favourable expenditure position from our operating activities to accommodate the additional investment spend in line with our tenant commitments to provide high quality housing and invest to improve the energy efficiency of our homes.

Key points to note:

- Total income is forecast to be £2,798k unfavourable to budget, with a reduction of £2,994k in grant income recognised following the early recognition of grant income in March 2025 for completion of 24 units at East Lane. An increase in gift aid income of £76k from Wheatley Developments Scotland (WDS) is also noted, linked to the higher forecast new build spend. This is an intra group item only and as such does not impact the overall financial performance at a group level.
- Total operating costs are forecast to be £103k favourable to budget reflecting payment of donations in March 2025 to Wheatley Foundation, earlier than budgeted and the forecast lower bad debts and direct running costs in line with the strong position reported at P6. Revenue repairs and maintenance spend is forecast to be 50k higher than budget reflecting the increase in completed jobs in 2025/26. Overall compliance spend is forecast to be in line with budget.
- Net capital expenditure is forecast to be £530k lower than budget, relating to the new build programme. Forecast new build spend is £6,550 higher than budget due to re-profiling of onsite works at several developments including Forfar Avenue and Dargavel North. Forecast new build capital investment income is £7,228k higher than budget as result of the change in profile of onsite works noted. This partly offset by a forecast increase in investment spend in line with tenant commitments.
- The forecast variations to budget continue to be managed within the covenants and golden rules for the RSL Borrowers.

Review of new build appraisal target return rate

- 4.4 The existing development appraisal approach and target return rates were last reviewed in August 2023. Reviews are required every three years or more frequently should there be major interest rate changes. Since the last review markets have remained challenging and gilt rates, which signal government borrowing costs, have risen. Market expectations are that rates are likely to remain higher due to persistent inflation and sluggish growth.
- 4.5 Our strategic objective to increase the supply of new homes must be delivered in the context of maintaining our strong credit rating and appropriately managing financial risks. The review of the target rates of return has been undertaken to ensure that in the current economic and operational environment developments remain financially viable on a project-by-project basis and cover the cost of funding with no cross-subsidy.

- 4.6 The Bank of England has cut the UK base rate from its recent peak of 5.25% in August 2024 to the current rate of 4.00%, however despite this inflation and weak growth persist. Fiscal confidence has declined due to welfare policy reversals with higher employer NI contributions and minimum wage increases continuing to increase prices for consumers and limiting growth. These factors have increased UK 30-year gilt rates to levels not seen since the 1990s.

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

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

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

- 4.9 The actual impact will depend on property size, rental income and other scheme specific factors but as an indication, to meet the proposed target IRR of 6.75% social rent developments will require an additional £2.1k of grant per unit and for a target of 6.95% on MMR schemes, an additional £2.8k per unit. The revised rates are subject to Group Board approval at their meeting on 17 December.

SHAPS Pension Scheme

- 4.10 Loretto has a legacy participation in the SHAPS Defined Benefit (DB) Pension scheme. It is a multi-employer scheme managed by TPT Retirement Solutions (TPT). In 2013 the scheme was closed and all staff were offered membership of the SHAPS Defined Contribution (DC) Scheme instead. A pension liability of £2,773k is reported on the Statement of Financial Position in relation to the closed DB scheme at 31 March 2025. There are 30 current staff members participating in the SHAPS DC scheme. The SHAPS DB Scheme reported a funding level of 98% at the triennial valuation carried out on 30 September 2021. It was agreed by the Scheme Trustees that the employer deficit contributions which had been paid in the period up to the publication of the results were no longer required from 30 September 2022.

- 4.11 Since the results of that 2021 valuation, there have been significant increases in UK Government Bond (gilt) yields and interest rates. The impact of this has been to reduce the overall size of the Scheme assets and liabilities. The most recent triennial valuation of the scheme for funding purposes was carried out as at 30 September 2024 with the results published recently. This showed that the scheme funding level had reduced from 98% to 90% and the Scheme deficit has increased from £27.3m to £79.5m. This means that a Recovery Plan is required to address the deficit, and the Trustees have agreed that deficit contributions will restart for a period of four years from 1 April 2026. For Loretto, the introduction of the deficit contribution results in an annual deficit contribution of £502k in 2026/27, this increases by 3% per annum.
- 4.12 Under the Group Standing Orders, the Group Board has responsibility for pension provision across the Group. The Group Board recently approved the updated Pension Strategy in February 2025. As well as Loretto's membership of SHAPS DB, Wheatley Homes East and Wheatley Care also have legacy membership of SHAPS DB schemes. The Pensions Strategy considered three options in relation to the SHAPS DB Scheme; stay in SHAPS and fund the deficits through provision in the Business Plan, exit completely by paying a lump sum to extinguish responsibility for all future liabilities (the s75 debt) or exit by a bulk transfer to another Trust. It is worth noting to exit by paying the s75 debt we would also need to remove all employees with pensionable service from the SHAPS DC Scheme.
- 4.13 In assessing the options open for the SHAPS DB schemes the costs form a key consideration. Taking Loretto's SHAPS DB scheme only, for a s75 exit, the debt to be funded by Loretto as at September 2024 is significant at £7,207k. For a bulk transfer, if the Scheme Trustees agreed to the transfer, they may firstly seek compensation for our exit by retaining a share of the assets in the scheme thus increasing the pension liability and in addition, Loretto would need to still fund the ongoing deficit by improving the funding in the Scheme or providing support post transfer. Having consulted our external Pension Advisors, Spence & Partners, and comparing the options to remain in the scheme or an exit, both exit routes would result in significant additional costs crystallising that would need to be funded through reserves, adversely impacting the reserves balance.
- 4.14 Having considered the options for additional costs crystallising, in approving the Pensions Strategy, the Group Board Pension agreed that if there was a requirement to reinstate the payment of any additional deficit contributions, the implications on our financial projections will be assessed to ensure our business plans include the necessary provision in respect of any SHAPS DB deficit contributions. Our initial assessment shows that the Business Plan for Loretto can deal with these additional costs. Nevertheless, we will continue to review the options following the results of the annual valuations and any updated s75 exit costs.

5. Customer Engagement

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

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

8.1 Delivery of our cost efficiency targets embedded within the 2024/25 budget is a key element of continuing to demonstrate value for money.

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

10.1 The Board's agreed risk appetite for business planning and budgeting assumptions is "open". This level of risk tolerance is defined as "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 report.

12. Key issues and conclusions

12.1 This paper presents the financial performance for the period to 30 September 2025.

13. Recommendations

13.1 The Board is requested to:

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

LIST OF APPENDICES:

Appendix 1: Period 6 – 30 September 2025 Finance Report



Loretto
Housing

Period to 30 September 2025
Finance Report

W Wheatley
Group

1a. Operating Statement – Period to 30 September 2025

	Period To 30 September 2025			Full Year Budget £k
	Actual £k	Budget £k	Variance £k	
INCOME				
Rental Income	9,319	9,246	73	18,652
Void Losses	(184)	(211)	27	(422)
Net Rental Income	9,135	9,035	100	18,230
Grant Income New Build	4,466	2,883	1,583	9,922
Grant Income Other	12	12	0	120
Other Income	61	58	3	351
Total Income	13,674	11,988	1,686	28,623
EXPENDITURE				
Employee Costs - Direct	781	779	(2)	1,548
Employee Costs - Group Services	506	511	5	1,015
ER / VR	0	0	0	0
Direct Running Costs	896	922	26	2,079
Running Costs - Group Services	284	294	10	606
Revenue Repairs and Maintenance	2,346	2,292	(54)	4,969
Bad debts	79	133	54	266
Depreciation	3,903	3,903	0	7,807
TOTAL EXPENDITURE	8,795	8,834	39	18,290
OPERATING SURPLUS / (DEFICIT)	4,879	3,154	1,725	10,333
<i>Net operating margin</i>	<i>35.7%</i>	<i>26.3%</i>	<i>9.4%</i>	
Net Interest Payable	(1,953)	(1,990)	37	(4,185)
STATUTORY SURPLUS / (DEFICIT)	2,926	1,164	1,762	6,148

	Period To 30 September 2025			Full Year Budget £k
	Actual £k	Budget £k	Variance £k	
INVESTMENT				
Total Capital Investment Income	1,517	623	894	1,885
Investment Programme	1,529	1,888	359	4,497
New Build Programme	3,517	3,608	91	6,537
Other Capital Expenditure	132	151	19	282
TOTAL CAPITAL EXPENDITURE	5,178	5,647	469	11,316
NET CAPITAL EXPENDITURE	3,661	5,024	1,363	9,431

Income and Expenditure account – key points

A net operating surplus of £4,879k, £1,725k favourable to budget and a statutory surplus of £2,926k, £1,762k favourable to budget is reported. The favourable variance reflects the good letting performance and the earlier than budgeted recognition of grant income following the early completion of units at South Crosshill.

- Net rental income is £100k favourable to budget due to 24 East Lane units, budgeted to complete in July 2025, completing ahead of schedule in March 2025, 44 units at South Crosshill completing early (16 in June and 28 in September), in addition to void losses of 1.97% in the year to date compared to the budgeted 2.28%.
- Grant income relating to new build is £1,583k favourable to budget due early completion of 44 units at South Crosshill in July and September 2025, budgeted for November 2025. This is partially offset with the early completion of 24 East Lane units in March 2025, which were in the current year budget.
- Total employee costs (direct and group services) are £3k favourable to budget due to the timing of changes compared to the budgeted structures in Wheatley Solutions.
- Total running costs are £36k favourable to budget due to the timing of spend and cost savings across several departments within Wheatley Solutions and due to the timing of direct running costs.
- Revenue repairs and maintenance are £54k unfavourable to budget. Revenue responsive repairs are £50k unfavourable and in the YTD, 5,838 responsive repair jobs have been completed, compared to 5,461 in the same period last year. This is linked to both an increase in the demand and a reduction in live jobs, (615 at March to 375 at the end of September). Compliance spend, including communal utilities, is £4k higher than budget due the timing of spend against budget.
- Bad debts are £54k favourable to budget. A prudent approach was taken when setting the budget.
- Net Interest payable is £37k lower than budget, due to the timing of loan drawdowns compared to the budgeted profile.

Net capital expenditure of £3,661k is £1,363k lower than budget.

- Capital investment income (grant) is £894k higher than budget due to the timing of the new build grant income for Bank Street and accelerated claims at Forfar Avenue due to the earlier than budgeted start on site.
- Investment programme expenditure of £1,529k relates to core programme works, capitalised repairs and voids. A favourable variance is reported due to the timing of core programme works, noting spend will increase over the coming months in line with our forecast, partly offset by higher spend on capitalised repairs in the YTD, linked to increase in completed jobs.
- New build spend is £91k lower than budget driven by the timing of spend across projects including South Crosshill where more spend was incurred in 2024/25. This underspend is partly offset by additional spend at Forfar Avenue, which started on site ahead of the budgeted date.
- Other capital expenditure of £132k mainly relates to Loretto's contribution to Wheatley Group IT costs.

1b. Underlying surplus – Period to 30 September 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 2018).
- However, the inclusion of grant income on new build developments creates volatility in the results and does not reflect the underlying cash surplus/deficit on our letting activity.
- The 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, gift aid and depreciation, including capital expenditure on our existing properties.
- At September, the underlying surplus is £834k, £538k favourable to budget. The variance to budget is primarily driven by the timing of core programme spend, in addition to an improved net operating surplus position linked to higher rental income from early completions at East Lane and South Crosshill, improved void performance, and lower operating expenditure.

Loretto Underlying Surplus - September 2025				
	YTD Actual £k	YTD Budget £k	YTD Variance £k	FY Budget £k
Net operating surplus	4,879	3,154	1,725	10,333
add back:				
Depreciation	3,903	3,903	0	7,807
less:				
Grant income	(4,466)	(2,883)	(1,583)	(9,922)
WDS gift aid income	0	0	0	(235)
Net interest payable	(1,953)	(1,990)	37	(4,185)
Total expenditure on Investment Programme	(1,529)	(1,888)	359	(4,497)
Underlying surplus/(deficit)	834	296	538	(699)

2a. Repairs & Investment Programme – Period to 30 September 2025

Repairs & Maintenance Expenditure	1 April 2025 - 30 September 2025			2025/26
	Actual £k	Budget £k	Variance £k	Budget £k
Responsive repairs	1,323	1,273	(50)	2,547
Cyclical (local)	-	-	-	119
Compliance revenue	1,023	1,019	(4)	2,303
Total	2,346	2,292	(54)	4,969

Repairs and Maintenance

- Responsive repairs are £50k unfavourable to budget, In the YTD, 5,838 responsive repair jobs have been completed, compared to 5,461 in the same period last year. This is linked to both an increase in the demand and a reduction in live job numbers, (615 at March to 375 at the end of September). This is in addition to an increase in the average cost of certain repair types. The MyRepairs team continue to closely monitor spend.
- Overall revenue compliance costs are £4k unfavourable to budget. Whilst there are variations across programmes, compliance is being managed within the overall budget provision for the year.

Investment Programme	1 April 2025 - 30 September 2025			2025/26
	Actual £k	Budget £k	Variance £k	Budget £k
Investment Programme Grant Income				
Adaptations	12	12	0	120
Total	12	12	0	120
Investment Programme Expenditure				
Adaptations	12	60	48	120
Empty Homes	0	0	0	0
Core programme	868	1,194	326	3,135
Capitalised repairs	219	164	(55)	328
Capitalised staff	193	192	(1)	383
Void repairs	237	278	41	531
Total	1,529	1,888	359	4,497

Investment Programme

- Core programme works are £326k favourable to budget, due to the timing of work, in particular central heating, windows and door programmes, with lower demand over the summer for reactive heating replacements and non-standard windows requiring procurement. Note that spend on these programmes will increase over the coming months, in line with our forecast.
- Capitalised repairs are £55k higher than budget linked to the increase in completed jobs.
- Void repairs report an underspend at P6 of £41k. Whilst the number of voids has been higher than budgeted, the average cost per void has been slightly lower in the YTD. Note, however, that due to the low number of voids in Loretto if there is a high void in the coming periods this could significantly impact the average cost.

2b. New Build Programme – YTD September 2025

	*Status	Contractor	Period To September 2025			Full Year
			Actual	Budget	Variance	Budget
Bank Street	On site	McTaggart	1,386	1,477	91	1,880
Carron Rd	Feasibility	McTaggart	0	0	0	42
Dargavel North	Due on Site	Taylor Wimpey	0	42	42	42
Dargavel 3A	On site	Dundas	4	42	38	84
Denny loan head Ph1	Feasibility	TBC	0	0	0	21
Duke St	Feasibility	TBC	43	100	57	550
East Lane	Complete	JR Group	3	90	87	90
Forfar Avenue	On site	McTaggart	783	64	(719)	1,276
Jackton Green	Feasibility	Avant Homes	0	16	16	32
Main st Maddiston	Complete	Miller Homes	0	0	0	50
Polmont Ph1	Feasibility	TBC	0	53	53	105
South Crosshill	Complete	BWD Trading	901	1,314	413	1,363
Prior Year	-	-	1	0	(1)	0
Total Social Rent			3,121	3,198	77	5,535
Land Acquisition	-	-	0	0	0	75
Capitalised Insurance	-	-	1	5	4	11
Capitalised Interest	-	-	0	0	0	109
Capitalised Staff Costs	-	-	395	405	10	807
Total New Build Investment			3,517	3,608	91	6,537

Grant Income			1,505	611	894	1,765
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Net New Build Costs			2,012	2,997	985	4,772
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Grant Income Completions (Recognised in OPS)			4,466	2,883	1,583	9,922
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New Build Expenditure

Bank Street, Coatbridge: 17 units social rent. Board approved in February 2024. Land acquisition and building contract concluded in August 2024 with works starting in that month. Programme forecasting completion in Q4.

Dargavel North: s75 opportunity for 20 social rent units with Taylor Wimpey, who now own the affordable land tranche. The council accelerated grant to this financial year and approval received from WDS Board in September 2025 to contract. Forecast spend for the year is £1.915m, including the Golden Brick payment, which will be fully grant funded. Golden brick payment and site start expected in March 2026.

Dargavel Phase 3A: Dundas Estates acquired the site from the administrators for Stewart Milne. WDS Board approved in January 2025 and contract was concluded at the end of March 2025 with a Golden Brick payment made at that time. Due to a lack of grant availability in 2025/26 agreement was reached with Dundas that no payments would be due until the second Golden Brick payment planned for April 2026. The local authority have advised that £4.1m of grant is now available this year and a proposal, which is being concluded, has been agreed with Dundas for a revised payment schedule allowing this grant to be claimed.

Duke Street: 19 units social rent. Viability difficulties delayed this remediation and conversion project. An alternative delivery route is now being progressed through our framework with CBG and project management now lies with the development team. Planning application was submitted as targeted in September 2025. The project is progressing for a Q4 tender return.

East Lane, Paisley: All 48 units for social rent completed in March 2025 ahead of budget.

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. Site start was deferred in 2024/25 due to lack of available grant funding. Works started on site in July 2025, earlier than budgeted, and GCC have confirmed grant availability in the year.

South Crosshill Rd, Bishopbriggs: s75 project with Barratt Homes for 44 social rent units. 16 properties were handed over in June and the last 28 units in September 2025 earlier than budgeted. Underspend reported is due to accelerated spend in 2024/25.

3. Balance Sheet

	30 September 2025 £k	31 March 2025 £k
Tangible Fixed Assets		
Housing Properties	167,135	165,861
Other Fixed Assets	1,664	1,664
Investment Properties	1,330	1,330
	<u>170,129</u>	<u>168,855</u>
Current Assets		
Rent and service charge arrears	685	462
less: Provision for rent arrears	(432)	(393)
Prepayments and accrued income	92	0
Intercompany balances	70	281
Other debtors	1,283	1,292
	<u>1,698</u>	<u>1,642</u>
Cash at Bank and in Hand	571	1,332
	<u>2,269</u>	<u>2,974</u>
Short Term Creditors		
Trade creditors	(225)	(132)
Accruals	(916)	(1,407)
Deferred income	(2,627)	(6,156)
Rent and service charges in advance	(1,467)	(1,441)
Intercompany balances	(4,517)	(5,276)
Other creditors	(615)	(631)
	<u>(10,367)</u>	<u>(15,043)</u>
Net Current Assets	(8,098)	(12,069)
Long Term Creditors		
Amounts due after one year	(88,432)	(86,682)
Deferred Income	(2,466)	(1,897)
Pension Liability	(2,773)	(2,773)
	<u>(93,671)</u>	<u>(91,352)</u>
Net Assets	<u>68,360</u>	<u>65,434</u>
Capital and Reserves		
Share Capital	-	-
Revenue Reserve b/fwd	65,434	69,499
Current year surplus/(deficit)	2,926	(4,065)
	<u>68,360</u>	<u>65,434</u>
Association's Funds	<u>68,360</u>	<u>65,434</u>

Key Comments

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

- **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 £56k higher than the March 2025 position, mainly due to an increase in prepayments due to timing.
- **Short Term Creditors** – Amount due within 1 year are £4,676k lower than the March 2025 position, mainly due to the release of deferred grant income following the completion of developments in addition to the timing of accruals and intercompany balances settlement.
- **Long-Term Creditors** - This includes £88.5m of loans due to Wheatley Funding No 1 Ltd.

4a. Q2 2025/26 Forecast

	Full Year 2025/26		
	Forecast £k	Budget £k	Variance £k
INCOME			
Rental Income	18,742	18,652	90
Void Losses	(392)	(422)	30
Net Rental Income	18,350	18,230	120
Grant Income New Build	6,928	9,922	(2,994)
Grant Income Other	120	120	0
Other Income	427	351	76
Total Income	25,825	28,623	(2,798)
EXPENDITURE			
Employee Costs - Direct	1,548	1,548	0
Employee Costs - Group Services	1,014	1,015	1
ER / VR	0	0	0
Direct Running Costs	1,992	2,079	87
Running Costs - Group Services	601	606	5
Revenue Repairs and Maintenance	5,019	4,969	(50)
Bad debts	206	266	60
Depreciation	7,807	7,807	0
TOTAL EXPENDITURE	18,187	18,290	103
OPERATING SURPLUS / (DEFICIT)	7,638	10,333	(2,695)
<i>Net operating margin</i>	<i>29.6%</i>	<i>36.1%</i>	<i>-6.52%</i>
Net Interest Payable	(4,040)	(4,185)	145
STATUTORY SURPLUS / (DEFICIT)	3,598	6,148	(2,550)

	Full Year 2025/26		
	Forecast £k	Budget £k	Variance £k
INVESTMENT			
Total Capital Investment Income	9,113	1,885	7,228
Investment Programme	4,645	4,497	(148)
New Build	13,087	6,537	(6,550)
Other Capital Expenditure	282	282	0
TOTAL CAPITAL EXPENDITURE	18,014	11,316	(6,698)
NET CAPITAL EXPENDITURE	8,901	9,431	530

Comments:

A statutory surplus of £3,598k, £2,550k unfavourable to budget is reported with the movement directly linked to the timing of the earlier than budgeted recognition of new build grant income on new build completions at East Lane in March 2025.

Total income forecast of £25,825k is £2,798k lower than budget.

- Rental income is £90k higher than budget linked to the early completion of the 24 East Lane units and 44 units at South Crosshill (completing in June and September instead of November), partly offset by a forecast delay of one month in completion of 17 units at Bank Street.
- Void losses forecast a favourable position of £30k, due to the favourable void performance to P6.
- Grant income relating to new build is £2,994k lower than budget due to the early recognition of grant in March 2025 for the completion of 24 properties at East Lane.
- Other income is £76k higher than budget due an increase in gift aid income from Wheatley Developments Scotland, linked to the higher forecast new build spend. This is an intra group item.

Total expenditure forecast of £18,187k is £103k lower than budget:

- Employee and running cost group recharges are forecast to be £1k and £5k lower than budget respectively, reflecting the timing of changes from the budgeted staff structure in Wheatley Solutions, and running cost savings across several departments within Wheatley Solutions.
- Direct running costs are forecast to be £87k lower than budget due to donations to Wheatley Foundation paid earlier than budgeted in March 2025.
- Revenue repairs and maintenance are £50k higher than budget linked to the increase in the number of completed responsive repairs following a reduction in overdue jobs and cancellations rates. Overall, compliance costs are forecast to be in line with budget.
- Net interest payable is £145k favourable to budget due to the reduction in the variable lending rate compared to budget and value achieved in the current market through entering into new funding arrangements with shorter maturities.

Net capital expenditure is forecast at £8,901k and is £530k lower than budget.

- Capital investment income is forecast £7,228k higher than budget due to the availability of grant at Dargavel North, Dargavel Ph 3A and Forfar Avenue.
- Investment programme is forecast to be £148k higher than budget with additional core programme investment in line with tenant commitments.
- New build investment expenditure is forecast to be £6,550k higher than budget due to an earlier site start at Forfar Avenue and reprofiling of start dates at Dargavel North and Dargavel Ph 3. This is linked to grant being made available in 2025/26 by Renfrewshire Council for the Dargavel projects and GCC advising a higher grant value being available in 2025/26 for Forfar Avenue than anticipated.

4b. Underlying surplus – Q2 forecast 2025/26

Key comments:

- As with the year to date results to 30 September 2025, the Q2 Forecast full year out-turn Operating Statement (Income and Expenditure Account) is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2018).
- An underlying deficit of £479k is expected for the full year as shown in the table below after adjusting to exclude the accounting adjustments for the recognition of grant income, group gift aid and depreciation, but including capital expenditure on our existing properties to reflect the underlying cash surplus/deficit on our letting activity.
- The strong letting performance at P6 is forecast to continue, generating capacity through additional net rental income and an overall favourable expenditure position from our operating activities and donations to Wheatley Foundation paid earlier than budgeted in March 2025 to accommodate the additional investment spend in line with our tenant commitments to provide high quality housing and invest to improve the energy efficiency of our homes. Financial performance continues to be managed within the overall budget parameters and covenants for the RSL Borrowers.

Loretto Underlying Surplus - Q2 forecast 2025/26			
	Forecast £k	Budget £k	Variance £k
Net operating surplus	7,638	10,333	(2,695)
add back:			
Depreciation	7,807	7,807	0
less:			
Grant income	(6,928)	(9,922)	2,994
WDS gift aid income	(311)	(235)	(76)
Net interest payable	(4,040)	(4,185)	145
Total expenditure on Investment Programme	(4,645)	(4,497)	(148)
Underlying deficit	(479)	(699)	220

Report

To: Loretto Housing Board

By: Laura Henderson, Managing Director

Approved By: Laura Pluck, Group Director of Communities

Subject: Risk Register

Date of Meeting: 24 November 2025

1. Purpose

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

2. Authorising and strategic context

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

3. Background

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

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

4. Discussion

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

- **Red font – risks highlighted for Member consideration (as set out in paragraph 3.1) and discussed further below;**

- Purple font – risks with a high residual risk or inherent risk score where Boards have received an update on the operation of the controls in the last 6 months;
- Black font – lower scoring risks that have remained stable within the current period.

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

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

Section A - Risks outwith risk appetite

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

Risk	Residual Risk		
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
RISK 020 - Radio Teleswitch switch off	 <p>Revised score:</p>	Minimal	The scoring of this risk has reduced again, reflecting the continuing reduction in the number of the Group's customers affected (c3500) and the staged approach to switching adopted by the energy companies. Overall, it remains outwith risk appetite because the Group is unable to directly resolve this issue on behalf of its customers. Engagement with third parties and awareness-raising communications to customers and staff continue.

Risk	Residual Risk Score	Risk Appetite Level	Commentary
RISK 089 – Fire Event		Minimal	This is focused on the risk of a fire within a customer's property. It is outwith risk appetite due to the limited control the Group has over the actions of third parties to minimise fire risk. Despite best efforts, we cannot eliminate all risk of accidental dwelling fires. We have reduced these year-on-year, through proactive engagement with our customers and rigorous fire safety inspections of our assets on a rolling programme basis and mitigating measures, but we will continue to experience accidental dwelling fires.

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

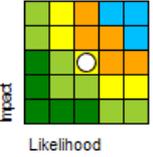
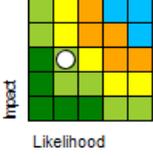
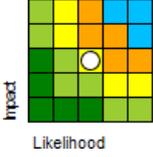
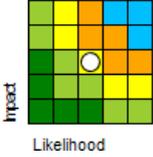
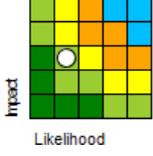
Section B – High scoring risks with controls due for review.

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

Section C- Horizon Scanning

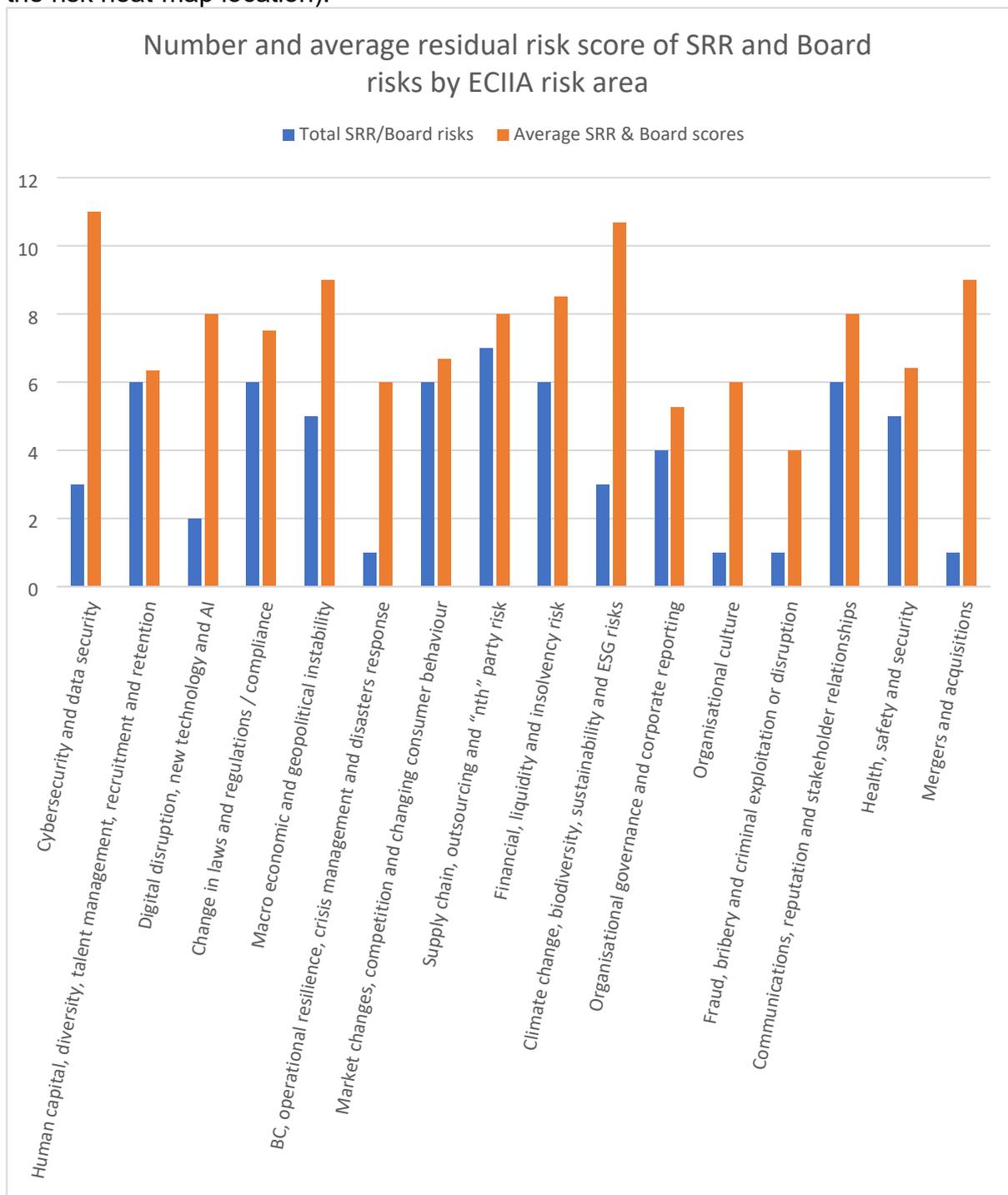
- 4.6 The table below summarises seven risks highlighted for the Board’s attention, including any key changes to the risks in the Risk Register.

Risk	Residual Risk Score	Risk Appetite Level	Commentary
RISK137 – Climate change impact on Group customers, assets and activities		Open	The inherent and residual risk scores have been increased to reflect increasing evidence of weather-related incidents that require an escalated response.
RISK100 – Underperformance of main delivery partner against investment plans		Open	Following changes to the management structure within the Group, RISK100 has been split in two. The updated RISK100 has been revised to focus on the delivery of investment

Risk	Residual Risk Score	Risk Appetite Level	Commentary
			plans. There has been no change to the risk scoring of this risk.
NEW RISK RISK182 – Underperformance of Repairs delivery partner (West)		Open	The new risk RISK182 has been introduced to capture the risk associated with delivery of the repairs service in the West. The residual score for this risk remains in line with the scoring of the original, joint risk (RISK 100).
RISK053 – Damp and mould		Minimal	The description and controls for this risk have been updated, to focus on the requirement to comply with legislation in this area, and to outline updated controls that have been recently introduced.
NEW RISK: RISK052 - Responsibilities under Awaab's Law		Open	This new risk has been added to the register, to reflect the potential for reputational damage due to stakeholders' differing knowledge and understanding of the law's scope and the requirements it places on social landlords.
NEW RISK: RISK052 - Impact of CBG consolidation on Group		Cautious	This new risk relates to the potential impact on the Group's ability to prepare consolidated accounts arising from delays to the implementation of CBG change management programme.
PROPOSED FOR DELETION: RISK005- Care and Support Services		Minimal	Proposed this risk is removed from Loretto risk register as Loretto do not commission services and no longer have a parent relationship.

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

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



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

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

5. Customer Engagement

5.1 No customer engagement implications arise directly from this report.

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

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

10. Risk Appetite and assessment

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

11. Equalities implications

11.1 This report does not require an equalities impact assessment.

12. Key issues and conclusions

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

13. Recommendations

13.1 The Board is asked to:

- 1) Approve the proposed changes to the Risk Register; and
- 2) Identify any further changes required to the Risk Register.

LIST OF APPENDICES:

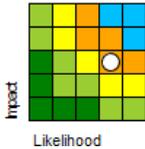
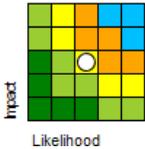
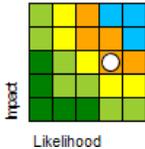
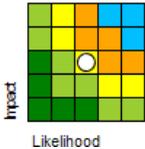
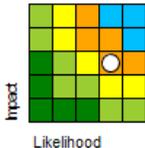
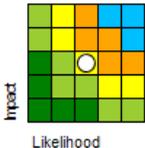
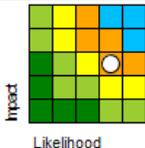
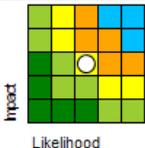
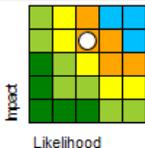
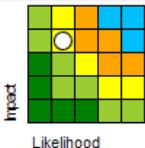
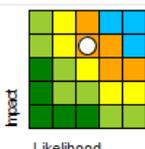
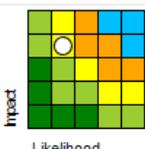
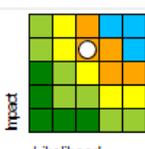
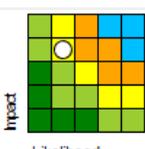
Appendix 1 – Loretto Summary Risk Register

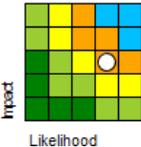
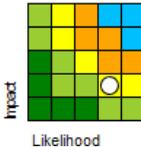
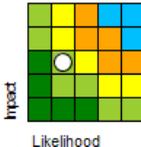
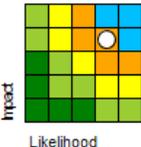
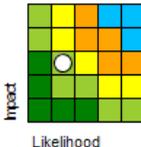
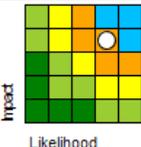
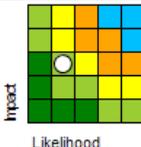
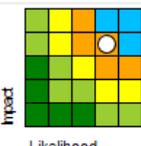
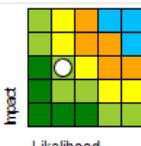
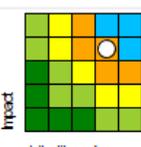
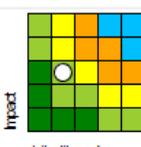
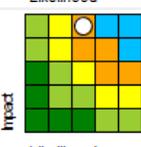
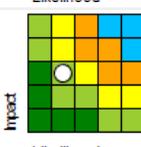
Appendix 2 – Risks flagged for Board attention

Appendix 1 – Loretto Risk Register

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

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

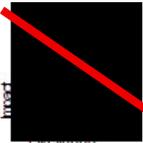
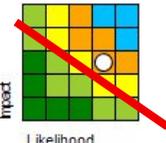
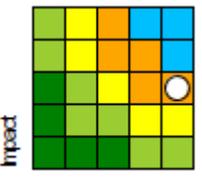
Code	Title	Original Score	Risk Appetite	Current Risk Score	Owner	Strategic Outcome	Ref to Appendix 2
RISK 052	Responsibilities under Awaab's Law		Risk Appetite is OPEN (Orange)		Group Director of Assets and Development	Investing in existing homes and environments	Page 18 New Risk
RISK 100	Underperformance of main delivery partner against investment plans		Risk Appetite is OPEN (Orange)		Group Director of Housing	Investing in existing homes and environments	Page 19 Amended risk
RISK 137	Non-achievement of sustainability targets		Risk Appetite is OPEN (Orange)		Group Director of Assets and Development	Setting the benchmark for sustainability and reducing carbon footprint	N/A
RISK 182	Underperformance of Repairs delivery partner (West)		Risk Appetite is OPEN (Orange)		Group Director of Housing	Developing a customer led Repairs Service	Page 20 New risk
RISK 004	Ability to meet Scottish Government legislative requirements for energy efficiency		Risk Appetite is CAUTIOUS (Yellow)		Group Director of Assets and Development	Investing in existing homes and environments	N/A
RISK 039	Supplier's Financial Position, Contingency and Business Continuity Planning		Risk Appetite is CAUTIOUS (Yellow)		Group Director of Governance and Business Solutions	Maintaining a strong credit rating and managing financial risks	N/A
RISK 089	Fire Event		Risk Appetite is MINIMAL (Light Green)		Group Director of Assets and Development	Developing peaceful and connected neighbourhoods	Page 21 Above risk appetite

Code	Title	Original Score	Risk Appetite	Current Risk Score	Owner	Strategic Outcome	Ref to Appendix 2
RISK 090	Monitoring H&S arrangements		Risk Appetite is CAUTIOUS (Yellow)		Group Director of Assets and Development	W.E. Work – Strengthening the skills and agility of our staff	N/A
RISK 005	Care and support services		Risk Appetite is MINIMAL (Light Green)		Group Director of Communities	Shaping Care Services for the future	Page 22 Proposed for deletion
RISK 012	Business Continuity		Risk Appetite is OPEN (Orange)		Group Director of Assets and Development	Progressing from Excellent to Outstanding	N/A
RISK 031	Senior staff recruitment		Risk Appetite is HUNGRY (Blue)		Group Director of Finance; Group Director of Governance and Business Solutions	W.E. Work – strengthening the skills and agility of our staff	N/A
RISK 032	Staff development and succession planning		Risk Appetite is HUNGRY (Blue)		Group Director of Finance; Group Director of Governance and Business Solutions	W.E. Work – strengthening the skills and agility of our staff	N/A
RISK 053	Damp and Mould		Risk appetite is MINIMAL (Light Green)		Group Director of Assets and Development	Investing in existing homes and environments	Page 23 Updated risk
RISK 003	Fire Safety		Risk Appetite is MINIMAL (Light Green)		Group Director of Assets and Development	Investing in existing homes and environments	N/A

Code	Title	Original Score	Risk Appetite	Current Risk Score	Owner	Strategic Outcome	Ref to Appendix 2
RISK 010	Group Credit Rating		Risk Appetite is MINIMAL (Light Green)		Group Director of Finance	Maintaining a strong credit rating and managing financial risks	N/A
RISK 006	Customer Satisfaction (tenants)		Risk Appetite is OPEN (Orange)		Group Director of Housing	Enabling customers to lead	N/A
RISK 007	Rent Arrears management		Risk Appetite is OPEN (Orange)		Group Director of Housing	Enabling Customers to Lead	N/A
RISK 009	Governance Structure		Risk Appetite is CAUTIOUS (Yellow)		Group Director of Governance and Business Solutions; Group CEO	W.E. Work– strengthening the skills and agility of our staff	N/A
RISK 085	Ineffective void service from suppliers and contractors		Risk Appetite is CAUTIOUS (Yellow)		Group Director of Housing	Progressing from Excellent to Outstanding	N/A
RISK 172	Insufficient Group Development Programme pipeline		Risk Appetite is MINIMAL (Light Green)		Group Director of Assets and Development	Increasing the supply of new homes	N/A

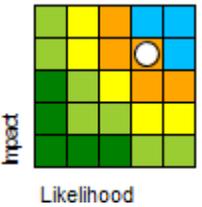
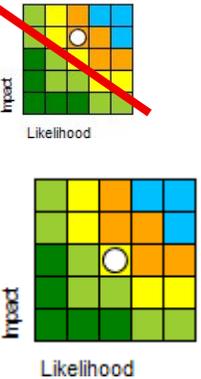
Appendix 2 – Risks flagged for Board attention

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

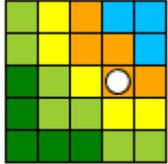
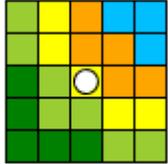
Strategic Outcome	Setting the benchmark for sustainability and reducing carbon footprint	Risk type	Financial or VFM	Risk owner	Group Director of Assets and Development
Description		Controls			
<p>There is a risk that the impact of climate change consequences on Group customers, assets and services are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

Description		Controls	
Inherent risk	Residual risk	Risk Appetite level:	Previous / Next detailed Board update on operation of controls listed above:
Impact	Impact	Risk Appetite is CAUTIOUS (Yellow)	

RISK 020 Radio Teleswitch switch off (Above risk appetite)

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

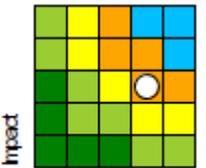
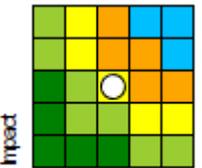
RISK 002 Impact of CBG consolidation on Group (New Risk)

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

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

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

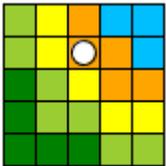
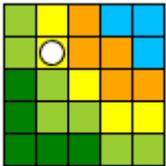
RISK 100 Underperformance of main delivery partner against investment plans

Strategic Outcome	Investing in existing homes and environments	Risk type	Reputation and Credibility	Risk owner	Group Director of Housing
Description		Controls			
<p>There is a risk that Wheatley’s main delivery partner in the West (CBG) is unable to deliver as expected and fails to deliver WH-G, Loretto and Lowther’s annual investment plans and repair targets resulting in reputational damage as a result of failing to deliver commitments made to customers.</p>		<p>CBG prepare a 5-year business plan each year. This is informed by workload information provided by both Members and for WHG linked directly through to the WHG financial projections and informs CBG resource and labour planning. The investment plans are routinely monitored in respect of delivery and reports are considered monthly at DMT on the delivery status of the annual programme.</p> <p>Performance in the delivery of the repairs service is also routinely monitored between operational delivery and management teams. WHG and CBG staff are co-located to ensure that this is achieved. Service levels and efficiency are measured against agreed targets and where issues are identified as part of this monitoring, improvement actions are then agreed and their effect monitored.</p>			
Inherent risk	Residual risk	Risk Appetite level:	Previous / Next detailed Board update on operation of controls listed above:		
 <p>Likelihood</p>	 <p>Likelihood</p>	<p>Risk Appetite is OPEN (Orange)</p>	<p>Regular updates to RSL Boards and the Group Board are provided.</p>		

RISK 182 Underperformance of Repairs delivery partner (West) (New Risk)

Strategic Outcome	Developing a customer led Repairs Service	Risk type	Reputation and Credibility	Risk owner	Group Director of Housing
Description		Controls			
<p>There is a risk that the Group's main repairs delivery partner in the West (CBG) does not meet agreed delivery standards due to factors such as missed/late appointments, poor quality repair work and/or poor service delivery, resulting in increased complaints and customer dissatisfaction.</p>		<p>Performance in the delivery of the repairs service is routinely monitored between operational delivery and management teams. WHG and CBG staff are co-located to ensure that this is achieved. Service levels and efficiency are measured against agreed targets and where issues are identified as part of this monitoring, improvement actions are then agreed and their effect monitored.</p> <p>Management reports cover areas including customer feedback, complaints monitoring, lessons learned, and training. Repairs performance is discussed at DMTs.</p> <p>Using My Voice scores and customer voice panels to obtain feedback on service delivery. Feedback from customers is monitored and used to deliver service improvement activities.</p>			
Inherent risk	Residual risk	Risk Appetite level:	Previous / Next detailed Board update on operation of controls listed above:		
		<p>Risk Appetite is OPEN (Orange)</p>	<p>Regular updates to RSL Boards and the Group Board are provided.</p>		

RISK 089 Fire Event (Above risk appetite)

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

RISK 005 Care and support services (Proposed for deletion)

Strategic Outcome	Shaping Care Services for the future		Risk type	Compliance: Legal/Regulatory	Risk owner	Group Director of Communities
Description			Controls			
<p>A failure in the care of an individual could result in serious personal harm, leading to risk to life and limb, financial liability and loss of future work due to reputational damage.</p>	<p>These include:</p> <ul style="list-style-type: none"> • 3 yearly cyclical reviews of care operational policy and procedure (or more frequently where error requires further mitigatory instruction). • Annual Self-Assurance demonstrating, through evidence gathering, compliance with legislation, regulation and operational policy. Self-assurance undertaken for 2023/24, and again in 2024/25 and reported to the Care Board demonstrating material compliance. • Monthly performance monitoring cycles demonstrate that incidents are being recorded in-line with the Care OSM and escalated as directed within policy and protocol, this includes, health, wellbeing concerns and adult protection cause for concern. These cycles also allow us to examine complaints, investigations and outcomes. This will be replicated in 25/26. • As per process, financial errors are reported to the Assurance Team to demonstrate that necessary enquiries/investigations have taken place with mitigating controls put in place. • Care and support services governance arrangements, including the authorising environment, are clear and have been approved, including the Care Business Framework. • Customer sentiment surveys are deployed annually to seek formal feedback on customer satisfaction with the service they receive. • The Care Inspectorate, in the main, conduct inspections either annually or ever 2 years producing reports that evidence outcomes from inspection (which includes monitoring the results from Care Inspectorate service visits and Group Assurance inspections) in place which assesses the quality of care and adherence to Care policies and procedures across Group. • The Protecting People Policy Framework sets out arrangement for protecting the people we work for, including those considered to be vulnerable. Work to deliver against the Framework is reported to the Wheatley Care Board. • Mandatory and service specific training is in place to give staff the knowledge to identify additional support needs in relation to the people we work for. A training needs analysis is completed for each service annually to identify any additional training requirements in relation to the specific needs of people using that service. Dynamic risk assessments are completed for service users where risk has been identified and revisited on an ongoing basis to ensure the care and support arrangements in place continue to meet their needs. • The BCP and local Service Contingency Plans are invoked where necessary and remain updated to ensure that priority frameworks inform the scheduling of care to the most vulnerable customers. • Care Strategic Review Project proposes improvements to data gathering that enhances reputation and credibility, with a sound evidence base. 					
Inherent risk	Residual risk	Risk Appetite level:	Previous / Next detailed Board update on operation of controls listed above:			
<p>Likelihood</p>	<p>Likelihood</p>	<p>Risk Appetite is MINIMAL (Light Green)</p>	<p>Care business plan and ongoing care performance reporting to Group and Wheatley Care Board (minimum quarterly); Care Self-Assurance to Care Board (October 2024); Strategic Care Review Update paper to Care Board (June 2024 / October 2024); Strategic Care Review Update paper to Group Board (November 2024); Strategic Care Review Update paper taken to Group Board (April 2025); Strategic Review update presented to each Care Board. Project concludes March 2025; Annual Self Assurance audit by external consultant taken to Care Board (February 2025); Customer Sentiment 24/25 update report at Care Board (February 2025)</p>			

RISK 053 Damp and Mould

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

Report

To: Loretto Housing Board

By: Laura Henderson, Managing Director

Approved by: Alan Glasgow, Group Director of Housing

Subject: Group Unacceptable Actions Policy update

Date of meeting: 24 November 2025

1. Purpose

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

2. Authorising and strategic context

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

3. Background

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

4. Discussion

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

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

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

4.4 There is currently one recorded case with unacceptable actions in place, which is managed in line with the existing Policy.

Staff and stakeholder engagement

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

Customer engagement

- 4.6 Alongside staff and stakeholder engagement, we undertook a digital survey to seek customer feedback. We received 185 responses from customers across Group, including 11 Loretto customers who had previously advised that they were happy to respond to surveys and had an interest in community safety. The key feedback was as follows:
- 46% of customers knew about the Policy
 - 63% agreed it's reasonable to restrict contact for unacceptable behaviour
 - 54% thought reviewing restrictions after six months is appropriate.
- 4.7 Customers indicated through the survey that incidents and individual circumstances should be evaluated independently. In particular, respondents expressed a view that vulnerabilities should be taken into account when applying the Policy.

Policy benchmarking

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

Key changes to policy

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

Implementation

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

5. Customer Engagement

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

6. Environmental and sustainability implications

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

7. Digital transformation alignment

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

8. Financial and value for money implications

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

9. Legal, regulatory and charitable implications

- 9.1 There are no current legal, regulatory or charitable implications for this report. The Employment Rights Bill is moving through the UK Government's policymaking process and is likely to receive Royal Assent later this year. Under the Bill, employers could be held responsible for 'third-party harassment' unless they can show that reasonable measures were taken to prevent it.

- 9.2 Additionally, should we decide to restrict a customer's contact, we must be careful to follow the process set out in our Policy to minimise any restrictions on a customer's access to the complaints process. This should be a last resort, as we are required to signpost the customer to the Scottish Public Services Ombudsman in these instances.

10. Risk Appetite and assessment

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

11. Equalities implications

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

12. Key issues and conclusions

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

13. Recommendations

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

LIST OF APPENDICES:

Appendix 1: Wheatley Group Unacceptable Actions Policy

Group Unacceptable Actions Policy

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

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

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

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

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

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

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1. Introduction

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

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

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

To achieve this, as a responsible employer we will:

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

2. Definitions: Unacceptable Actions

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

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

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

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

Aggressive or abusive behaviour (verbal or physical)

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

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

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

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

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

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

Unreasonable Demands

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

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

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

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

Unreasonable Persistence

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

Vexatious Behaviour

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

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

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

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

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

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

Inappropriate use of social media

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

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

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

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

3. Managing unacceptable actions

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

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

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

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

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

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

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

Informing the customer

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

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

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

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

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

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

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

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

Consequences of Unacceptable Actions; Restricting Contact and Services

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

Possible actions include:

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

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

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

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

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

Supporting our Staff

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

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

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

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

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

4. Review Period

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

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

5. Right to Appeal

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

6. Policy review

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

7. Other related policies

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