

**THE WEST LOTHIAN HOUSING PARTNERSHIP LIMITED
BOARD MEETING**

**Wednesday 18 August 2021
New Mart Road, Edinburgh**

AGENDA

1. Apologies for Absence
2. Declarations of Interest
3. Minute of Meeting on 26 May 2021 and Matters Arising

Main Business Items

4. Business and Remobilisation update
5. Anti-social Behaviour Framework 2021-2026
6. Stronger Voices, Stronger Communities – an update on our engagement activity
7. a) Financial statements for the year to 31 March 2021
b) Annual Internal Audit Report and Assurance Statement 2020/21

Other Business Items

8. Finance Report
9. Delivery Plan 2021-22 Quarter 1
10. Governance update
11. AOCB

Report

To: West Lothian Housing Partnership Board

By: Lynsey Fotheringham, Head of Housing

Approved by: Olga Clayton, Group Director of Housing and Care

Subject: Business and Remobilisation update

Date of Meeting: 18 August 2021

1. Purpose

- 1.1 To provide the Board with a business update and an update on our current remobilisation position and to seek Board approval to consult our customers for proposed changes to the new operating model.

2. Authorising and strategic context

- 2.1 The Group CEO has responsibility for business operations across the Group. The pandemic has had a significant effect on these operations and to reflect this the Board previously agreed the principles of our approach for how we might continue to develop our service. This approach remained subject to the rate at which Scotland moved through the phases of Scottish Government's route map. The Board is being asked to approve consultation with customers regarding changes to the way we deliver services our service.
- 2.2 Under the group Authorise / Manage / Monitor Matrix this Board has responsibility for authorising new operating /service delivery models in West Lothian.

3. Risk appetite and assessment

- 3.1 Our risk appetite relating to laws and regulations is "averse"; defined as avoidance of risk and uncertainty is a key organisational objective. The strategic risk register identifies the particular risk associated with non-compliance with health and safety requirements.
- 3.2 Our priority throughout the pandemic has been protecting the health and safety of our customers, our staff and the other people they come into contact with. We continue to mitigate this risk by undertaking rigorous health and safety risk assessments as part of our remobilisation, including compliance with all relevant Scottish Government guidance.

4. Background

- 4.1 The Scottish Government has continued to progress through its strategic routemap to ease restrictions. All of Scotland is now at level zero and we have been able to remobilise services safely in line with Government guidance.

5. Customer engagement

- 5.1 Our strategy has a very clear focus on enhancing our customer engagement and a significant element of co-development and co-design with our customers. As we have remobilised services we have been able to increase the levels of engagement. As part of the remobilisation we have been able to carry out neighbourhood walkabouts, home visits by Housing Officers, and provide a full repairs and Neighbourhood Environmental Team (NETs) service.
- 5.2 The Board has previously agreed the principles that set out our approach to deliver services in a way that takes the positive learning from the pandemic and delivers a much more agile and flexible service model that aims to give customers more choice and control of their services. This report is seeking approval to consult with customers on the new operating model. The consultation will seek customers views over a six-week period and will be reported back to the Board in November.

6. Discussion

- 6.1 In recent months we have continued to remobilise services where possible. We have largely been able to undertake the remobilisation plans previously outlined to Board (see table below). Our aim is still to fully remobilise by September but we have slightly flexed our plans to allow the phased reintroduction to continue to the end of September if necessary. This is due to the current situation which is more fragile than anticipated with rising numbers across much of the country. We will therefore need to continue our regular review of remobilisation plans and adapt these as required. It is possible that the situation will change relatively rapidly.

	End April	End May	June-August	September onwards
Repairs	Fully remobilised Customer comms plan launched		End August – lockdown backlog cleared	Fully remobilised
Investment	Non-complex internal investment commences		Internal investment scales up to full remobilisation	Fully remobilised
Compliance		Standalone electrical inspections, TMV maintenance and M&E works recommenced	Fully remobilised	Fully remobilised
Housing Officer	Increased patch-based activity	Increased visibility in patches and increasing visits	Fully remobilised	Fully remobilised
Income collection	Increased Doorstep visits	Increased home visits	Fully remobilised	Fully remobilised
Allocations/ Homelessness	Mutual exchanges resumed		Fully remobilised	Fully remobilised
Stair cleaning		Phased reintroduction	Fully remobilised	Fully remobilised
Environmental	Fully remobilised			
Anti-social Behaviour, Group Protection	Doorstep visits	Increased visibility in patches and increasing visits	Fully remobilised	Fully remobilised
Fire Safety Visits	Fully remobilised			
Care / support			Services remobilised with blended model for some outreach services	Fully remobilised
New Build	Fully remobilised			
Foundation	Emergency response Fund closed	Bursary programme launched Environmental apprentice recruitment	Fully remobilised	Fully remobilised

6.2 Our initial plans to complete the backlog of repairs noted during lockdown restrictions early in 2021 has progressed with only 1 of the 64 repairs that were paused still to be progressed. Since the remobilisation of the repairs service customers are having to wait slightly longer for appointments for complex repairs but through very proactive resource management we have been able to keep this within our target timescales. Further detail on the repairs remobilisation is detailed in section 6.30.

6.3 A more detailed update on the current position and future remobilisation of our services is set out below.

Housing Services

6.4 During the pandemic we have continued to operate the vast majority of our services with staff largely home based. The gradual easing of restrictions by the Scottish Government has now allowed us to be much more active and present in local communities. Housing officers are now carrying out regular patch visits and meeting customers in their neighbourhood.

Housing Officer role

- 6.5 For most of 2020 and all of 2021 housing officers have been based at home. In line with restrictions, we have visited customers only where there has been an exceptional need. We have provided invaluable support and contact to customers, primarily through the use of telephone and digital means.
- 6.6 Here are some examples of support offered by Housing staff:
- Assistance was provided to a customer in Winchburgh applying for a Crisis Grant. The customer has been struggling and did not have any data left on their phone so could not complete the form themselves. The Housing Officer was able to provide the necessary support to apply.
 - When a customer's job came to an end and he found himself out of work he turned to his Housing Officer for assistance. He had a small arrear that was really worrying him and he'd been struggling to afford food. The Housing Officer arranged for money from the Helping Hands fund to assist the customer with their arrears and also arranged for a food voucher for them. The customer also had a gas cooker which he had been unable to get installed as he couldn't afford the installation by a Gas Safe engineer. His Housing Officer was able to assist in getting the customer an electric cooker from Home Comforts. The customer was very grateful for all the assistance.
 - We recently signed up a gentleman who had been referred to us from West Lothian Council. The man, in his late 80's, has a cancer diagnosis and was struggling with the stairs in his upper flat. The Housing Officer had identified that the property was in need of a kitchen upgrade and at the viewing was able to advise the customer that his kitchen would be replaced with one of his choosing. The customer is delighted and looking forward to living in his new home.
 - We'd been having difficulty engaging with a customer who was accruing rent arrears. Her direct debits were bouncing and she wasn't responding to any of our contact attempts. The Housing Officer made an evening call which was answered as the customer didn't expect us to be making contact at that time. The customer and Housing Officer went on to discuss the situation and what assistance we could offer. A Discretionary Housing Payment application was appropriate and the Housing Officer assisted in the completion resulting in a successful award of £450 towards her arrears. The customer now has a repayment arrangement and has a more positive approach to her engagement with us.
- 6.7 As part of the phased move to our new operating model we have commenced neighbourhood walkabouts with customers to increase our visibility and to identify issues that would normally have been picked up by housing officers on their patch. These walkabouts are co-ordinated by the community engagement officer and generally include the housing officer for the patch, relevant NETs team leader and an investment officer. They consider the external condition of buildings, stairs and other communal areas and the neighbourhood environment. It also provides an informal opportunity for customers to meet our team in their local community to have a general discussion about issues that matter to them.

- 6.8 In line with our strategy and our community based approach, our new model will mean that customers do not need to come to an office. In most circumstances they will either use digital contact, or housing officers can come to them and meet them at their home. Under Level zero, housing officers have been able to undertake essential visits in customer homes. PPE and social distancing requirements are still very much in place in line with operating safety manuals already used by our repairs staff.

Income collection

- 6.9 Maintaining our rental income to fund our services and supporting our customers to pay their rent have been key priorities through the pandemic. As a result, we have maintained a sector leading arrears position and have achieved the target for keeping Gross rent arrears at 2.97% in the first quarter of the financial year.
- 6.10 Whilst much of our contact with customers in arrears remains via telephone and digital contacts we have been able to start visits for customers in their homes in relation to rent and associated support.
- 6.11 The 6-month notice period for Notice of Proceedings and evictions has been extended by the Scottish Government until 30 September 2021. The new escalation processes which we have developed to take account of this are now well embedded. This includes the potential to escalate to Notice of Proceedings where we are satisfied that the household 'won't pay' rather than 'can't pay'. This will only be done following a review of individual cases, including an assessment of any Covid-19 impact and any potential vulnerabilities.
- 6.12 As we have remobilised, we will continue to build on the innovation we have undertaken throughout the year. Our housing officers now have access to bespoke reporting through our PowerBI dashboards which distils complex information into easily readable visuals and data.

Allocations and Homelessness

- 6.13 Allocations have been remobilised since August 2020 and are operating in a business as usual mode with additional safe working procedures. Providing homes for homeless households and other priority households continues to be the priority and we have:
- Continued to focus on improving our void turnaround performance. As at end of quarter 1 our average relet time is 6.5 days.
 - Let 19 homes since April, with 2 of these to homeless customers.
- 6.14 Our commitment to addressing homelessness by allocating 50% of our re-lets to homeless households is currently below target due to a request made of us by West Lothian Council. Details on this and the plan in place to address this can be found in the Quarter 1 Delivery Plan paper in a later agenda item.

- 6.15 We are moving closer to being able to welcome the customers decanted following the floods at Pyothall back to their homes. Final works are underway and a phased return is in place as properties are reinstated. Regular contact has been maintained with the customers who are looking forward to their return home.

Wraparound support

- 6.16 In Quarter 1 around 110 customers in our households received support from Wheatley Foundation.
- 6.17 Eat Well continues to support tenants who are going through periods of financial difficulty. Supermarket vouchers are sent to tenants' phones or emails which allows them to choose items for their weekly shop. The value of the voucher provided depends on the number of people living in the household. In Q1, customers from 18 of our households were provided with vouchers to purchase food, to the value of £880. One third of our tenants supported by Eat Well have been single person households and one third have been households with children.
- 6.18 The Wheatley Works team have continued to support tenants from across the Group get back into training and employment. There has been one opportunity for one of our tenants during this quarter. This opportunity has come through Changing Lives programme.
- 6.19 Applications for Bursaries opened in April. Fifty awards will be made each year by the Wheatley Foundation to tenants across Group, providing them with financial support as they study. This year the Foundation received a total of 108 applications including 4 from our tenants. Applications will be assessed in Q2 and awards made shortly after.
- 6.20 The Emergency Response Fund, a significant support to customers across group throughout the pandemic, ended in quarter one. One of our tenants was supported in the quarter before the fund closed in May. In total 60 of our tenants have been supported by the fund, since it was created in March 2020 in response to the pandemic.
- 6.21 The new Barony Support Fund was then launched in June to support tenants in financial difficulty with one-off purchases. Items purchased in the 4 weeks of operation in quarter 1 include household items, mobile phones and white goods. One of our tenants has been supported by the fund in Q1.
- 6.22 My Great Start has supported 16 of our tenants in Q1 with financial advice including support with benefit applications. Three households have been supported by Home Comforts to access furniture and white goods.
- 6.23 Dolly Parton Imagination Library delivered 212 books to 73 children under five in living in our homes during quarter one, continuing to support early-years literacy and children's introduction to books.

- 6.24 A £50k Creative Scotland grant is funding a Youth Arts Small Grants programme involving 150 young people across all Wheatley communities. The Foundation ran the grant application process and distributed small grants to independent artists to deliver engaging projects to young people in Q1, supporting new local activity, community partnerships and securing employment opportunities for artists. Projects have now begun across Wheatley RSL's including Glitter Cannons (LGBT youth group). This group will support young people in creating skin art, designing temporary tattoos using colours and graphics to tell their own story around self-harming and emotional scarring. This project is based in West Lothian and will support young people between 15-25 years old.

Fire safety, Anti-social Behaviour, Group Protection

- 6.25 Fire safety visits for vulnerable households were recommenced last summer and continued through the second lockdown.
- 6.26 The Home Safety, Anti-social Behaviour and the Group Protection Teams are now well established in their new model. Contact with relevant agencies is almost entirely digital and has worked well throughout the pandemic. Officers recommenced home visits from July.
- 6.27 There continues to be particular concern for the victims of domestic abuse during this period who may have had less opportunity to seek out support. It is possible that there will be increased reporting of abuse as restrictions ease. As outlined during the recent Board presentation, staff are well trained on domestic abuse and this provides them with the knowledge, skills and experience to best support victims, connecting them to our services or to bespoke domestic abuse support. When required, we are able to draw on the specialist knowledge and services of the Group Protection Team which can guide staff dealing with complex cases.
- 6.28 In Quarter 1 we dealt with 23 incidents of anti-social behaviour. A report on the new Group Anti-Social Behaviour Framework and how this will support us will be presented later on the agenda at this Board meeting.

NETs Service

- 6.29 Our NETs team have been engaging in Keep Scotland Beautiful (KSB) assessments during June. The NETs service has worked in partnership with KSB since 2016 when they designed and developed an audit methodology and award scheme for assessing and reporting on environmental quality across all stock types and areas, including West Lothian. Following the KSB audit / assessment an independent report is produced that provides a score and detailed feedback on each of the elements we audit. The final overall percentage score is then graded into one of four Wheatley award levels.
- 6.30 The four award levels for the Wheatley Group are as follows:
- Under 50% - no award;
 - between 50-60% - 3 Star;
 - between 60-80% - 4 star; and
 - over 80% - 5 Star.

- 6.31 At our first inspection in 2018 we achieved a 5 Star award. KSB carried out an assessment in June 2021 as phase 2 of our inspection programme and not only did we retain our 5 Star award we were able to supersede our score from the previous award.

Customer engagement

- 6.32 Our new customer engagement framework was approved by the Board in February 2021. It provides the basis for delivering our strategic aim of increased customer control. An update on our engagement activity is provided as a later agenda item at this Board meeting.

Repairs, Investment and Compliance

Repairs

- 6.33 During Quarter 1 of 2021/22 948 repairs have been completed to our customer homes. Emergency repairs have been delivered on average in 2.43 hours. The volume and nature of the repairs carried out have varied in line with changing government restrictions on undertaking works in and around homes and we are now carrying out higher number of non-emergency repairs. These are being completed within 4.98 days.
- 6.34 Since resuming the full repairs service we have noticed a significant pent up demand in new repairs reported. We delivered 691 reactive repairs in Quarter 1 of this year compared to 354 reactive repairs in Quarter 1 of 2019. (We have excluded Quarter 1 of 2020 due to the lockdown). This is an increase of 95% however cognisance should be given to the increased stock numbers following the transfer of Barony properties and the addition of our new build site in Whitburn.

Handyperson service

- 6.35 The handyperson service has been suspended throughout the pandemic. With the effective roll out of vaccines to the initial priority groups and the Government's easing of restrictions we were able to re-introduce this service from May 2021.

Investment

- 6.36 The external investment workstreams which continued throughout the lockdown since January are progressing well. Internal workstreams previously suspended at the beginning of January have been remobilised in stages depending on the nature of the work to ensure the safety of our customers, contractors and staff.
- 6.37 We have now remobilised our internal investment programme. As at the end of July we are delivering new boilers and a programme of new windows and doors as part of the Barony ballot promised previously reported to Board. The work on the pilot property has been well received and the customers are looking forward to seeing the finished product, particularly as they have chosen a contrasting style to their existing windows and doors giving the properties a fresh new look.

- 6.38 Our customer engagement process for investment works has been implemented to support this and provide enhanced assurance to customers around our robust approach to health & safety when delivering improvement works in their homes.
- 6.39 Aids and Adaptations works have been prioritised based on both need and risk of our customer referrals. In 2021/22 four adaptations have been carried out, continuing to prioritise customer needs. There is detailed engagement with customers to ensure that they understand the process for the adaptation installation and the procedures we will follow to keep them safe.

Compliance

- 6.40 Our compliance works include programs to meet our legal and regulatory obligations, as well as works we undertake as part of keeping our customers and assets safe. All programs to meet our legal and regulatory obligations are operational despite current restrictions including gas safety, legionella prevention and smoke and heat detector installations. The current status of each is as follows:
- 6.41 **Gas safety** – we remain 100% compliant in this area.
- 6.42 **Legionella testing/water management** – work is continuing as planned and all required works have been carried out.
- 6.43 **Smoke and Heat Detector Installation** –work in this area is continuing as it is considered essential under the guidelines for the restrictions introduced since January. Good progress has been made with just over 88% of installations carried out. We are on track to complete by the deadline of February 2022 set by Scottish Government.
- 6.44 **Periodic electrical inspections** – Good progress has been made with 90% of inspections carried out. We are on track to complete this by the deadline of March 2022.

Development

- 6.45 The Scottish Government has committed £3.5bn in the five-year period from 2021/22 to the delivery of affordable housing. This was one of the main pillars within the Scottish Government Housing to 2040 strategy launch.
- 6.46 Linked to this we have been participating, as one of the Scottish Federation of Housing Association representatives, as members in the Scottish Government's Affordable Housing Investment working group. We are represented by the Director of Development. This working group is tasked with bringing back recommendations to both the Cabinet Secretary for Social Justice, Housing and Local Government and to the COSLA Leadership on affordable housing Grant benchmarks for 2021/22 and beyond.

- 6.47 Towards the end of Quarter 2 we are expecting the first of our handovers at Jarvey Street, Bathgate, closely followed by the first handovers in our Almondvale development in Livingston. Both sites will provide homes for customers leaving their shared living settings as part of the re-provisioning work previously reported to Board. Regular liaison is on-going between Housing, Wheatley Care and Development to ensure the transition for the people we work for is as seamless as possible.

Staffing

- 6.48 We have had no staff on furlough since January. Our sickness level at the end of Q1 is 0.23%, greatly improved from 2020/21 when we experienced long term absence within the team.

New Operating Model

- 6.49 The Board previously supported the principles for a new operating model. The pandemic has accelerated changes to the way we deliver services and the way customers access services. Our new 2021-26 strategy, **Your Home, Your Community, Your Future** sets out an exciting new way of delivering services that gives more control and power to customers and uses a much more agile delivery model that increases access to services 24/7 through the use of technology whilst also ensuring we deliver face-to-face services in local communities.
- 6.50 The operating model has four key components:

Customer First Centre – Our customers already have access to 24/7 service through the Group Customer Service Centre (CSC). However, we have ambitions to further improve the CSC where we anticipate resolving up to 95% of customer queries at the point of contact by basing housing experts in a new Customer First Centre. This will free up Housing Officers to spend more time out on their patches to deal with complex cases, support the most vulnerable customers and engage with their communities.

More services in your home - Enhancing the presence of Housing Officers in communities – the message is you do not need to come to us, we will come to you.

Do more online - Improved online self-service options to allow customers to do more for themselves at a time and place to suit them.

Centres of Excellence - If customers don't want to see us at their home, they can still choose to meet us at a convenient location, including our new Centres of Excellence in Glasgow and Edinburgh. Both will be available for customers to use the internet, for wider community activities and as learning centres.

6.51 Consultation

Under the Housing (Scotland) Act we have a statutory duty to formally consult all tenants on our new operating model and tenant participation strategy. An omni-channel approach to consultation will be the hallmark of this approach, using face-to-face, phone and digital methods. We have also produced a traditional printed booklet to be sent to all customers. We will utilise email, GIFs through WhatsApp and social media to promote this consultation and encourage customers to provide feedback.

6.52 The proposal is to consult with all of our customers on this innovative blended operating model. A copy of the proposed consultation document is included at Appendix 1.

6.53 Key dates in proposed consultation launch are:

- Proposal to Board at this meeting - 18 August 2021;
- Consultation runs from approximately. 30 August - 24 September;
- Initiated through digital channels on 20 August ;
- Letter and consultation pack mailed to all tenants by end of August;
- Dedicated website area and promotion via Online Services;
- Sustained promotion through digital channels throughout consultation period;
- Proactive calls to customers via the Customer First Centre and local housing staff; and
- Consultation results presented to Board on 24 November 2021.

Key issues and conclusions

6.54 The Scottish Government's current roadmap out of lockdown now provides more definitive timescales for changes. This has provided us with greater certainty in terms of our remobilisation plans than at any previous stage.

6.55 As indicated in the report, a key focus is how we clearly communicate our remobilisation of services to customers. An equally important element will include internal communication to staff, including ensuring our health and safety protocols and procedures continue to be well understood.

6.55 As we move towards implementation of our proposed new operating model it is important we engage with customers to get their views. This report sets out the proposed consultation with customers as we develop our new blended approach to service delivery. A copy of the proposed consultation document is included in Appendix 1.

7. Digital transformation alignment

7.1 The remobilisation of services is aligned with the use of new digital communications, rent payment methods and service delivery as part of our new agile operating model.

8. Financial and value for money implications

8.1 Our remobilisation plans are reflected in the 2021/22 budgets.

9. Legal, regulatory and charitable implications

- 9.1 A key focus will continue to be complying with the prevailing legal and regulatory restrictions at all stages of our remobilisation. We continue to update the Scottish Housing Regulator as appropriate on our remobilisation activities.

10. Equalities implications

- 10.1 We will continue to take special account of those who have underlying health conditions.
- 10.2 We have undertaken an initial Equalities Impact Assessment (“EIA”) in relation to our new operating model and engagement approach. The assessment did not identify any adverse implications for our tenants. Rather, the approach to enhancing our accessibility is expected to have a positive impact. In terms of diversity, the widening of our engagement structure will have a positive impact and broaden the range of customers segments who engage with us.

11. Environmental and sustainability implications

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

12. Recommendations

- 12.1 The Board is asked to:
- 1) Note the progress made towards fully remobilising services across the business; and
 - 2) Approve consultation with our customers for the new blended operating model.

List of Appendices

Appendix 1 – Consultation document

Report

To: West Lothian Housing Partnership Board

By: Lynsey Fotheringham, Head of Housing

Approved by: Olga Clayton, Group Director of Housing and Care

Subject: Group ASB Framework 2021-2026

Date of Meeting: 18 August 2021

1 Purpose

- 1.1 This report seeks adoption of the new Group Anti-Social Behaviour Framework, which supports the ambition in ***Your Home, Your Community, Your Future*** to create calm and peaceful communities where people are proud to live.

2 Authorising and strategic context

- 2.1 Work on Anti-Social Behaviour (“ASB”) is a key part of our strategy, “Your Home, Your Community, Your Future”. It expands across our housing, care and foundation activities. Our approach to ASB and the broad services we deliver are strategic decisions.
- 2.2 Under the Group Authorising Framework, the approval of any Group wide frameworks is reserved to the Group Board. Our Board is responsible for overseeing the implementation of the framework within our area of operation.
- 2.3 The ASB Framework is a strategic commitment directly linked to the ‘*Delivering peaceful and connected neighbourhoods*’ strategic outcome in our Group strategy. Approval of the framework will mark an element of this strategic outcome having been achieved. It is also linked to the delivery of a number of strategic results. This strategic context is set out in more detail within this report.

3 Risk appetite and assessment

- 3.1 Our risk appetite for service improvement is “open”. This means we are prepared to take the risk of adopting the approach that is most likely to result in the successful delivery of our service objectives.
- 3.2 Shifting the balance of power towards the customer brings some risk as we empower customers to take more decisions around priorities and resources. A robust framework within which we can support customers and use our strategic delivery plan to manage this transformation will help to mitigate any risks.

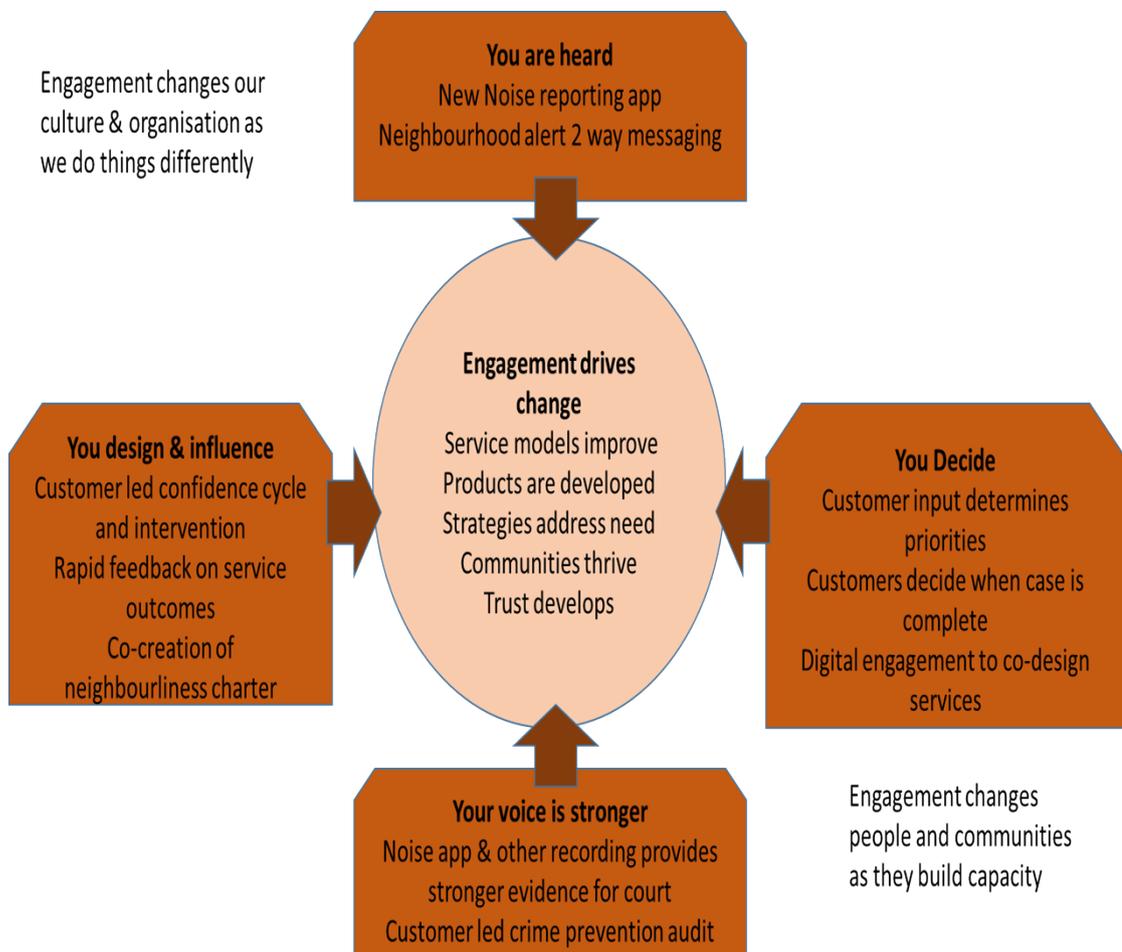
4 Background

- 4.1 Our Strategy highlights some key commitments which relate to ASB. The primary action is to utilise the Community Improvement Partnership approach to take communities from being merely safe to ones that are improving, peaceful and with high levels of satisfaction.
- 4.2 This will be based on building a confidence cycle with and for communities. The cycle will support communities to become more resilient through increased confidence to report crimes and other issues. In turn, this information will help us and our community partners to support those living there to make their communities stronger and more peaceful.
- 4.3 The ASB Framework and the services we have access to as part of the Group will allow us to identify and address anti-social behaviour as defined by legislation and forge local connections and partnerships to support our customers to live in a peaceful community. The ASB Framework provides robust measures for dealing with all anti-social behaviour, however particular focus will be given by our staff in addressing the low-level complaints we more commonly receive.
- 4.4 The ASB Framework sets out how we will deliver this and also supports a number of other key commitments in the strategy including:
- Customers should have control over their own lives and be able to direct the design of services.
 - Customers should be helped to sustain their home including receiving understanding of trauma, adverse childhood experiences, substance abuse, mental health issues and the impacts of homelessness.
 - Work will be undertaken with our communities to co-create a 'Wheatley Place Measure' that reflects the criteria our customers identify as crucial to a successful and resilient community.
 - Creation of a new community entrepreneurship and resilience programme, demonstrating our faith in people and our willingness to create opportunities for them to thrive.
 - Establishing a virtual network and leveraging our physical assets and spaces within communities, such as commercial units and corporate office footprint, empowering communities to come together in creative ways.
 - Putting the 'Neighbour' back into our neighbourhoods, creating a modern version of 'Neighbourliness' as a hallmark of our communities by 2026.
 - Creating digital neighbourhoods where our customers can connect virtually to further support each other and co-create local solutions to improve their community.
- 4.5 We know from our customers that anti-social behaviour plays a major part in whether they are happy in their home and neighbourhood, whether they feel safe as well as how satisfied they are with us as a landlord. This can be true whether it is high level crime or issues relating to factors such as noise. Our priority will therefore always be to resolve and reduce anti-social behaviour so that our customers can live peacefully. We will use enforcement wherever necessary to achieve that aim. Our customers will be at the centre of helping us to identify the issues that matter to them and telling us when we have resolved them.

- 4.6 Utilising our resources across Group we already have a reputation for leading the sector and creating innovative approaches to anti-social behaviour. In the last few years we have developed our Community Improvement Partnership which brings together our staff with colleagues in Police and Fire in each of our key geographic areas to provide a co-ordinated approach to issues.
- 4.7 Our “confidence cycle” approach encourages customers to become involved in resolving ASB and strengthening communities. This is based on strong data analytics which shows us the key issues and priority areas. We then work with customers to develop targeted plans to deal with the issues in their neighbourhoods.
- 4.8 Our innovation has led to a range of new policies and approaches including:
- Protecting people policy;
 - MAPPA policy;
 - Child protection policy;
 - Adult support and protection policy; and
 - Domestic abuse policy.
- 4.9 Our approaches have been widely recognised across the Country. This includes the Scottish Government’s Divert & Deter, Serious and Organised Taskforce recognising the CIP operating model as best practice – resulting in a delegation from the Home Office visiting Wheatley.
- 4.10 Police Scotland’s Partnerships Prevention & Wellbeing Division have recognised the CIP Operating Model and promote our approach to their other partners. They regularly bring visiting forces from across the world to showcase the work they do in partnership with Wheatley. Two recent examples are the visit of the Deputy Chief Officer from Toronto and of 20 Senior Officers from Beijing.

5 Customer engagement

- 5.1 Customer engagement and control is at the heart of this Framework. The diagram below shows how some of the key actions in this Framework also support our strategic priorities for customer control.



6 Discussion

Vision and Aims

6.1 In addition to supporting our strategic vision:

Customers have increased control over their services, their communities and their lives, with new opportunities for building skills and resilience.

6.2 The ASB Framework sets out a vision and aims for this area of work:

Vision:

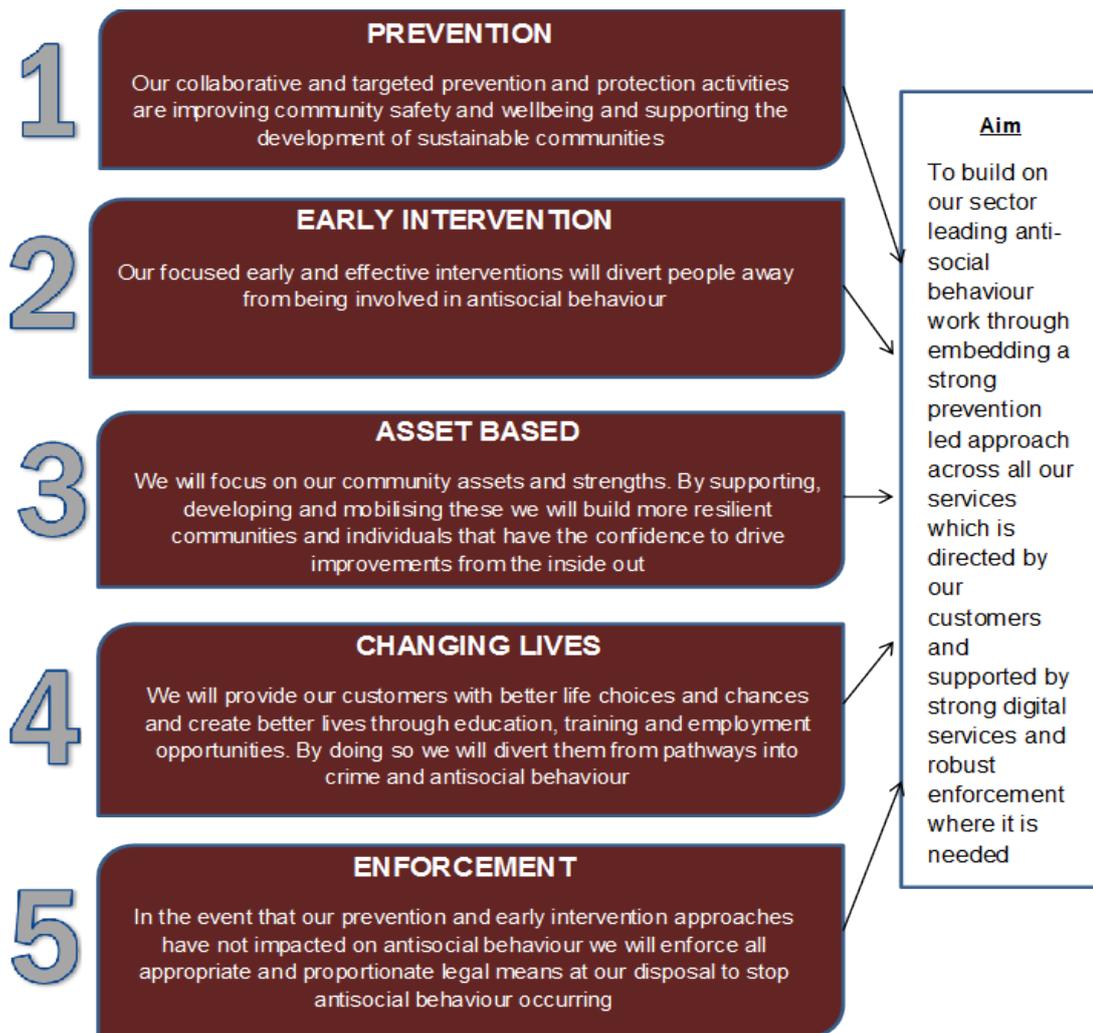
Our Antisocial Behaviour Prevention and Mitigation Framework will create calm, peaceful and sustainable communities where people are proud to live.

Aim:

To build on our sector leading anti-social behaviour work through embedding a strong prevention led approach across all our services which is directed by our customers and which is supported by strong digital services and robust enforcement where it is needed.

Our approach

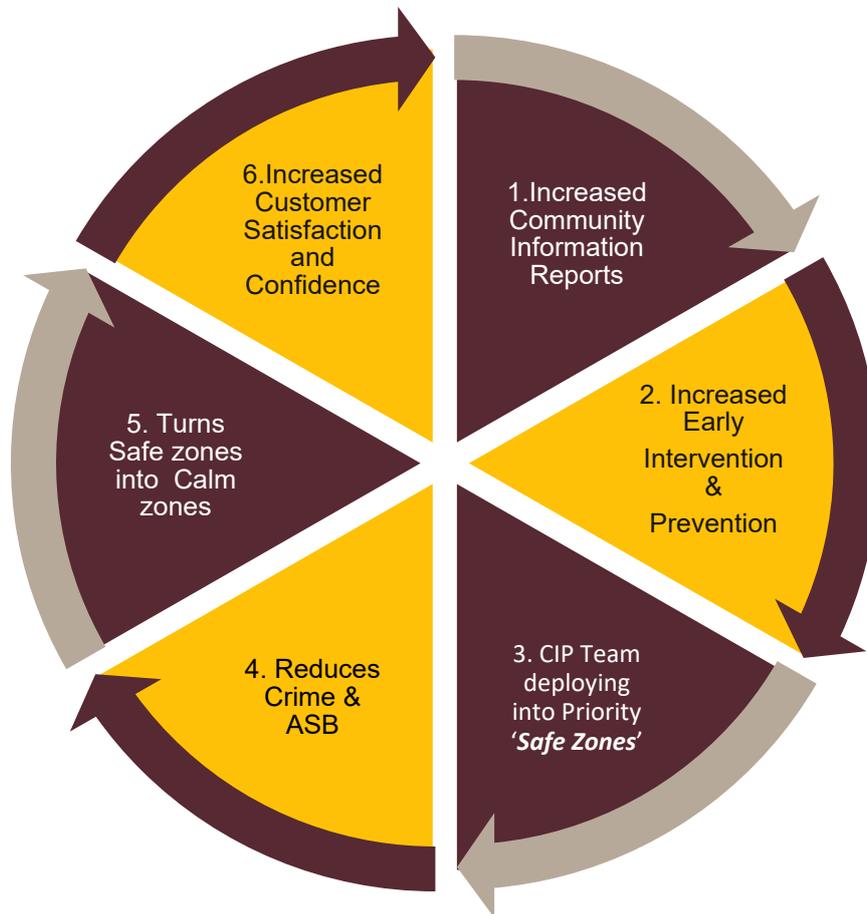
6.3 There are five key strands to our approach going forward:



6.4 This structured approach to anti-social behaviour focuses on ensuring that our customers will be empowered to make their own choices about the services they want, be properly equipped to do things for themselves and involved in the design of products and services from start to finish. It will support digital provision of services where these are appropriate, recognising that it is important that “no-one is left behind”. In particular, we recognise that those who are living in socially deprived communities may have particular challenges in gaining access to or using digital services.

6.5 Success will be dependent on strong relationships with our customers and communities. They must feel confident to report issues and information to us and our partners. Our ability to provide quality resolutions to issues and to respond to customer feedback will be vital to this.

6.6 Our “confidence cycle” will be an important element of this approach. This helps increase people’s willingness to provide information and report issues. In turn, the information we receive can be used to target crime, reducing incidence and creating a more peaceful community. This then further encourages the community to have confidence in sharing information with housing officers and police to create further benefit.



- 6.7 This Framework recognises that preventing ASB requires a partnership of many organisations. We will continue to support local authorities and Police Scotland in their statutory role to prevent anti-social behaviour. Our people are supported and trained to think innovatively, to think yes together with their customers and to provide leadership in digital transformation. We will use this innovative style to help provide thinking which challenges and encourages a new approach to services. We will work with partners across the country to share innovation and best practice to deliver our aims.
- 6.8 We are aware that customers can be subject to anti-social behaviour because of a disability or support requirement. Whilst not a feature of our anti-social complaints to date, if it were, we would ensure we worked jointly with relevant support providers, including Wheatley Care for the people we work for, to support customers appropriately.
- 6.9 We will continue to develop links to support customers identified as vulnerable through the reporting of anti-social behaviour. Of those reports received, a significant number involve customers we are identifying as requiring support. Whilst we do not have high instances of anti-social behaviour, these particular incidents can be both difficult and time-consuming to address. We will use our Group links with the CIP and resources within external agencies to work on solutions for both the affected customers and the community as a whole.
- 6.10 Excellence is embedded in our DNA, so we will build on the innovative approaches that we have used to date. We will continue to push towards outstanding service, challenging our performance and outcomes in each area. As part of our new relationship with customers, we will measure this in different and more stretching ways, looking to further improve the aspects of service which matter most to customers.

6.11 The actions within the Framework are aligned with our Group strategic themes. Some of the key actions are outlined in the diagram below:



Measuring Success

6.12 The key Group strategic target for this Framework is that **70% of our customers live in neighbourhoods categorised as peaceful**. However, the Framework also support a number of other strategic targets:

Delivering exceptional customer experience:
<ul style="list-style-type: none"> ▪ Overall customer satisfaction is above 90% ▪ RSL tenant satisfaction with value for money is increased to 85% ▪ Overall satisfaction amongst households with children is improved to 90% ▪ 90% of customers feel they can participate in the landlord’s decision making ▪ 95% of customers actively engaged in shaping services feel they participate in decision making
Changing lives and communities
<ul style="list-style-type: none"> ▪ 4,000 jobs, training and apprenticeships delivered ▪ 250 customers have been supported to attend higher education and university through Wheatley bursaries ▪ 10,000 vulnerable children benefit from targeted Foundation programmes
Enabling our ambitions
<ul style="list-style-type: none"> ▪ Over 50% of customers actively use their online account to make transactions with us

Context

6.13 Our extensive experience in dealing with anti-social behaviour, backed up by research in Scotland and elsewhere, has given us a greater understanding of underlying causes. This has shown that the prevalence and type of ASB are often directly linked to issues such as childhood adversity, poverty and vulnerability.

- 6.14 We will use this knowledge to deliver our early intervention and prevention approach. While this will reduce anti-social behaviour we will still use appropriate and proportionate enforcement action where it is needed. This will be the case where the issues are so severe that they need to be dealt with immediately or where other action is having no effect.
- 6.15 In some cases, we may need to move the perpetrator to protect the community. This Framework sets out how we will seek to do this through planned pathways wherever possible. Working with partners, we plan to establish alternative accommodation routes to break a cycle of anti-social behaviour and eviction.
- 6.16 Drug and alcohol misuse is a major issue across Scotland. We also know that drug and alcohol dependencies can increase the likelihood of anti-social behavior. Being able to support and treat customers to help them overcome or reduce use should be a key part of reducing ASB. Our employability and training options will also help to provide hope and purpose which can often help stabilise misuse or prevent a spiral of decline.
- 6.17 Mental health issues are growing in prevalence in society. It is likely that the Covid-19 pandemic will only increase this trend. Our experience is that issues can often arise where our customers have low level mental health issues.
- 6.18 These are often not sufficient for them to meet the criteria for specialist support. Despite this, our customers can struggle to live safely in a home and some will also behave in an anti-social way as a result. Using our care expertise and strong partnerships, we will seek to find ways to increase the support to these customers.
- 6.19 In a West Lothian we are finding that it is levels of vulnerability which increase our instances of reported anti-social behaviour. Recurring themes include domestic incidents which are being reported as anti-social behaviour and deteriorations in mental health where perceptions of events are altered.
- 6.20 The nature of ASB is changing. Technology increasingly enables people to commit and hide crime. Fraud and organised crime are growing and often targeted at those who are vulnerable or poor. Child sexual abuse and exploitation remains at significant levels while reports of adult concern have risen in recent years. Stalking and harassment continue to be an issue and now often involves an element of online activity. In addition, "outing" of sex offenders has become much more prevalent, often using online forums. While the crime element of this trend is dealt with by the Police we increasingly have to support our communities and deal with the outcomes.

7 Digital transformation alignment

- 7.1 The digital element of work in this Framework aligns with two themes in the transformation plan: Providing better online services for our customers and transformation of our housing service delivery. The Framework commits us to providing digital delivery where that is appropriate to the service, while ensuring that no-one is left behind.
- 7.2 The key aspects of this will be the introduction of a new noise app which allows recording and digital reporting of noise and the rapport messaging system which

provides 2-way communication for our customers. In addition, we will use the new digital customer engagement tools that are in development to ensure customers are able to co-create and refine our services.

- 7.3 This work is already built into our transformation plan over the next two financial years.

8 Financial and value for money implications

- 8.1 There will be costs associated with a number of the proposals. As they are developed, they will be considered via business case assessment and reported to Board as appropriate. Most costs will be incorporated within the existing budgets.

9 Legal, regulatory, and charitable implications

- 9.1 The Antisocial Behaviour etc (Scotland) Act 2004 is the primary legislation for dealing with antisocial behaviour in Scotland. The Act sets out a range of responses made available to Local Authorities and Police Scotland. The legislative framework that governs how all Group RSLs currently interpret and manage antisocial behaviour is contained within *the Housing (Scotland) Act 2014* and *the Antisocial Behaviour etc. (Scotland) Act 2004*. The 2004 Act states that a person is engaging in antisocial behaviour if they:

- Act in a manner that causes or is likely to cause alarm and distress; or
- Pursue a course of conduct that causes or is likely to cause alarm or to distress to at least one person not of the same household as them.

- 9.2 The *Housing (Scotland) Act 2014* further enhanced the powers available to social landlords for the management of antisocial behaviour. This includes:

- Social landlords will have the power to convert an existing tenant's Scottish Secure Tenancy (SST) to a Short SST (SSST) or to grant a SSST to a new tenant in cases where there is evidence that the tenant, a member of their household, or a visitor, has been involved in antisocial behaviour in or near their home within the last three years;
- Simplifying the eviction process in cases involving serious antisocial behaviour by allowing social landlords to make use of an existing conviction as grounds for possession. The tenant must have been convicted within the last 12 months; and
- Clarifying that a social landlord can suspend an application for social housing under certain prescribed circumstances.

- 9.3 The Scottish Social Housing Charter was introduced by the Scottish Government to help improve the quality and value of the services that social landlords provide

and support the Government's long term aim of creating a safer and stronger Scotland.

Outcome 6 of the Scottish Social Housing Charter states that:

“Social landlords, working in partnership with other agencies, help to ensure that:

Tenants and other customers live in well-maintained neighbourhoods where they feel safe.”

9.4 This outcome covers a range of actions that social landlords can take on their own and in partnership with others. It covers action to enforce tenancy conditions on estate management and neighbour nuisance, to resolve neighbour disputes, and to arrange or provide tenancy support where it is needed. It also covers the role of landlords in working with others to tackle antisocial behaviour.

9.5 The Scottish Housing Regulator have developed the following indicators to assess how well housing associations and the Group are managing complaints of antisocial behaviour and our wider estates:

- **Indicator 13:** Percentage of tenants satisfied with the landlord's contribution to the management of the neighbourhood they live in; and
- **Indicator 15:** Percentage of antisocial behaviour cases in the last year which were resolved.

10 Equalities implications

10.1 A full Equality Impact Assessment has been carried out for this Policy. The assessment has reviewed the impact of actions against the protected characteristics identified in equalities legislation. This shows that the Framework will have a positive or neutral impact on all characteristics because it will reduce levels of anti-social behaviour, increase community resilience and provide support to vulnerable households.

11 Environmental and sustainability implications

11.1 The review has no direct environmental or sustainability implications. However, the aim to provide digital service wherever possible will limit unnecessary journeys and use of offices.

12 Recommendation

12.1 The Board is asked to note adoption of the Group Anti-Social Behaviour Framework.

List of Appendices

Appendix 1 - Draft Group Anti-Social Behaviour Framework

Our Antisocial Behaviour Prevention Framework - Peaceful Places in Thriving Spaces 2021 - 2026

P REVENTION

E ARLY & EFFECTIVE INTERVENTION

A SSET BASED APPROACH

C HANGING LIVES

E NFORCEMENT

Our Journey from Excellent to Outstanding

CONTENTS

- 1. Introduction and background**
- 2. Our Organisation**
- 3. Building on Our Success**
- 4. Our Vision to end Anti-social behaviour**
- 5. Voice of the customer**
- 6. National and Group context**
- 7. Our Strategic and Operational Response**
- 8. Our Approach**
- 9. Investigating incidents and using our powers**
- 10. Legislation, planning and guidance**
- 11. Complaints**
- 12. Responsibilities**
- 13. Review**

Introduction and background

The Wheatley Group (The Group) is Scotland's leading housing, care and property management organisation. It comprises of five Registered Social Landlords (RSLs), one care organisation and one commercial organisation. In addition to these organisations, the Group also entered into a joint venture in April 2017 with City Building Glasgow.

As the largest and most diverse landlord in Scotland, we recognise the crucially important role we have in ensuring our communities are calm and peaceful places to live. **Your Home, Your Community, Your Future**, our 2021-26 five-year strategy, identifies that feeling safe and secure in their home and community is one of the most important priorities for our customers. All parts of the Group have a shared commitment to improving not just homes but the lives of those in our communities.

As a Group we are nationally and internationally recognised for defining excellence and have an outstanding track record in delivering sector leading standards of service and innovating in all fields in which we operate.

We are already regarded as sector leading in our approach to anti-social behaviour. Our Community Improvement Partnership (CIP) in Glasgow broke new ground in close and effective working between Wheatley staff, police and the fire service. The CIP has now been developed into a true Group wide resource that influences partner priorities and facilitates joint working and the sharing of data across the different organisations resulting in improved services for our communities. It covers a range of inter-related areas including homelessness, allocations and group protection as well as anti-social behaviour.

We have established a holistic approach to key services that our customers need through the creation of our Wheatley 360 service. It brings together housing, environmental and support staff with police to deliver a seamless personalised approach across a comprehensive range of 'wrap-around' services that provide a life-line for our customers.

We know from our customers that anti-social behaviour plays a major part in whether they are happy in their home and neighbourhood, whether they feel safe as well as how satisfied they are with us as a landlord. This can be true whether it is serious, high level crime or issues relating to factors such as noise. Our priority will therefore always be to resolve and reduce anti-social behaviour so that our customers can live peacefully. We will use enforcement wherever necessary to achieve that aim. Our customers will be at the centre of helping us to identify the issues that matter to them and telling us when we have resolved them.

Our experience shows us that there is a great deal of benefit to tackling some of the root causes of anti-social behaviour while continuing to use enforcement as required. This means working towards prevention wherever possible. This can be done in a variety of ways including early intervention before matters escalate, helping neighbours to understand one another and through an empathetic approach to the vulnerabilities and trauma many victims and perpetrators have already experienced in their lives. Developments we have already put in place include new and ground breaking policies

around domestic abuse, sex offenders, hate crime together with child and adult protection.

This approach helps us to avoid a repeat cycle of enforcement and intervention which does not resolve the problem. It provides a firm basis for robust enforcement action where our efforts to change behaviour do not work. Enforcement will continue to be a key resource, for example where the nature of the behaviour is very serious and having a significant impact on the community, where the perpetrator shows no inclination to engage with help or where that help does not succeed and the community is being detrimentally affected.

Our new Framework will take these developments to the next level, accelerating the creation of calm and peaceful communities where people are proud to live. We have set a challenging target that **by 2026 over 70% of our customers live in neighbourhoods we classify as peaceful**. It will also support many of the other key aims in the strategy. These include the increase in the number of homeless households we house – many of these are likely to be vulnerable or have suffered trauma so our approach will help ensure that these households settle while maintaining stable communities. It will also help support the increasing focus on preventing homelessness from occurring in the first place by supporting vulnerable households who might otherwise have become homeless as a result of either perpetrating or being impacted by ASB.

Customers will co-create our approaches and priorities using our new customer engagement framework “**Stronger voices, stronger communities**”. Our new operating model, developed to support our Group Strategy, is based on highly skilled staff who can empower customers to get the services and support they require. We will increasingly look to digital and easy access approaches so that people can quickly tell us what they want us to hear. In turn we can then respond effectively and quickly while ensuring that no-one is left behind where they don't have digital skills.

This Framework will embed our approach to anti-social behaviour across all areas of the Group. Our aim is that all our staff will have an understanding of anti-social behaviour and the skills to help customers take the first steps to resolution. We will work with our customer facing staff to ensure that they have the training they need to deliver this aim. Training will apply across all services including the customer service centre, housing officers, concierge and care staff so that they can respond well to anti-social behaviour and can understand underlying issues which may be relevant.

Our approach is laid out within this Framework under five distinct themes. These are:

Prevention;
Early and Effective Intervention;
Asset Based Approach;
Changing Lives and
Enforcement.

Our Organisation

Wheatley Group has a unique integrated Group value proposition that gives our customers unrivalled access to expertise and resources across housing, homelessness, care, support, advice, training, volunteering and employment. Our Subsidiaries are:



Glasgow Housing Association, Scotland's largest social landlord, has more than 42,000 affordable homes in Glasgow. GHA works closely with Glasgow Police Division and the Glasgow City Council Multi Agency Tasking & Coordinating Group to tackle anti-social behaviour. Wheatley Group are also represented on Glasgow's Strategic Community Planning and Safe Glasgow Groups.

Glasgow, as Scotland's largest city, has the highest proportion of our anti-social behaviour. The proportion of ASB incidents reported to us in GHA is broadly in line with its proportion of stock and accounts for almost 80% of our cases. This is often concentrated in areas of high deprivation – in 2019 nearly half of Glasgow's population lived in areas identified as amongst the 20% of most deprived communities in Scotland. Almost a quarter of the most deprived zones in Scotland are to be found in Glasgow.



Loretto Housing Association has more than 2,500 affordable homes across the central belt and works closely with a number of local authorities and police divisions to tackle anti-social behaviour. Our Loretto housing has a higher proportion of customers in supported or specialist accommodation where we work closely with care colleagues.



DGHP joined Wheatley Group in December 2019 with 10,300 affordable homes spread from Dumfries to Stranraer. It provides the majority of the social rented stock in the area. DGHP have well established links with their local police division to ensure a joined up and effective response is provided to all reports of anti-social behaviour. Outside Dumfries the area is largely rural with long distances between communities. One third of the population live in communities with less than 500 people. Approximately 10% of data zones in Dumfries and Galloway are amongst the 20% most deprived in Scotland. The nature of deprivation in such a rural area means that these areas tend to be highly concentrated and also suffer from poor connections – both physical and digital.



Dunedin Canmore provides over 5,000 homes in Edinburgh, the Lothians and Fife. DC works with 3 Police Scotland divisions (Edinburgh City, Lothian & Borders & Fife Division). Wheatley have 2 seconded police officers working with frontline staff in the east of Scotland to tackle antisocial behaviour. Edinburgh has just under 15% of its datazones in the most deprived 20%, while Fife has 20%.

West Lothian Housing Partnership, with over 700 affordable homes works closely with West Lothian Council and Police Division to tackle anti-social behaviour. Just over 15% of West Lothian's datazones are in the most deprived in the country.

Wheatley 360 is our wraparound support division changing lives from every angle. Its role is at the heart of making our communities safer and helping people to settle in their homes. It encompasses the Community Improvement Partnership who work with seconded officers from Police Scotland. This has demonstrated the effectiveness of joint working and knowledge sharing across housing, care and police. Our anti-social behaviour team work closely with communities and households impacted by or perpetrating anti-social behaviour to provide advice, support and resolution. Concierges and neighbourhood environmental teams provide a local and visible service. They keep our communities clean, tidy and provide a friendly face. Our Think Yes approach allows them to do much more – helping our customers where they most need assistance. W360 also includes the homelessness and allocations teams which will create an important synergy as we help people to settle in resilient neighbourhoods.

Wheatley Care provides services to approximately 7,000 customers each year. Wheatley Care's innovative Tenancy Support Service is integral to supporting vulnerable customers and works closely with Wheatley 360 resources to prevent, and respond effectively to, antisocial behaviour. Our wider care services provide support to customers in a whole range of areas including homelessness, alcohol abuse and other vulnerabilities. Some of our vulnerable customers will receive support from Wheatley Care. While the majority will receive care from other providers our expertise means we work to ensure our customers receive the services they need.

Wheatley Foundation invests over £3million annually on improving the life opportunities of disadvantaged people in Wheatley's communities which includes funding our Home Comforts and Eat Well services to customers experiencing poverty. It provides jobs, training and apprenticeship opportunities to many of our customers. These opportunities have given customers with some of the most challenging histories opportunities, optimism and better life chances.

Building on Our Success

Investing in our Futures, the Wheatley Group's first five-year strategy, delivered outstanding customer satisfaction and raised the bar in Scotland and beyond for performance results and business efficiency in housing, care and property management. Over the last five years we have worked with our customers and communities to ensure our neighbourhoods are places customer are proud to live.

The Community Improvement Partnership (CIP) was first established in 2010 by Glasgow Housing Association, Strathclyde Police and Strathclyde Fire and Rescue. In 2017 we undertook a strategic review of our CIP and created a brand new operating model.

As the CIP has developed the benefits of closer links with a range of services became clearer. It became apparent that there were overlaps in the knowledge and services required for some customers who were homeless, for those suffering from or perpetrating ASB and in relation to protection and safety issues such as domestic abuse and vulnerable adults.

As a result, in 2018 the Scottish Justice Secretary, Humza Yousaf, launched our new holistic approach - Wheatley 360. Its focus is to deliver a more seamless, personalised approach across a comprehensive range of 'wrap-around' services that provide a life-line for our customers whilst improving their safety, wellbeing and resilience. The CIP sits at the centre of this service providing core services and insight in relation to safety and vulnerability.

As part of the development of Wheatley 360 we have brought together housing, environmental and support staff from the Wheatley Group with our CIP police and fire officers to tackle everything from antisocial behaviour and fire safety to fly-tipping, graffiti and food and fuel poverty. Services are co-designed by our staff and our customers to address the underlying causal issues to ensure that vulnerable tenants are provided with sustainable solutions that enable them to live safely, whilst enjoying their homes and creating thriving and sustainable communities.

The following unique examples are just some of the ways we are currently tackling and preventing anti-social behaviour across the Group:

Dedicated Specialist Resources

We reviewed the way we deployed our seconded policing team using detailed analytics and feedback from our customers and staff. This led to the creation of a two shift police team increasing our coverage at critical times by almost 300%. This included the provision of 2 dedicated officers to support our customers and staff in DC & WLHP.

A new Police Information and Intelligence Support Unit was created to support the new two team operating model and to ensure our frontline staff received the most up to date police information that was critical to resolving their antisocial behaviour investigations. In the last twelve months this new team have managed more than 2,600 information

requests from front line staff, proactively disclosed over 600 incidents of ASB and have processed more than 1,300 community information and intelligence reports. In the past it could take up to four weeks to get disclosure information from local policing.

The CIP's high profile position within Police Scotland ensures that we are always in the fortunate position to recruit the most experienced and best qualified officers from across the country. For example, our current team of officers has the following skill sets: a hate crime champion, crime prevention & architectural liaison officer, community information and intelligence gathering specialists, community and youth engagement champions, domestic abuse investigators, public order specialists and behavioural detection trained officers. In addition, all our supervisors are trained police incident officers who are able to lead and manage serious incidents and complex investigations.

Our police officers' specialist knowledge is used every day across the Group to support both our customers and staff whether a crime prevention officer is assisting our new build CoE or our hate crime champion is advising our Group Protection Team. Our ability to deploy this specialist resource anywhere in the Group is a unique ability and has brought many successes including the arrest of 2 fire starters in Glasgow.

Partnership Links

The CIP have a unique relationship with Police Scotland through our seconded police team. The CIP Management Team meet monthly with Police Scotland's Partnership Development Manager who is part of the newly created Partnerships, Prevention & Community Well Being Division. This provides unparalleled access to additional support services and national resources. A recent example of this is the support the division are providing to develop a public health approach to drug deaths in DGHP. Dundee City are the sector leaders in this approach and are sharing their experiences and expertise through Police Scotland to the CIP who will tailor this approach for DGHP.

Innovation & New Technology

Our CIP Team are empowered to develop, test and deliver innovative and collaborative changes to suit emerging threats and provide the right mix of services to meet our customer's needs. A recent example of this was the Group's decision to purchase the Noise App, an innovative digital way for our customers to record and report noisy neighbours in a safe way that is compliant with data protection regulations. This will have a particularly positive impact on an issue that now represents more than 50% of customer complaints to our RSLs.

We are also at the forefront of working with a major software company to develop the optimum antisocial behaviour, domestic abuse and vulnerability case management platform that will revolutionise the way we record, report and resolve complex cases relating to antisocial behaviour and vulnerability.

The Group is collaborating with Police Scotland and the Scottish Community Safety Network to bring to Scotland for the first time an innovative, secure, digital platform 'Community View', This will enable the us to gain a real-time understanding of opinions

from customers about our deployments and the wrap around services we are providing. Local engagement has been critical to the success of the CIP and this and other similar developments will take our digital partnership with our customers to the next level.

Anti-social behaviour

Our Antisocial Behaviour Interventions & Preventions Team (ASBIP Team) consists of 15 members of staff who are all highly skilled and trained in effectively investigating and managing the groups most serious/complex and persistent types of antisocial behaviour across Group. The team utilise their skills in adopting a collaborative, problem solving approach to tackling antisocial behaviour, whilst engaging fully with all parties to understand and provide the most appropriate support and guidance.

The teams' primary focus is to work with colleagues and partners to deliver effective intervention and prevention focussed services that seek to support and address the causal factors of ASB, whilst also support those affected by it. The ASBIP Team also provide invaluable support to the Groups front-line teams, specifically our Housing Officers, in offering guidance and support to assist them in their day-to-day role in managing ASB.

Our ASBIP Officers are all highly skilled in preparing cases to be lodged into court where cases cannot be resolved and enforcement is required. They will lead evidence on behalf of the organisation, whilst representing our customers and communities.

Unique Approach to CIP Deployments

The creation of our CIP Operating Model (Customer REASSURES) has ensured that we have continued to develop our understanding of the issues that negatively impact on the safety and well-being of our customers and communities. We have adapted our approach in line with changes across the world and locally in our communities. This meant that, during the pandemic, we continued to be visible and accessible to our customers.

Our new approach involves operating in both the physical and virtual environments increasingly extending our presence into the digital world. It makes strong use of data analytics to inform priorities. For example, the data we now collect has shown us that the majority of complaints are around noise related issues and that this has been exacerbated during the Covid-19 restrictions. These complaints are a low priority for police but have a major impact on our customers. Our interventions are now designed to have a focus on noise issues, alongside other issues identified by our customers. In addition, our data shows us where there is high incidence of ASB, and the nature of it. This enables us to target intervention at communities suffering the most, or seeing a sudden increase in incidents, working with residents to tackle the issues that matter most to them. Our early work in this area has shown the major positive impact that can be achieved within our communities

Our approach to tackling and preventing antisocial behaviour has delivered sustained change and improvements in a number of communities across the Group as can be seen from some of the results achieved since the introduction of our new operating model:

- During a CIP deployment to a community in Dunedin Canmore our approach resulted in a 12.5% reduction in customer reported antisocial behaviour which increased to a 14% reduction after six months. The turn around and sustained improvements in this community led to very positive coverage in the Edinburgh Evening News and a walkabout and photo shoot with our Director of Housing and local MSP
- In Blairdardie, GHA a CIP deployment led to a 44% reduction in customer reported antisocial behaviour including a 51% reduction in noise, 62% reduction in violence and a 13% in disorder. Our 6-month review post deployment highlighted a further improved and sustained reduction of 32% in customer reported antisocial behaviour.
- Whilst in Govan a CIP deployment achieved similar overall results but also a particularly striking 60% reduction in youth related antisocial behaviour. This was one of our communities' top priorities. This performance resulted in the Govan Ward being removed from the City's, Multi Agency, Tasking and Coordinating Groups top priorities for the first time in three years. Our approach also received praise from the Scottish Justice Secretary Humza Yousaf and was subsequently awarded Cash Back for Communities funding which has been used to support much needed youth outreach work.
- Our most recent deployment to Wyndford achieved a 26% reduction in customer reported incidents of antisocial behaviour, a 30% reduction in disorder and a 54% reduction in violence. A focus on the customer priority of drug dealing led to 14 drug dealers being arrested with over 6kg of drugs in total recovered after 5 house searches. This is the first ever deployment that was based on our Group Strategic priority of creating '**Peaceful**' communities. The deployment continued until all five data zones incorporating our 1,500 homes had moved from being merely safe to calm and peaceful communities. The comments below were made by local customers and partners:

“It is this level of joined up working that will inspire and nurture connections within the community” - Head of Wyndford Nursery following CIP actions in relation to threats and ASB.

“The increased police presence can be felt, you can see the difference, it’s like back to when we first moved in and had community police officers” - Elderly Cube resident to Housing Officer.

“I now appreciate that my actions are unacceptable and I am trying my best to change my behaviour” – Anonymous perpetrator of noise, following package based CIP police interactions and warnings (no further calls to date)

“This is an excellent partnership which is having a great impact on the Wyndford area” - Local Councillor and Cube Resident, Chair of Safe Glasgow Group

“In what has been a challenging time, our colleagues at CIP have been an invaluable resource to the team. It’s great to see the benefits this partnership has brought to Wyndford.” - Head of Housing, Wheatley Housing Group

Our approaches to tackling crime and antisocial behaviour have been widely recognised across the Country. This includes the Scottish Government’s Divert & Deter, Serious and Organised Taskforce recognising the CIP operating model as best practice – resulting in a delegation from the Home Office visiting Wheatley. Police Scotland’s Partnerships Prevention & Wellbeing Division have recognised the CIP Operating Model and promote our approach to their other partners. They regularly bring visiting forces from across the world to showcase the work they do in partnership with Wheatley. Two recent examples are the visit of the Deputy Chief Officer from Toronto and of 20 Senior Officers from Beijing.

Our Vision to End Antisocial Behaviour

Strategic vision: Our Antisocial Behaviour Prevention and Mitigation Framework will create calm, peaceful and sustainable communities where people are proud to live.

Our aim: To build on our sector leading anti-social behaviour work through embedding a strong prevention led approach across all our services, directed by our customers and supported by strong digital services and robust enforcement where it is needed.

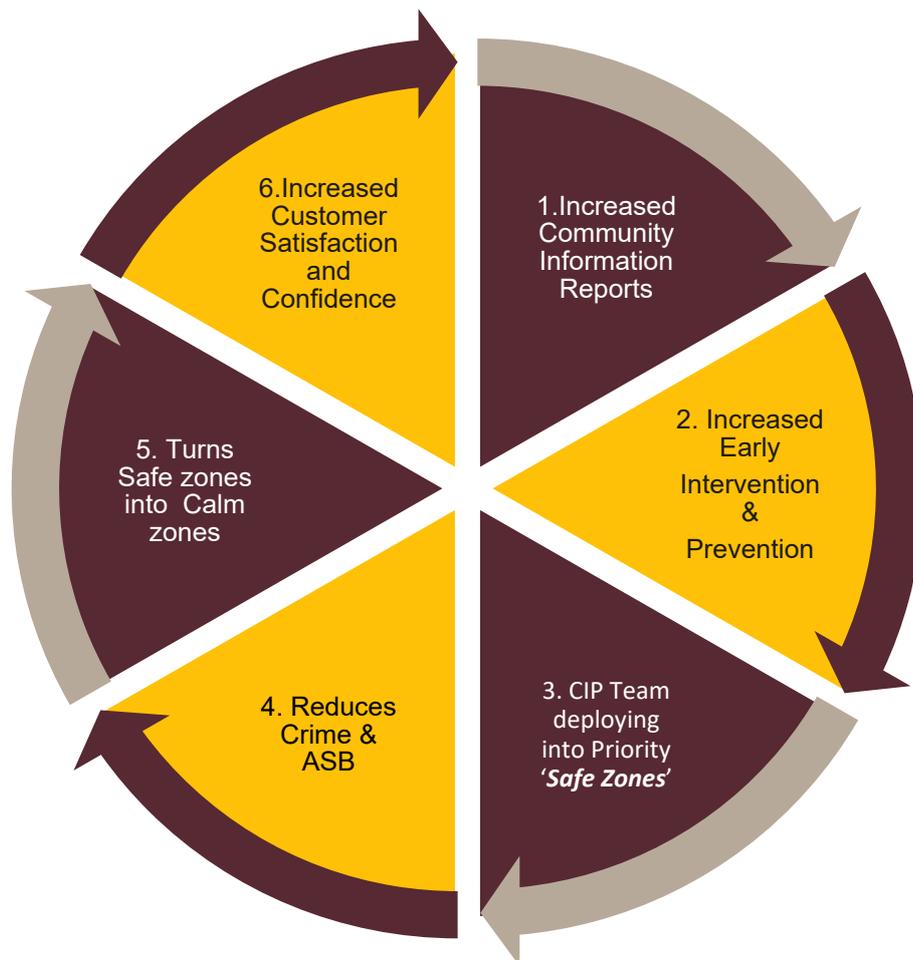
We will deliver this aim by successfully achieving the following five key outcomes:



This structured approach to anti-social behaviour focuses on ensuring that our customers will be empowered to make their own choices about the services they want, be properly equipped to do things for themselves and involved in the design of products and services from start to finish. It will support digital provision of services where these are appropriate, recognising that it is important that “no-one is left behind”. In particular, we recognise that those who are living in socially deprived communities may have particular challenges in gaining access to or using digital services.

Success will be dependent on strong relationships with our customers and communities. They must feel confident to report issues and information to us and our partners, knowing we will use it effectively for prevention and enforcement. Our ability to provide quality resolutions to issues and to respond to customer feedback will be vital to this.

Our “confidence cycle” will be an important element of this approach. This helps increase people’s willingness to provide information and report issues. In turn, the information we receive can be used to target crime, reducing incidence and creating a more peaceful community. This then further encourages the community to have confidence in sharing information with housing officers and police to create further benefit.



We have created a model to define communities as safe, calm and aiming to have 70% of our communities meeting the definition of “peaceful” as shown in the matrix below.

		Public Reported Incidents of ASB					
		→					
		Low Volume and Stable/Improving	Low Volume yet Emerging Deterioration	Low Volume yet Sustained/Progressive deterioration	High Volume yet Stable/Improving	High Volume yet Emerging Deterioration	High Volume yet Emerging Deterioration
Deprivation (SIMD)	Levels of affluence and Improving	Peaceful	Peaceful	Peaceful	Peaceful	Calm	Calm
	Levels of affluence yet Worsening	Peaceful	Peaceful	Peaceful	Calm	Calm	Safe
	Levels of deprivation yet Improving	Peaceful	Peaceful	Calm	Calm	Safe	Safe
	Levels of deprivation and Worsening	Peaceful	Peaceful	Calm	Calm	Safe	Safe

This Framework recognises that preventing antisocial behaviour requires a partnership of many organisations. We will continue to support local authorities and Police Scotland in their statutory role to prevent anti-social behaviour. Our people are supported and trained to think innovatively, to think yes together with their customers and to provide leadership in digital transformation. We will use this innovative style to help provide thinking which challenges and encourages a new approach to services. We will work with partners across the country to share innovation and best practice to deliver our aims.

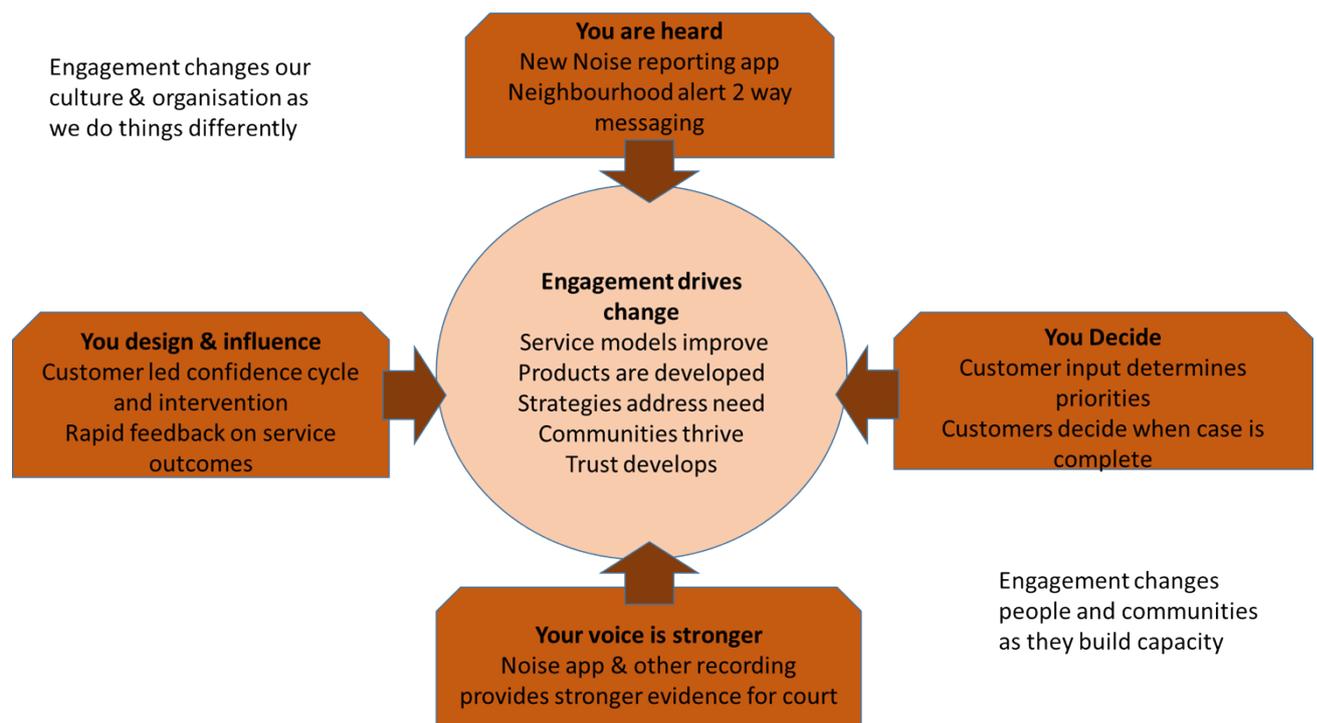
Excellence is embedded in the Wheatley DNA, so we will build on the innovative approaches that we have used to date. We will continue to push towards outstanding service, challenging our performance and outcomes in each area. As part of our new relationship with customers, we will measure this in different and more stretching ways, looking to further improve the aspects of service which matter most to customers.

Voice of the customer

In line with our Group Strategy, the process of refining and developing our services in relation to anti-social behaviour will be led by our customers. Wheatley customers already influence services through a wide range of engagement processes. Our new Engagement Framework “Stronger Voices, Stronger Communities” puts customers at the heart of decision making. This is particularly important for customers and communities experiencing anti-social behaviour where a sense of powerlessness to effect change can exacerbate the situation.

Our new approach ensures customers are at the heart of planning and decision making. This will help to replace that sense of powerlessness with confidence that change can be achieved. We know that this engagement will also have a powerful effect in building resilience in our communities.

The diagram below shows some examples of how this will work in relation to our anti-social behaviour services.



This Framework will take engagement to a new level for those customers who have experienced or are experiencing the impacts of anti-social behaviour. We recognise that our customers may have many issues in their lives and will ensure that our engagement approach makes it as easy as possible for people to talk to us and to become involved in directing service decisions. Our partners will also be working to engage with customers so we will work with them to ensure maximum joint benefit from each engagement. The diagram below sets out the key pillars of our approach.



Our engagement approach will mean that customers direct our approach across a range of areas. It will include:

- Identifying the priority issues in their own community;
- Develop the best ways to strengthen neighbourliness in their areas;
- Help empower their community and others around them to take control of situations and build capacity
- Engaging with us on the when, how and where of our anti-social behaviour work; and
- Directing support received from us so that it works best for the customer.

National & Group Context

In terms of national policy, the 'Promoting Positive Outcomes: Working Together to Prevent Antisocial Behaviour in Scotland' framework (published in 2009) remains the Scottish Government's most recent antisocial behaviour policy document. When developing antisocial behaviour strategies, and looking at new approaches to service design and interventions, it still provides the strategic direction for Local Authorities, Housing Associations and other statutory partners to follow.

Its' principal aim is to prevent antisocial behaviour from happening in the first place by:

- Encouraging agencies to work together more effectively;
- Involving communities more closely in developing local solutions; and
- By communicating positive, evidence-based messages about our people and places.

These aims are still relevant today and both our Group Strategy and this Framework are committed to prevention, community involvement, positive messaging and joint working. Our Framework builds on these by taking the next steps. These include developing customer control and real co-creation of services, not just consultation processes and seeking to influence our partner agencies to adopt a similar approach.

The Scottish Government recently commissioned the Scottish Community Safety Network to undertake some up to date research. This research, which was published in July 2020, aimed to provide an updated picture of antisocial behaviour in Scotland. Some of the key findings were:

- Levels of ASB have decreased over the past 10 years and the public have noticed this decline in their areas. 29% of adults in 2017/18 thought ASB was common in their area which is down from 46% in 2009/10;
- Those living in the most deprived areas, in socially rented housing and in large urban areas, as well as younger people, are more likely to perceive ASB issues in their area;
- While it is an improving picture, there is still a strong link between ASB and deprivation, possibly as a result of more densely populated communities and a lack of community facilities;
- Perceptions of ASB and who engages in it are often inaccurate and influenced by stereotypes;
- Court action for ASB has decreased over the last 10 years, reflecting a shift from treating ASB as an issue of law and order that requires sanctions to one of addressing perpetrator vulnerability to prevent ASB.

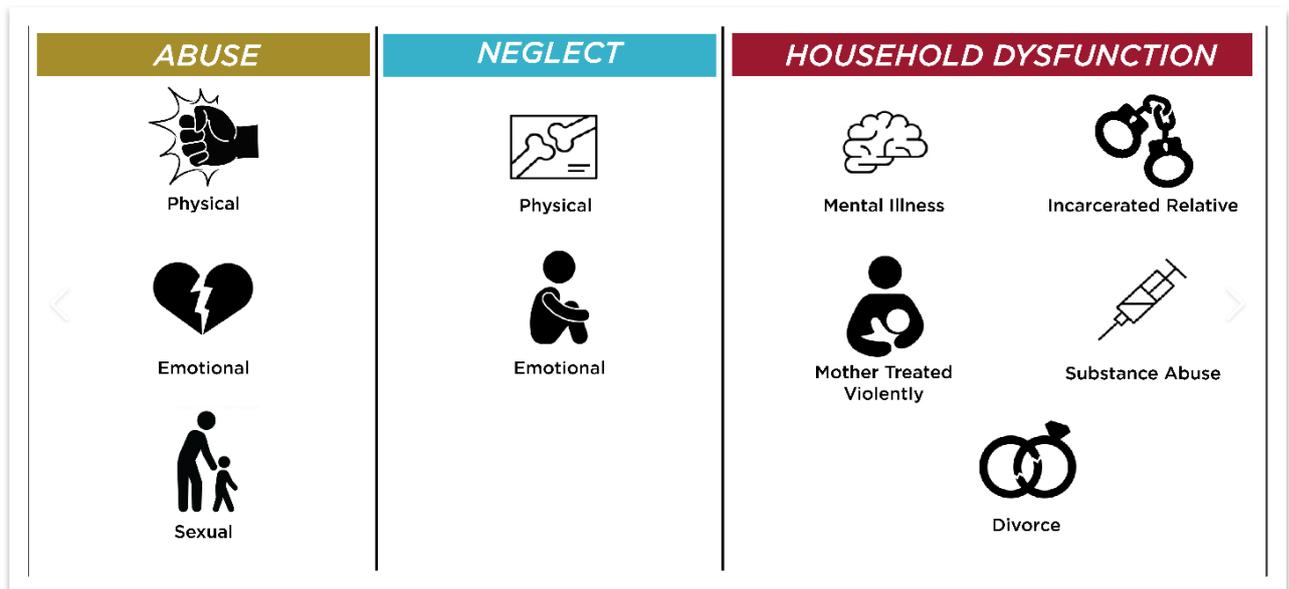
In recent years a growing body of research has directly linked the prevalence and type of antisocial behaviour in our communities to issues such as childhood adversity/victimisation and poverty.

International research has shown that a significant number of adult perpetrators of certain crimes and antisocial behaviour have experienced high levels of childhood trauma and

maltreatment. These are commonly known as Adverse Childhood Experiences or ACEs. This body of evidence is also reflected within Scottish statistics where we know that:

- 45% of adult prisoner survey respondents reported that they had been physically abused in their homes as a child;
- 61% of adult prisoner survey respondents had been bullied at school or somewhere else; and
- 56% of young people in custody said they had been sworn at, humiliated or put down by an adult in their own home.

The ten most commonly measured ACEs are categorized as follows:



Drug and alcohol misuse is a major issue across Scotland. Levels of misuse tend to be higher in areas of social deprivation but it is an issue in all our RSLs. We know that drug and alcohol dependencies can increase the likelihood of anti-social behaviour. Evidence suggests that in many cases the root cause of people becoming addicted to drugs and alcohol can be traced back to traumatic experiences in their childhood. Being able to support and treat customers to help them overcome or reduce use should be a key part of limiting ASB.

To do this we will need our customers to have quick and easy access to the support services they need, delivered by our partners in health and local authorities. We will help ensure that our customers' voices are heard by the organisations responsible for providing specialist support and we will work in partnership with those organisations to ensure that services are as seamless as possible. Our training and employability options form a key part of supporting customers with substance misuse issues. Providing hope and a purpose in life can help avoid a spiral of decline in misuse and help those recovering from addiction.

We have seen the impact that embedding specialists within our teams has delivered in areas such as domestic abuse and suicide prevention. We will expand this approach to

work with our local authority and health and social care partnership colleagues in relation to addictions. In addition, we will look to bring learning from substance abuse professionals into the training that we will give our staff.

Mental health issues are growing in prevalence in society. It is likely that the covid-19 pandemic will only increase this trend. Our experience is that issues can often arise where our customers have low level mental health issues. These are often not sufficient for them to meet the criteria for specialist support. Despite this, our customers can struggle to live safely in a home and some will also behave in an anti-social way as a result. Using our care expertise and strong partnerships, we will seek to find ways to increase the support to these customers.

Increasingly our partners are developing a similar approach and our joint objectives will support the achievement of the best results for customers. A key outcome for Police Scotland is “To protect people effectively, Police Scotland will evolve, sharpening its focus on keeping people safe from harm, whilst embracing innovative technologies and partnerships. Police Scotland will continue to be a key contributor to local joint planning and delivery, as well as to national cross-sectoral partnerships, helping drive a shift to prevention and early intervention across services.”

Similarly, the Scottish Fire and Rescue Service has a strategic outcome to “work in partnership with communities and others in the public, private and third sectors, on prevention, protection and response, to improve the safety and well-being of people throughout Scotland”.

Prevalence of crime and anti-social behaviour

For much of the last 10 years there has been a general decline in the number of recorded crimes in Scotland. Between 2018-19 and 2019-20, crimes recorded by the police in Scotland remained almost unchanged, increasing by less than 1% from 246,480 to 246,516. The 2019-20 figures include 1,681 new crimes recorded under the Domestic Abuse (Scotland) Act 2018, following its enactment on the 1st April 2019. The recording of crime remains at one of the lowest levels seen since 1974.

We know that ASB levels have increased significantly during the pandemic. The Police have recorded an increase in ASB issues of approximately 35% in Glasgow City. Across the Group, we have seen a slightly lower increase at 27%. Most of the increase has been related to noise and the impact of people being at home far more.

Our CIP has a well-established information sharing approach that provides us with detailed intelligence on all antisocial and violent behaviour in or around Wheatley properties. This information can be broken down by Subsidiary and then Local Housing Office or ‘patch’.

The data we now have has already allowed us to develop services which target key issues. For example, our increased understanding of domestic abuse issues has allowed us to create the Group Protection Framework with a range of increased supports for victims and actions against perpetrators. Our data has shown that noise

issues are the cause of the majority of complaints. These tend not to be a major focus for police work but do have a significant impact on our customers' wellbeing. We have developed a number of strategies to deal with noise issues which will be expanded during the course of this Framework.

The changing nature of crime

Serious and organised crime (SOC) affects more UK citizens, more often, than any other national security threat. It has a daily impact on citizens, public services, businesses, institutions, national reputation and infrastructure. SOC is estimated to cost the UK economy at least £37 billion a year, with this cost increasing year on year. This figure is highly likely to be a significant underestimate, particularly in relation to areas such as fraud.

The shifting demographic in Scotland has a major influence on how public services must work together to protect the most vulnerable people in our communities. Adult concern calls to Police Scotland have risen by 13.7% in the last two years, with a significant proportion of calls relating to vulnerability.

Advancing technology gives offenders new tools to commit and hide their crimes. Today's criminals can sell drugs, share indecent images of children, or hack into national infrastructure from anywhere in the world, communicating covertly through encrypted services and moving illicit finances at speed. Notable trends in the past year have related to the criminal use of encryption tools, the dark web and virtual currencies.

Advances in technology have also led to an increased threat of cybercrime, the use of technology in recorded cases of fraud has increased significantly in the past year, and 67% of stalking / harassment crimes now have an element of digital enablement.

Child sexual abuse and exploitation (CSAE) remains a high-volume offence, with recorded instances increasing across Scotland. It covers a range of crimes, from offending in the family context, to generation of indecent images, online grooming, blackmail and extortion.

These changes in digital and online behaviour have a significant effect on our communities. Disputes between neighbours can often be rapidly escalated via social media making it harder to resolve. The advent of social media has also vastly increased the incidence of outings of sexual offenders (accurately or otherwise), again causing disruption in our communities. While the crime element of this trend is dealt with by the Police we increasingly have to support our communities and deal with the outcomes.

Our approach will take account of these changing trends. It will seek to ensure that our communities are alert to new forms of crime and new methods of committing crime so that they can protect themselves from these. Our approaches will ensure that we take a whole community view, seeking to minimise the disruptive impact on our customers.

Our Strategic & Operational Response

Prevention

Our Aim:

Our collaborative and targeted prevention and protection activities are improving community safety and wellbeing and supporting the development of sustainable communities.

We know that feeling safe and secure in their home, and community, is extremely important to our customers and this in turn directly affects local demand and community stability. To successfully deliver this goal, customers must be at the centre of our work so that we are clear about what their concerns are and what they need. We must also build on our existing good relationships to work collaboratively with local authorities and other key partner organisations, such as Police Scotland, to develop sector leading antisocial behaviour prevention services. These services will protect, develop and support our communities to reach their full potential and become peaceful places where customers are proud to live. In addition to tackling and preventing crime and anti-social behaviour we will develop new and innovative ways to prevent, disrupt and respond to ever more challenging and complex problems by enhancing our use of digital tools and tactics.

Our four pillars of prevention are:

Community Prevention

We will focus on the causal factors of antisocial behaviour at a community level and introduce prevention focussed services designed to change the conditions that influence antisocial behaviour in our communities

Developmental Prevention

We will focus on interventions designed to inhibit the development of antisocial behaviour in individuals by targeting risk. Our support and other interventions will be designed to lower risks and provide life chances which increase a sense of community

Situational Prevention

We will focus on physical crime prevention and interventions designed to reduce the opportunities for antisocial behaviour and to increase the risk and difficulty of committing antisocial acts in the first place

Criminal Justice Prevention

If our prevention and early intervention approaches don't have the desired effect or where there is an imminent and serious risk to the community, we will use all legal measures to prevent individuals continuing to commit antisocial acts

Prevention – Our key measures

- Create a baseline for reporting in Streetwise post- covid to allow us to set informed targets for levels of reporting in each year.
- 100% of customers who request home safety and security consultations receive these
- 20% of priority neighbourhoods have a Wheatley community advocate by the end of the pilot process
- % of customers satisfied with the digital reporting system (baseline to be determined)

Prevention – case study

Our Home Safety Team work very closely with our CIP Police Team Crime Prevention Officer to improve the safety and security of some of our most vulnerable customers and their homes. A recent example involved a customer who was deaf and mute and lived in a street where there had been an increase in youth related antisocial behaviour. The customer's housing officer contacted the CIP for help. The next day the CIP were able to visit the customer and carry out a home/fire safety visit with an interpreter. During the visit the customer was provided with a range of home and personal safety products including the latest video doorbell. The customer was delighted with the service and has let their housing officer know how much safer they now feel. This approach to home safety and security has been provided to 170 customers this year alone. The demand for the service continues to grow.

Early Intervention

Our Aim:

Our focussed early and effective interventions will divert people away from being involved in antisocial behaviour.

We know that early and effective intervention has an important role to play in preventing crime and anti-social behaviour occurring in the first place.

The early identification of the characteristics that may lead to a customer or community becoming anti-social enables us to provide bespoke wrap around services. These can dovetail with our Wheatley Foundation work to reduce social exclusion and improve outcomes for disadvantaged communities. Characteristics we will particularly focus on include childhood trauma, vulnerability and current or previous drug and alcohol abuse.

We are developing predictive analytical approaches to identify communities that are susceptible to increased levels of crime and anti-social behaviour. Artificial intelligence will mine our rich data to support our frontline teams, spot trends and empower us to deliver personalised customer services where they are most needed. We will draw on our care expertise to mainstream effective tenancy support approaches into the skill sets of our customer facing staff, to help our tenants sustain their homes and lead their own lives, this will include experiential learning around the impacts of substance misuse, Adverse Childhood Experiences and mental health. We will work closely with our strategic

partners acknowledging that keeping people safe and promoting community wellbeing is a shared responsibility.

Our early intervention key measures

- Reduce the number of repeat complaints of ASB by 20%
- Reduce the number of noise nuisance calls customers make to Police by 25%
- 100% of customer facing staff are trauma informed and easily able to identify the characteristics associated with vulnerability
- Our Prosocial Behaviour media campaign is recognised as helpful by staff and customers across the Group

Early intervention – case study

An elderly couple in the North of Glasgow had lived peacefully for years in their end terraced house until the school at the rear of their home was closed. A path ran adjacent to their garden which formerly accessed the school. Over time, the path was not maintained and shrubs and trees began to grow over the path providing a canopy that could not be seen from the road. A group of youths began to congregate, drinking and playing loud music. This led to vandalism and broken bottles being thrown at the gable of our customer's home. After many calls to local police our CIP Team identified the pattern during their analysis of Group antisocial behaviour incidents.

Our customers were visited by the CIP who took time to listen to the concerns of the elderly customers before providing the reassurance that things would start to improve. Over the next few weeks visits and crime prevention surveys were carried out and partners engaged including the police and local authority. The CIP's recommendations were all progressed including removing the shrubbery, replacing broken street lighting, upgrading and repairing the customers fence, engaging with the local youths and providing positive alternatives. The CIP monitored police systems for any incidents at the property and called the couple once a week regardless. Our approach to antisocial behaviour prevention resulted in a heart-warming letter being received from the couple simply stating ***"Thank you! You have given us our lives back."***

Asset Based Approach

Our Aim:

We will focus on our customer and community assets and strengths in order to build more resilient individuals and communities, driving improvements from the inside out

Our Assets based approach is an integral part of our vision of creating calm and peaceful communities. It will encourage people and communities to come together to achieve positive change using their own knowledge, skills and lived experience of the issues they encounter in their own lives. The most important resource in dealing with anti-social behaviour will be our communities and the people in them. The focus will be on building people's skills and expertise to strengthen the sense of neighbourliness. Physical and

virtual locations that we and our partners have in our communities will help to support this.

We recognise that positive health and social outcomes will not be achieved by maintaining a 'doing to' culture and respect that meaningful social change will only occur when customers and communities have the opportunities and agency to control and manage their own futures. Our assets based approach recognises and builds on a combination of the human, social and physical capital that exists within our local communities.

We will take our award winning Think Yes culture to the next level to introduce Thinking Yes Together, improving the self-reliance of our customers and enhancing digital connectivity. Customers will be able to draw down many of our services easily and reliably at a time and place of their choosing.

Our Asset key measures

- 95% of customers actively engaged in shaping ASB services feel they have played a part in informing decision making
- Increase the number of customers who sign up for our neighbourhood alert system by 25%

Asset based approach – case study

During a recent CIP deployment in the South of Glasgow youth related antisocial behaviour and drunkenness was identified as a top customer priority. The CIP recruited some youth leaders to work with and engage with the local youths. The main focus was to establish what would divert them away from hanging about and causing antisocial behaviour.

The youths unanimously stated that a place to gather that was warm and safe and where they could play online games would be great. The CIP identified an abandoned shop that was still owned by the Group and applied for community pay back funding to upgrade the shop into a youth club. The local youths were brought into assist with the work.

Late night basketball was also requested. A local youth was trained up as an organiser, flood lights were borrowed from another Wheatley community and a local court was identified. These two projects had a significant positive impact on the local community. Youth related antisocial behaviour reduced by 60%.

Changing Lives

Our Aim:

We will provide our customers with better life choices and chances, creating better lives through education, training and employment opportunities.

By doing this we will build resilience and the ability to support their own communities. These life chances will also help to divert those who have committed or are at most risk of committing crime and antisocial behaviour into more positive pathways.

Almost half of Scotland's most deprived communities are within our neighbourhoods. Deprivation reduces life chances and makes life more difficult for households. At Wheatley, our mission is to make homes and lives better. We will make lives better through a comprehensive range of services. These include specific services such as tenancy support, fuel advice or money advice which help our customers manage in their homes. It also includes a range of opportunities that are uniquely available to Wheatley customers. As part of this Framework our customers will be given access to a range of training through Wheatley Academies. They can also be given additional help and support to ensure that they can get the most out of these opportunities.

Changing lives is not only about individuals but about communities. Our Group Strategy and this Framework set out our ambition to make communities stronger. The impact of the Covid-19 pandemic has shown just how much neighbours can help and support each other. We will work to develop this further by helping people to understand the issues that some members of the community face – whether as refugees, through mental health issues, addictions, homelessness or trauma.

Our ideal is that individuals and communities can take the lead in identifying issues and in developing local solutions. We will work to identify local community advocates who will help to support effective communities. The approach will be underpinned by a commitment to support people's ability to live life to the fullest as part of a strong, thriving sustainable community. Our customers will be at the forefront of the development of our services throughout the lifetime of this Framework. These actions will help to develop community resilience and voice, in turn creating neighbourhoods which work together to create strong communities.

Our Changing Lives key measures

- % of vulnerable customers who have tenancy star in place
- % of Wheatley Foundation opportunities taken up by those who have been referred as a result of being impacted by or perpetrating anti-social behaviour
- We will also develop a measure around the uptake of wraparound services

Changing Lives – case study

A young male who was part of a local gang and involved in drunkenness and antisocial behaviour was identified by one of our Environmental Team Leaders. The male was initially encouraged to get involved with the local five a side football game the Group organised.

This in turn led to an opportunity to enrol in our “Changing Lives” programme which provided him with training and ultimately a job. The male turned his life around and was even able to put down roots when he was offered a local house.

The young man is now providing W360 services in the very area where he was once a member of a youth gang.

Another great example of what Team Wheatley can deliver in changing chaotic lives into resilient, peaceful ones.

Enforcement

Our Aim:

In the event that our prevention and early intervention approaches have not impacted on antisocial behaviour we will enforce all appropriate and proportionate legal means at our disposal to stop antisocial behaviour occurring

We know that feeling safe and secure in their home, and community, is extremely important to our customers and this, in turn, directly affects community stability and the desire to live in an area. To successfully deliver this goal for our customers we need to work collaboratively with local authorities and other key partner organisations, such as Police Scotland, to develop sector leading antisocial behaviour services. These services will protect, develop and support our communities to reach their full potential and become great places to live.

Instances of antisocial or criminal behaviour, particularly where they become repeated or entrenched, can adversely affect our tenants’ feeling of safety, the quality of the environment and their ability to peacefully enjoy their homes.

We are committed to tackling all reports and forms of antisocial behaviour in an effective manner. Our early intervention and prevention approach, aligned to our Community Improvement Partnership confidence cycle will reduce anti-social behaviour but we will use appropriate and proportionate enforcement action where it is needed. This will be the case where the issues are so severe that they need to be dealt with immediately or where other action is having no effect.

In some cases, we may need to move the perpetrator in order to protect the community. This Framework sets out how we will seek to do this through planned pathways wherever possible. Working with partners, we plan to establish alternative accommodation routes to break a cycle of anti-social behaviour and eviction. This may involve the use of alternative supported or other specialist accommodation or it may simply require a

change of location to somewhere where there is more family support or where a fresh start can be made.

Our Enforcement key measures

- 50% increase in submission of community information and intelligence direct to our Police Information and Intelligence Unit

Enforcement – case study

Drug abuse and drug dealing are regularly in our customers' top priorities the CIP were recently asked to support a local housing office to gather information/intelligence that would support an application to evict a tenant who was a well-known drug dealer.

Our CIP Police & ASBIP Team worked tirelessly to try and find a customer willing to speak up to what was going on in their community. The drug dealer had convinced the courts that they had turned their life around and was now a model citizen.

The drug dealing customer was due to be moved into a brand new home.

The CIP Team were able to gather enough information and intelligence to secure three drug search warrants for houses related to the drug dealer.

The subsequent police operation involved over 60 specialist police officers and search dogs. The operation was a huge success with drugs, monies and stolen property being recovered and the drug dealer and associates arrested. The drug dealer was subsequently evicted.

The community leaders were hugely complimentary of the CIP's involvement in ridding their community of the Drug Dealer.

Our approach

Moving forward we aim to future proof and build on the outstanding achievements delivered to date through our new Framework. The Framework is also a key element in the delivery of our Group wide strategy. It sets a very clear benchmark for the standard of service our customers should expect over the next 5 years and beyond.

The Framework supports the Strategy in some of the following key ways:

- Creating the detailed approach to delivering peaceful neighbourhoods;
- Improving customer satisfaction with home and neighbourhood through reduced anti-social behaviour and increased resilience within communities;
- Creating the digital platforms for anti-social behaviour which allow customers to self-serve, to engage with us when and where they want and which help us work more efficiently;
- Working across the Group to ensure our programmes to build community resilience and increase neighbourliness reach out to those most vulnerable and most excluded; and
- Preventing homelessness by reducing the number of people who need to leave their home either because they perpetrate ASB or because of the impact of such behaviour.

Our approach will require effective partnership working at local community and subsidiary level. No one agency or organisation can tackle antisocial behaviour alone. We will work together with our customers, colleagues in Police Scotland, Scottish Fire and Rescue Service, Local Authorities, Health Authorities, Community Justice, Social Work and Education. Together we must develop shared outcomes based on joint priorities, local intelligence and customer insight.

The table below shows where the Antisocial Behaviour Framework has significant importance for the delivery of our strategic themes.

Strategic Themes				
Delivering Exceptional Customer Experience	Making the Most of our Homes and Assets	Changing Lives and Communities	Developing our Shared Capacity	Enabling our Ambitions
Key Outcomes				
<ul style="list-style-type: none"> • Enabling customers to Lead • Progressing from Excellent to Outstanding 	<ul style="list-style-type: none"> • Investing in existing homes and environments • Building community voice, engagement and resilience 	<ul style="list-style-type: none"> • Developing peaceful and connected neighbourhoods 	<ul style="list-style-type: none"> • W.E. Create - driving innovation • W.E. Work – strengthening the skills and agility of our staff 	<ul style="list-style-type: none"> • Influencing locally and nationally to benefit our communities

The following sections summarise the key actions we will undertake through this Framework.

Delivering exceptional customer experience

Progressing from excellent to outstanding

- Embedding our approach to ASB across all our services and staff so that customers receive a consistent and supportive response wherever they contact us
- Improving our customers' experience through:
 - Creation of a new Community Safety Solutions & Prevention Hub to enhance our dynamic response to anti-social behaviour
 - Using our sector leading approach to customer involvement and data analysis to influence our priorities and those of our partners in line with our customers' objectives (including our data analysis partnership with Brainnwave)
- Develop the skills of our frontline staff including those in the CSC, housing officers, environmental staff and care staff, so that they can:
 - provide a first line response to ASB;
 - deliver a supportive space for customers to report or discuss concerns;
 - understand the traumas and vulnerabilities that may be relevant;
 - link customers to community networks;
 - understand some early resolution approaches and when they may be considered.
- Deliver customer informed digital approaches which make it easy to communicate with us and to receive information from us.
- Create a Group definition of vulnerability in relation to fire and anti-social behaviour to help support early intervention, prevention and understanding of our customers
- Develop the ability to record vulnerability characteristics, where appropriate and agreed by the customer, in order to provide pioneering products and services tailored to customers reducing the likelihood of them becoming a victim or perpetrator of anti-social behaviour in the future

Enabling customers to lead

- Support our customers to co-create a "Neighbourliness Charter" which defines what it means to be a good neighbour
- Conduct joint customer- led crime prevention audits in all of our communities currently categorised as safe in order to identify priorities
- Create new digital engagement processes which allow customers to co-create services with us
- Provide new, digital systems to allow customers to direct and engage with services including:
 - 24/7 digital reporting methods;
 - Increased use of "Rapport" messaging which provides 2-way communication for our most vulnerable customers; and
 - Development of crime and anti-social behaviour toolkits for customers with expert advice and guidance on spotting the early signs of crime & ASB, including what to do and expect if they become a victim of crime or ASB

- Develop integrated case management which ensures the customer can draw down the most appropriate resource to deal with their case at a time of their choosing.
- Extend the use of our innovative tenancy star for tenants with vulnerabilities. This will enable customers to direct their services to meet their priorities
- Develop learning from the fire safety “stay safe” campaign to develop communication campaigns in relation to ASB

Making the most of our homes and assets

Increasing the supply of new homes

- Use our expertise in anti-social behaviour and Community Improvement Partnerships to provide skills in 'Designing out Crime' to our Asset Team and New Build CoE

Investing in existing homes and environments

- Work with customers to develop home safety and security products which best meet their needs

Building community voice, engagement and resilience:

- Review the options to build community resilience and connectedness through volunteer community advocates/navigators, building on the experience of others in the community who may once have faced trauma or other issues, supporting communities and individuals to have a stronger voice and to create a greater sense of neighbourliness
- Co-create a '**Wheatley Place Measure**' that reflects the criteria our customers identify as the hallmarks of a successful and resilient community
- Ensure pathways into our new community entrepreneurship and resilience programme for our vulnerable customers
- Work with our customers to co-create community networks for those customers who do not receive additional support

Changing lives and communities

Shaping care services for the future

- Reshape our Tenancy Support Service to provide:
 - early assessment and support for at risk customers, particularly those who have been homeless or have vulnerabilities;
 - a focused approach to managing ASB;
 - Building resilience to cope with ASB; and
 - Effectively identifying pathways of specialist support where these are needed.
- Mainstream our effective tenancy support approaches into the skill set of all relevant customer facing staff to help our tenants sustain their homes
- Work with partners to develop clear pathways for care services, specialist services, risk management strategies, and protection plans for our customers, including services for low level mental health issues
- Work with partners to identify new pathways of support for those at risk of repeated homelessness through anti-social behaviour
- Ensure that our volunteering offer can have maximum benefit for customers with vulnerabilities, those experiencing and perpetrating ASB, wherever appropriate
- Develop new partnership approaches to tackle the harm caused by drug and alcohol abuse

Developing peaceful and connected neighbourhoods:

- Expand and develop our customer confidence cycle so that customers are at the heart of directing services and strengthening their communities
- Use our better lives focus to connect households to their neighbourhoods through support which encourages engagement including group activities, volunteering and other actions.
- Use our virtual spaces to create room for community discussion to help grow the understanding and support for newcomers but also to address the impacts or concerns existing tenants may have.
- Support work to use our facilities for the benefit of communities and creating neighbourliness
- Ensure our enforcement process builds on our understanding of root causes and is used rapidly and effectively where it has to be implemented
- Influence our strategic partners and the Scottish Community Safety Network with our unique and sector leading approach to reinventing neighbourliness and pro-social Behaviour
- Improve our strategic links with our approach to Group Protection for vulnerable people

- Work with Scottish Fire & Rescues' Prevent and Protect Team to change the behaviours of those customers involved in setting deliberate fires

Supporting economic resilience in our communities:

- Review our Wheatley Foundation and other wider services to maximise the employment, training and skill building opportunities available to customers who are vulnerable, have had adverse childhood experiences or who are at higher risk of being impacted by or perpetrating anti-social behaviour
- Use our proposed participatory budget events in our priority communities to increase confidence and resilience
- Further develop our sports for change programme to encourage young people to get active and involved.
- Work closely with Police Scotland's Cyber Crime 'Centre of Excellence' ensuring our customer receive the best possible advice and guidance on preventing them from becoming a victim of online exploitation or fraud

Developing our shared capability

W.E. Think – creating our “Thinking Yes Together” culture

- New, digital apps will be used to allow customers to direct and engage with services

W.E. Create – driving innovation

- Work with our partners to examine options for integrated commissioning of support across homelessness, addictions, mental health, criminal justice and general health budgets in order to achieve a comprehensive and effective service for our customers
- Enable customers to access online learning to build up Wheatley Credits for housing, care and property management that will be a recognised part of Wheatley’s Pathways into Work programme

W.E. Work – strengthening the skills and agility of our staff

- Train all customer facing staff in our approach to understanding trauma, preventing ASB and building community resilience, linking to the THRIVE model used by our Police Scotland colleagues
- Ensure all our staff are trained in our approach to ASB and knowledgeable about key factors which are relevant including trauma, vulnerability, addictions and mental health issues.
- Increase the skills of our frontline staff, including the customer service centre and housing officer teams to receive and respond to reports of ASB
- Increase our understanding of substance abuse issues through integrating the experience of our partners in drug and alcohol services into our training and processes
- Provide training for staff in negotiation and mediation skills to allow early intervention to de-escalate issues between neighbours quickly
- Customer facing staff trained in supporting community connections across all our services.
- Create a specialist digital qualification for frontline housing, care and other staff which develops an empowering approach to support and the skills to support customers through trauma and disruption. This will be complementary to the Scottish Government’s national trauma training programme led by NHS Education for Scotland.

Enabling our ambitions

Influencing locally and nationally to benefit our communities

- Work with Police Scotland’s “Partnership, Prevention and Community Wellbeing division” co-creating innovative services to keep our customers safe and secure in their homes
- Gather and share information with Police Scotland and Scottish Fire & Rescue Service on anti-social behaviour to highlight emerging issues and target preventative measures
- Influence our neighbourhood organisations to support new residents

The key strategic measures

The key Group strategic target for this Framework is that **70% of our customers live in neighbourhoods categorised as peaceful**. However, the Framework also supports a number of other strategic targets:

Delivering exceptional customer experience:

- Overall customer satisfaction is above 90%
- RSL tenant satisfaction with value for money is increased to 85%
- Overall satisfaction amongst households with children is improved to 90%
- 90% of customers feel they can participate in the landlord's decision making
- 95% of customers actively engaged in shaping services feel they participate in decision making

Changing lives and communities

- 4,000 jobs, training and apprenticeships delivered
- 250 customers have been supported to attend higher education and university through Wheatley bursaries
- 10,000 vulnerable children benefit from targeted Foundation programmes

Enabling our ambitions

- Over 50% of customers actively use their online account to make transactions with us

Investigating incidents and using our powers

Customers can report antisocial behaviour by phone, e-mail, in writing or in person and will be advised, in all instances, to report criminal behaviour to Police Scotland. As part of this Framework reporting by digital methods will also be available. Whilst recognising that enforcement action needs to be appropriate, proportionate and timely the wellbeing and protection of our tenants and communities will always be at the forefront of our decision making process.

Our approach to the use of enforcement action will be informed by the type and severity of antisocial behaviour that has been reported. In the majority of cases this will have been when a preventative and supportive approach has failed to address the problem but we will move straight to enforcement action if it is deemed necessary for the protection of our tenants and communities.

When required our staff will utilise the various types of legislative powers available to RSLs within the Antisocial Behaviour etc. (Scotland) Act 2004, the Housing (Scotland) Act 2001 and the Housing (Scotland) Act 2014 to manage antisocial behaviour, and the perpetrators of such. This will include the use of:-

- Referrals for support;
- Acceptable Behaviour Contracts (ABC);
- Unacceptable Behaviour Notices (UBN);
- Mediation (non-legislative);
- Warning Letters (non-legislative);
- Interim Antisocial Behaviour Orders (Interim ASBO);
- Antisocial Behaviour Orders (ASBO);
- Notice of Proceeding for Recovery of Possession (NPRP);
- Eviction Orders; and
- Short Scottish Secure Tenancy.

When investigating cases of antisocial behaviour we will be fair and firm, remaining impartial and observing confidentiality at all times. We will take a customer focused approach to tackling antisocial behaviour, working with the complainer and the alleged perpetrator with a view to reaching agreed actions, timescales and ultimately closure. An antisocial behaviour toolkit has been developed for staff to refer to. The toolkit provides detailed guidance on how to manage the five key stages of an antisocial behaviour complaint, ensuring staff manage cases in a consistent and informed manner. These are:



The guiding principles of the toolkit are noted below:

- Listen to complaints and give complainers advice as to what they can do and what they can expect from us;
- Assess and monitor any risk;
- Keep to specified target response times for acknowledging and responding to reports of antisocial behaviour;

- Ensure the emergency and statutory services have been notified where there has been/is a risk to life or safety;
- Discuss the forward process with the complainant, being clear and realistic about potential outcomes and timescales involved;
- Choose from a range of different actions and take action proportionate to the type of antisocial behaviour reported;
- Refer customers to external agencies for support and advice as appropriate;
- Use the Streetwise system to note all reports of antisocial behaviour and manage the case in accordance with good practice and Scottish Social Housing Charter (SSHC) requirements; and
- Keep in regular contact with the complainant and advise how they can record any future incidents, for example using diary sheets.

Tenant Agreed Categories & Timescales

Following consultation with our tenants we have defined, categorised and grouped the different types of antisocial behaviour according to their level of seriousness. We have also agreed the following timescales for actioning and resolving complaints of antisocial behaviour.

Category	Definition	Timescales
A	<ul style="list-style-type: none"> • A conviction or criminal charges of drug dealing (supply or intent to supply) or production of a controlled drug. • Criminal charges relating to firearms. • Criminal behaviour involving serious incidents of violence or threats of violence towards any members of the public. • Serious assault. • Serious harassment. • Hate crimes (racial, sectarian, homophobic, religious, disability etc.). • Serious damage to property including wilful fire-raising. 	Action within 1 working day
		Resolve within 10 working days
B	<ul style="list-style-type: none"> • Aggressive / Abusive behaviour. • Drug / Solvent / Alcohol abuse. • Verbal / Written harassment. • Noise nuisance / Disturbances. • Vandalism. • Dog fouling • Graffiti. • Non-accidental Bin fires / Grass fires. 	Action within 3 working days
		Resolve within 10 working days

Legislation Planning and Guidance

National and Legal Context

As well as enabling our Group's strategic outcomes, our Antisocial Behaviour Prevention and Mitigation Framework also demonstrates and strengthens our contribution towards a number of the national outcomes contained within the Scottish Government's National Performance Framework. These include national outcomes such as:

- **Outcome 2** - We respect, protect and fulfil human rights and live free from discrimination
- **Outcome 5** - We live in communities that are inclusive, empowered, resilient and safe
- **Outcome 6** - We grow up loved, safe and respected so that we realise our full potential

The Legal Framework

The Antisocial Behaviour etc (Scotland) Act 2004 is the primary legislation for dealing with antisocial behaviour in Scotland. The Act sets out a range of responses made available to Local Authorities and Police Scotland ranging from the requirement of Local Authorities to jointly prepare and produce an antisocial behaviour strategy, to the dispersal of groups, closure of premises, dealing with noise nuisance and the environment as well as the application of Antisocial Behaviour Orders.

This Antisocial Behaviour Prevention and Mitigation Framework has been developed to ensure that we are not only meeting all the legislation and guidance that is pertinent to antisocial behaviour reduction and prevention but exceeding it and setting best practice approaches nationally.

There are a number of additional pieces of legislation which support responses to antisocial behaviour such as:

- Human Rights Act 1998;
- Regulation of Investigatory Powers (Scotland) Act 2000;
- Housing (Scotland) Act 2001;
- Equality Act 2010;
- Housing (Scotland) Act 2010;
- Housing (Scotland) Act 2014; and
- Data Protection Act 2018.

Registered Social Landlord Subsidiaries

The legislative framework that governs how all Group RSLs currently interpret and manage antisocial behaviour is contained within *the Housing (Scotland) Act 2014* and *the Antisocial Behaviour etc. (Scotland) Act 2004*. The 2004 Act states that a person is engaging in antisocial behaviour if they:

- Act in a manner that causes or is likely to cause alarm and distress.
- Pursue a course of conduct that causes or is likely to cause alarm or to distress to at least one person not of the same household as them.

The *Housing (Scotland) Act 2014* further enhanced the powers available to social landlords for the management of antisocial behaviour. This includes:

- Social landlords will have the power to convert an existing tenant's Scottish Secure Tenancy (SST) to a Short SST (SSST) or to grant a SSST to a new tenant in cases where there is evidence that the tenant, a member of their household, or a visitor, has been involved in antisocial behaviour in or near their home within the last three years;
- Simplifying the eviction process in cases involving serious antisocial behaviour by allowing social landlords to make use of an existing conviction as grounds for possession. The tenant must have been convicted within the last 12 months; and
- Clarifying that a social landlord can suspend an application for social housing under certain prescribed circumstances.

Scottish Social Housing Charter

The Scottish Social Housing Charter was introduced by the Scottish Government to help improve the quality and value of the services that social landlords provide, and support the Government's long term aim of creating a safer and stronger Scotland.

Outcome 6 of the Scottish Social Housing Charter states that:

“Social landlords, working in partnership with other agencies, help to ensure that:

- *Tenants and other customers live in well-maintained neighbourhoods where they feel safe.”*

This outcome covers a range of actions that social landlords can take on their own and in partnership with others. It covers action to enforce tenancy conditions on estate management and neighbour nuisance, to resolve neighbour disputes, and to arrange or provide tenancy support where it is needed. It also covers the role of landlords in working with others to tackle antisocial behaviour.

The Scottish Housing Regulator have developed the following indicators to assess how well housing associations and the Group are managing complaints of antisocial behaviour and our wider estates:

- **Indicator 13:** Percentage of tenants satisfied with the landlord's contribution to the management of the neighbourhood they live in; and
- **Indicator 15:** Percentage of antisocial behaviour cases in the last year which were resolved.

Complaints

Our aim is to get it right first time, however, where there is dissatisfaction with this Framework or its operation, customers can make a complaint. A summary of our Complaints Policy and Procedure is available on our website and in local offices.

Responsibilities

The Group Director of Housing and Care will have overall strategic responsibility and will oversee the successful implementation of the work plan.

Review and Consultation

Our framework will be reviewed regularly to ensure that it continues to be relevant and appropriate in achieving our aims. Partners remain committed to working together to critically review performance, to maintain or improve our current high standards of service delivery. Partners will also seek to develop services that are focused on early intervention and prevention and meet the differing needs of the various communities across Group.

Report

To: West Lothian Housing Partnership Board

By: Lynsey Fotheringham, Head of Housing

Approved by: Olga Clayton, Group Director of Housing and Care

Subject: Stronger Voices, Stronger Communities – an update on our engagement activity

Date of Meeting: 18 August 2021

1. Purpose

- 1.1. This report presents an update on our implementation of the Wheatley Group engagement framework, which supports the ambition in ***Your Home, Your Community, Your Future*** to transform our engagement approach and shift the balance of power towards our customers.

2. Authorising and strategic context

- 2.1. The Group Board has responsibility for setting the overall Group frameworks within which each partner organisation will operate. The engagement framework is a new approach which supports the delivery of the 2021-26 strategy. Our Board is responsible for deciding and monitoring how this will be operationalised.

3. Risk appetite and assessment

- 3.1. Our risk appetite for service improvement is “open”. This means we are prepared to take the risk of adopting the approach that is most likely to result in successful delivery of our service objectives.
- 3.2. Shifting the balance of power towards the customer brings some risk as we empower customers to take more decisions around priorities and resources. Creating an engagement plan to take this forward for our customers and ensuring this aligns with our strategic delivery plan to manage this transformation will help to mitigate any risks.

4. Background

- 4.1. Our 2021-26 strategy - ***Your Home, Your Community, Your Future*** – sets a clear ambition that “*customers will have increased control over their services, their communities, and their lives, with new opportunities for building skills and resilience*”.

- 4.2. Our engagement framework – **Stronger Voices, Stronger Communities** – has been developed to help support the delivery of this ambition, and this was discussed at the Board meeting in February this year. As we deploy this framework, we seek to ensure that our customers and communities will feel more in control of their personal and collective wellbeing, inspired to raise their aspiration and able to realise their potential.
- 4.3. We have developed a **Stronger Voices Engagement Plan** to help us implement the new framework. This is attached at Appendix 1. Initially we had hoped that by this time we would have been able to attend or hold some face-to-face events for customers, particularly the summer gala and pop-up events which our customers and their families enjoy. Due to the slower release of Covid restrictions this has not been possible but will certainly be included in the plans for next year.
- 4.4. We were however very keen to re-establish our visible presence in our communities as soon as we were able to. Throughout May and June we focused our engagement activity on neighbourhood walkabouts in our communities – inviting customers to join a small group of officers (Housing Officer, NETs team leader, Investment Officer) - to assess the neighbourhood and identify any issues and improvements which can either be resolved or taken forward in an improvement programme. These continue to be part of the engagement plan throughout the year. In February the Board identified an annual allowance in the business plan which would enable us to take forward a customer focused investment programme informed through our engagement programme. For the 2021/22 budget this was set at £19k.
- 4.5. Whilst ensuring that face-to-face engagement remains an important part of our engagement and our service provision, a key theme in the Stronger Voices engagement framework was to take advantage of the opportunities that a more digital environment can bring to our engagement approach in terms of accessibility and flexibility. In July a Group Stronger Voices Manager was appointed to lead on developing this digital engagement approach as well as ensuring that across Group our customers are involved in shaping the strategic agenda.
- 4.6. During August a group of customers drawn from the different subsidiaries in Group will be working in a co-creation group with officers to test and improve our repairs Web Self Service (WSS) customer journey. Repairs WSS was switched off at the beginning of the pandemic in March 2020 as we moved to an emergency repairs service. As we prepare to re-introduce this we want to ensure that our customer voice is influential in ensuring this service provides an excellent experience for our customers.
- 4.7. Customers will also be involved in a number of other strategic projects from the 2021/22 Group delivery plan in the next few months. These include:
- working with us to co-design what a Wheatley MyCommunity app would look like – this initially involves customers in communities in the South East of Glasgow;
 - customer journey mapping for rental income management;
 - customer journey mapping for allocations; and
 - customer research on review of Choice Based lettings systems.

5. Customer engagement

- 5.1. Our 2021/26 strategy **Your Home, Your Community, Your Future** has a very clear focus on enhancing our customer engagement and a significant element of co-development and co-design with our customers. This report discusses some of the activities underway to take forward the **Stronger Voices, Stronger Communities** framework which supports this.

6. Discussion

- 6.1. The engagement framework consists of 4 pillars which support our engagement with customers, as illustrated in Figure 1 below.

Figure 1 – The Stronger Voices, Stronger Communities framework



- 6.2. Since remobilisation at the beginning of May we have been able to increase our engagement activity. The **Stronger Voices Engagement Plan** at Appendix 1 gives more detail on both completed and planned engagement. Key activities from the plan are discussed further below grouped under the different pillars of engagement.

We Listen

- 6.3. **Consultation with former Barony customers** – following the transfer of Barony customers to WLHP we engaged with customers on how the transition had been and on what worked well or could have been improved upon. We were able to address all customer queries and established changes in service experienced were as a result of widespread Covid restrictions, not the change in landlord.

- 6.4. *Repairs focus groups* – whilst our customers will be involved in some Group-wide activity around repairs such as developing the online customer journey, we would also like to discuss with our customers the experience they have of the repairs service delivered by Dunedin Canmore Property Services. This would include exploring customer experience of the repairs service delivery including the quality of work undertaken and professionalism of the staff involved; our communication with customers on repairs; whether we are able to resolve issues at first visit; and anything they would want to see improved.
- 6.5. We plan to carry out the focus groups later in the autumn once customers have had some months to experience our fully mobilised repairs service.

We Co-create

- 6.6. *Neighbourhood walkabouts* – Twenty-five visits have been carried out across our neighbourhoods to date and customers have been delighted to join us on these neighbourhood explorations. We have a further 8 scheduled for the remainder of 2021/22. Issues are wide ranging but themes that customers are happy with include the services provided by NETs around external maintenance and stair cleaning – customers have particularly noted how glad they are that the latter has restarted following restrictions on service during lockdown. Compliments have also been paid around the quality of the grass cutting. Part of the purpose of these walkabouts is for customer to identify issues that they would like resolved and these are summarised in paragraph 6.12.
- 6.7. *Customer journey mapping* – 4 of our customers are involved in the Group-wide exercise during August to assess and improve the Repairs Web Self Service journey. We will also have customers involved in customer journey mapping for both rental income and allocations later in the year.
- 6.8. *Recruitment campaign for Customer Voices* – we are engaging with customers on an ongoing basis but in October we intend to create a recruitment drive which will focus on the strategic objective of improving diversity in the customer base we work with. The current activities we are getting our customers involved with will help to illustrate the impact a strong customer voice can make and help to motivate others to become involved.
- 6.9. *Consultation on the operating model* – the business update report on this agenda proposes the consultation exercise to be carried out with customers to understand their views on our new operating model.

We Give Power

- 6.10. *Customer focused investment* – this budget has been identified to give customers control over parts of the investment programme which are not driven by lifecycle replacements or health and safety or structural issues. Requests and projects identified by our customers are being costed at the moment but we anticipate with the budget available we should be able to deliver on these. A variety of themes have been identified, these include:

- Additional washing poles in drying areas;
- Painting of communal fences and railings;
- Bike storage areas or sheds;
- Repairs to communal fencing;
- Gutter cleaning;
- Improved door numbering for blocks of flats;
- Installation of path and seating at common areas;
- Painting soffits and eaves;
- Additional bins for dog waste; and
- Improvements to the bins stores to accommodate additional bins.

6.11. *You Choose Challenge* – at our meeting in February Board considered the pilot of using this methodology to enable a community in Whitburn to take control of the decision on spending Community Benefit funding. This methodology uses digital as well as face-to-face engagement and co-creation methods with our customers and employs an online voting mechanism to find consensus on priorities. The outcome in Whitburn was the development of a community garden. We concluded the project and the feedback loop by issuing a newsletter to customers. It was important for us to be able to demonstrate why the suggestions they'd taken the time to make weren't taken forward under the project. Whilst many were out-with our budget or remit, some suggestions were already in place with other community resources so contact details were included in the newsletters for those who wished to explore these.

We Support

- 6.12. *Development Programme for Customer and Community Voices* – much of the work we do in our day to day operations, and the activities of Wheatley Care and Wheatley Foundation, support this pillar which aims to develop capacity and resilience in our communities. Specifically, around engagement however, we intend to support the recruitment plan for Customer and Community Voices with a learning and development support programme. This will cover aspects such as providing Keep Scotland Beautiful assessment training for customers, but also support which will help break down the barriers which prevent some of our customers becoming involved such as language, disability, or confidence levels.
- 6.13. The new engagement framework *Stronger Voices, Stronger Communities* is designed to support the delivery of the ambition in *Your Home, Your Community, Your Future* and shift the balance of power and control towards our customers, empowering them to make their own choices about the services they want. Over the past few months we have been delivering a number of engagement activities which support the implementation of this framework.
- 6.14. As Housing staff we work alongside a number of support providers, primarily Wheatley Care, to ensure our customers are supported and engaged. Whether receiving a commissioned package of care by Social Work or the short-term input of the Tenancy Support Service (TSS), joint working is in place to provide specialist help and assistance to customers and act as a vehicle to obtain feedback and promote involvement.

- 6.15. Our Livingwell site at Almondvale will be a new service offering for WLHP. We will engage with customers to personalise the building ensuring that it feels like home. Customers will be supported to meet their neighbours, implement the activities they'd like to see at the service and explore resources in the wider community.
- 6.16. We will support our communities to have more control over their wellbeing and build financial resilience. Information will be provided on resources available both locally and beyond to allow customers to make choices to best support their mental and financial wellbeing.
- 6.17. The link between the engagement framework, budget setting and our strategic delivery plan will ensure that the voice of the customer is fully embedded in our plans and priorities, driving change and innovation throughout Wheatley. Through strong engagement with our customers we will support them to develop potential and build stronger communities. Our engagement plan at Appendix 1 helps us to structure this.

7. Digital transformation alignment

- 7.1. Proposals such as the MyCommunity app and the introduction of a digital tool to improve customer feedback on services are included in the Digital Transformation Programme.

8. Financial and value for money implications

- 8.1. The 2021/22 financial projections include a provision of £179k over the five-year period for customer directed investment. In 2021/22, £19k of investment priorities will be decided on by tenants. Within the Wheatley Foundation, £0.8m of funding has been set aside to support the You Choose Challenge project across the Group's RSLs.
- 8.2. Ensuring that the customer voice is at the heart of our activities and our strategic planning will help to drive increased value for money.

9. Legal, regulatory and charitable implications

- 9.1. There are no legal implications arising from this report.

10. Equalities impact

- 10.1. The **Stronger Voices, Stronger Communities** framework seeks to expand the opportunities available to customers to engage with us. By adopting a blended digital/off-line approach and increasing accessibility and flexibility it is intended to increase the diversity of customers who are involved in providing feedback and shaping our services.

11. Environmental and sustainability implications

- 11.1. This report has no specific environmental or sustainability implications.

12. Recommendation

12.1. The Board is asked to note and make any comment on the programme of planned and completed engagement activity to date in 2021/22.

List of Appendices

Appendix 1 – West Lothian Housing Partnership *Stronger Voices, Stronger Communities* Engagement Plan 2021/22

Appendix 1

West Lothian Housing Partnership Stronger Voices, Stronger Communities Engagement Plan 2021/22

Month	Activity	Outcome	Supporting pillar
March	Discussion with ex-Barony customers following their transition to being customers of WLHP	Learn from customer experience/feedback. Provide updates on commitments of Barony ballot	You are heard
April	Discussion with customers on the new engagement framework	New opportunities for involvement	You influence and co-design
April	Re-commencement of neighbourhood walkabouts programme. Involving Customers, Investment, Repairs, NETs, Housing & Community Engagement	New opportunities for Customer involvement. Estate management and environmental issues are jointly identified and resolved. Customer focused investment priorities are identified by customers.	You influence and co-design
May	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
May	Mental Health Awareness Week 2021 (10th-16thMay)	Cross-promotion of Awareness day to support customers and promote Health	We Support
May	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve	We Support

	customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	access for these. Offer opportunities to our customers.	
May	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
May	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
May	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support
June	Pride Month	Cross-promotion of Awareness day to support customers and promote Health	We Support
June	Men's Health week (14th-20thJune)	Cross-promotion of Awareness day to support customers and promote Health	We Support
June	Walk to School Week (17th- 21st)	Cross-promotion of Awareness day to support customers and promote Health	We Support

June	Breathe Easy Week- British Lung Foundation (22nd-28th June)	Cross-promotion of Awareness day to support customers and promote Health	We Support
June	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprenticeship, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
June	Programme for Customer and Community Voices is developed based on Board's strategic delivery plan	New opportunities for involvement	You influence and co-design
June	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
June	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
June	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
June	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy	We Support

		activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	
June/July	Grow your own Sunflowers/Flowers	Run an activity at the community events in each street. Encourage customers and their children to come to these. Supply a small pot with soil and sunflower/ flower seeds so the children can grow these. Possible inclusion of competition. Encourage children to get outside and enjoy gardening/ growing plants.	We Support
June/July	Summer gala days/outdoor events	Publicise services, publicise feedback loop, community consultation, local investment priorities, apprenticeship programme	You are heard
June/July	Promotion of Healthy Lifestyles and get active at summer events.	Provide information on local groups and activities for staying active and healthy, promote My Savings for healthy eating and activities.	You are heard
July	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
July	Newsletter to customers in Whitburn providing feedback on You Choose Project Responses	Provide customers with feedback on responses and highlight additional work undertaken on the back of these.	You are heard
July	Tell us about your favourite walks and trails. Photo competition.	Get customers out and active exploring local trails and walks. Competition for the best picture/	We Support

		walk, Promotes healthy lives and helps let other customers know about trails and walks in the area they may not know about.	
July	Samaritans- Talk To Us annual awareness campaign	Cross-promotion of Awareness day to support customers and promote Health	We Support
July	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
July	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
July	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support
July	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support

August	Apprenticeship programme launches	Young customers are supported into the labour market, building skills and resilience	Your voice is stronger
August	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
August	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
August	Cycle to Work Day (5 th August)	Cross-promotion of Awareness day to support customers and promote Health	We Support
August	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
August	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
August	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE	We Support

		Benefits to get out and engage in a more healthy lifestyle.	
August/ September	Tell us about your local groups	Encourage customers to tell us about their local groups. Raise awareness of these and promote to other customers. Possibility for assistance with funding.	You are heard
September	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
September	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
September	Party in the Park (dependant on Lockdown restrictions)	Support for the event, host a stand at the event, promote WLHP and services	You are heard
September	World Alzheimer's Month	Promote healthy lifestyles and exercise to customers.	We Support
September	Know your Numbers Week- Blood Pressure UK (6th-12th)	Promote healthy lifestyles and exercise to customers.	We Support

September	World Suicide Prevention Day (10 th Sept)	Promote healthy lifestyles and exercise to customers.	We Support
September	Recycle Week (20th – 26th)	Promote healthy lifestyles and exercise to customers.	We Support
September	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
September	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
September	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support
October	Rent consultation <ul style="list-style-type: none"> - Face-to-face focus groups (balanced for age/gender) - MD Webinar - Interactive email and Website feedback 	Consultation informs budget setting	You are heard
October	Recruitment drive for Customer and Community Voices launches	New opportunities for involvement	You influence and co-design

October	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
October	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
October	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
October	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
October	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support
October	Breast Cancer Awareness Month	Promote healthy lifestyles and exercise to customers.	We Support

October	Dyslexia Awareness Week (4th – 10th Oct)	Promote healthy lifestyles and exercise to customers.	We Support
November	6 monthly performance is published on line and customer scrutiny invited through MD webinar	Customers are involved in scrutiny and improvement ideas	You influence and co-design
November	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
November	Learning and development programme to support the Customer and Community Voices	Customers are supported to develop knowledge and skills	Your voice is stronger
November	Livingwell 60- meet your neighbours Almondvale	Information Sessions for New Customer to provide relevant local and Group information. Enable customers to get to know their neighbours	We Support
November	Livingwell 60- Common room/spaces personalisation(timing depends on when all customers have moved in)	Involve customers in the design of the decoration for the common rooms/spaces	You influence and co-design
November	Livingwell- West Lothian Over 50s Network visit/ promotion	Arrange for West Lothian Over 50s Network to visit to promote their groups and activities. Help customers stay active and interact with community	We Support
November	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety;	Highlighting all the services and support available to customer. Make customers aware of	We Support

	Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	how important safety checks are and improve access for these. Offer opportunities to our customers.	
November	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
November	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
November	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support
November	Lung Cancer Awareness Month	Promote healthy lifestyles and exercise to customers.	We Support
November	Book Week Scotland 2021 (15th-21 st Nov)	Promote healthy lifestyles and exercise to customers.	We Support

December	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
December	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
December	Christmas Event/ Customer Hampers	Information and sign posting for customers who may be isolated or alone for Christmas period. Hampers for those older customers who may be struggling	We Support
December	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
December	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
December	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE	We Support

		Benefits to get out and engage in a more healthy lifestyle.	
January	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
January	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
January	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprenticeship, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
January	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
January	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support

January	Jarvey Street New Build Customers Sessions	Information Sessions for New Customer to provide relevant local and Group information. Enable customers to get to know their neighbours	We Support
February	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
February	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
February	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
February	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
February	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE	We Support

		Benefits to get out and engage in a more healthy lifestyle.	
February	World Cancer Day (4th Feb)	Promote healthy lifestyles and exercise to customers.	We Support
March	Group Delivery plan approved	At least 50% of projects have specific milestones covering customer engagement – which helps develop the Customer and Community Voice programme	You influence and co-design
March	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
March	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
March	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support

March	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
March	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support
March	Ovarian Cancer Awareness Month	Promote healthy lifestyles and exercise to customers.	We Support
March	Almondvale New Build Customers Sessions	Information Sessions for New Customer to provide relevant local and Group information. Enable customers to get to know their neighbours	We Support
April	Customer and Community Voices annual Group conference – presenting their findings to senior staff, Boards and other stakeholders, including interested customers	Confidence building and skills development – showcasing achievement	Your voice is stronger
April	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design

April	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
April	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
April	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
April	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support
April	Autism Awareness Month	Promote healthy lifestyles and exercise to customers.	We Support
May	Customer ideas and feedback are incorporated in Board strategy sessions for Board consideration	Customer input informs strategy development	You influence and co-design

May	Neighbourhood walkabouts	New opportunities for Customer involvement. Possible way to recruit Customer and Community Voices.	You influence and co-design
May	Promotion of local activities and what is going on in West Lothian	Cross promote local events and activities to raise customer awareness of what is happening in their area.	We Support
May	Social Media posts through Communication Team highlighting: Gas Safety; Fire Safety; Scottish Government Grants available to customers; Support offered by Wheatley Foundation (Changing Lives, Modern Apprentice, Bursaries, Dolly Parton's Imagination Library) and Wrap Around Services (Fuel Advice, Money Advice, etc)	Highlighting all the services and support available to customer. Make customers aware of how important safety checks are and improve access for these. Offer opportunities to our customers.	We Support
May	Cross promotion of local Leisure & Health activities. (example: Xcite)	Promote healthy lifestyles and exercise to customers.	We Support
May	WE Benefits Healthy lives and activities promotion	Monthly promotion of We Benefits for benefiting health lives for example savings on sports/outdoor wear and deals on healthy activities. Encourage customers to use their WE Benefits to get out and engage in a more healthy lifestyle.	We Support

Report

To: West Lothian Housing Partnership Board

By: Pauline Turnock, Director of Financial Reporting

Approved by: Steven Henderson, Group Director of Finance

Subject: 2020/21 Financial Statements

Date of Meeting: 18 August 2021

1. Purpose

- 1.1 This report provides an overview of the 2020/21 audited West Lothian Housing Partnership Limited financial statements.
- 1.2 The Board should note that a summary of the financial statements has been reviewed by the Wheatley Group Audit Committee and recommended for approval at its meeting which was held on 4 August 2021.

2. Authorising and strategic context

- 2.1 Under the terms of the Intra-Group Agreement between West Lothian Housing Partnership and the Wheatley Group, as well as the Group Authorise, Manage, Monitor Matrix, the WLHP Board is responsible for the on-going monitoring of performance against agreed targets. This includes the on-going performance of its finances and the approval of the statutory financial statements.

3. Risk appetite and assessment

- 3.1 Our agreed risk appetite in relation to compliance with laws and regulation is averse. Averse is defined as “Avoidance of risk and uncertainty is a key Organisational objective.”

4. Background

- 4.1 This report provides the Board with the final statutory financial statements following the completion of the external audit by KPMG and a reconciliation of the final out-turn to Period 12 2020/21 management accounts.

5. Customer engagement

- 5.1 No implications.

6. Discussion

6.1 Summary of year-end financial results

6.2 The financial statements are now complete and have been audited. They reflect the requirements of the 2014 Statement of Recommended Practice ("SORP 2014") for Social Housing Providers. The audited financial results are summarised below.

	Year ended 31.03.21 £'000	Year ended 31.03.20 £'000
Turnover	4,126	8,066
Operating expenditure	(2,842)	(1,802)
Other gains	10,460	-
Operating surplus	11,744	6,264
Loss on disposal of fixed assets	(5)	(5)
Net finance costs	(1,355)	(600)
Social housing property revaluation	95	(5,324)
Surplus for the year	10,479	335
Actuarial (loss)/ gain in respect of pension schemes	(93)	72
Total comprehensive income for the year	10,386	407

Adjustments from 31 March management accounts

6.3 The finance reports submitted to the Board during the year formed the basis of these financial statements and were updated to include a number of year end statutory adjustments.

	I&E £'000	Net Assets £'000
March management accounts	(14)	18,288
Social housing property valuation movement	95	95
Barony Housing Association gain on business combination	10,460	21
Pension valuation adjustments	(73)	(73)
Depreciation and disposal adjustments	(166)	(166)
Other adjustments	84	84
WLHP statutory accounts	10,386	18,249

- 6.4 Property valuation movements: WLHP's social housing properties were revalued at the year-end by Jones Lang Lasalle which resulted in an increase of £95k to the value of social housing properties. As there were only 8 new build completions in the year a small valuation gain was in line with expectations.
- 6.5 Barony Housing Association (BHA) gain on business combination: For management accounts purposes the gain as a result of the transfer of the ex-BHA properties reported already as an increase in reserves of £10,439k but for statutory accounts this requires to be shown through the statement of comprehensive income as a gain of an amount equal to the net assets transferred given there was no consideration payable to BHA. A final adjustment of £21k was made to recognise a share of rent arrears balances transferred from BHA.
- 6.6 Pension valuation adjustments: On an annual basis the SHAPS defined benefit pension scheme is revalued by independent actuaries. The 2020/21 valuation resulted in a credit to service costs reported in operating expenditure of £21k, interest on the liabilities of £1k and an actuarial loss of £93k.
- 6.7 Depreciation and disposal adjustments: as part of our year end work depreciation charges were calculated at individual component level and related disposals processed. This resulted in an increase in the charge provided in the management accounts of £166k.
- 6.8 Other: These adjustments are for other items finalised after the preparation of the management accounts such as a review of accruals made following the receipt of the invoices post year end.

Audit summary

- 6.9 The external auditors, KPMG have completed their audit of the financial statements and have issued an unqualified audit opinion.
- 6.10 No audit adjustments were identified during the course of the audit.
- 6.11 As a standard part of the standard audit process, and in line with previous years, KPMG require the Board of each organisation in the Wheatley Group to sign a "letter of representation" in which the Board confirms certain matters in terms of disclosure and record-keeping. As in previous years, a letter from the Chief Executive has been provided to each Board to provide comfort that the officers have complied with the matters stated in this letter. Both these documents are provided along with this paper at appendix 2 and 3 respectively.
- 6.12 The Board are asked to confirm in the letter of representation that the financial statements are prepared on a going concern basis. The assessment that the Partnership continues in business is based on the preparation and approval of the Partnership's 30-year business plan which includes cashflow forecasts, the certainty of revenue streams from rental income and the assessment of the availability of funding provided to West Lothian Housing Partnership through the RSL borrower relationship with WFL1.
- 6.13 The accounts and letter of representation will be signed following the approval of the Wheatley Group accounts at the Group Board meeting on 26 August 2021.

7. Digital transformation alignment

7.1 No implications.

8. Financial and value for money implications

8.1 Ensuring financial performance remains in line with approved budget is a key element of continuing to demonstrate value for money. WLHP performed favourably to budget in 2020/21 ensuring the achievement of these targets. Any statutory accounts adjustments were non cash adjustments only and did not impact the achievement of these targets.

9. Legal, regulatory and charitable implications

9.1 Under Section 485 of the Companies Act we are required to appoint an auditor for each financial year. Under the Intra-Group Agreement with Wheatley Housing Group we are required to use the Group Auditors. We require to appoint KPMG LLP as the auditors for 2021/22 at the Annual General Meeting. The appointment will be subject to the Group confirming their reappointment at its Annual General Meeting.

9.2 Following approval and signing of the financial statements they require to be submitted to Companies House and the annual return made to the Scottish Housing Regulator.

10. Equalities implications

10.1 No implications.

11. Environmental and sustainability implications

11.1 No implications.

12. Recommendations

12.1 The Board is asked to:

- 1) Approve the 2020/21 financial statements;
- 2) Confirm the preparation of the financial statements using the going concern basis;
- 3) Delegate authority to the Chair and Group Director of Finance to approve any non-material changes to the accounts; and
- 4) Approve the letter of representation from the auditors, and note the related letter of comfort from the Chief Executive.

List of Appendices

Appendix 1: Financial statements for the year ending 31 March 2021 [redacted. Available at: https://www.wheatley-group.com/_data/assets/pdf_file/0019/131419/WLHP-Annual-Accounts-2021.pdf]

Appendix 2: Letter of representation [redacted]

Appendix 3: Letter of comfort [redacted]

Report

To: West Lothian Housing Partnership Board

By: Ranald Brown, Director of Assurance

Subject: Internal Audit Annual Report and Opinion 2020/21

Date of Meeting: 18 August 2021

1. Purpose

- 1.1 This paper provides the Board with an update for noting on the following matters:
- the Internal Audit Annual Report and Opinion 2020/21;
 - the results of assurance work completed in Q4 2020/21; and
 - the rolling 3-month Internal Audit Plan for 2021/22.
- 1.2 As the Internal Audit Annual Report and Opinion supports the 2020/21 year-end financial statements, we present this paper at the Board meeting as part of the overall Annual Accounts.

2. Authorising and strategic context

- 2.1 Under the Group Authorising Framework, the Board is responsible for managing and monitoring its compliance arrangements and operational performance. The activities undertaken by the Assurance Team provide the Board with independent assurance to support the Board in this role.
- 2.2 The Group Audit Committee is responsible for monitoring the Group's assurance activities. The Group Audit Committee has responsibility for instructing and keeping under review the long-term plan for internal audit within the Group, to approve the annual Group Assurance Plan and monitor results as presented in the annual internal audit report and assurance statement. The 2020/21 Annual Internal Audit Report and Assurance Statement was approved by the Group Audit Committee on 5 May 2021, as was the Internal Audit Plan 2021/22.

3. Risk appetite and assessment

- 3.1 The Board's risk appetite in relation to Governance is deemed "cautious" meaning that tolerance for risk taking is limited to events where there is little chance of any significant repercussion should there be a failure.
- 3.2 This report is designed to inform the Board members of specific risks arising from internal audit reviews, in order that members can make informed governance decisions.

4. Background

- 4.1 The Group's Internal Audit team operates in accordance with the Chartered Institute of Internal Auditors' International Professional Practices Framework (IPPF), which includes the International Standards for the Professional Practice of Internal Auditing (the Standards).
- 4.2 In line with the requirements of the Standards, Internal Audit provides the Group Audit Committee with an Annual Report and Opinion, which summarises the results of the Internal Audit team's work during the financial year and provides an opinion on the Group's internal control, governance, and risk management framework.
- 4.3 The Internal Audit Annual Report and Opinion 2020/21 was approved by the Group Audit Committee at its meeting on 5 May 2021. The Group's established position is that it only operates Committees at Group level. The Group Audit Committee's role and responsibilities are contained within its Terms of Reference. **Annex 3 of Appendix 1** sets out the core areas and further explanation of the respective roles and responsibilities of the Group Audit Committee and partner Boards. The Annual Report and Opinion is then reported to each partner Board alongside the annual accounts. The Statement on Internal Financial Control included within the statutory accounts sets out our conclusions.
- 4.4 In terms of Assurance coverage that covers WLHP, **sections 3 and 4 of Appendix 1** provide details of all the reviews and which Subsidiary they include. The reviews specifically relevant to WLHP are detailed below:

Gas Safety	PPE Health & Safety	Fire Safety	Arears Management
NETs PPE	Allocations	Business Continuity Planning	Cybersecurity Healthcheck – IT operations
Cybersecurity Healthcheck – SaaS systems	Working from Home review	Payroll Data Analytics	Digital Strategy

- 4.5 The Annual Report refers to the results of work reported to the Group Audit Committee in May 2021, which has not previously been reported to the Board. A summary of the Internal Audit Plan for 2021-22 is set out in **Appendix 2 – Group Assurance Update**, along with key findings for the following reviews:

- a) Allocations;
- b) Business Continuity Planning;
- c) DGHP Transformation Programme;
- d) Digital Strategy Interim report;
- e) Wheatley Care self-assurance consultancy review;
- f) Payroll Data Analytics; and
- g) Follow-Up of Management Actions.

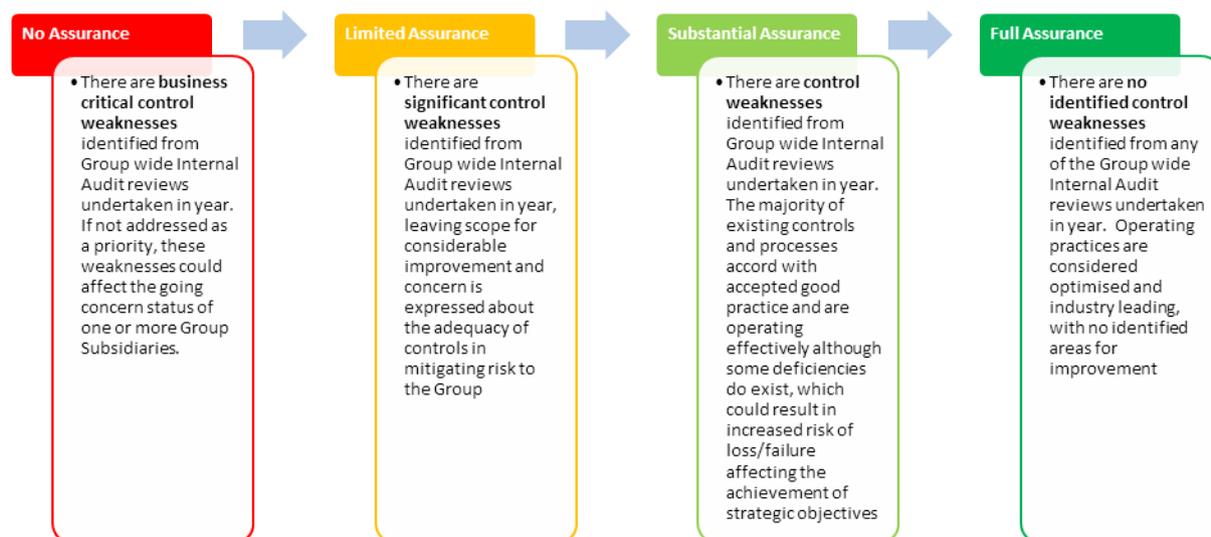
5. Customer engagement

- 5.1 There are no customer engagement implications arising directly from this report.

6. Discussion

Internal Audit Annual Report and Opinion 2020-21

- 6.1 A copy of the Annual Report and Opinion has been included at **Appendix 1**. The table below shows the different types of Internal Audit Opinion which may be given:



- 6.2 Following completion of our approved Internal Audit Plan, we can confirm that sufficient work has been undertaken to enable us to provide an opinion on the adequacy and effectiveness of the internal control environment in operation during 2020/21. In giving this opinion, it should be noted that assurance can never be absolute.
- 6.3 During the course of our work, we identified no critical weaknesses in the governance, risk management, or internal control environments that would put the achievement of subsidiary or Group strategic objectives at risk. Management has acted to address the findings we reported during the year, and thereby strengthen the control environment. The status of all audit actions will continue to be reported regularly to the Group Audit Committee. In addition, we gave a mid-year Assurance update to Partner Boards to highlight relevant audit findings.

Internal Audit Opinion 2020/21

Based on our Group-wide work undertaken in 2020/21 a substantial level of assurance can be given that there is a sound system of internal control, designed to support achievement of relevant organisational objectives. However, some weaknesses in the design and or consistent application of controls exist. Management has agreed to the improvements to the control environment and the progress of implementing these additional controls will be reported to the Group Audit Committee.

- 6.4 The table below summarises the results of 2020/21 Annual Plan work reported to the Group Audit Committee in May 2021.

Review	Control objectives
Allocations	Green Green Yellow Green Green
Business Continuity Planning	Yellow Yellow Yellow Yellow
DGHP Transformation Programme	Green Green Green Green
Digital Strategy interim report	Not applicable for this review
Payroll analytics	Not applicable for this review

- 6.5 More detail on the key findings for each review are set out in the *Group Assurance Update* at **Appendix 2**. Full reports are available to all Board members upon request. In addition, we have provided consultancy support to Wheatley Care for the design and implementation of a self-assessment process to demonstrate compliance with the Care Inspectorate’s Care Quality Framework.

- 6.6 The paper at **Appendix 2** also sets out identified areas for internal audit focus for 2021/22, which have been identified through review of Group and Subsidiary Board Strategies and Risk Registers, discussion with senior managers and consideration of the Assurance map. These areas of focus will be updated on a rolling basis throughout the financial year and will be used to identify the reviews to be prioritised each quarter. This plan was approved by the Group Audit Committee at its meeting on 5 May 2021.

7. Digital transformation alignment

- 7.1 The agreed actions within the Digital Strategy interim review will assist management to achieve the digital transformation required in order to successfully deliver the Group’s strategic aims.
- 7.2 The good practice highlighted within the DGHP Transformation Programme would, if applied to the Digital Transformation Programme, provide management and the Group Audit Committee with additional assurance about whether the programme is delivering in line with expectations.

8. Financial and value for money implications

- 8.1 There are no financial or value for money implications arising directly from this report.

9. Legal, regulatory and charitable implications

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

10. Equalities implications

10.1 This report does not require an equalities impact assessment.

11. Environmental and sustainability implications

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

12. Recommendation

12.1 The Board is asked to note the contents of this report, including the Annual Internal Audit opinion detailed in Section 6 above.

List of Appendices

Appendix 1 – Internal Audit Annual Report and Opinion 2020-21

Appendix 2 – Group Assurance Update August 2021

Internal Audit Annual Report and Opinion 2020/21

Ranald Brown
Director of Assurance
5 May 2021

1. Introduction

The purpose of this report is to provide our view on the adequacy and effectiveness of the Wheatley Group's ('the Group') system of governance, risk management and internal control, as assessed through delivery of our 2020/21 Annual Assurance Plan.

The 2020/21 Annual Assurance Approach and Plan was approved by the Group Audit Committee and progress against this plan has been reported to the Group Audit Committee throughout the financial year.

Our detailed findings from specific reviews have been reported to Management during the year, with a summary of these findings reported to the Group Audit Committee throughout 2020/21. Reporting to Subsidiary Boards and the Group Board has taken place where appropriate.

This Annual Report summarises the Internal Audit activity and therefore does not include all matters which came to our attention during the year. Such matters have been included within our detailed reports to Management and the Group Audit Committee during the year.

“Internal Audit is an independent, objective assurance and consulting activity designed to add value and improve an organisation’s operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.”

Section 3 – Definition of Auditing; Chartered Institute of Internal Auditors’ International Professional Practices Framework

Group Assurance Mission Statement

To enhance and protect the Wheatley Group by providing independent, risk based and objective, assurance, advice and insight

2. Annual Internal Audit Opinion

Scope

In line with the International Standards for the Professional Practice of Internal Auditing (“the Standards”), Internal Audit provides the Group Board, Audit Committee and Subsidiary Boards with an Annual Internal Audit Opinion, as a result of the work completed during 2020/21.

Our opinion is subject to the inherent limitations of Internal Audit (covering both the control environment and the assurance over controls) as set out in Appendix 1 (Limitations and Responsibilities).

In arriving at our Annual Internal Audit Opinion, we have taken the following matters into account:

- the results of all Internal Audit work undertaken (including any upheld instances of fraud or whistleblowing) during the year ended 31 March 2021;
- in accordance with the Wheatley Group City Building Glasgow Assurance approach, we have placed reliance on the internal audit work done by the Glasgow City Council’s Chief Internal Auditor in relation to City Building Glasgow;
- due to the COVID-19 pandemic, the Group followed UK Government advice and implemented virtual working arrangements while moving to an emergency service delivery model;
- the effects of any material changes in the Group’s objectives, activities or regulatory environment; and
- whether there have been any resource constraints imposed upon us which may have impinged on our ability to meet the Group’s Internal Audit needs.

Basis of Opinion

Sufficient work has been undertaken to enable us to provide an opinion on the adequacy and effectiveness of the internal control environment in operation during 2020/21. In giving this opinion, it should be noted that assurance can never be absolute.

During the delivery of our Internal Audit plan, we identified no critical weaknesses in the governance, risk management, or internal control arrangements which would put the achievement of Group objectives at risk.

As reported to the Group Audit Committee, Management has acted promptly to address the findings we reported during the year and thereby strengthen the controls in place. Implementing agreed actions is a priority and progress is regularly reported to the Directorate Management Teams, Executive Team, Subsidiary Boards, City Building Glasgow, Group Board and the Group Audit Committee.

Internal Audit Opinion 2020/21

Based on our Group-wide work undertaken in 2020/21 a **substantial level of assurance** can be given that there is a sound system of internal control, designed to support achievement of relevant organisational objectives. However, some weaknesses in the design and or consistent application of controls exist (See **Annex 2** for Assurance Opinion Definitions). Management has agreed to the improvements to the control environment and the progress of implementing these additional controls will be reported to the Group Audit Committee.

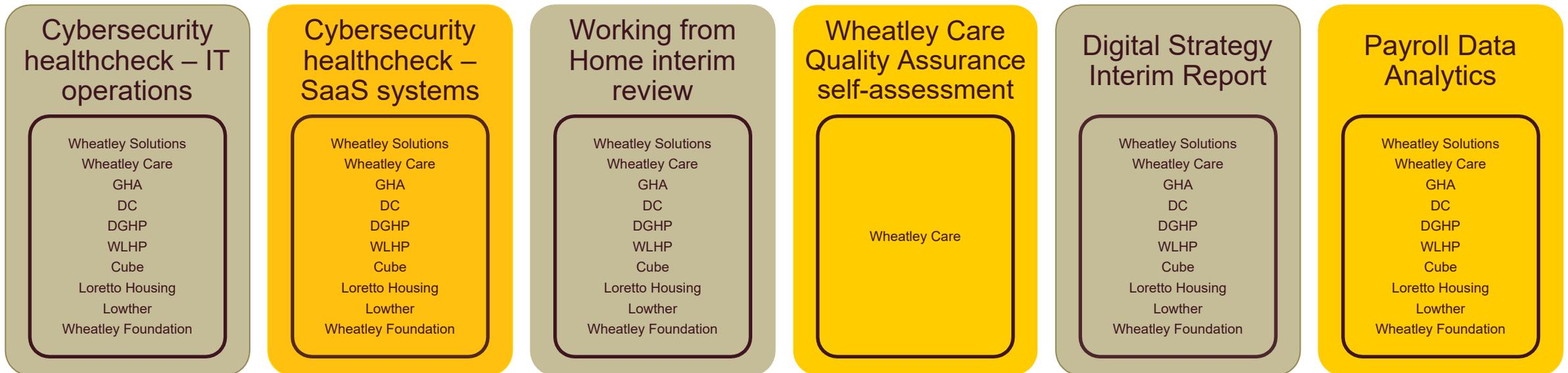
3. Summary of Findings

This section summarises the results of Internal Audit advisory reviews completed during 2020/21. Each of these reviews included an assessment of the extent to which the control objectives set out in the Terms of Reference were achieved, as reflected in the charts below.



4. Summary of other work performed

The Internal Audit team has also completed the following advisory and consultancy reviews, which did not include an assessment of the achievement of control objectives, due to the nature of the work performed.



Review Title	Entities Involved
Cybersecurity healthcheck – IT operations	Wheatley Solutions Wheatley Care GHA DC DGHP WLHP Cube Loretto Housing Lowther Wheatley Foundation
Cybersecurity healthcheck – SaaS systems	Wheatley Solutions Wheatley Care GHA DC DGHP WLHP Cube Loretto Housing Lowther Wheatley Foundation
Working from Home interim review	Wheatley Solutions Wheatley Care GHA DC DGHP WLHP Cube Loretto Housing Lowther Wheatley Foundation
Wheatley Care Quality Assurance self-assessment	Wheatley Care
Digital Strategy Interim Report	Wheatley Solutions Wheatley Care GHA DC DGHP WLHP Cube Loretto Housing Lowther Wheatley Foundation
Payroll Data Analytics	Wheatley Solutions Wheatley Care GHA DC DGHP WLHP Cube Loretto Housing Lowther Wheatley Foundation

Summaries of the findings of all the reviews conducted during 2020/21 have previously been reported to the Group Audit Committee and to Subsidiary Boards.

5. Follow Up of Management Actions

Internal Audit completes follow up activity to verify that management have implemented actions as agreed in our internal audit reports. During 2020/21, the Group Audit Committee approved a decision to pause routine follow up activity during 2020/21.

In order to resume follow up activity for 2021/22, we have completed an annual assessment of the status of all open actions.

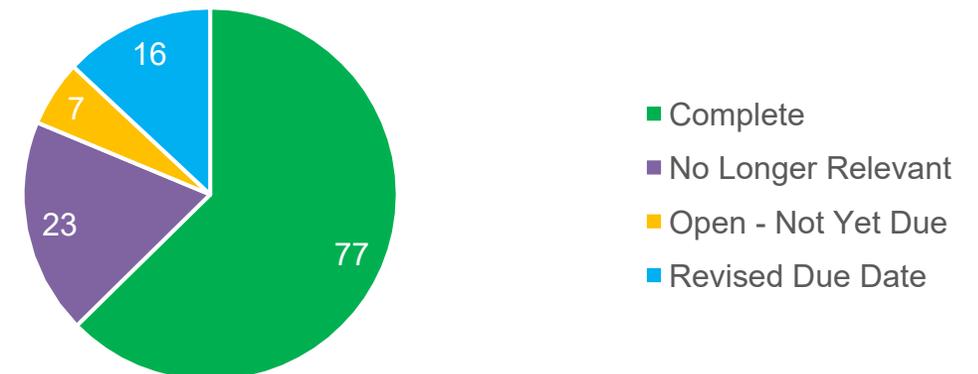
These comprise Wheatley Group actions brought forward from 2019/20, DGHP actions brought forward from 2019/20, and actions reported during 2020/21. Our assessment has included review of each action to determine whether:

- a) The action has been completed during 2020/21; or
- b) The action is no longer relevant or has been superseded by revised plans for the Group's new operating model.
- c) For those actions that remain open and relevant, we have discussed the current status with management and identified revised timescales for completion of the original actions.

Status	Actions
Actions brought forward from 29 Feb 2020	22
Q4 2019/20 actions added	16
Legacy DGHP actions added	52
New actions agreed during 2020/21	33
Total Actions followed up	123

The chart below summarises our assessment of the status of the 123 actions carried forward to 2021/22.

Status of Actions at 31 March 2021



6. IA Key Performance Indicators

The Internal Audit team’s performance against its agreed KPIs for 2020/21 is set out below:



Notes:

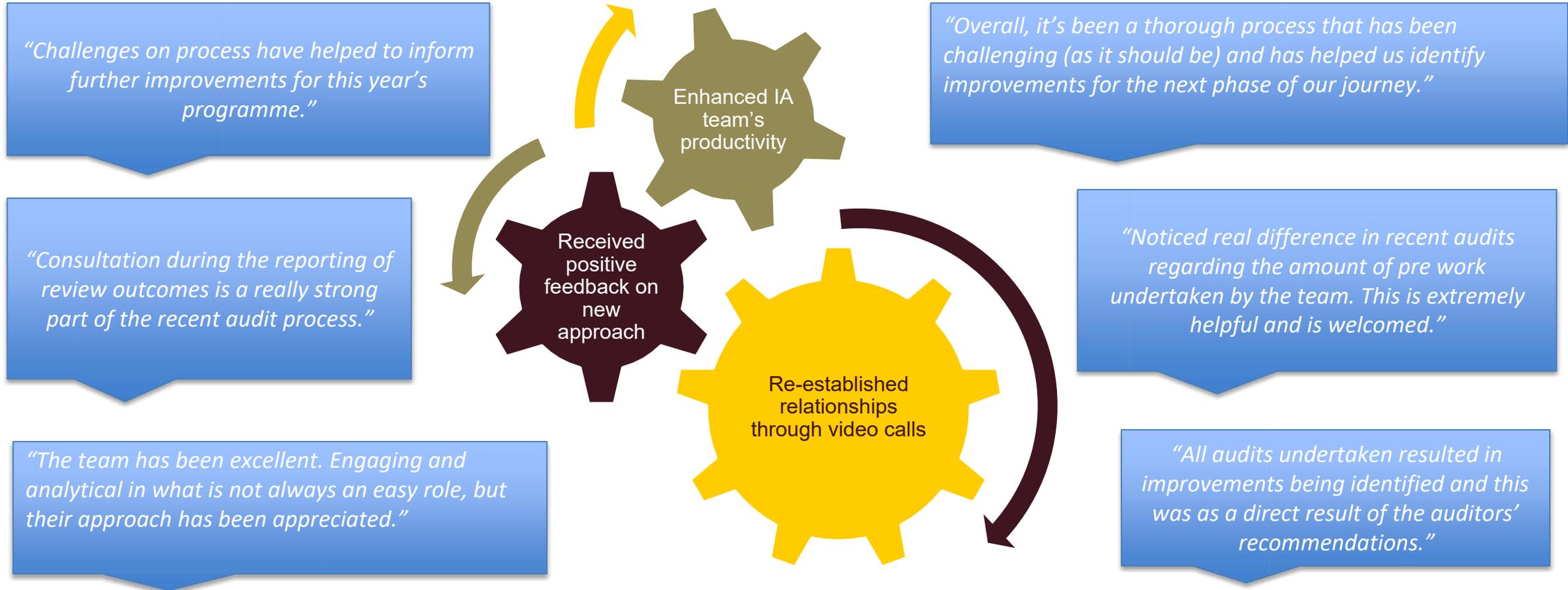
1. The 2020/21 Annual Plan was superseded following lockdown. The revised plan has been approved by the Group Audit Committee on a quarterly basis and delivered in line with proposed timescales.
2. The Internal Audit team was furloughed between April 2020 and September 2020. The team’s utilisation has therefore been measured based on 100 days for 2020/21, reflecting the period they were working.

Key:

Red	More than 15% away from target
Amber	Within 15% of target
Green	Target met / on track for year

7. IA 2020/21 Feedback

The Internal Audit team has received the following feedback since returning from furlough in September 2020/21 and changing the audit approach. The quotes are taken from 2020/21 review feedback forms received from Subsidiary Directors.



8. IA Compliance with Standards

Internal Audit compliance with professional standards

The Internal Audit team employs a risk-based approach to determine the audit needs of the Group at the start of each year, which is reviewed on a rolling three-month basis throughout the year. The team uses a risk-based methodology to plan and conduct our work, and all Internal Audit activity is performed in line with the International Standards for the Professional Practice of Internal Auditing and the Code of Professional Conduct (including Code of Ethics) promoted by the Chartered Institute of Internal Auditors.

Internal Audit independence

Each member of the Internal Audit team is required to confirm their independence annually. The Independence Statements were last collected in September 2020 and the exercise will be repeated in September 2021.

Conflicts of Interest

The Internal Audit team is led by the Director of Assurance, who reports directly to the Group Chief Executive and meets regularly with the Chair of the Group Audit Committee.

The Director of Assurance has other operational responsibilities. Consequently, the Group Audit Committee assesses the controls in place to maintain the Director's independence on an annual basis.

There have been no conflicts of interest during the year which have impacted on our independence or our ability to report our findings.

9. IA Quality Assurance and Improvement Programme

As part of the IA Team's Quality Assurance and Improvement Programme, we completed our internal quality assurance during 2020/21, comprising:

Ongoing monitoring

- Day-to-day supervision and review of IA team's work
- Key Performance Indicators (KPIs) monitoring and reporting

Annual CPE Completion

- Each IA team member completes training to meet the annual CPE requirement of their professional institute.

Annual self-assessment

- Completed using guidance issued by the CIIA
- Results reported within the Annual Report and Opinion

Annual Self-Assessment

The Internal Audit team completed the quality assessment template produced by the Chartered Institute of Internal Auditors (CIIA) and rated performance as:

Generally Conforms

- The evaluator has concluded that the relevant structures, policies, and procedures of the activity, as well as the processes by which they are applied, comply with the requirements of the individual Standard or element of the Code of Ethics in all material respects.

The results of the assessment, including identified improvement opportunities were reported separately to the Group Audit Committee.

Limitations Inherent to the Internal Auditor's Work

We have prepared the Internal Audit Annual Report and undertaken the agreed programme of work as set out in the Annual Assurance Plan, subject to the limitations outlined below.

Opinion

The Annual Internal Audit Statement is based solely on the work undertaken as part of the agreed Annual Assurance Plan. The work addressed the control objectives agreed for each individual assignment as set out in our individual Terms of Reference. The matters raised in this report are only those which came to our attention during our Internal Audit work and are not necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

There might be weaknesses in the system of internal control that we are not aware of because they did not form part of our programme of work, were excluded from the scope of the individual review, or were not brought to our attention. Our audit plan is based on risk to capture the higher risk areas within the Group. As a consequence, Management and the Group Audit Committee should be aware that our opinion may have differed if our programme of work or scope for individual reviews was extended or other relevant matters were brought to our attention.

Internal Control

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgement in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Responsibilities of Management and Internal Audit

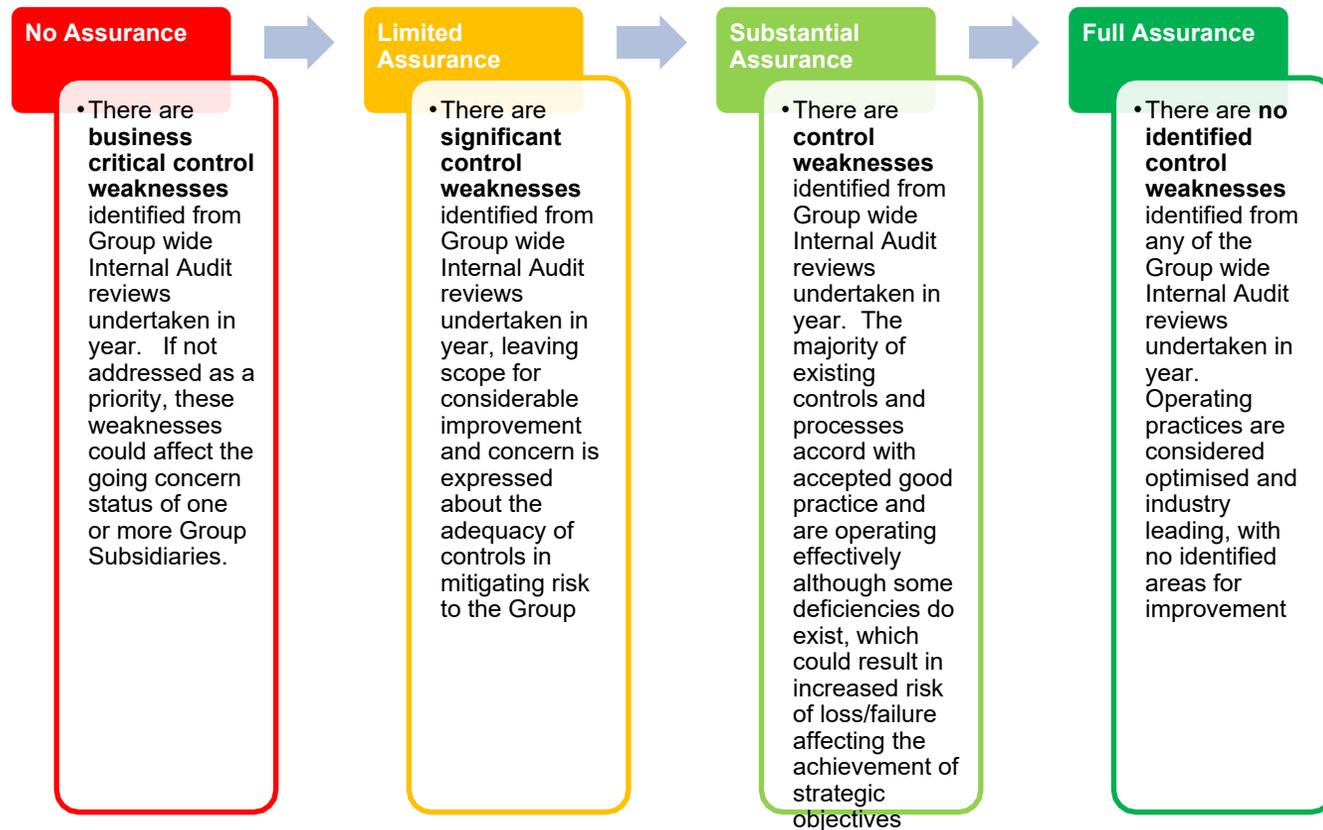
It is Management's responsibility to develop and maintain sound systems of risk management, internal control and governance to ensure the prevention and detection of irregularities and fraud. Internal Audit work should not be seen as a substitute for Management's responsibilities for the design and operation of these systems.

Internal Audit endeavour to plan work so that we have a reasonable expectation of detecting significant control weaknesses and if detected, we shall carry out additional work directed towards the identification of consequent fraud or other irregularities. Internal Audit procedures alone, even when carried out with due professional care, do not guarantee that fraud will be detected, and our examinations as Internal Auditors should not be relied upon to disclose all fraud, defalcations or other irregularities which may exist.

Annex 2: Assurance Opinion definitions

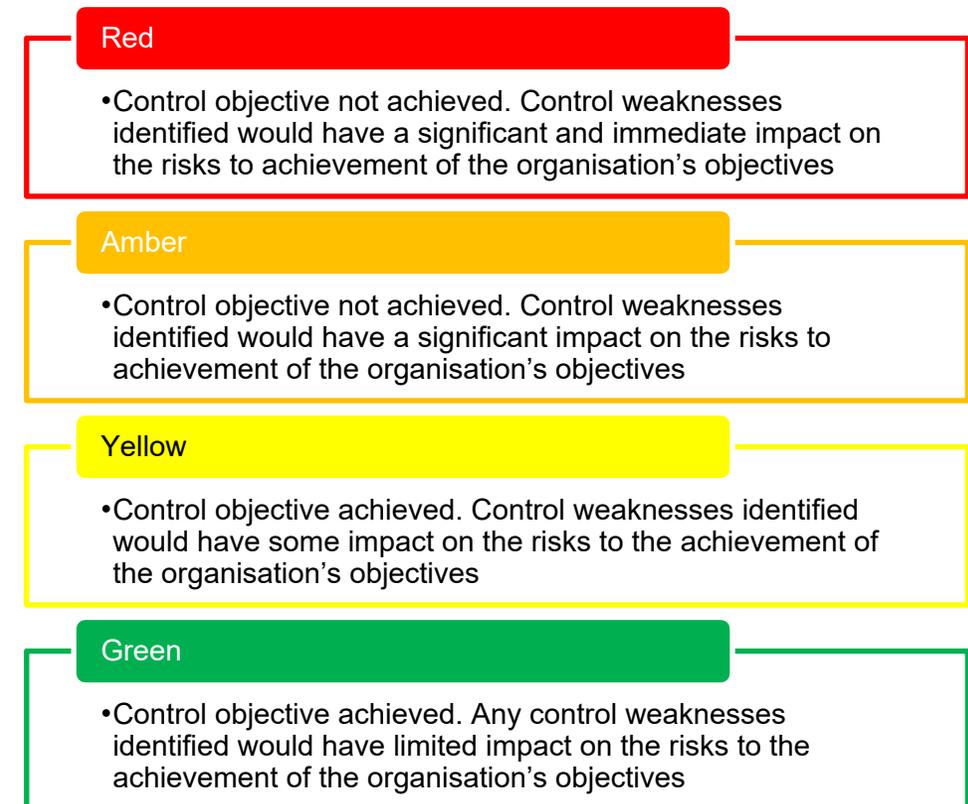
Annual Assurance Opinion Definitions

The table below details the different types of Internal Audit opinion which may be given:



Control Objective Classification

Each control objective is assigned a classification based on an assessment of the impact of individual findings within the report, as follows:



Annex 3: Respective roles of Group Audit Committee and Partner Boards



Core area	Group Audit Committee roles and responsibilities	Partner Board roles and responsibilities
Internal Audit	<ul style="list-style-type: none"> ▪ Approve annual assurance plan (all planned Internal Audit work for the year). ▪ Consider feedback from Group wide audits and inspections and monitor progress in implementing recommendations. ▪ Consider annual report and opinion for Group. ▪ Monitor effectiveness of Internal Audit. 	<ul style="list-style-type: none"> ▪ Note the Annual Plan and identify any potential areas to recommend to the Group Audit Committee for inclusion. ▪ Note feedback from Partner specific audits and inspections and monitor progress in implementing recommendations. ▪ Receive updates on Group-wide audits as part of bi-annual assurance update. ▪ Note Group annual report and opinion. ▪ Provide feedback, as appropriate, on Internal Audit to Group Audit Committee.
Risk, Fraud and Whistleblowing	<ul style="list-style-type: none"> ▪ Review and make recommendations to the Group Board on the Group's risk management framework and Corporate risk register (Subsidiaries and Joint Ventures). ▪ Group Audit Committee approves 'Fraud, Corruption and Bribery' and 'Whistleblowing' policies. 	<ul style="list-style-type: none"> ▪ Approve Subsidiaries risk appetite level and risk register. ▪ Partner Boards to monitor compliance with 'Fraud, Corruption and Bribery' and 'Whistleblowing' policies.
Financial Statements	<ul style="list-style-type: none"> ▪ Review the Group's accounting policies. ▪ Review financial statements of all group members. 	<ul style="list-style-type: none"> ▪ Approve individual financial statements and letters of representation.
External Audit	<ul style="list-style-type: none"> ▪ Approve annual audit plan. ▪ Recommend appointment/re-appointment of external auditors to Group Board. ▪ Set policy for award of non-audit work to external auditors. 	<ul style="list-style-type: none"> ▪ As required under individual constitution.
Policy	<ul style="list-style-type: none"> ▪ Recommend to Group Board and/or approve assurance related policies. 	<ul style="list-style-type: none"> ▪ Provide feedback on and implement Group assurance policies.

Appendix 2 - Group Assurance Update August 2021

Ranald Brown
Director of Assurance

1. IA Plan 2020/21 Status

Status of Reviews : This section summarises the results of Internal Audit activity completed during this period. We have completed the reviews approved by the Group Audit Committee at its February 2021 meeting.



Digital Strategy Interim Report (section 5)

- Wheatley Solutions
- Wheatley Care
- GHA
- DC
- DGHP
- WLHP
- Cube
- Loretto Housing
- Lowther
- Wheatley Foundation

Wheatley Care Quality Assurance self-assessment (section 6)

- Wheatley Care

Payroll Data Analytics (section 7)

- Wheatley Solutions
- Wheatley Care
- GHA
- DC
- DGHP
- WLHP
- Cube
- Loretto Housing
- Lowther
- Wheatley Foundation

Follow-Up (section 8)

- Wheatley Solutions
- Wheatley Care
- GHA
- DC
- DGHP
- WLHP
- Cube
- Loretto Housing
- Lowther
- Wheatley Foundation

Internal Audit Plan 2021-22 (section 9)

- Wheatley Solutions
- Wheatley Care
- GHA
- DC
- DGHP
- WLHP
- Loretto Housing
- Lowther
- Wheatley Foundation

1. IA Plan 2020/21 Status

Control Objective Classification:

Each control objective is assigned a classification based on an assessment of the impact of individual findings within the report, as follows:

Red	Amber	Yellow	Green
<ul style="list-style-type: none">• Control objective not achieved.• Control weaknesses identified would have a significant and immediate impact on the risks to achievement of the organisation's objectives.	<ul style="list-style-type: none">• Control objective not achieved.• Control weaknesses identified would have a significant impact on the risks to achievement of the organisation's objectives.	<ul style="list-style-type: none">• Control objective achieved.• Control weaknesses identified would have some impact on the risks to the achievement of the organisation's objectives.	<ul style="list-style-type: none">• Control objective achieved.• Any control weaknesses identified would have limited impact on the risks to the achievement of the organisation's objectives.

2. Allocations

Report Conclusion

The Group suspended allocations across its housing stock from the end of March 2020 in line with the Scottish Government's COVID-19 response. Management put temporary processes in place to manage customer expectations and ensure that staff could work safely once letting activity could resume. We reviewed the Allocations process developed during the COVID-19 lockdown and assessed plans for development of a post-COVID process for the new operating model. This included consideration of variations to Allocations processes followed across the MyHousing, EdIndex and Orchard systems.

We tested a sample of 25 allocations across all three systems and found that interim processes were applied correctly. We also reviewed all complaints received in the year to date and found no trends or cases that indicate any issues with the processes followed or information provided to customers.

There are ongoing reviews into aspects of the allocations systems, such as the use of digital signatures for tenancy agreements, and the outcome of these will impact on the way in which lessons learned during lockdown can be applied in a post-COVID process.

This report includes agreed management actions to progress the outcomes of this ongoing activity and consider how staff working across all three Allocation systems can share learning and opportunities for improvement.

Control Objective Classification

 The Group's agreed COVID-19 response for allocations activity has been reviewed and amended as required during the pandemic period, in line with Scottish Government guidance.

 Customer expectations have been managed throughout the lockdown period, with support provided to existing and new housing applicants as required.

 The registration, selection and offer processes currently in use enable staff to work remotely, and in a COVID safe way.

 Properties used for temporary accommodation during the pandemic will be returned or 'flipped' in a managed way which minimises void periods and supports the achievement of the Group's agreed COVID-19 response.

 Lessons learned during lockdown will inform the development of a post-COVID allocations process for the new operating model.

Areas of Good Practice

- ✓ The Group's Void and Allocation Recovery Plan has evolved in response to changing Scottish Government COVID guidance and priorities. The Executive Team received weekly updates and presentations on the Group's allocations response throughout lockdown.
- ✓ Specific guidance on managing our homes during COVID was created for Housing Officers. This includes Health and Safety procedures for conducting viewings and sign-ups safely.
- ✓ Voids and Allocations Forum has been established to track voids, review void performance and identify and reduce blockages across West RSLs. Forum leads attend the Allocations Community of Excellence (COE) where opportunities for improvement can be shared.
- ✓ COE Bulletins are published on WeConnect to keep staff informed of the work of the COE and ongoing activity.
- ✓ RSL websites contain clear information for customers on how to access housing or get support. Letters were sent to customers who had live offers or notes of interest in place at the time letting activity had to stop due to lockdown to reassure them that these would still be valid post-lockdown.
- ✓ MyHousing and Orchard Housing Management systems retain the details of each selection and offer, providing an online record and audit trail of which applicants were eligible at the time of selection and the rationale for each offer made.
- ✓ Opportunity to develop a matching process for section 5 applications has been trialled with Glasgow City Council. The results of a Vanguard review are still to be agreed and shared with the Executive Team, but it is expected that the proposed approach would reduce staff time spent reviewing referrals, reduce the likelihood of section 5 applications held in MyHousing becoming outdated and increase the likelihood of successful tenancies.
- ✓ Flat-flipping approach is being used where customers have settled well into a temporary property and community and would benefit from remaining in that home permanently.

Opportunities to Improve - (Management had identified these areas prior to our review. They reflect work which is in progress and planned next steps.)

- Once approved, the Allocations Recovery Plan should form the basis of an action plan of approved changes to the Allocation systems, policies and procedures in place across the Group. The Allocations COE should manage the plan and ensure it reflects the outcomes of the Group Allocation systems review and Vanguard review.
- Management should review the EdIndex process and to identify any short-term solutions which could make the process more efficient while staff continue to work remotely. For example, the Sharepoint 'version history' function could remove the need for different versions of the same letting pack document to be retained.
- An Allocations Engagement Plan should be developed to set out what key messages the Group will communicate with customers, how and when. Management should also use the plan to identify key communications to staff to ensure they have the knowledge to manage customer queries and concerns about post-COVID allocations activity in a consistent and informed way.
- Service Innovation & Improvement Teams should resume compliance checks on samples of Allocations to confirm that selections and offers are being completed in line with policy. The new Voids and Allocations Forum will provide an opportunity to share learning from these checks with RSLs in the West. The Allocations COE should consider how staff in the East RSLs and DGHP can also work with this Forum to increase sharing of good practice at an operational level.
- Following the Executive Team's decision on the use of digital signatures on tenancy agreements, the Allocations COE should lead the development of revised procedures and guidance to support either the adoption of digital signatures, or a revised process for handling and storing tenancy agreement documents following sign-up.

3. Business Continuity Planning

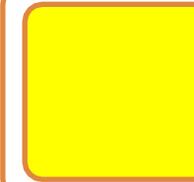
Report Conclusion

The COVID-19 pandemic has demonstrated the importance of having a robust Business Continuity Management System (BCMS) in place. While the Group has a documented framework for business continuity in place, the Group's response to COVID-19 has deviated from the planned response in order to successfully manage a challenging situation.

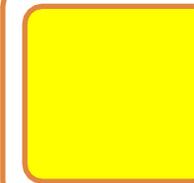
Management was aware from the outset of this review that the Group's BCMS requires update (particularly to reflect the new operating model) and so this review assessed the existing documentation against the good practice outlined in ISO 22301:2019 and any lessons learned during 2020/21.

We have identified some areas of good practice to be continued and have highlighted opportunities for improvement, including the opportunity to revise the BCMS structure in light of the new operating model.

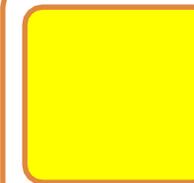
Control Objective Classification



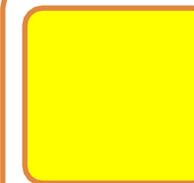
Lessons learned and examples of good practice from local COVID-19 responses are being used to review and update the Group's BCP approach and individual BCPs.



BCP business owners review the content of their plans at least annually and as operational changes are implemented including responses to Scottish Government guidance.



Group BCP's include identification of key office bases, IT systems and any supply chain threats to the delivery of key services, including vendor solvency and implementation of supplier BCPs.



There is a list of prioritised BCPs that reflects the order in which services and IT systems would be restored if all became unavailable at the same time.

3. Business Continuity Planning

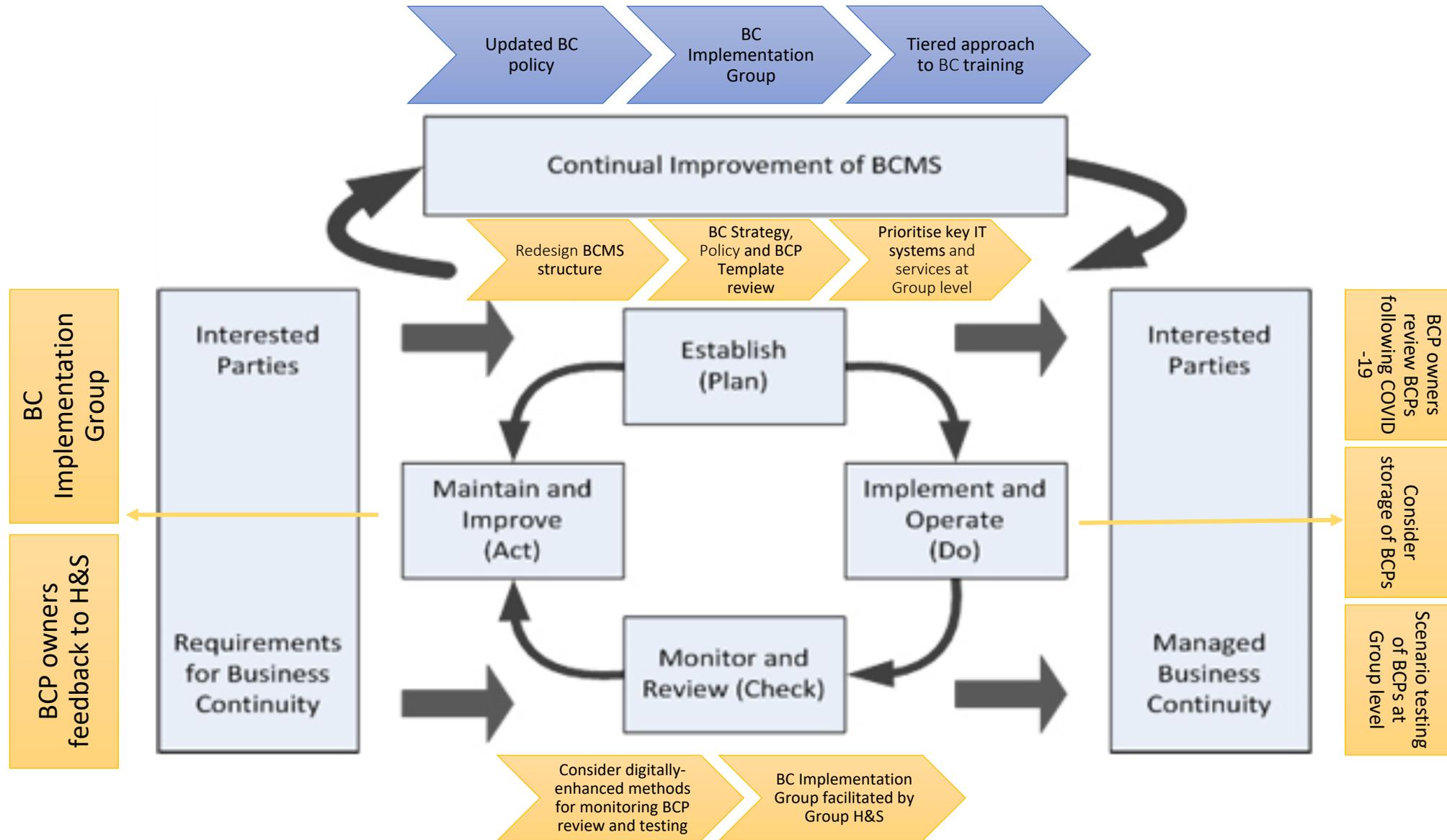
Areas of Good Practice

- ✓ At the start of lockdown, an Essential Services presentation to the Wheatley Group Board and Subsidiary Boards clearly set out who was in the initial response team, their responsibilities and the approach being taken.
- ✓ In response to COVID-19, Business Continuity (BC) was successfully directed and implemented by the Group Chief Executive and Executive Team through daily calls in the initial phase which allowed a consistent response to be implemented and consistent messaging to be relayed across Group.
- ✓ The uncertain return to full service delivery caused by COVID-19 was managed through regular business updates and remobilisation plans reported to Boards to allow scrutiny over business decisions. These accounted for a variety of possible scenarios depending on easing/tightening of restrictions (e.g. the impact of 10%/20%/30% loss of staff).
- ✓ The Group aligned its BC response to relevant legal/regulatory requirements (e.g. the Coronavirus (Scotland) Bill).
- ✓ Business Continuity is a risk on the Group's Strategic Risk Register which is regularly reviewed by senior management, Group Audit Committee and Boards.
- ✓ The Group Health and Safety Manager attends a Disaster Response Team meeting with representatives from the emergency services, Scottish Government and Local Authorities, which provides good practice examples that can be introduced to the Group BCMS.

Opportunities to Improve – including to reflect the new operating model

- Group Health and Safety should develop a proposed new BCMS, agreed by ET, which reflects the Group's new operating model. This should be documented to show which teams are responsible for different aspects of the BCMS and which teams should prepare BCPs.
- Group Health and Safety should establish a BC Implementation Group to oversee monitoring and review of BCPs, share lessons learned and good practice and to discuss and action improvements to the BCMS.
- The BC Implementation Group should review the BCMS (including BC strategy, BC policy and BCP templates) in line with the summarised improvement areas noted below and the redesigned Group BC structure.
- Group Health and Safety should review the BCP template and consider including assessment of the impact particular events might have on services over different time periods (e.g. a few hours, a day, a week) and the different levels of support that might be required from teams such as IT and Facilities Management in each case.
- The BC Implementation Group should develop and monitor a prioritised list of IT systems/networks across Group which considers the needs of business users and the order in which resources are made available during a BC event.
- Group Health and Safety/ the BC Implementation Group should consider digitally-enhanced methods (e.g. Teams/SharePoint/a BC apps) for storing BCPs and monitoring BCP review/exercise completion.
- Group Health and Safety/ the BC Implementation Group should review BC training, giving consideration to a tiered system of BC training across Group, depending on the individual's level of involvement and responsibility for BC. This would include review of the Group's current BCP e-learning module, which is available on MyAcademy.

3. Business Continuity Planning



4. DGHP Transformation Programme

Report Conclusion

This report reviewed the revised DGHP Transformation Programme, 'Time to Excel', to assess the processes in place to manage delivery of a large-scale change programme.

We found that the Programme is well-managed, has allowed for the impact of COVID-19 on the delivery of the individual projects and has made significant progress towards the full integration of DGHP into the Group. There has been strong communication with stakeholders and staff from both DGHP and Wheatley Solutions have commented positively on the joint working arrangements for the programme.

We noted some minor opportunities for continuous improvement that would facilitate delivery of the remainder of the programme.

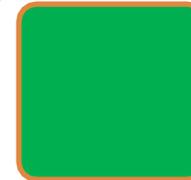
Control Objective Classification



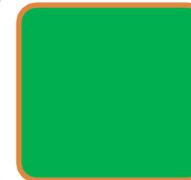
The transformation programme has been updated as the challenges of COVID-19 are managed.



Key stakeholders are informed of implementation progress and any changes due to COVID-19.



The Transformation Programme Group meets regularly to review plan progress and identify any emerging risks or issues to be escalated to the Executive Team and Boards as appropriate.



A process is in place to review and evaluate individual projects within the programme as they are completed to determine the extent to which success criteria have been delivered.

Areas of Good Practice

- ✓ The Transformation Programme Board meets every two weeks to review and assess progress of the outstanding projects within each of five workstreams. This includes review of workstream exception reports and status of previous meeting actions, which are formally documented.
- ✓ Detailed progress reports on the Transformation Programme status, including where the impact of COVID –19 has caused slippage to the original programme target dates, have regularly been provided to the Group’s Executive Team (ET), the Group and DGHP Boards.
- ✓ Requests for amendments to timelines and changes to the Transformation Programme have been approved by ET and the Group Board, in line with the Group’s Authorisation Framework.
- ✓ A detailed Communications and Engagement Plan has been developed and implemented by the Group and DGHP Communications teams to support delivery of the Transformation Programme.
- ✓ Members of the Transformation Programme Board have held regular internal and external stakeholder updates, including to the wider Dumfries and Galloway community, using different mediums such as, Zoom meetings, YouTube videos for staff, staff presentations, local press releases and customer newsletters.
- ✓ An independent evaluation is being commissioned by the Group to assess delivery of DGHP and Group Promises, which the programme was set up to deliver.

Opportunities to Improve: Continuous improvement actions

1. Recording of Meeting Actions - A master action log will be created to improve the Transformation Programme Board's ability to track open and ongoing actions.

2. Recording of Changes to the Transformation Programme - A change log will be created to record all future changes to the Transformation Programme, which will provide additional assurance over the completeness of amendments and provide clarity over any programme slippage.

3. Strategic Partnership Register - A Transformation Programme Strategic Partnership Register will be developed to ensure knowledge from partnership relationships is not lost due to staffing changes or remits.

4. Lesson Learned - A lesson learned /success log will be added to the key documents file of the Transformation Programme to record opportunities for future improvements to the management of projects and the overall Programme.

Members of the Transformation Programme Board will participate in a lessons learned session to assess delivery of the programme to date, with the outcomes from the session recorded in the lesson learned /success log.

5. Base-lining performance to allow measurement of project benefits - A review of “DGHP Promises” will be completed, to establish, where appropriate, agreed measures that will demonstrate delivery and achievement of benefits.

5. Digital Strategy Interim report

Work Performed: This interim review examined the status of the technology planning underway to support the delivery of the technology elements within the Wheatley Group Strategy 2021-26 , the Wheatley Solutions Strategy 2021-2026, and the February 2021 Wheatley Solutions Board paper “Approach to developing our technology plan”.

Findings:

- There are linkages between the overall approved Group Strategy and the agreed Delivery Plan. This includes the key digital areas included within the Group’s Strategy.
- Managing Directors and Directors have taken ownership for delivery of the digital projects being implemented across the Group to reflect the ambition to have digital leaders throughout the organisation.
- Seven key focus areas have been identified to meet Wheatley’s Strategic Digital Outcomes. High level road maps have been created for each focus area outlining the activities planned over the next five years. Ongoing improvement and enhancement of projects has also been built into the road map.
- The Director of IT has taken on the role of the digital lead.
- The Digital Team has been created, which sits under the Director of IT & Digital Services’ remit. The Digital Team has three goals:
 1. Improve digital maturity across the 7 model competencies,
 2. Improve project delivery, and
 3. Promote digital adoption and digital ways of working. Work is ongoing to bring the appropriate skills and resources into the Digital Team.

Next Steps:

- Detailed planning will be reviewed through completion of Year 1 project scoping documents to detail dependencies, resources required, and key stakeholders.
- Consideration will be given to the programme governance structure to support delivery of the plans.
- A communications plan will be created by the Digital Team to ensure engagement for wider groups of staff during the programme delivery stages.

Further Action: *The IA team will work with Azets to bring an updated position to the Group Audit Committee in August 2021.*

6. Wheatley Care Quality Assurance Self-assessment



Work Performed: As part of Wheatley Care’s project to update its quality assessment processes, Service Managers were asked to complete a pilot self-assessment based on Question 7 (Q7) of the Care Inspectorate’s Quality Assurance Framework. Q7 was selected for the pilot because it relates to arrangements for the management of services during the COVID-19 pandemic. The pilot checklist was circulated to all services for completion, with managers initially asked to provide a “yes / no” response along with evidence to support the selected response. The Internal Audit team reviewed a sample of six Service responses to determine whether the process design provided assurance that there was sufficient evidence available to support each service’s self-assessment.

Findings: Our initial assessment found that more evidence is required to support the services’ self-assessments and we identified areas in which the process design could be improved to simplify the assessment process and to promote capture of the required evidence. For example, the Q7 checklist contains 60 statements against which service managers are asked to rate performance and provide evidence. This represents a significant administrative burden, especially when replicated across Questions 1 – 5 (Question 6 requires development of an action plan). In designing the process, further consideration should be given to balancing the level of assurance provided against the time taken to complete each exercise.

We also requested further evidence from each of the Services and completed virtual tours of each service to determine whether the evidence gaps in the self-assessments were due to lack of information or if processes were not followed. We found that, while additional evidence was provided, this did not fully evidence the statements in all cases. The volume of the evidence provided and the fact it was still insufficient to fully evidence the pilot checklist reinforced our conclusion that the design of the pilot process would be overly onerous and that there are more efficient ways of presenting the information.

Next Steps: *We have discussed options for improving the process design and will continue to work with Care management to implement the new process during 2021/22.*

Summary of work performed

There are no exceptions to highlight to the Group Audit Committee. The Internal Audit team has developed a planned approach to payroll testing that identifies those controls to be tested through development of continuous auditing and those where a periodic testing approach remains more appropriate. We have confirmed the operation of the controls through a walkthrough test and have started development of the continuous audit testing scripts.

Using the data available for 2020/21 we have used IDEA to confirm:

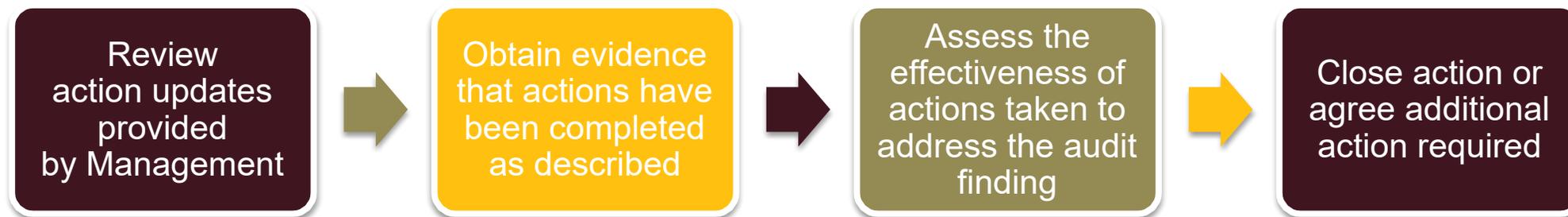
1. There are ***no duplicate employee numbers being used*** (across all payrolls)
2. We identified ***21 duplicate bank account numbers in use during the year*** (across all payrolls). These were matched to the staff establishment list and most are clearly joint accounts, with the remainder relating to a change in role or employment status.
3. Our testing confirmed that ***none of the duplicate bank accounts belong to Payroll staff*** .
4. There were 16 employees who received no Gross Pay in year. These are all Wheatley Care staff and we have confirmed with the payroll team that this is due to the nature of the contracts in place for these staff members.

Next Steps

- The payroll team will prepare reports so the IA team can test the IDEA approach and confirm all planned testing works as expected. This will include ongoing comparison of payroll data from Access (new name for Selima) to HR spreadsheet of:
 - New starts
 - Leavers
 - Salary changes
 - Changes to bank details.
- The payroll and IA teams will agree a schedule of reports to be provided at agreed points during the year.
- Following the introduction of the planned self-service approach for expenses and overtime, the IA team will complete walkthrough testing and update the IDEA testing approach (if required).
- The results of the continuous audit testing will be reported to each meeting of the Group Audit Committee during 2021/22.

Follow Up Approach 2020/21

Internal Audit completes follow up activity to verify that management have implemented actions as agreed in our internal audit reports. Follow up activity is usually completed on an on-going basis, with quarterly updates reported to the Executive Team and Group Audit Committee. Our verification approach includes the following key steps:



In March 2020 in response to COVID-19, the Group implemented a reduced service delivery model. To support this and enable management to focus on the remobilisation of services, the Group Audit Committee approved a decision to pause routine follow up activity during 2020/21. In order to resume follow up activity for 2021/22, we have completed an annual assessment of the status of all open actions. These comprise Wheatley Group actions brought forward from 2019/20, DGHP actions brought forward from 2019/20, and actions reported during 2020/21. Our assessment has included review of each action to determine whether:

- The action has been completed during 2020/21; or
- The action is no longer relevant or has been superseded by revised plans for the Group's new operating model.
- For those actions that remain open and relevant, we have discussed the current status with management and identified revised timescales for completion of the original actions.

This report summarises the results of our assessment and the status of those actions carried forward to 2021/22.

8. Follow up

Group-wide action status at 31 March 2021

Overall there has been good progress in implementing actions during 2020/21, with 77 of the 123 actions followed up being confirmed by Internal Audit as complete. A further 23 have been closed as no longer relevant, due to changes arising the Group's new Strategy or the Group's new operating model, leaving a total of 23 open actions.

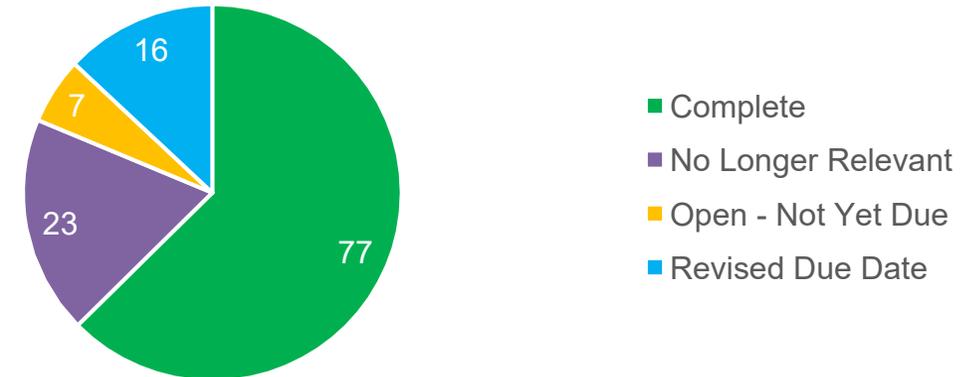
Sixteen of the open actions have been allocated revised due dates because delays caused by resource availability and competing priorities during COVID-19 lockdown meant actions were not completed in line with original timescales. These 16 actions arose in the following reports, and details of the current status of each action are set out in the rest of this report:

- External Stakeholder Engagement
- Assurance Statement
- Project Management
- Risk Management
- Talent Management
- Universal Credit Management
- Fire Safety
- WFH Readiness Health Check
- Cyber Security Health Check
- Wheatley Foundation Emergency Response Fund Expenditure

Status	Actions
Actions brought forward from 29 Feb 2020	22
Quarter 4 2019/20 actions added	16
Legacy DGHP actions added	52
New actions agreed during 2020/21	33
Total Actions followed up	123

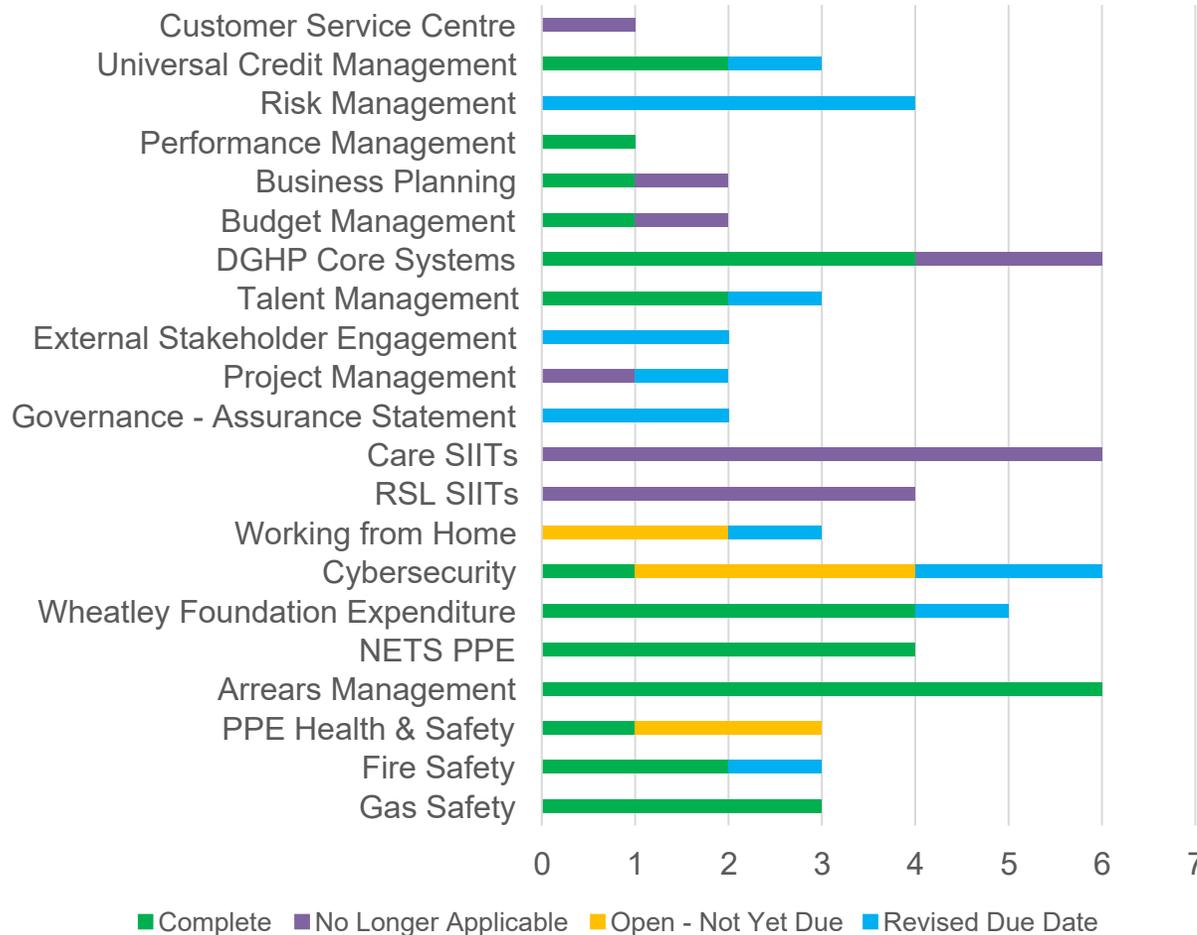
The chart below summarises our assessment of the status of the 123 actions carried forward to 2021/22.

Status of Actions at 31 March 2021

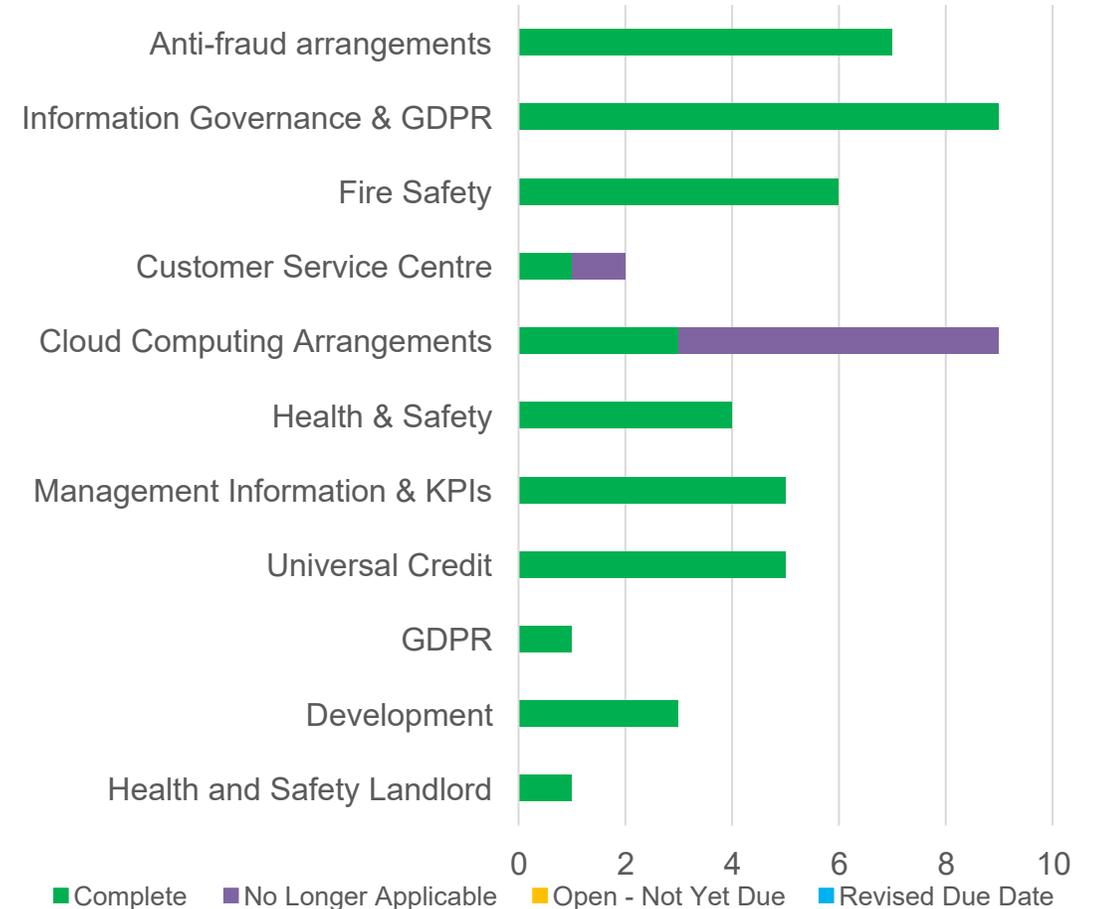


8. Follow up

Wheatley Group actions status



Legacy DGHP action status



Identification of internal audit areas of focus

As previously agreed by the Group Internal Audit Committee, the Internal Audit team has re-introduced some aspects of annual planning for 2021-22, in order to provide assurance on the completeness of systems and processes considered when identifying reviews for the rolling 3-month plan.

This has resulted in identification of areas of audit focus over the next 12-month period (see next slide), from which reviews for the next 3 months have been prioritised, based on consideration of the following matters:



The areas of audit focus we have identified have been allocated to one the following four categories.



Assurance to Group and Subsidiary Boards

The Internal Audit team will also consider the extent to which the identified areas of focus for 2021-22 apply to Group and Subsidiary Boards, to confirm that an appropriate range of assurance is provided. This includes the following:

RSLs	Care	Commercial	Support
<ul style="list-style-type: none"> •GHA •DGHP •DC •Loretto Housing •WLHP •Cube (part year) 	<ul style="list-style-type: none"> •Wheatley Care 	<ul style="list-style-type: none"> •Lowther •City Building Glasgow (Joint Venture) 	<ul style="list-style-type: none"> •Wheatley Solutions •Wheatley Foundation •WGC •WLF1 •WLF2

9. Internal Audit Areas of Focus for 2021/22

The following details the identified areas of audit focus over the next 12 months to be monitored during 2021-22. This list (along with any new risk areas) will be used to identify reviews to be prioritised each quarter, for approval by Group Audit Committee. The areas of focus will also be reviewed quarterly. The areas highlighted in bold italics are proposed for the next three months.

Operational Process

- **Accounts payable: Purchase Cards, Faster Payments**
- **Payroll and expenses**
- **Furlough scheme**
- Accounts payable: IPOS
- Complaints management
- Voids management
- Treasury & Cash management, including covenant reporting
- Lowther: Letting process
- Procurement: Use of Supplier Frameworks
- Home working follow up
- Care Appointee Accounts

Regulatory Focus

- **SHR Annual Assurance Statement**
- **Environmental, Social and Governance (ESG) reporting arrangements**
- **Equalities & Human Rights reporting**
- Lowther: Factoring Code of Conduct process
- Implementation of Group Homelessness Framework
- Fire Risk Assessments
- Care quality assurance framework

Strategic Change

- **Digital Strategy and Technology Roadmap follow up**
- CSC operating model
- Digital Maturity Assessment refresh
- New Build Programme- locality planning, development pipeline, portfolio additions
- Customer Engagement model
- DGHP Transformation Programme
- Repairs Transformation Project
- Capital Investment Programme

Management Focus

- Delivery of promises to Cube tenants
- Power BI reporting
- Group-wide review of repairs provision by geographic area
- MyAcademy
- New build programme – securitisation process
- Employee Performance Management system (MyContribution)
- User device / asset management
- Repairs end-to-end customer journey (with GCC to review CBG arrangements)

9. IA Plan Key Performance Indicators 2021/22

In line with previous years, the Internal Audit team will monitor and report on performance against agreed targets throughout 2021/22. The proposed targets are set out below, for approval by Group Audit Committee. These targets have been revised to provide a wider assessment of team performance.

<p>Customer Satisfaction: consultation and engagement</p> <ul style="list-style-type: none">• <i>Target Average score: 8 out of 10</i>	<p>Customer Satisfaction: delivery of review</p> <ul style="list-style-type: none">• <i>Target Average score: 8 out of 10</i>	<p>Customer Satisfaction: Added value of actions</p> <ul style="list-style-type: none">• <i>Target Average score: 8 out of 10</i>
<p>Team utilisation on IA delivery (based on 200 days)</p> <ul style="list-style-type: none">• <i>Target: 100% utilisation</i>	<p>Team operates in accordance with IIA Standards</p> <ul style="list-style-type: none">• <i>Target: "Generally Conforms" rating</i>	<p>Team members meet CPD/ training requirements</p> <ul style="list-style-type: none">• <i>Target: 100% of team</i>
<p>Annual workplan: completed to agreed timescale and budget</p> <ul style="list-style-type: none">• <i>Target: 100% of audits</i>	<p>Annual Report available for signing of Annual Accounts</p> <ul style="list-style-type: none">• <i>Target: August Group Audit Committee</i>	

The three customer satisfaction measures will be based on feedback forms completed by auditees following each review.

Performance against target will be allocated a Red, Amber or Green rating, as follows:

-  More than 15% away from target
-  Within 15% of target
-  Target met / on track for year



Report

To: West Lothian Housing Partnership Board

By: Pauline Turnock, Director of Financial and Legal Services

Approved by: Steven Henderson, Group Director of Finance

Subject: Finance report

Date of Meeting: 18 August 2021

1. Purpose

- 1.1 The purpose of this report is to provide the Board with:
- An overview of the management accounts for the period to 30 June 2021 including the latest forecast for 2021/22; and
 - To provide an update on the SHAPS pension valuation at 30 September 2020.

2. Authorising and strategic context

- 2.1 Under the terms of the Intra-Group Agreement between The West Lothian Housing Partnership and the Wheatley Group, as well as the Group Authorise, Manage, Monitor Matrix, the WLHP Board is responsible for the on-going monitoring of performance against agreed targets. This includes the on-going performance of its finances.

3. Risk appetite and assessment

- 3.1 Our agreed risk appetite for performance against Group 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”.
- 3.2 Delivery of financial results within approved budgetary limits is a key element in delivering our strategy and maintaining the confidence of investors. This report provides the Board with an update of performance to date to allow it to discharge its role in monitoring performance and agreeing any actions required.

4. Background

- 4.1 This report outlines performance against budget for the period to 30 June 2021, and provides an update on the SHAPS pension update as at 30 September 2020.

5. Customer engagement

5.1 No implications.

6. Discussion

6.1 This report outlines performance against budget with the appendix providing more detail on the financial results.

Period to 30 June 2021

6.2 We have reported a statutory deficit of £253k in the period to 30 June 2021, £72k favourable to budget.

6.3 Total income is £11k favourable to budget. Gross rental income of £929k is £1k favourable to budget and void losses are £10k favourable to budget.

6.4 Total expenditure of £895k is £42k favourable to budget with the largest favourable variances relating to employee costs and running costs. Staff costs savings have resulted from a vacancy and the secondment of a Housing Officer to another subsidiary. Running costs reflect the continued savings generated to date from the ongoing impact of the working from home model.

6.5 Repairs and maintenance costs are £4k lower than budget. Within this, reactive repairs spend is £1k higher than budget with strong customer demand.

6.6 Core investment expenditure of £100k is £34k favourable to budget, it is expected spend will be in line with budget by year end as works fully resume.

6.7 New Build expenditure of £1,197k is reported at the end of period 3 with the variance of £3,060k driven by lower than expected spend at several sites including Almondvale (£0.9m), Jarvey Street (£0.5m), Blackness Road (£0.5m) and Sibbalds Brae (£1.1m) which is now likely to be a golden brick arrangement. Grant income of £328k has been received in the year to date for Winchburgh O, the variance against budget reflects the lower than budgeted expenditure detailed above.

Q1 2021/22 full year forecast

6.8 The Q1 forecast full year out-turn for 2021/22 reflects the results in the year to date as well as expected expenditure for the remaining 9 periods of the year. The forecast operating surplus of £12,662k is £53k higher than budget. Statutory surplus forecast of £11,731k is £112k favourable to budget.

6.9 The key drivers of the variance are lower void losses, staff costs and direct running reflecting the year to date favourable variances. Staff costs reductions reflect the Housing Officer secondment in the current year.

6.10 Running costs include a prudent element of continued savings anticipated from staff continuing to work for home and the move to the hybrid model in the second half of the year.

- 6.11 Interest costs are forecast to be £59k favourable to budget driven by lower interest rates as a result of the restructure of fixed rate loans in March 2021.
- 6.12 Forecast net capital expenditure of £8,805k is £790k lower than budget. New build expenditure is forecast to be £4,735k below budget with Sibbalds Brae likely to be a golden brick arrangement changing the timing of payments and forecast £3.7m below budget and the delay to the site approval and start date for Preston Crescent where construction is likely to commence in early 22/23 (£1.0m below budget in 21/22).
- 6.13 Grant income is expected to be £3,945k below the original budget reflecting the lower than expected spend detailed above.
- 6.14 Core programme and other capital expenditure are forecast to be in line with budget.
- 6.15 [redacted]
- 6.16 [redacted]
- 6.16 [redacted]
- 6.17 [redacted]
- 6.18 [redacted]

7. Digital transformation alignment

- 7.1 No implications.

8. Financial and value for money implications

- 8.1 Underlying surplus after deducting major repairs and interest costs from EBITDA was £163k for the month compared to budgeted underlying surplus of £56k, with the variance driven by lower levels of repairs, staff and running costs and lower interest costs.

9. Legal, regulatory and charitable implications

- 9.1 No implications.

10. Equalities implications

- 10.1 Not applicable.

11. Environmental and sustainability implications

- 11.1 Not applicable.

12. Recommendations

- 12.1 The Board is requested to:

- 1) Note the management accounts for the year period to 30 June 2021 at Appendix 1; and
- 2) Note the SHAPS pension update.

List of Appendices

Appendix 1: Finance report - period to 30 June 2021



Period to 30 June 2021 Finance Report

1) Period 3 YTD - Operating Statement

Key highlights year to date:

- Net operating surplus of £31k is £53k favourable to budget. Statutory deficit for the period to 30 June is £253k, £72k favourable to budget with main drivers being lower interest costs, running and staff costs compared to budget.
- Total income is £11k favourable to budget. Gross rental income of £929k is £1k favourable to budget and void losses are £10k favourable to budget.
- Total expenditure of £895k is £42k favourable to budget. Employee costs of £124k are £17k favourable to budget, due to a Housing Officer vacancy and unbudgeted staff recharges for one FTE to a different group subsidiary.
- Running costs are £13k favourable to budget resulting from savings in office running costs generated while staff continue to work from home.
- Gross interest payable of £284k is £19k favourable to budget following the restructuring of WFL 1 fixed rate loans in March.
- Core investment expenditure of £100k is £34k favourable to budget, it is expected spend will be in line with budget by year end as works fully resume.
- New Build expenditure of £1,197k is reported at the end of period 3 with the variance of £3,060k driven by lower than expected spend at several sites including Almondvale (£0.9m), Jarvey Street (£0.5m), Blackness Road (£0.5m) and Sibbalds Brae (£1.1m).
- Grant income of £328k has been received in the year to date for Winchburgh O. The budget of £1,957k included expected grant receipts for Winchburgh O, Sibbalds Brae and Blackness Road. The variance against budget reflects the lower than budgeted expenditure detailed above.

	Year to 30 Jun 2021			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
INCOME				
Rental Income	929	927	1	3,920
Void Losses	(3)	(13)	10	(51)
Net Rental Income	926	915	11	3,869
Other Income	0	0	0	32
HAG Recognised in the Year	0	0	0	12,467
TOTAL INCOME	926	915	11	16,368
EXPENDITURE				
Employee Costs - Direct	124	140	17	581
Employee Costs - Group Services	18	18	0	69
Direct Running Costs	73	86	13	296
Running Costs - Group Services	13	13	0	49
Revenue Repairs and Maintenance	146	150	4	647
Bad Debts	5	13	7	51
Depreciation	516	516	0	2,065
TOTAL EXPENDITURE	895	937	42	3,759
NET OPERATING SURPLUS / (DEFICIT)	31	(22)	53	12,609
<i>Net Operating Margin</i>	3%	-2%	6%	77%
Interest receivable	0	0	(0)	1
Interest payable	(284)	(303)	19	(991)
STATUTORY SURPLUS / (DEFICIT)	(253)	(325)	72	11,619

	Year to 30 Jun 2021			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
INVESTMENT				
Total Capital Investment Income	328	1,957	(1,629)	7,274
Total Expenditure on Core Programme	100	135	34	828
New Build & Other Investment	1,197	4,257	3,060	15,975
Other Capital Expenditure	13	17	3	67
TOTAL CAPITAL EXPENDITURE	1,311	4,408	3,097	16,869
NET CAPITAL EXPENDITURE	983	2,451	1,468	9,595

2) Period 3 only - Operating Statement

Key highlights year to date:

- The table shows the operating statement for period 3 only. Net operating surplus of £1k is £1k favourable to budget. Statutory deficit for the period is £104k, £3k favourable to budget.
- Total income of £306k is £1k favourable to budget.
- Total expenditure of £307k is in line with budget with repairs running £7=8k higher than budget for the month following the full remobilisation and the service picking up jobs postponed from Q4 2020/21.
- Interest expenditure is £1k favourable to budget.
- Core programme expenditure is £32k favourable to budget. New build expenditure is £857k lower than budget.

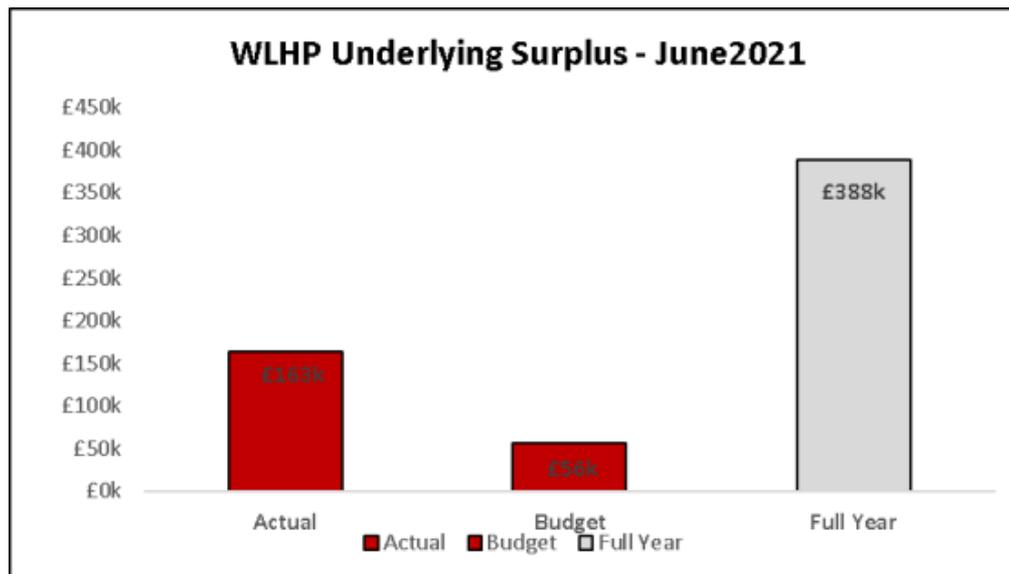
	Period 03 - 30 June 2021			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
INCOME				
Rental Income	307	309	(2)	3,664
Void Losses	(1)	(4)	3	(112)
Net Rental Income	306	305	1	3,552
Other Income	0	0	0	22
HAG Recognised in the Year	0	0	0	11,263
TOTAL INCOME	306	305	1	14,836
EXPENDITURE				
Employee Costs - Direct	44	47	2	546
Employee Costs - Group Services	7	7	0	72
Direct Running Costs	21	24	3	367
Running Costs - Group Services	4	5	1	46
Revenue Repairs and Maintenance	57	48	(8)	582
Bad Debts	2	4	2	49
Depreciation	172	172	0	1,702
TOTAL EXPENDITURE	307	307	(0)	3,364
NET OPERATING SURPLUS / (DEFICIT)	(1)	(2)	1	11,472
<i>Net Operating Margin</i>	0%	-1%	0%	77%
Interest receivable	0	0	(0)	2
Interest payable	(103)	(104)	1	(919)
STATUTORY SURPLUS / (DEFICIT)	(104)	(106)	3	10,554

	Period 03 - 30 June 2021			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
INVESTMENT				
Total Capital Investment Income	328	612	(284)	8,659
Total Expenditure on Core Programme	37	69	32	645
New Build & Other Investment	426	1,284	857	18,138
Other Capital Expenditure	8	6	(2)	27
TOTAL CAPITAL EXPENDITURE	471	1,358	887	18,809
NET CAPITAL EXPENDITURE	143	746	603	10,150

3) Underlying surplus – P3 June 2021

Key comments:

- The Operating Statement (Income and Expenditure Account) on page 2 is prepared in accordance with the requirements of accounting standards (Financial Reporting Standard 102 and the social housing Statement of Recommended Practice 2014).
- However, the inclusion of grant income on new build developments creates volatility in the results and does not reflect the underlying cash surplus/deficit on our letting activity.
- The chart below therefore shows a measure of underlying surplus which adjusts our net operating surplus by excluding the accounting adjustments for the recognition of grant income and depreciation, including capital expenditure on our existing properties.
- In the period to the end of June 2021, an underlying surplus of £163k has been generated using this measure which is £107k favourable to budget. The variance is driven by the lower levels of repairs, staff and running costs and lower interest costs. The full year budget reflects an underlying surplus of £388k.



4) Management Information - Employee & Running Costs

Employee Costs	Year to 30 Jun 2021			Full Year Budget £ks
	Actual £ks	Budget £ks	Variance £ks	
Salary/NIC/Pension	136	150	14	620
Staff Costs Capitalised	(12)	(10)	3	(39)
Overtime	-	-	-	-
TOTAL	124	140	17	581

Comments

Employee Costs

- Employee costs of £124k are £17k favourable to budget. Salary and on-costs are £14k lower than budget linked to a housing officer vacancy and an adjustment relating to a member of staff whose costs are now being recharged to another subsidiary.

Running Costs

- Direct running costs of £73K are £13k favourable to budget.
- Central environmental recharges include the use of the Bathgate depot, owned by Dunedin Canmore and vehicle and equipment use, where the costs for these are incurred centrally.
- Office and property costs are lower than budget as a result of savings made in overheads with all office-based staff working from home.

Initiatives

- The bottom table provides a breakdown of the year to date Initiative expenditure. The annual donation to the Wheatley Foundation was paid in period 1.

Direct Running Costs	Year to 30 Jun 2021			Full Year Budget £ks
	Actual £ks	Budget £ks	Variance £ks	
Consultancy/Legal/Insurance	8	8	(0)	32
Environmental Recharges	8	8	0	30
Initiatives	20	22	2	41
Office & Property	37	47	10	185
Staff Related Costs	1	2	1	8
TOTAL	73	86	13	296

Initiatives	Year to 30 Jun 2021			Full Year Budget £ks
	Actual £ks	Budget £ks	Variance £ks	
Helping Hand	-	1	1	2
Tenancy Support Service	1	2	1	9
Think Yes	1	1	0	5
Wheatley Foundation	17	17	0	18
Wider Action	-	-	0	6
TOTAL	20	22	2	41

5) Management Information - Repairs and Investment

Repairs & Maintenance	Year to 30 Jun 2021			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
Responsive Repairs	113	112	(1)	494
Cyclical Maintenance	27	37	10	148
Communal Heating	6	1	(4)	5
TOTAL	146	150	4	647

Key Comments:

Repairs

- Repairs and maintenance expenditure of £146k is £4k favourable to budget.
- Responsive repairs costs are £1k adverse to budget. Cyclical maintenance costs are £10k favourable to budget.

Investment	Year to 30 Jun 2021			Full Year
	Actual £ks	Budget £ks	Variance £ks	Budget £ks
Void	22	10	(13)	38
Core Investment	58	107	49	72
Capitalised Staff	20	18	(2)	718
TOTAL	100	135	34	828

Investment

- Core investment spend of £58K is £49k lower than budget. Void costs of £22k are £13k adverse to budget largely due a high volume of voids after coronavirus restrictions have been eased.

6) Management Information - New Build

	Year to 30 Jun 2021			Full Year Budget £'000
	Actual £'000	Budget £'000	Variance £'000	
Almondvale	747	1,614	867	3,994
Blackness Road	-	467	467	1,420
Deans South	0	-	(0)	
Dixon Terrace	1	-	(1)	150
Jarvey Street	72	525	453	1,815
Kirk Lane	1	23	23	23
Linkston Road	-	-	-	112
Preston Crescent	-	-	-	1,097
Sibbalds Brae	-	1,076	1,076	3,718
Winchburgh O	330	523	193	1,873
Winchburgh BB	18	-	(18)	1,659
Capitalised Employee Costs	28	28	(0)	113
TOTAL INVESTMENT	1,197	4,257	3,060	15,975
GRANT INCOME	328	1,957	1,629	7,274
NET CAPITAL EXPENDITURE	869	2,300	1,431	7,315

New Build Expenditure

- £1,197k of new build expenditure has been incurred in the year to date which is £3,060k lower than budget. Spend has been lower than expected at a number of sites, including, Sibbalds Brae, Almondvale, Blackness Road and Jarvey Street.
- There has been no spend in the year to date at Sibbalds Brae against a budget of £1,076k. Planning approval has been delayed and is now anticipated to be issued in August 2021. The site will also now likely to progress as a golden brick development. The combination of these factors results in the likely of no spend this financial year.
- Spend of £747k has been incurred at Almondvale up to end of period 3 which is £867k below budget. Overall progress on site is going well but the spend profile has been revised largely due to covid restrictions. It is currently forecast that spend will be in line with budget at year end. We are expecting 120 completions at Almondvale during 2020-21 starting in Q3.
- There has been no spend in the year to date at Blackness Road. The site was acquired in November 2020 with immediate start on site wide infrastructure works. Plot works and therefore spend are now expected to start in August 2021 and it is currently forecast that spend will be in line with budget at year end.
- Spend of £72k has been incurred at Jarvey street which is £453k below budget. Works on the completion contract by City Building (Glasgow) continue on site and spend is forecast to be in line with budget by year end.
- There have been no completions up to the end of period 3 and therefore we have not recognised any grant income held in deferred income. This is in line with the budget.

Grant Income

- Grant income of £328k in relation to Winchburgh O has been received in the year to date. This reflects the lower than budgeted spend at a number of sites as detailed above.

7) Balance Sheet

	30 June 2021 £'000	31 March 2021 £'000
Fixed Assets		
Social Housing Properties	55,590	54,808
Other Fixed Assets	211	198
	<u>55,801</u>	<u>55,006</u>
Current Assets		
Trade & Other Debtors	263	263
Cash & Cash Equivalents	675	603
	<u>938</u>	<u>866</u>
Creditors: within 1 year		
Trade Creditors	0	(1)
Accruals & Deferred Income	(13,548)	(13,876)
Prepayments of Rent and Service Charge	(78)	(99)
Other Creditors	(84)	(91)
Amounts due to Group Undertakings	(1,487)	(1,010)
	<u>(15,197)</u>	<u>(15,077)</u>
Net Current Liability	<u>(14,259)</u>	<u>(14,343)</u>
Long Term Creditors		
Amounts due to Group Undertakings	(23,476)	(22,476)
Pension liability	(70)	(70)
Net Assets	<u>17,996</u>	<u>18,249</u>
Capital and Reserves		
Share Capital	-	-
Revenue Reserve	17,996	18,249
Partnership's funds	<u>17,996</u>	<u>18,249</u>

Key Comments:

- The balance sheet reported reflects the audited 31 March 2021 year end statutory accounts position after completion of the audit. Year end adjustments applied include the revaluation of housing properties and actuarial valuation of the defined benefit pension scheme.
- The value of our fixed assets reflects additions in the year less depreciation.
- **Trade & other debtors** of £263k include rent arrears of £94k after bad debt provision. This compares to £90k at 31 March 2021.
- **Cash at Bank** – At 30 June WLHP had £675k in the bank and has access to draw down further funding from WFL1 as and when required.
- **Short-Term Creditors** – Amounts due within one year of £15,197k include £1,487k due to other Wheatley entities and £13,548k in accruals and deferred income, primarily HAG received for the construction of new build properties. The remaining balance includes rent received in advance from our tenants, trade and other creditors.
- **Long-Term Creditors** - This relates to £23.5m of loans due to WFL1 less fees paid. This borrowing has primarily been used to fund the new build investment programme.

8) Quarter 1 Forecast to 31 March 2022

	2021/22 Budget £ks	Q1 Forecast £ks	Variance £ks
INCOME			
Rental Income	3,920	3,920	-
Void Losses	(51)	(41)	10
Net Rental Income	3,869	3,879	10
Other Income	32	32	-
HAG Recognised in the Year	12,467	12,467	-
TOTAL INCOME	16,368	16,378	10
EXPENDITURE			
Employee Costs - Direct	581	558	23
Employee Costs - Group Services	69	69	-
Direct Running Costs	296	276	20
Running Costs - Group Services	49	49	-
Revenue Repairs and Maintenance	647	647	-
Bad Debts	51	51	-
Depreciation	2,065	2,065	-
TOTAL EXPENDITURE	3,759	3,716	43
NET OPERATING SURPLUS / (DEFICIT)	12,609	12,662	53
<i>Net Operating Margin</i>	77%	77%	0%
Interest receivable	1	1	-
Interest payable	(991)	(931)	59
STATUTORY SURPLUS / (DEFICIT)	11,619	11,731	112
INVESTMENT			
Total Capital Investment Income	7,274	3,329	(3,945)
Total Expenditure on Core Programme	828	828	-
New Build & Other Investment	15,975	11,240	4,735
Other Capital Expenditure	67	67	-
TOTAL CAPITAL EXPENDITURE	16,869	12,134	4,735
NET CAPITAL EXPENDITURE	9,595	8,805	790

Comments

- This table shows the 2021/22 budget presented to the Board compared to the Q1 forecast for 2021/22. The forecast reflects the results in the year to date as well as the expenditure for the remaining 9 periods of 2021/22
- The forecast operating surplus of £12,662k is £53k higher than budget. Statutory surplus forecast of £11,731k is £112k favourable to budget.
- The drivers of the forecast operating surplus variance are lower void losses, staff costs and operating costs, reflecting year to date favourable variances.
- Staff costs reductions reflect the current year variance plus additional savings as a result of an outwards secondment to other subsidiaries assumed to July 2021.
- Running costs reflect the continued savings anticipated from ongoing impact of the working from home model.
- The positive statutory surplus variance reflects lower than budgeted interest costs due to savings as a result of the conversion of fixed rate loans to variable rates in March 2021.
- New build expenditure and grant income as well as core investment programme expenditure have been updated to reflect the revised spend profile.
- New build expenditure is forecast to be £4.7m under budget. The main sites where there is expected to be lower than budgeted spend are Sibbalds Brae (£3.7m below budget) which is now likely to progress as a golden brick site and Preston Crescent (£1.0m below budget) which is likely to be delayed with a site start expected in early 22/23.
- Grant income is expected to be £3.9m below the original budget reflecting the lower than expected spend detailed above with the biggest variances also at Sibbalds Brae and Preston Crescent.

Report

To: West Lothian Housing Partnership Board
By: Lynsey Fotheringham, Head of Housing
Approved by: Olga Clayton, Group Director of Housing and Care
Subject: Quarter 1 Performance Report and Delivery Plan update
Date of Meeting: 18 August 2021

1 Purpose

- 1.1 This report provides the Board with an update for Quarter 1 on the performance measures and projects in the performance framework and strategy. Appendix 1 contains the dashboard of Board Performance Measures and Appendix 2 provides a table of progress delivering Strategic Projects.

2 Authorising and strategic context

- 2.1 Under the terms of the Group Authorising Framework, the Group Board is responsible for setting the overall Group Performance Framework and approving the delivery plan for each year. Under the Group Authorise/Manage/Monitor Matrix, the Group Board has an ongoing role monitoring performance of subsidiaries across the Group against the key indicators agreed under the performance framework.
- 2.2 Under the terms of the Intra-Group Agreement between us and the Wheatley Group, as well as the Group Authorise, Manage, Monitor Matrix, our Board is responsible for approving regulatory returns including the Charter. It is also responsible for monitoring of performance against agreed targets and performance of our services. In addition, the Group Authorising Framework states that our Board is responsible for approving any changes to our Service Delivery Model or arrangements which it may consider necessary to deliver the level of performance to achieve agreed targets.
- 2.3 This report is based on our Strategy for 2021 to 2026, which set out strategic themes, outcomes and intended results.

3 Risk appetite and assessment

- 3.1 Our agreed Group risk appetite in relation to board governance is “cautious”. This level of risk tolerance is defined as “preference for safe delivery options that have a low degree of inherent risk”. We mitigate this risk by reserving the agreement of individual performance targets and strategic projects to Boards and providing the Board with regular updates in relation to progress against these targets and projects.

4 Background

- 4.1 The Board agreed our Strategy for 2021 to 2026, *Your Home, Your Community, Your Future*. At the same time, the Board also agreed the supporting Performance Framework, setting out the measures, targets and reporting arrangements that provide performance management and oversight of delivery for Boards and management.
- 4.2 Our Strategic Results in Quarter 1 (Q1) continue on from 2020 to 2021 in a positive trend with all but 2 results meeting or exceeding target. Of note, void re-let times continue to be well below target at 6.5 days and improvement can be seen with the number of gas safety checks expired now recorded as zero.

5 Customer engagement

- 5.1 A key theme throughout our strategy is our commitment to ensuring customers have greater power, control and choice regarding the services they receive. We have reflected this in our approach to developing our strategic projects, with over 50% incorporating an element of customer engagement activity. This is a key deliverable within our new engagement framework, Stronger Voices, Stronger Communities.
- 5.2 Engagement was carried out with the Group Scrutiny Panel about the proposed Group performance framework, in particular the strengthened focus on customer value. The Panel provided feedback, which has been used to refine our approach.

6 Discussion

Part 1: Performance update

- 6.1 This section outlines performance as at Quarter 1.
- 6.2 A range of measures and targets were reviewed in line with our 2021-26 strategy. Details are given in the Appendices and key points have been set out below:

Delivering exceptional customer experience

- 6.3 Responses to Stage 1 complaints continue to be completed within our 5-day target. No Stage 2 complaints have been received in Q1.

Making the most of our homes and assets

- 6.4 Average time taken to complete both emergency and non-emergency repairs continues to be within target. Our 100% gas compliance continues and we can now report a reducing number of expired gas safety certificates, which occurred during Covid restrictions in 2020/21, from 8 properties to five.

Changing lives and communities

- 6.4 Our target across Group is for over 70% of customers to live in neighbourhoods categorised as peaceful by 2025/26. We can report 69.9% of customers are within this category against a 2021/22 target of 68%. WLHP have resolved 100% of ASB complaints received and report no Accidental Dwelling Fires as recorded by Scottish Fire and Rescue in Q1.
- 6.5 Our % of lets to homeless is currently below our 50% target at 11.8%. All of our homeless lets are allocated via nominations from West Lothian Council. We were asked by the Council to match our own properties from 5 May – 13 June 2021 due to their workload. Of the 18 lets in Q1, 11 of them were during this time, causing a considerable decrease in our % of lets to homeless customers. A plan has been put in place to request homeless nominations for all re-lets going forward to ensure every effort is made to meet target however our ability to achieve this will be dependent on the number of give-ups we have across the year. Assumptions on year-end performance will be developed based on likely turnover.

Developing our shared capacity

- 6.6 Our rate of absence in Q1 is 0.23%, below our target of 3%. This is a significant improvement on our 2020/21 figure which was as a result of a long-term absence.

Enabling our ambitions

- 6.7 Operational performance in managing rent arrears and in re-letting voids remains strong. We are reporting Gross Rent Arrears at 2.97% against a target of 3.12%. Our average void re-let in Q1 is well below our 15-day target at 6.5 days. This is as an example of the excellent joint working of the Housing Officers and trades within Dunedin Canmore Property Services. Our % of lettable houses that became vacant is unusually high at 7.01%; the highest it has been in a number of years. 22% of turnover to the end of Q1 was unavoidable and as a result of customers passing away. It is hoped that this will level out over the year to bring our figures back to meet target of 5.6%.

Part 2: Delivery of strategic projects update

- 6.8 Appendix 2 outlines progress on the strategic projects in the Delivery Plan at the end of Quarter 1.
- 6.9 All projects, including those listed below, are on track to deliver on time:
- Implement new engagement framework - Phase 1;
 - Refine Repairs Delivery Model;
 - Wheatley Green Investment Plan;
 - Deliver a group wide Antisocial Behaviour Prevention & Mitigation Framework (ASBPMF) that maps out our approach to preventing, managing and mitigating ASB – **Complete in Quarter 1**; and
 - Establish digital maturity approach and assessments.

Key issues and conclusions

- 6.10 This report outlines relatively strong progress in achieving the majority of performance targets and the delivery of projects, despite the challenges posed by the COVID-19 pandemic and an unprecedented year. Particularly strong performance in the management of arrears meant that the economic impact of the pandemic was mitigated. Repairs, too, performed strongly under challenging service delivery circumstances. Key areas of focus as we continue into 2020/21 will be the continued support of customers who may be experiencing additional financial hardship and to manage our arrears, continued focus on letting properties and supporting our contribution to reducing homelessness, and delivery of safe and high-quality repairs and care services to our customers.

7 Digital transformation alignment

- 7.1 There are no digital transformation themes aligned to the content of this report.

8 Financial and value for money implications

- 8.1 The measures and projects included in this report were agreed as the strategy delivery plan for 2021/22. These items are intended to focus service improvement on the key priorities within the Strategy to make sure that financial and other resources are aligned with our priorities.
- 8.2 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 Registered Social Landlord. Key indicators within the Return are included in quarterly performance reporting to boards, such as gross rent arrears and the average days to re-let properties. RSLs are also required to involve tenants in the scrutiny of performance, which the Group does through its Tenant Scrutiny Panel, and to report to tenants annually by October.

10 Equality implications

- 10.1 There are no proposals relating to our duties under equality legislation or that have an adverse impact on equality.

11. Environmental and sustainability implications

- 11.1 We have our own plans to increase the number of environmental and sustainability based measures in our performance framework. The Scottish Housing Regulator recently consulted on the on the indicators it will use to monitor landlord performance against the Energy Efficiency Standard for Scottish Social Housing (ESSH). The SHR is due to publish technical guidance to support landlords to make their first return under the new indicators on 31 May 2022.

12. Recommendations

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

List of Appendices

Appendix 1 Board performance measures dashboard

Appendix 2 Board strategic projects dashboard

Appendix 1 - WLHP Board - Delivery Plan 21/22 - Strategic Results

1. Delivering Exceptional Customer Experience

Strategic Result	2020/21	YTD 2021/22		
	2020	2021		
	Value	Value	Target	Status
Average time for full response to all complaints (working days) - Stage 1	2.94	4.5	5	
Average time for full response to all complaints (working days) - Stage 2	No Stage 2 Complaints	No Stage 2 Complaints	20	
% new tenancies sustained for more than a year - overall	92.65%	92.54%	90%	

2. Making the Most of Our Homes and Assets

Strategic Result	2020/21	YTD 2021/22		
	2020	2021		
	Value	Value	Target	Status
Number of gas safety checks not met	8	5	0	
Average time to complete approved applications for medical adaptations (calendar days)	40.25	9	35	
New build completions - Social Housing	8	0	0	
New build completions - MMR	0	0	0	
Reduce the volume of emergency repairs by 10% by 2025/26	Q1 19/20 – 148	204		
Average time taken to complete emergency repairs (hours) – make safe	2.52	2.35	3	
Average time taken to complete non-emergency repairs (working days)	4.00	4.29	5.5	
% reactive repairs completed right first time	97.16%	96.4%	95%	

3. Changing Lives and Communities

Strategic Result	2020/21	YTD 2021/22		
	2020	2021		
	Value	Value	Target	Status
% lets to homeless applicants	69.7%	11.8%	50%	
% lets to homeless applicants (ARC)	65.0%	10.5%		
Number of lets to homeless applicants (contributes to 10,000 for Group by 2025/26)	26	2		
Group Result - Over 70% of customers live in neighbourhoods categorised as peaceful by 2025/26	69.4%	69.9%	68%	
% ASB resolved	100%	100%	98%	
Total number of jobs, training places or apprenticeships created including Wheatley Pledge	1	1	1	
Group Result - Increase the number of active users of MySavings to 5,000 as part of our commitment to reduce the cost of running a home.		325		
Group Result - Relevant properties with current fire risk assessment in place	100%	100%	100%	
Group Result - HMOs with current fire risk assessment in place	100%	100%	100%	
Group Result - Non-relevant properties with current fire risk assessment in place		23.03%	23%	
Number of accidental dwelling fires recorded by Scottish Fire and Rescue	1	0		

4. Developing Our Shared Capacity

Strategic Result	2020/21	YTD 2021/22		
	2020	2021		
	Value	Value	Target	Status
% Sickness rate	3.61%	0.23%	3%	

5. Enabling Our Ambitions

Strategic Result	2020/21	YTD 2021/22		
	2020	2021		
	Value	Value	Target	Status
% court actions initiated which resulted in eviction - overall	No evictions	No evictions	33%	
Average time to re-let properties (ARC)	19.78	6.5	15	
Gross rent arrears (all tenants) as a % of rent due	2.62%	2.97%	3.12%	
% lettable houses that became vacant	5.10%	7.01%	5.6%	

Appendix 2 - WLHP Board - Delivery Plan 21/22 - Strategic Projects

01. Delivering Exceptional Customer Experience

Delivery Plan Project	Delivery Date	Status	% Progress
Implement new engagement framework - Phase 1	31-Mar-2022		<input type="text" value="0%"/>
Develop a Wheatley Whole Family approach	31-Mar-2022		<input type="text" value="0%"/>
Introduce new cloud based telephony system	31-Mar-2022		<input type="text" value="0%"/>
Develop new RSL online services model	31-Mar-2022		<input type="text" value="0%"/>
Refine Repairs Delivery Model	28-Feb-2022		<input type="text" value="33%"/>

02. Making the most of our Homes & Assets

Delivery Plan Project	Delivery Date	Status	% Progress
Implement Group corporate estate model - phase 1	31-Mar-2022		<input type="text" value="14%"/>
Wheatley Green Investment Plan	31-Dec-2021		<input type="text" value="50%"/>

03. Changing Lives & Communities

Delivery Plan Project	Delivery Date	Status	% Progress
Deliver a group wide Antisocial Behaviour Prevention & Mitigation Framework (ASBPMF) that maps out our approach to preventing, managing and mitigating ASB	30-Jun-2021		<input type="text" value="100%"/>
Review Group Fire Prevention & Mitigation Framework including digital solutions	31-Mar-2022		<input type="text" value="33%"/>

04. Developing our Shared Capability

Delivery Plan Project	Delivery Date	Status	% Progress
Develop new leadership development programme	31-Jul-2021		<div style="border: 1px solid black; width: 100px; height: 20px; background-color: #4a86e8; position: relative;"> 70% </div>
Strategic governance review	31-Oct-2021		<div style="border: 1px solid black; width: 100px; height: 20px; background-color: #4a86e8; position: relative;"> 25% </div>

05. Enabling our Ambitions

Delivery Plan Project	Delivery Date	Status	% Progress
Restructure funding syndicate	31-Dec-2021		<div style="border: 1px solid black; width: 100px; height: 20px; position: relative;"> 0% </div>
Establish digital maturity approach and assessments	28-Feb-2022		<div style="border: 1px solid black; width: 100px; height: 20px; background-color: #4a86e8; position: relative;"> 42% </div>

Report

To: West Lothian Housing Partnership Board

By: Anthony Allison, Director of Governance

Approved by: Steven Henderson, Group Director of Finance

Subject: Governance update

Date of Meeting: 18 August 2021

1. Purpose

- 1.1 To update the Board and, where applicable, seek Board approval on the following governance related matters:
- Final schedule of meetings for the remainder of the 2021 calendar year, including 2021 Annual General Meeting (“AGM”) arrangements;
 - Annual Secretary Report;
 - Board Appraisals and succession planning; and
 - 2022 schedule of meetings.

2. Authorising and strategic context

- 2.1 Under the Group Authorising Framework, the Group Board is responsible for the Group’s overall governance arrangements. As part of this role, the Group Board is responsible for the Group’s governance framework and agreement of any changes.
- 2.2 The Board is responsible for calling meetings, including General Meetings. All Board member appointments / re-appointments at the AGM require approval by the Parent under the Articles of Association.
- 2.3 In relation to Board appraisals, under the Group Standing Orders the Group RAAG Committee is responsible for determining the approach each year and agreed to the approach used this year.

3. Risk appetite and assessment

- 3.1 Our agreed risk appetite for governance is “cautious”. This level of risk tolerance is defined as a “preference for safe delivery options that have a low degree of inherent risk and have only limited potential for reward”.
- 3.2 The Group strategic risk register contains the risk *“The governance structure is not clearly defined, is overly complex and lacks appropriate skills at Board and Committee levels to govern the Group effectively. Failure of corporate governance arrangements could lead to serious service and financial failures.”*

- 3.3 We seek to mitigate this risk by reviewing our governance structure on an ongoing basis, including the strategic governance review currently underway. In addition to this we review our succession planning arrangements formally as part of our annual appraisal process, including linking this to the wider Group board succession planning where it relates to Wheatley appointees.
- 3.4 The report sets out the up-to-date position following a review of our 3 year succession plan during the 2021 appraisal process.

4. Background

- 4.1 Our Articles set out certain requirements of the Secretary and the procedures for the Annual General Meeting (“AGM”) including for the business of the AGM, which includes the retirement and appointment of Board members and calling notices.
- 4.2 Board appraisals are a well-established practice within the Group both as a matter of good governance and to meet our Regulatory obligations. We have used the appraisal process to inform our succession planning.

5. Customer engagement

- 5.1 As governance related matters, the content of the report is reserved to the Board and is of an internal focus and as such no customer engagement has been appropriate. We will however ensure that our AGM is as accessible as possible to our members.

6. Discussion

2021 meetings

- 6.1 We have two further Board meetings scheduled for this calendar year. One pre-AGM meeting which will be held on Wednesday 22nd September and a further meeting which was previously scheduled for Wednesday 24th November 2021 at 14.00pm. This would take us to the minimum requirement of 6 scheduled meetings for the calendar year.
- 6.2 It is proposed that we call our AGM on 22nd September 2021 at 18.00pm, with a short Board meeting to be held following the AGM at 18.30pm. AGM will be held at New Mart Road, Edinburgh and will be called in line with the requirements of our Articles.
- 6.3 It is proposed that the November Board meeting be brought forward to Wednesday 10th November at 14.00pm. This will allow us to:
- receive feedback from the consultation on our new operating and engagement model (subject to a separate agenda item);
 - agree the proposals for 2022 rent setting (for which the September meeting would be too early); and
 - formally agree the initiation of tenant consultation on our 2022 rent setting proposals.

Secretary's report

6.4 In advance of the AGM, Article 68 states that:

“At the last Board meeting before the annual general meeting, the Secretary must confirm in writing to the Board that Articles 62 to 67 have been followed or, if they have not been followed, the reasons for this”.

6.5 The Secretary's report in relation to each Article referred to in Article 68 is as follows:

Article	Secretary report
62	Minutes are up to date and are now being signed digitally via Docusign.
63	The seal is not routinely used. It is kept at the registered office.
64 and 65	All registers have been checked and maintained throughout the year and are held at our registered office. Currently these are held in securely in our offices at Lipton House until renovation at Wheatley House are complete.
66	Our registered name is displayed at our registered office and at every office where our business is carried out. It is also clearly marked on business letters, notices, adverts, official publications and financial documents.
67	Our books of account, registers, securities and other documents are kept at our registered office or any other place the Board decides is secure. Currently these are held in securely in our offices at Lipton House until renovation at Wheatley House are complete.

Appraisal and 3 year succession plan

6.6 The Group RAAG Committee agreed our approach to appraisal that reflected the extraordinary circumstances of the previous year. This included the Chair meeting with all members.

6.7 This years' appraisal meetings were held virtually and facilitated by the Deputy Group Company Secretary. As part of this process, the following topics were covered:

- Board member reflections on last year including how the Board has operated;
- Chair's reflection on Board member performance during last year;
- Succession planning; and
- Board CPD: these will be resuming this later in the year with initial sessions covering (i) equality and diversity; (ii) Group funding structure; and (iii) environment and sustainability.

Reflections on previous year

- 6.8 The extraordinary circumstances of the pandemic were recognised by all members. The strongest theme of feedback was that members felt the Board adapted well; however, this had presented some challenges in building relationships for Board members appointed just prior to the pandemic. Board members recognised the need to continue to take into account the dynamic situation regarding restrictions but expressed a strong desire to resume full in-person Board meetings as soon as possible. We anticipate returning to full in-person meetings with effect from our AGM and Board meeting in September.
- 6.9 A number of Board members commented on the Board packs, in particular the length and the level of detail contained therein. On the whole, longer standing Board members felt that the level of detail and breadth of information assisted them in their role and helped to evidence decision making; however there was some feedback that papers should be as concise as practically possible and potentially supported by an executive summary.
- 6.10 There were a suggestion that we explore alternative ways to advise the Board of corporate policies and Group reports for noting. It is however recognised that there is a balance to be struck between agenda size and formally recording that the Board are aware of and understand the wider group policy context. We regularly review our reporting arrangements and will take this into account as part of the wider strategic governance review.

Succession planning

- 6.11 Succession planning was discussed with each member based on the current, Board approved succession plan. As part of this, each member was asked to formally confirm their plans for over the rolling three-year period. The existing Chair will retire at the AGM, following a period of outstanding service during which we have made significant progress as an organisation. Having served 3 year terms, Lesley-Anne Williams, Lesley Bloomer and Judith McGlashan will also be required to retire and will be eligible for re-appointment.
- 6.12 Following this feedback, we have revised the Board three-year succession plan. The revised plan also takes into account the changes to the Group Board succession plan. A copy of the revised succession plan is attached at Appendix 1.
- 6.13 As the Board are aware, we are currently in the process of undertaking a wider strategic governance review. As part of this it is proposed that we undertake a wider Board member skills and experience mapping relative to our overall Board skills matrix.
- 6.14 Board members will be asked to undertake a self-assessment against the matrix. This will allow us to formally document the depth of skills and experience of members beyond just the core skills recorded in the succession plan. In addition to this, feedback will be sought on the current skills matrix. This will include the level/depth of skills and experience we require in each area and if there are any areas no longer of relevance/gaps in the existing skills matrix.

- 6.15 This will provide context for any future discussions post governance review on the future Board composition. A report will be brought back to the September meeting.

Board CPD

- 6.16 All Board members indicated their support for the proposed Board CPD focus.

2022 schedule

- 6.17 The proposed Board dates for 2022 are as follows:

- 1) Wednesday 16 February at 14.00pm – Board meeting;
- 2) Wednesday 30 March at 14.00pm – Board meeting following stock tour;
- 3) Wednesday 25 May – Board meeting and strategy workshop – 10.00-17.00;
- 4) Wednesday 17 August 14.00pm – Board meeting;
- 5) Wednesday 21 September –AGM 18.30pm followed by Board meeting; and
- 6) Wednesday 9 November at 14.00pm – Board meeting.

- 6.18 The proposal is that we use the May date to hold a Board meeting in the morning and resume post lunch for a strategy workshop. Based on feedback from members that there is a strong preference to combine dates it is also proposed that the stock tour is scheduled for after the March Board meeting. We do however also anticipate scheduling a standalone risk workshop during the spring.

- 6.19 In addition to this, the following dates are proposed for the 2022 Board CPD/social sessions:

- 1) CPD - Wednesday 23 February at 13.30, Wheatley House;
- 2) CPD – Wednesday 29 June at 13.30, Wheatley House;
- 3) CPD – Wednesday 28 September 17.00, New Mart Road; and
- 4) Social lunch (Group wide) - Wednesday 14 December at 13.00, Wheatley House.

7. Digital transformation alignment

- 7.1 The contents of this report are not directly related to our digital transformation activities.

8. Finance and value for money implications

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

9. Legal, regulatory and charitable implications

- 9.1 The legal and regulatory requirements are set out in detail within the body of the report.

10. Equalities impact

- 10.1 There are no equalities implications arising from this report and as such no Equality Impact Assessment is required. As part on our Board CPD programme, an equality and diversity masterclass will be delivered to Board members by an external expert before the end of the year.

11. Environmental and sustainability implications

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

12. Recommendations

- 12.1 The Board is asked to:

- 1) Instruct the Secretary to call the Annual General Meeting for 22 September 2021 at 18.30pm;
- 2) Agree to reschedule the November meeting to Wednesday 10th November
- 3) Note the Secretary's report under Article 68;
- 4) Note the Board's appraisal feedback;
- 5) Approve the updated Board 3-year succession plan;
- 6) Note the succession plan and recommend the re-appointment of Lesley-Anne William, Lesley Bloomer and Judith McGlashan subject to Group RAAG review and approval; and
- 7) Approve the schedule of meetings for 2022.

List of Appendices

Appendix 1: Updated 3 Year succession plan



West Lothian Housing Partnership

3 Year Succession Plan

1. Introduction

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

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

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

2. Background and context

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

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

3. Current Board tenure and skills

The current tenure stages of each Board member, projected retirement dates and details of the core skills and experience they bring (relative to our agreed skills matrix) are set out below. Any reappointments beyond the span of this plan will be subject to previous tenure restrictions and Parent reapproval.

	Core skills and experience	9 Years	3 year position
John Hill (Chair)	<ul style="list-style-type: none"> ▪ Accountancy and audit, knowledge of relevant statutory requirements ▪ Organisational strategy and policy development ▪ Housing management and repairs and maintenance of social housing 	2021	2021
Mairi Martin	<ul style="list-style-type: none"> ▪ Organisational change and development ▪ Management, leadership and strategy in a housing context ▪ Provision of customer services (in a housing or other similar context) 	2026	2024
Lesley-Anne Williams (tenant)	<ul style="list-style-type: none"> ▪ Knowledge of the areas, clients, tenants and communities served ▪ Knowledge of other relevant sectors – health, charities, social enterprise, education, policing, or other ▪ Customer and community engagement 	2027	2024
Judith MacGlashan (tenant)	<ul style="list-style-type: none"> ▪ Knowledge of the areas, clients, tenants and communities served ▪ Knowledge of other relevant sectors – health, charities, social enterprise, education, policing, or other ▪ Customer and community engagement 	2027	2024
Lesley Anne Bloomer	<ul style="list-style-type: none"> ▪ Performance management, value for money and continuous improvement ▪ Social and housing policy in Scotland and the wider UK ▪ Involvement in planning/ delivery of a Value for Money strategy, in housing or similar organisation 	2027	2024
Bryan Sherriff	<ul style="list-style-type: none"> ▪ Property, asset management, development, regeneration, surveying etc. ▪ Commercial business, financial & management skills 	2029	2023
Gregor Dunlay	<ul style="list-style-type: none"> ▪ Commercial business, financial & management skills ▪ Accountancy and audit, knowledge of relevant statutory requirements 	2029	2023
Gordon Smith	<ul style="list-style-type: none"> ▪ Strategic asset management ▪ General commercial business, financial & management skills ▪ Organisational strategy and policy development 	2029	2023
Alan McCloskey	<ul style="list-style-type: none"> ▪ Knowledge of other relevant sectors – health, charities, social enterprise, education, policing, or other ▪ Risk identification, management and mitigation 	2029	2023

4. Succession Plan 2021-2024

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

2021

John Hill (Chair) will retire at the end of the AGM in September. Mairi Martin will take over the role of Chair.

2022

No planned retirement.

2023-2024

No planned retirements.

Mairi Martin, Lesley-Anne William, Lesley Bloomer and Judith McGlashan have confirmed their intention to remain on the Board until at least 2024

As new Board members, Alan, Bryan, Gregor and Gordon have each expressed an intention to remain in post for at least their 3-year terms (ending in 2023)

5. Review

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