



WEST OF SCOTLAND HOUSING GROUP

**Environmental, Social and Governance Report
on Sustainable Reporting Standards for Social Housing 2024/25**





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welcome

Welcome to West of Scotland Group's third Environmental, Social & Governance (ESG) report which, for the second year, incorporates our submission to the Good Economy on our performance against the specific criteria contained in Sustainability Reporting Standards for Social Housing.

West of Scotland Group comprises of West of Scotland Housing Association (WSHA), and our subsidiaries, Willowacre Trust and Westscot Living.

WSHA provides and supports 4,500 homes across Scotland and has a vision to 'go further to provide housing you call home'. Willowacre Trust is WSHA's charitable subsidiary tackling social disadvantage and supporting the most vulnerable in our communities. Westscot Living is WSHA's commercial subsidiary, which manages our Mid-Market Rent homes and provides a factoring service to property owners.

WSHA Group's Strategic Aims are to:

- *Deliver outstanding service to all our customers*
- *Maintain and improve our homes and communities and develop new homes to meet local needs*
- *Be the best we can be for our customers, staff and volunteers*
- *Work with others to improve tenants' lives and deliver sustainable communities*
- *Be well managed and financially strong*
- *Drive sustainability across our organisation by reducing carbon emissions and waste*





overview

West of Scotland Group’s Sustainability Strategy and current challenges

West of Scotland Group have a responsibility to make every effort to minimise the negative environmental impact of the services we deliver on the communities we build and operate within. Consideration for embedding sustainable practices in all we do will positively impact the environment, improve health and wellbeing and will enhance social outcomes.

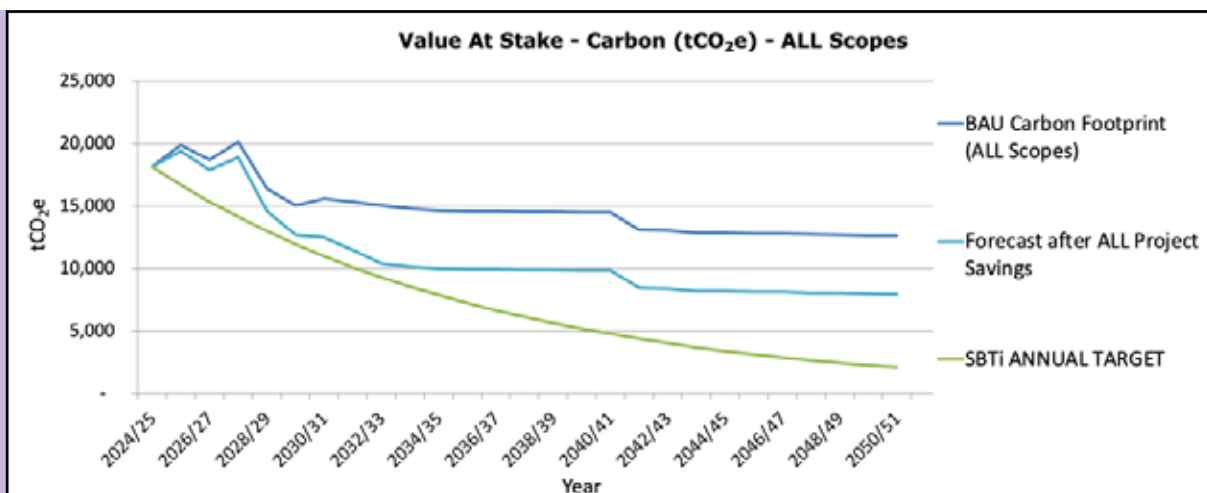
WSHA’s 2023 Sustainability Strategy commits West of Scotland Group to three Strategic Aims across its business and subsidiary functions.

1. We will work in the best way to reduce our carbon emissions across our organisation to meet our reduction targets (mitigation).
2. We will work and deliver our functions in a way that is considered most sustainable (acting sustainably).
3. We will plan our functions in a way that considers the long-term impacts of climate change to our communities, tenants, and buildings (adaptation).

Key targets of WSHA’s Sustainability Strategy

- Halving emissions (50%) from our operational direct (Scope 1) and indirect (Scope 2) emissions by 2030 and
- Setting objectives to calculate indirect emissions (Scope 3) of our primary impact areas such as existing homes and planned developments to enable long-term target reductions of more than 90% by 2045.

These are outlined in graphical form in Figure 1 below.



There has been a 14% reduction (from 121 to 104) since 23/24 and therefore we are on target to reduce the remaining 60t CO₂ within the next five years.

Figure 2 below displays the direct and indirect emission sources used in our carbon footprint calculations for 2024/25.

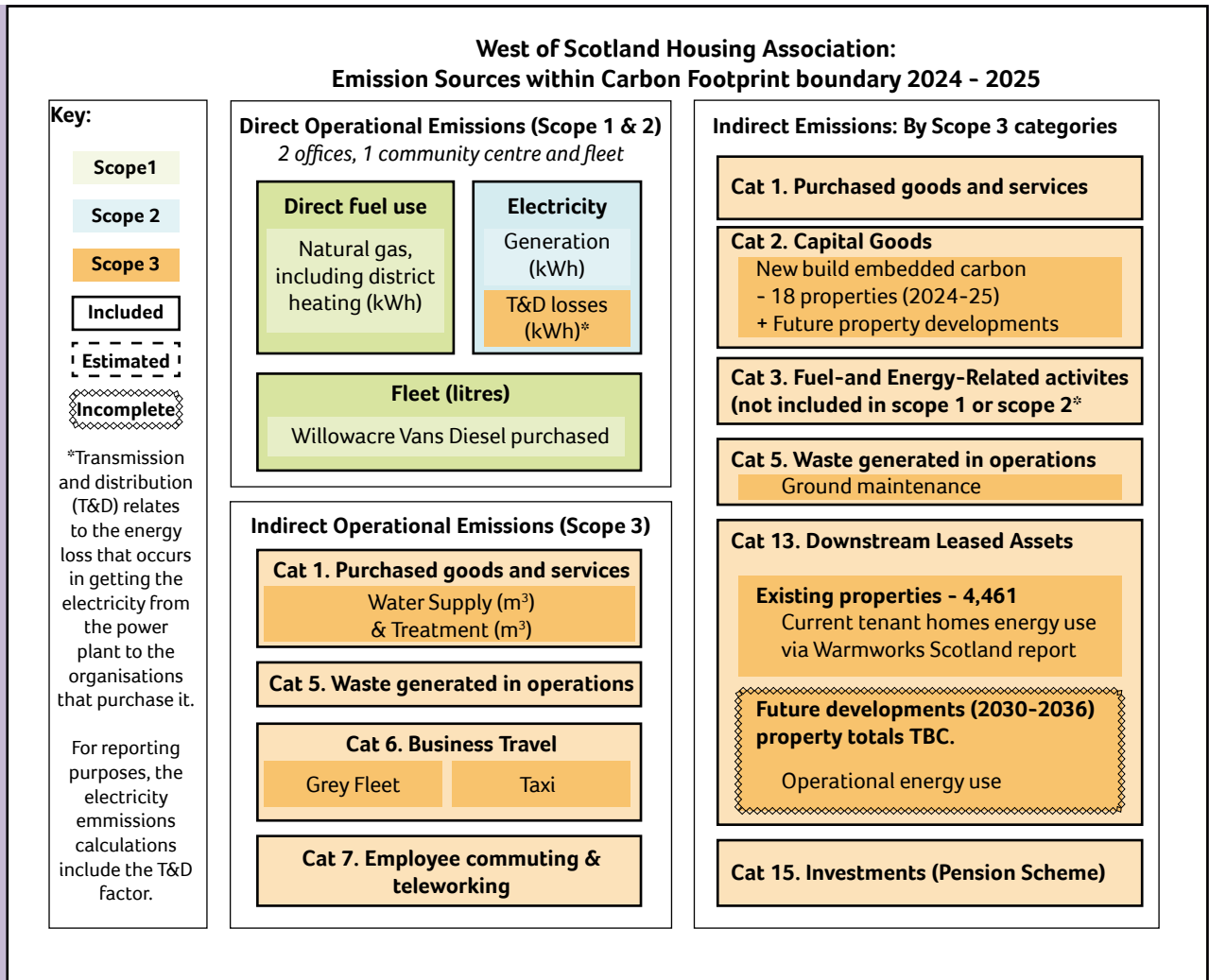


Table 1 (below) shows WSHA's carbon footprint for 2024/25.

| West of Scotland Housing Association Carbon Footprint Emissions 2024-2025 | | |
|--|---|--------------------------|
| Scope 1 | Direct Emissions from owned or controlled sources | |
| | Source | Tonnes CO ₂ e |
| | Gas ◊ | 59.5 |
| | Fleet ◊ | 3.3 |
| | | 63 |
| Scope 2 | Indirect Emissions from the generation of purchased energy | |
| | Source | Tonnes CO ₂ e |
| | Electricity (inc. EV chargers @ Camlachie House)◊ | 40.8 |
| | | 41 |
| Scope 3 | All other indirect emissions such as purchased goods, business and commuter travel, waste disposal or leased assets as per Greenhouse Gas Protocol Categories | |
| | Source | Tonnes CO ₂ e |
| Cat 1 | Purchased Goods and Services | |
| | Day to Day Repairs | 942 |
| | Major Repairs | 890 |
| | Maintenance + H&S | 717 |
| | Property Insurance & Feuduty | 117 |
| | Business support services | 208 |
| | Void Repairs | 226 |
| | IT Hardware & Software Licenses | 103 |
| | Office insurance | 11 |
| | Offices water supply and treatment ◊ | 0.4 |
| Cat 2 | Capital Goods | |
| | New Build Contractors Developments embodied carbon + | 710 |
| Cat 3 | Fuel- and Energy-Related Activities (not Included in scopes 1 or 2) | |
| | Electricity Transmission & Distribution (T&D) | 3.6 |
| Cat 5 | Waste Generated in Operations | |
| | General municipal refuse (non-recyclable) + Recycled material | 2.8 |
| Cat 6 | Business Travel | |
| | Grey fleet | 23.8 |
| | Air, Rail, Taxi + Bus | 0.7 |
| Cat 7 | Employee Commuting & teleworking | |
| | Teleworking (hybrid/working from home) | 15.7 |
| | Commuting | 64.3 |
| Cat 13 | Downstream leased assets | |
| | Tenant property energy consumption ☆ | 9,750 |
| Cat 15 | Investments | |
| | DB pension scheme | 4,237 |
| | | 18,024 |
| Offsets | Carbon credits that have been purchased or verified as offsets within the company | |
| | Source | Tonnes CO ₂ e |
| | | |
| TOTAL | Absolute Emissions 2024-25 (Tonnes CO₂e) | 18,128 |

(◊) denotes operational emissions

(+) Calculation modelled using 18 properties, using Passivhaus embodied carbon average (597.6kg CO₂e/m²), 40% lower than current building regulations as per Passivhaus and Embodied Carbon Report - April 2022. Plus, average social sector home (mean) floor area 66 m².

(☆) Warmworks Scotland report total (9,484 t CO₂e) adjusted to BEIS 2024 factors plus Transmission & Distribution

WSHA established a pre-Covid-19 (2019/20) baseline carbon footprint and have been improving the data quality and supply year on year. Table 2 (below) provides a summary of the latest operation footprint for 2024/25 and shows a strong like-for-like emissions reduction of 36% compared to the 2019/20 baseline.

However as already mentioned, the data collection has improved to a point where it barely compares to the original calculations and has been re-baselined from FY 2023/24 going forward to align better with the 2024/25 total footprint.

Table 2: WSHA Operational Carbon Footprint 2024/25

| Category | Subcategory | 2019/20 Tonnes CO ₂ e | 2022/23 Tonnes CO ₂ e | 2023/24 Tonnes CO ₂ e | 2024/25 Tonnes CO ₂ e | % age difference |
|---|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|---------------------|
| Direct Operations - Scope 1 & Scope 2 | | | | | | |
| Energy | Camlachie House - Gas | 11.4 | 5.9 | 5.6 | 6.8 | |
| | Camlachie House - Elec | 31.3 | 21.7 | 17.9 | 12.9 | |
| | Camlachie House - EV charge points * | | 1.5 | 2.0 | 2.1 | |
| | 31 Ashley Street - Gas ** | | | 2.4 | 1.8 | |
| | 31 Ashley Street - Elec ** | | | 1.9 | 2.5 | |
| | Barrowfield Community Centre - Gas * | | 9.2 | 64.4 | 50.9 | |
| | Barrowfield Community Centre - Elec * | | 22.5 | 23.0 | 23.2 | |
| Travel | Fleet - Willowacre Van | 5.4 | 6.2 | 3.9 | 3.3 | |
| SUBTOTAL | | 48 | 67 | 121 | 104 | |
| Direct Operations - Scope 3 | | | | | | |
| Water +treatment (Cat 1) | Camlachie House * | | | 0.2 | 0.2 | |
| | 31 Ashley Street ** | | 0.1 | 0.04 | 0.03 | |
| | Barrowfield Community Centre ** | | | 0.3 | 0.2 | |
| Waste (Cat 5) | Municipal Waste | 0.01 | 0.03 | 0.02 | 0.01 | |
| | Recycling | 0.01 | 0.01 | 0.004 | 0.003 | |
| Travel (Cat 6) | Business Travel - Grey Fleet | 24.9 | 23.5 | 21.3 | 23.8 | |
| | Business Travel - Taxi | 1.1 | 0.4 | 0.6 | 0.7 | |
| Staff Commute & teleworking (Cat 7) | Staff Home/Hybrid Working * | | 16 | 15.7 | 15.7 | |
| | Commuting *** | | | | 64.3 | |
| SUBTOTAL | | 26 | 40 | 38 | 105 | |
| Indirect Operations - Scope 3 | | | | | | |
| Category 1 ** | Purchased Goods and Services, (including new home developments) | | | 3,165 | 3,216 | |
| Category 2 ** | Capital Goods | | | 21,459 | 710 | |
| Category 3 ** | Fuel and Energy-Related Activities Not Included in Scope 1 or Scope 2 | | | 4 | 3.6 | |
| Category 5 ** | Waste generated in operations | | | 21.6 | 2.8 | |
| Category 13 ** | (tenant property energy consumption) | | | 9,788 | 9,750.3 | |
| Category 15 ** | Investments, (DB Pension Scheme) | | | 3,923 | 4,236.8 | |
| SUBTOTAL | | - | - | 38,361 | 17,919 | |
| <i>Like-for-like vs Original 2019/20 BASELINE TOTAL</i> | | 74 | 58 | 49 | 48 | -36% |
| TOTAL | | 74 | 107 | 38,520 | 18,128 | |
| * New entries for 2022/2023 Carbon Footprint | | | | | | |
| ** New entries for 2023/2024 Carbon Footprint | | | | | | |
| *** New entries for 2024/2025 Carbon Footprint | | | | | | |



Another key driver for WSHA, and the larger Social Landlord sector, when considering sustainable practices was the **Energy Efficiency Standard for Social Housing (EESH)**.

Since its introduction in 2014, EESH has set milestones for the energy efficiency ratings of social rented homes to reduce fuel poverty and greenhouse gas emissions. The Scottish Government consulted on a new Standard, the **Scottish Social Housing Net Zero Standard (SHNZS)** in 2024 and the outcome of this has still to be published. SHNZS will set high-level targets to ensure the social housing sector achieves a just transition as it progresses to net zero.

West of Scotland Group had engaged with Warmworks to undertake an analysis of WSHA’s housing stock. The phasing proposed by Warmworks assumes all our stock requires to be improved and front-loads installation of proven Net Zero technologies with deliverable and easier to treat projects being prioritised with more complex projects coming on-stream later. The scale of work would require a significant amount of investment by WSHA which is currently unaffordable without significant grant funding.

Warmworks’ report highlighted gaps in our data, in particular EPC and Stock Condition data, which is essential for WSHA to produce a robust investment plan. In January 2025, WSHA decided to delay its delivery plan to Net Zero for two years to enable us to understand more completely the baseline of our stock in terms of energy efficiency and overall performance to improve our decision-making processes.

In the meantime, we will continue to monitor and learn from our existing Net Zero initiatives and identify further pilot projects to support our future delivery plan.

We are also keen to better understand the carbon emissions across our housing stock to enable us to report them under Scope 3, Category 13: Downstream Leased Assets emissions. This analysis will identify an initial carbon emissions benchmark, which can be refined and updated as the accuracy and depth of available energy demand data increases. The Warmworks report will utilise that analysis as the basis for recommending an approach to prioritising and phasing energy efficiency improvements across the WSHA portfolio.



WSHA's sustainability achievements to date are too many to individually list, but a few are noted below:

- Produced first Environmental, Social & Governance Statement in 2021
- Successful completion of two Passivhaus (ultra-low energy) developments
- 90% of waste recycled through new build construction
- Assessed our core properties for flood risk with the Scottish Environmental Protection Agency
- Installation of EV charging points at WSHA offices, purchase of two electric pool cars for staff use and introduction of electric vehicle leasing scheme for staff
- Installation of secure cycle storage at WSHA offices and in our communities plus the purchase of 2 e-bikes for staff usage when travelling in our communities
- 100% of office energy supplies switched to renewables
- Installed Solar PV panels to the roof our main office and our community centre, which means on many days of the year we are "off-grid"
- Established baseline Carbon Footprint, 74 Tonnes CO₂e, for direct operations
- Brought a waste site used for fly-tipping back into community use as a community garden





Sustainability Reporting Standards

The Sustainability Reporting Standards for Social Housing

The Good Economy has updated their Sustainability Reporting Standard for social housing to “allow housing providers to measure and communicate their ESG performance in a common, consistent and transparent way”.

The Sustainability Reporting Standard provides the framework for this Environmental Social & Governance (ESG) report to demonstrate how WSHA performs against the themes and criteria set out in SRS V2.0.

SRS v2.0 places a greater focus on sector priorities, with specific questions aimed at improving transparency around net zero commitments, the management of damp and mould, and matters around equality, diversity and inclusion (EDI).

The Sustainability Reporting Standard notes that there are six big reasons to adopt the SRS:

1. *Join a growing community that is supporting the sector and its residents on the ESG journey*
2. *Help to lead and shape the reporting of the sector’s sustainability performance*
3. *Enable lenders and investors to assess the ESG performance of housing providers, enabling access to finance*
4. *Support work with residents and other stakeholders to create positive social and environmental outcomes*
5. *Feature in the SRS Directory to enhance visibility and connectivity in ESG and social housing*
6. *Gain access to our exclusive series of webinars and events*

West of Scotland Group’s ESG performance is set out on the following pages based on the major themes, sub-themes and criteria of SRS v2.0.





environmental

Environmental themes

Theme 1 (T1): Climate Change

Criteria 1(C1): Distribution of EPC ratings of existing homes (those completed before the last financial year).

Prior to this financial year, West of Scotland’s stock fell within the below EPC rating.

EPC RATINGS OF EXISTING HOMES

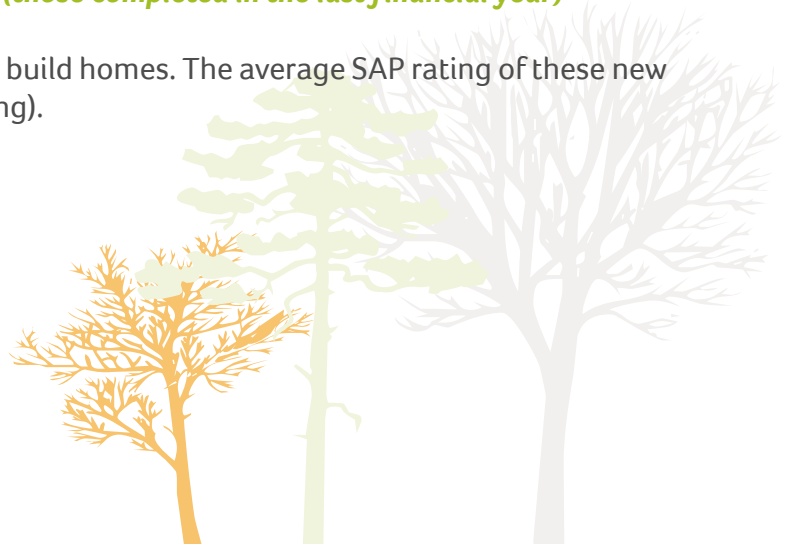
| EPC Banding | Number of Properties | Percentage of Stock |
|-------------|----------------------|---------------------|
| A | 131 | 2.95% |
| B | 1116 | 25.10% |
| C | 1667 | 37.49% |
| D | 275 | 6.18% |
| E | 29 | 0.65% |
| No Rating | 1229 | 27.64% |

With the “NO RATING” properties omitted, our SAP average across our stock is 78 (B and C).

We plan to fully leverage our asset management software, Asset Pro, by populating all relevant fields to support the generation of more accurate EPC scores for every property going forward.

(C2) Distribution of EPC ratings of new homes (those completed in the last financial year)

In the last financial year we completed 18 new build homes. The average SAP rating of these new homes is 92 (78% A rating and 22% are B rating).



(C3) Does the housing provider have a Net Zero target and strategy? If so, what is it and when does the housing provider intend to be net zero by?

West of Scotland’s Board approved its first Sustainability Strategy in June 2023 which, for the first time, set a Net Zero Target for the Association. We aim to be net zero by 2045.

Our Sustainability Strategy notes our targets as:

- Halving emissions (50%) from our operational direct (Scope 1) and indirect (Scope 2) emissions by 2030
- Setting objectives to calculate indirect emissions (Scope 3) of our primary impact areas, such as existing homes and planned developments, to enable long-term target reductions of more than 90% by 2045

Our Sustainability Strategy sets out our strategic aims and the key milestones to help us to become a business that reduces its negative impact on the environment, considers communities and individual’s wellbeing, builds resilience and restores planetary health for today’s and tomorrow’s generations.

(C4) What retrofit activities has the housing provider undertaken in the last 12 months in relation to its housing stock? How do these activities align with, and contribute towards, performance against the housing provider’s Net Zero strategy and target?

In January 2025, our Board decided to delay our delivery plan for net zero until April 2027 to improve the EPC and Stock Condition data we hold for each of our properties.

Over the last two years we have been piloting a number of Net Zero projects and retrofit activities following successful Net Zero and ECO4 funding applications. A summary of our activities is as follows:

| Net zero/ECO 4 projects | Description | Comment |
|--|---|----------------------------------|
| NexGen Infrared Wallpaper | 22 properties, including 10 at Kirkfieldbank and 12 in Pre -1919 tenements. | Glasgow Uni monitoring Pre -1919 |
| Injected Bead Insulation | 200 completed and a further 504 in the programme | Ongoing |
| ASHP, Solar Panels & Battery Storage | 31 properties at Hill Road, Cumbernauld | Completed March 2025 |
| Solar Panels | 26 properties at Orchard House, Kilmarnock (Sheltered Complex) | Completed April 2025 |
| Communal ASHP & Triple Glazing Windows | 25 properties at 45 Arlington Street (Sheltered Complex) | Completed Sept 2024 |
| Solar Panels and Battery Storage | 25 properties at Arlington Street | Completed Sept 2025 |
| Electric Heating, Solar Panels | 31 properties at Linthaugh Gardens, Stonehouse | Due Completion Nov 2025 |



In the last year we have undertaken a number of retrofitting activities. These have included a full cavity wall insulation extraction and replacement with ‘injected bead’ insulation at a block of four properties at Crookston Road, Glasgow. We undertook trials of new innovative clean heating system (NexGen ‘infrared’ wallpaper) at one tenemental property on Renfrew Street, Glasgow. We also installed internal wall insulation and replacement gas central heating with air source heat pumps at two properties: Keppochhill Road, Glasgow and Nursery Avenue, Kilmarnock.

We expect retrofit activity to increase significantly in 2024/25 as we have been successful in securing Net Zero Funding for improvements to two sheltered housing blocks. We are also utilising ECO Funding to improve a number of properties in Springburn, Glasgow with injected bead cavity wall insulation. This funding will also be used to install Photovoltaic panels and battery storage at a further sheltered housing site in Ayr. Further pilots trialling the infrared wallpaper are also being undertaken at Keppochhill Road and Melrose Street, Glasgow.

The above projects will help us take a risk averse approach to reducing our Scope 3 emissions, but the scale of retrofit and moving to “clean heating” will require successful outcomes from the pilots and significant external funding to deliver across all our assets.

We have engaged in discussions with a framework provider regarding a proposed pilot project in partnership with Octopus Energy. Under this initiative, Octopus would fund the installation of solar photovoltaic (PV) systems on qualifying properties. Participating tenants would benefit from an estimated 23% reduction in their monthly electricity costs, while WSHA would receive an annual income of approximately £700–£1,100 per property from surplus energy generation. All ongoing maintenance, monitoring, and component replacement would be undertaken and funded directly by Octopus Energy, ensuring no additional cost or administrative burden to WSHA.

The exact criteria for property eligibility and tenant qualification are still under discussion, and further clarification will be sought as the pilot proposal develops.

In addition, WSHA is maximising all available fabric-first opportunities that are fully funded through external programmes. Over the coming months, a new project will commence to install injection bead insulation in qualifying properties within the Charing Cross area. This initiative will improve thermal performance, reduce heat loss, and support WSHA’s wider objectives around energy efficiency and sustainability.

(C5) Scope 1, Scope 2 and Scope 3 green house gas emissions. Scope 1, Scope 2 and Scope 3 green house gas emissions per home.

Measuring our scope 1, 2 and 3 emissions is a standard and easily comparable reporting requirement which is asked for by many investors to provide an insight into the environmental impact of an organisation’s activities.

Scope 1 emissions are direct greenhouse gas (GHG) emissions that occur from sources that are controlled or owned by an organisation (e.g. emissions associated with fuel combustion in boilers, furnaces, vehicles).

Scope 2 emissions are indirect emissions from the generation of purchased energy.

Scope 3 emissions account for other indirect emissions, capturing value chain emissions.

Landlords report on “regulated” emissions from independently heated homes. Regulated emissions are those that arise due to the (in)efficiency of the home fabric and the heating system which the landlord has control. They are different to the “unregulated emissions” which are the result of plug-in appliances (TVs, fridges etc) which are under control of residents. As there is very limited influence landlords can have over “unregulated emissions” these are not typically included in scope 3 emission measurements.

In 2022 WSHA employed consultants Carbon Change and Marberg to help us measure our Carbon Footprint for the first time. Their latest report for West of Scotland Group - West of Scotland Housing Association Carbon Emissions Summary 2024/25 confirms our carbon footprint boundary and our 2024/25 baseline. All carbon calculations are in line with the Greenhouse Gas Protocol Corporate Standard¹ and thus use the defined approach to the scoping and quantification of Scope 1, Scope 2, and Scope 3 emissions.

The table below summarises our scope 1,2 and 3 emissions per home:

| Sustainability Reporting Standard (SRS) for Social Housing Category C5 - Carbon Footprint data requirements | | Values for West of Scotland Housing Association 2024-25 | |
|--|--|---|------------|
| Item | Data | Values | |
| C5 | Scope 1, Scope 2 and Scope 3 Green House Gas emissions | Scope 1: Kg CO2 equivalent | 62,835 |
| | | Scope 2: Kg CO2 equivalent | 40,754 |
| | | Scope 3: Kg CO2 equivalent | 18,024,389 |
| | | Scope 1, 2 & 3: Total Kg CO2 equivalent | 18,127,978 |
| | Scope 1, Scope 2 and Scope 3 Green House Gas emissions per home (Using a total of 4,360 properties) | Scope 1: Kg CO2 equivalent/home | 14.4 |
| | | Scope 2: Kg CO2 equivalent/home | 9.3 |
| | | Scope 3: Kg CO2 equivalent/home | 4,134.0 |
| | | Scope 1, 2 & 3: Total Kg CO2 equivalent/home | 4,157.8 |

Comments for SRS report in support of Green House Gas emissions data:
 All data validated and calculated as per GHG Protocol and using UK Government GHG Conversion Factors for Company Reporting 2024, v1.0
 Scope 3 - Cat 1 Purchased Goods & Services emissions calculated with inflation adjustment using Conversion factors kgCO₂e per £ spent, by SIC code 2022.
 Scope 3 - Cat 1 (Developments) emissions from embodied carbon of 18 new homes to Passivhaus standard modelled using social sector home mean floor area 66m² (as per English Housing Survey Headline Report 2019-20) and LETI Embodied Carbon Primer and Passivhaus and Embodied Carbon Report - April 2022 (kg CO₂e/m²) sliding-scale averages.

(C6) How has the housing provider mapped and assessed the climate risks to its homes and supply chain, such as increased flood, drought and overheating risks? How is the housing provider mitigating these risks? In addition to action plans, include information of Board oversight to ensure all risks are mitigated. Assessing the Housing Provider's consideration of flooding and overheating provides an indication of the climate resilience of the housing stock in the face of increasing risks of flooding and rising summer temperatures.

We undertook a desktop exercise in 2021 to identify our stock that was within flood plains. This highlighted a potential risk to our new build properties at Dalmarnock Road, Glasgow. However, Clyde Gateway have undertaken flood prevention works that have significantly reduced this risk.

More broadly, we recognise that this is an area where WSHA require to assess these risks in more detail.

We undertook our first exercise in assessing over-heating in our new build properties after a complaint received from a tenant in Doonfoot, Ayr. We reported the outcome to our Development & Asset Management Sub Committee on our findings, which demonstrated that in this case, the issue was limited to an individual property.

We have assessed overheating in our Passivhaus and Net Zero new build projects alongside a qualified energy strategist. Measures such as orientation, shadowing and mechanical ventilation heat recovery systems have been installed to mitigate overheating.



Theme 2 (T2): Ecology

(C7) Does the housing provider have a strategy to enhance green space and promote biodiversity on or near homes? If yes, please describe with reference to targets in this area. If no, are you planning on producing one in the next 12 months?

The Association has published a Biodiversity Strategy 2025-31 that defines how current policies relating to the biodiversity aspects of sustainability will be delivered during the execution of WSHA's remit for the provision of new housing, and other projects looking to bring existing derelict land into purposeful use.

The implementation of the Biodiversity Strategy is underpinned by two main themes:

1. Understanding and acknowledging the biodiversity assets present within the WSHA portfolio
2. Application of the biodiversity Mitigation Hierarchy during the delivery of all services.

The Association has been working with estates contractor Idverde in regard to exploring proposals for habitat creation and refinements to support wildlife and increase biodiversity. A report has been produced containing recommendations across a number of sites which includes creating



- Wildflower mounds
- Species-rich grassland
- Community Orchard
- Community bioblitz events
- 3-phase mosaic maintenance regime (Mosaic mowing)
- Nesting boxes
- Bat roosting boxes
- Road verge wildflowering
- Pollinator-friendly flower turf
- Community gardens

The Association has also created a Community Flat in the Springburn area linked to a Community Garden and a gardening club has been running over the summer months teaching local residents how to create flower displays and grow food.

Theme 2 (T2): Ecology (continued)

The Association has also carried out the following biodiversity work at our Sheltered Housing sites:

Arlington Street:

Gardening sessions held with tenants; garden prepared for winter and spring/summer; pruning demo, composting started, and fox damage addressed.

Molly Weir Garden:

Full garden clear-up; pruning, litter picking, path maintenance; garden prepped for April 2025 community gardening course.

Barrowfield Community Centre Garden:

Sessions on planting and maintenance; sunflower growing competitions with take-home kits for tenants.

Barrowfield Burn Community Garden:

Local tenants continued to maintain and develop the space as a community garden and play area.

Woodlands and Garnethill Women's Group:

Four planting sessions - group grew salads, herbs, and potatoes in portable containers suitable for small spaces.

(C8) Does the housing provider have a strategy to identify, manage and reduce pollutants that could cause material harm? If so, how does the housing provider target and measure performance?

This will be addressed in the review of our Sustainability and Development Strategies this financial year (2025/26).



Theme 3 (T3): Resource Management

(C9) Does the housing provider have a strategy to use or increase the use of responsibly sourced materials for all building and repairs works? If so, how does the housing provider target and measure performance?

(C10) Does the housing provider have a strategy for waste management incorporating building materials? If so, how does the housing provider target and measure performance?

We will formalise a Waste Management Strategy as part of our Sustainability Strategy review in 2025/26. In the interim we operate a documented approach: for offices we target 80% recycling, monitored through Enva's reporting and regular audits; for construction, contractors provide Site Waste Management Plans and quarterly KPIs against a 70% reuse/recycle target, with many achieving c.90% diversion from landfill. Evidence includes our office waste audit (Step Up to Net Zero, Mar 2025) and contractor KPI schedule.

(C11) Does the housing provider have a strategy for water management? If so, how does the housing provider target and measure performance?

WSHA's current sustainability strategy has the following strategic aim: 'We will work and deliver our functions in a way that is considered most sustainable (acting sustainably)'. When West of Scotland Group review our Sustainability and Development Strategies this financial year we will look to set out what our strategy and targets will be in respect of identifying, managing and reducing pollutants together with details on how we will manage our water systems, increase the use of responsibly-sourced materials and in turn minimise waste.

A Water Management Strategy will be developed as part of our Sustainability Strategy review (2025/26). We currently prioritise statutory compliance (e.g., Legionella risk assessments and inspection programmes) as set out in our Landlord Safety Manual. We also pilot local water efficiency projects where appropriate (e.g., rainwater harvesting proposal for the office).



social

Theme 4 (T4): Affordability & Security

(C12) For properties that are subject to the rent regulation regime, report against one or more Affordability Metric:

1) Rent compared to median private rental sector (PRS) rent across the relevant Local Authority

| Average of Rent as % of BRMA Median Rent | No. of Bedrooms | | | | | | | | |
|--|-----------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| | 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | Grand Total |
| East Ayrshire | 88.41% | 89.96% | 71.66% | | | | | | 86.62% |
| East Dunbartonshire | | | 25.49% | | | | | | 25.49% |
| Falkirk | | | | 19.19% | | | | | 19.19% |
| Glasgow | 48.17% | 47.24% | 41.07% | 34.08% | 20.86% | 20.22% | 21.81% | | 40.65% |
| North Ayrshire | | 90.33% | 74.02% | 62.63% | 42.55% | | | | 75.52% |
| North Lanarksire | | 77.89 | 62.03% | 54.14% | 37.68% | | | | 67.26% |
| South Ayrshire | 87.74% | 90.61% | 76.54% | 65.21% | 44.58% | | | | 77.63% |
| South Lanarkshire | | 70.84% | 62.00% | 50.59% | 31.89% | 35.58% | | 32.75% | 63.00% |
| Grand Total | 67.05% | 64.23% | 53.81% | 43.26% | 24.67% | 23.47% | 21.81% | 32.75% | 54.55% |
| % of BRMA-PRS Median Rent 41.38% | | | | | | | | | |

2) Rent compared to the relevant Local Housing Allowance (LHA)

| Average of Rent as % of LHA | No. of Bedrooms | | | | | | | | |
|-----------------------------|-----------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| | 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | Grand Total |
| East Ayrshire | 101.66% | £103.44% | 86.99% | | | | | | 100.43% |
| East Dunbartonshire | | | 30.86% | | | | | | 30.68% |
| Falkirk | | | | 24.05% | | | | | 28.04% |
| Glasgow | 85.34% | 54.18% | 48.21% | 45.80% | 25.57% | 26.01% | 26.72% | | 48.70% |
| North Ayrshire | | 103.87% | 89.84% | 77.83% | 57.34% | | | | 90.12% |
| North Lanarksire | | 88.76% | 76.33% | 63.94% | 50.66% | | | | 79.50% |
| South Ayrshire | 100.89% | 104.19% | 92.91% | 81.03% | 60.07% | | | | 93.22% |
| South Lanarkshire | | 86.03% | 75.14% | 63.42% | 43.18% | 45.47% | | 44.35% | 76.80% |
| Grand Total | 92.86% | 74.61% | 64.56% | 55.60% | 31.21% | 29.54% | 26.72% | 44.35% | 65.42% |
| % of LHA rent 52.43% | | | | | | | | | |

(C13) Share the number of existing homes (owned and/or managed) completed before the last financial year allocated to:



- General needs (social rent)
- Intermediate rent
- Affordable rent
- Supported Housing
- Housing for older people
- Low-cost home ownership
- Care homes
- Private Rented Sector
- Other

In 2024/25 we relet 251 of our existing homes, with 85% being general needs social rent, 13% being sheltered housing. 1% being mid-market rent and another 1% being “other”, which includes amenity and adapted housing.

| Stock Type | Quantity re-let |
|--|-----------------|
| # of General Needs (social rent) units | 214 |
| # of Intermediate Rent units | 2 |
| # of Affordable Rent units | 0 |
| # of Supported Housing units | 0 |
| # of Housing for Older People units | 32 |
| # of Low-cost Home Ownership units | 0 |
| # of Care Home units | 0 |
| # of Private Rented Sector units | 0 |
| # of Other units | 3 |



(C14) Share the number of new homes (owned and/or managed) that were completed in the last financial year, allocated to:



- General needs (social rent)
- Intermediate rent
- Affordable rent
- Supported Housing
- Housing for older people
- Low-cost home ownership
- Care homes
- Private Rented Sector
- Other

We completed 18 new build homes in the year 2023/24. 100% of these homes were allocated for Mid-Market Rent homes, managed by our commercial subsidiary, Westscot Living on completion.

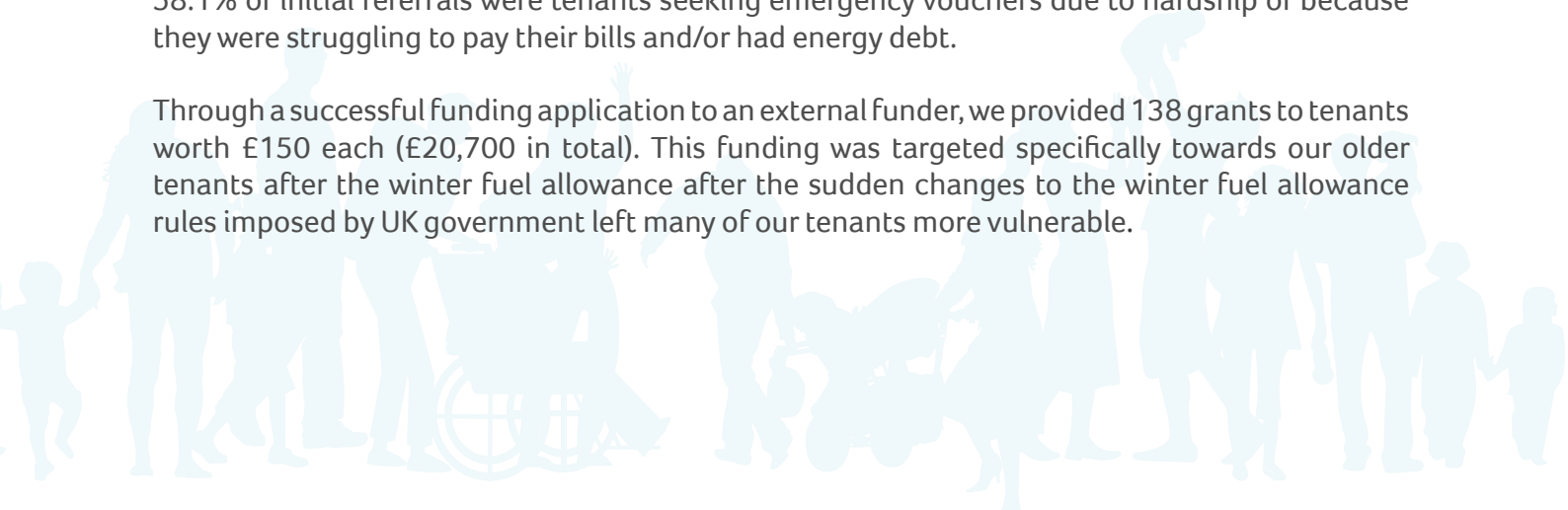
(C15) How is the housing provider trying to reduce the effect of high energy costs on its residents?

For new builds, we are committed to building to a higher energy standard, i.e Passivhaus and Net Zero. We commission consultants to provide a heating and hot water strategy to consider options including ongoing running and maintenance costs to ensure the most affordable solution is adopted. For existing tenants, we have an Energy Advice team who support tenants with general advice on paying utility bills, supply energy vouchers and help with energy debt.

In 2024/25 our charitable subsidiary Willowacre Trust, through its Energy Advice Service, provided support to 516 tenants and their households.

58.1% of initial referrals were tenants seeking emergency vouchers due to hardship or because they were struggling to pay their bills and/or had energy debt.

Through a successful funding application to an external funder, we provided 138 grants to tenants worth £150 each (£20,700 in total). This funding was targeted specifically towards our older tenants after the winter fuel allowance after the sudden changes to the winter fuel allowance rules imposed by UK government left many of our tenants more vulnerable.



In addition, we made individual applications for energy debt write-off grants and secured £11,218 of energy debt written off for tenants while securing a further £12,054 in energy vouchers for tenants to heat their homes.

We ran a successful awareness campaign around the Warm Home Discount scheme to help ensure that as many households as possible would benefit. This led to us assisting 35 households to make their application which doubled the number of homes helped in the previous year.

As well as addressing the immediate financial support required for those referred, the team looked at a range of measures to help combat the effect of high energy costs on tenants. These included:

- *Providing advice and support to switch energy suppliers*
- *Providing information and advice on maximising energy savings around the home*
- *Providing training on programming and using heating controls*
- *Promoting the installation of smart meters to give tenants more control over their energy usage*
- *Delivering energy advice workshops to groups*
- *Promoting energy saving tips at large events*

The table below shows the initial reason given for referral to WSHA's Energy Advice team. 58.1% of referrals are tenants who are either seeking emergency vouchers (hardship), or who are struggling with bills and/or energy debt.

| Type of Intervention | Number | Percentage |
|----------------------|------------|-------------|
| Financial Hardship | 123 | 23.8% |
| Billing Issues | 79 | 15.3% |
| New Tenants | 88 | 17% |
| Heating Controls | 26 | 5% |
| Capped Gas Supply | 18 | 3.5% |
| Meter Problems | 34 | 6.6% |
| Energy Debt | 80 | 6.6% |
| Account Review | 19 | 3.7% |
| Warm Home Discount | 35 | 6.8% |
| Total | 516 | 100% |

(C16) How does the housing provider provide security of tenure for residents?

All Registered Social Landlords are required, in terms of the Housing (Scotland) Act 2001, to provide a written tenancy agreement which incorporates security of tenure and permits them to remain in their home for life, assuming they do not want to leave voluntarily and that they adhere to the terms of their tenancy.

The Scottish Government provided a model agreement type, the Scottish Secure Tenancy (SST), in 2002 and WSHA adopted this at the same time. All WSHA tenancies are, by default, SSTs. Exceptions are rare, such as for shared accommodation (HMOs), but the occupancy agreement used in these limited circumstances still include a high level of security of tenure.

Our Mid-Market Rent (MMR) tenancies utilise the Private Rented Tenancy (PRT) model produced by the Scottish Government as part of the introduction of the Private Housing (Tenancies) (Scotland) Act 2016. While there are differences between this and the SST, they operate in broadly similar terms and for WSHA (and our subsidiary Westscot Living who are the landlord for MMR tenancies), it means that our MMR tenants can remain in their home for life assuming they do not want to leave voluntarily and adhere to the terms of their tenancy. All MMR tenancies are, exclusively, PRTs.



Theme 5 (T5): Building Safety & Quality

(C17) Describe the condition of the housing provider's portfolio, with reference to:

- % of homes for which all required gas safety checks have been carried out.
- % of homes for which all required fire risk assessments have been carried out.
- % of homes for which all required electrical safety checks have been carried out.

100% of gas safety checks were carried out before the anniversary date.

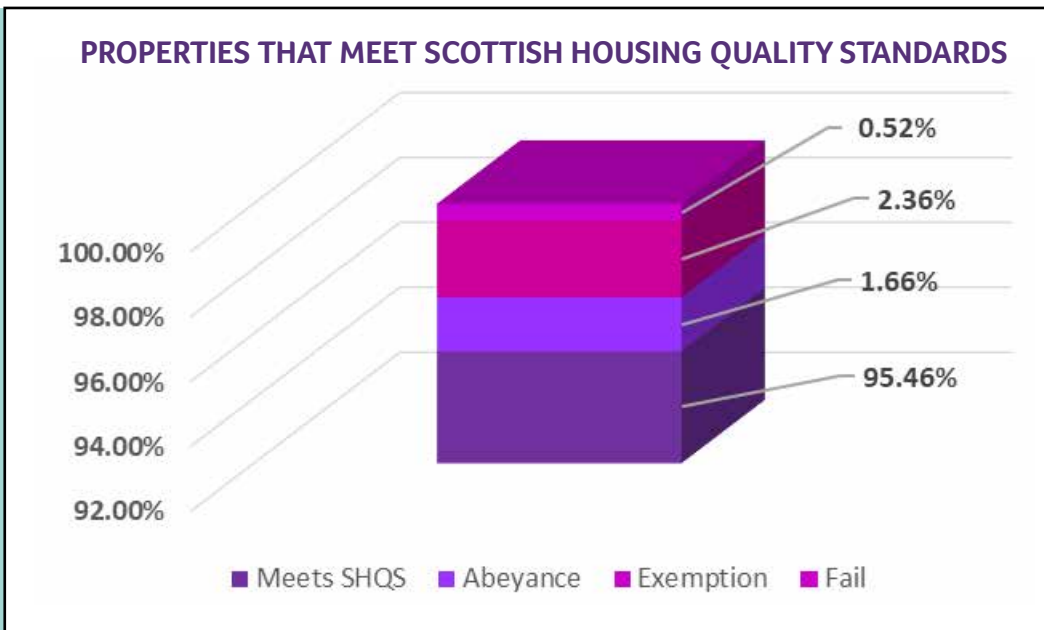
100% of fire risk assessments have been carried out to our communal areas of our flat blocks and all commercial properties. There is no legal requirement to carry out fire risk assessments within domestic premises.

Currently, **99%** of WSHA properties hold a valid Electrical Installation Condition Report (EICR). There are three outstanding inspections remaining from last year, two are scheduled for completion, while one property is unlikely to be completed due to significant access issues arising from issues within the home. This case has been referred to the Housing team for further action. WSHA continues to work towards achieving full compliance as soon as practicably possible.



(C18) What % of homes meet the national housing quality standard? Of those which fail, what is the housing provider doing address these failings?

All Scottish Registered Social Landlords were required to bring their homes up to the Scottish Housing Quality Standards (SHQS) by 2015. As the standard has changed over time, the position on the number of properties failing to meet the standard can change. By March 2025, 96.1% of West of Scotland homes meet SHQS. The graph below outlines the breakdown of the 3.9% that don't meet the standard.



- 1.66% are in “Abeyance” which means that some factors such as no access or a request to delay works by the tenant has meant we are unable to carry out necessary works to bring up to the standard.
- 2.36% are “exempt” which means that due to the particular property, it is not possible to bring up to SHQS. For example, a kitchen may be too small to enable the required kitchen storage capacity of units.

As of March 2024, 23 properties were showing as SHQS failures due to failing to meet the required EPC rating of C (SAP rating of 69). We aim to implement energy efficiency measures to the identified properties within this financial year with the goal of achieving a B rating. As of September 2024, we have completed measures to one property with works commencing in an additional 17 properties by January 2025.

(C19) How do you manage and mitigate the risk of damp and mould for your residents?

We have a Damp and Mould policy that outlines our strategic and operational response to this issue. Our damp and mould policy was audited in November 2024 and achieved moderate assurance. There were three recommendations which have all been implemented. We also recently reviewed our Damp and Mould Policy following Awaabs' Law and in the main our policy complies apart from two areas which we plan to incorporate into the updated policy this year.

The processes we follow are clear processes and consistent with best practice and regulatory guidance. We ensure the work is carried out to the tenant's satisfaction and that any issues with damp and mould have been fully resolved.

We have purchased 4 Enviromental Sensor kits that includes 31 room sensors and 21 window sensors. We have used these in five properties as a way to monitor and improve the home environment for tenants in harder to treat damp and mould scenarios. This has proven to be very useful in helping both the tenant and WSHA pinpoint causes of any damp and mould problems and provide tailored advice.

We have developed leaflets and include articles in our bi-annual Westworld tenant magazine in relation to damp and mould to help tenants be more aware of simple measures they can take to reduce condensation inside their homes and decrease the risk of dampness and mould forming.



Theme 6 (T6): Resident Voice

(C20) What are the results of the housing provider's most recent tenant satisfaction survey? How has the housing provider acted on these results?

In September 2024, West of Scotland HA was able to report on the latest Tenant Satisfaction Survey (completed by Research Resource via in-person interviews).

On overall satisfaction with West of Scotland HA as a landlord we are currently showing total 91% satisfaction:

| | | |
|-----|---------|------------------------------------|
| 340 | (37.8%) | Very satisfied |
| 482 | (53.6%) | Fairly satisfied |
| 30 | (3.3%) | Neither satisfied nor dissatisfied |
| 30 | (3.3%) | Fairly dissatisfied |
| 18 | (2.0%) | Very dissatisfied |
| 0 | (0.0%) | No opinion |

The table below summarises how that score has changed since 2019 and how we compare with the sector average.

| Taking everything into account, how satisfied or dissatisfied are you with the overall service provided by your landlord? | |
|--|---|
| 91% | % satisfied overall 2024 |
| 87.7% | % satisfied overall 2022 |
| 91.14% | % satisfied overall 2019 |
| 86.5% | % satisfied (all landlords average 23/24) |

In January 2025, we presented a report to our Board with our findings and action plan setting out how we will address any areas of weakness. The action plan is currently underway.

(C21) What arrangements are in place to enable residents to hold management to account for the provision of services?

The majority of seats on West of Scotland HA Group's Board of Management are for tenants of the Housing Association (8 out of 15 places). We also have both a Tenant Advisory Group and a Tenant Scrutiny Panel whose members come from our communities and who will challenge and scrutinize our decision making. In addition, we have residents' groups in a number of our major communities and have Factored Owners and Mid-Market Rent Forums.

(C22) In the last 12 months, how many complaints have been upheld by the Ombudsman? How have these complaints (or others) resulted in change of practice within the housing provider?"

There have been no complaints escalated to the SPSO in the past 12 months. We do carry out a lessons-learned process with our Leadership Team for Stage 2 Complaints to ensure we change practice where required.

Theme 7 (T7): Resident Support

(C23) What are the key support services that the housing provider offers to its residents? How successful are these services in improving outcomes?

WSHA and its subsidiary Willowacre Trust provide a number of support services which fall under the heading of ‘tenancy sustainment’.

These services include income maximisation, tenancy starter packs, food parcels, an Imagination Library providing free books to under-5s, an upcycling project, and Christmas/summer activities.

Additional support services have been developed and implemented and these include money advice, energy advice, volunteering, handyperson services, Community Hubs, Community Benefit programme, community support & development, capacity building and older people’s services.

As a result of the above, WSHA has maintained a strong record in supporting tenants and enabling tenancy sustainment. For the last few years, tenancy sustainment has continually been around 90%+ and tenancy debt has reduced each year for the last three years.

Welfare benefits secured in 2024/25 resulted in £137k of backdated benefits and income generated totalling just over £1.04m by means of 1859 forms of contact to help support tenants.

General support provided by Willowacre Trust resulted in over 8,200 forms of contact to our tenants, helping with areas such as energy advice, money advice and older persons support. In addition, over 28,000 people used our Community Hubs.

As a result of the above, WSHA has maintained a strong record in supporting tenants and tenancy sustainment. For the last few years, tenancy sustainment has continually been around 90%+ and tenancy debt has reduced each year for the last three years.



Theme 8 (T8): Placemaking

(C24) Describe the housing provider's community investment activities, and how the housing provider is contributing to positive neighbourhood outcomes for the communities in which its homes are located. Provide examples or case studies of where the housing provider has been engaged in placemaking or placeshaping activities.

We apply our Community Benefit Policy to most of our investment activities. This identifies the investment requirements including any local initiatives. In addition, West of Scotland Housing Association, through our subsidiary charity Willowacre Trust, have taken part in Place Standard consultations. The most recent covered Glasgow's Springburn area, with a particular focus on Cowlares. This led to an action plan being created with issues raised including everything from maintenance of open spaces and community fun days to community facility provision. Since that consultation, the Association has created a new Community Hub for use by the local Cowlares community.





governance

Theme 9 (T9): Structure & Governance

(C25) Is the housing provider registered with the national regulator of social housing?

West of Scotland HA is registered with the national housing regulator for Scotland:

<https://www.housingregulator.gov.scot/landlord-performance/landlords/west-of-scotland-housing-association-ltd/>.

(C26) What is the housing provider's most recent regulatory grading/status?

Our current regulation status is COMPLIANT with the Regulatory Standards of Governance and Financial Management as noted in our current Engagement Plan:

<https://www.housingregulator.gov.scot/landlord-performance/landlords/west-of-scotland-housing-association-ltd/engagement-plan-from-1-april-2025-to-31-march-2026/>

Our last Annual Assurance Statement was submitted as COMPLIANT with these Regulatory Standards:

<https://westscot.co.uk/regulatory-information/>

(C27) Which Code of Governance does the housing provider follow, if any?

As a Scottish Registered Social Landlords we must comply with the Scottish Housing Regulator's Standards of Governance and Financial Management.

(C28) Is the housing provider a Not-For-Profit?

Section 4.1 of our Rules confirm that the Housing Association is a not-for-profit body. Our enterprises which generate a profit are managed through our commercial subsidiary, Westscot Living.

(C29) Explain how the housing provider's Board manages ESG risks. Are ESG risks incorporated into the housing provider's risk register?

We have a robust risk management process in place and have both a strategic and an operational risk register in place.

Risk Management Process

When identifying a new risk, the following process is carried out and added to our risk register:

- *Identification of causes*
- *Identification of effects*
- *Scoring of residual risk (without controls)*
- *Identification of risk controls currently in place*
- *Scoring of inherent risk (with controls)*
- *Assessment of assurance level of controls in place*
- *Identification of any further actions required to mitigate the risk*

As per our risk management process, operational risks are reviewed quarterly by the relevant owner and high level operational and strategic risks are reported to the Audit Committee quarterly and to the Board bi-annually.

In addition to the above, the Board assesses our risk appetite of each risk dependent on the risk category of the risk.

Emerging Causes

For each of our strategic and operational risks our risk management process allows us to identify causes for each risk and then assess the effect of these causes. Once this has been done, we identify which control measures we have in place for each cause to mitigate the effect. This allows us then to score the risk as well as identify any further actions required. It is important that as part of the ongoing risk management process we identify any new causes and carry out this process.

When considering the causes that impact our strategic and operational risks we consider environmental, social and governance elements and our risks, controls and further actions identified reflect these considerations.

(C30) Has the housing provider been subject to any adverse regulatory findings in the last 12 months (data protection breaches, bribery, money laundering, HSE breaches etc.) that resulted in enforcement or other equivalent action?

We have not been subject to adverse regulatory findings in the last 12 months.

Theme 10 (T10): *Board and Trustees*

(C31) How does the housing provider ensure it has a diverse range of inputs into governance processes? Does the housing provider consider resident voice at the board and senior management level? Does the housing provider have policies that incorporate Equality, Diversity and Inclusion (EDI) into the recruitment and selection of board members and senior management?"

WSHA is committed to including a representative resident voice at the highest levels of our organisation. We do this in a number of ways.

Tenant Board Members

As previously mentioned, the majority of seats on West of Scotland HA Group's Board of Management are for tenants of the Housing Association (8 out of 15). Our Board consists of eight tenant Board members and seven professional Board members.

Tenant Advisory Group

Our Tenant Advisory Group (TAG) is made up of tenants from across the communities where we have homes. TAG is the main way we engage and involve tenants in the operation of West of Scotland Housing Association. TAG are responsible for overseeing our performance in how we deliver services to tenants and the group receives quarterly updates on performance against a range of key performance indicators. TAG also has a role to play in challenging and scrutinising decisions made by our Board and Management Team.

Tenant Scrutiny

We have a Tenant Scrutiny Panel in place. The group has a framework which sets out how they will work, and explains the relationship the panel has to their stakeholders, including WSHA and the wider tenant group. This framework is due for review in late 2024 when the group reconvenes after a summer break. This review will ensure the activities of the Scrutiny Panel continue to meet the needs of tenants.

The Scrutiny Group undertakes a minimum of two activities on an annual basis, reviewing different aspects of the services WSHA provide to tenants and other customers. The activities are decided by the Scrutiny Panel but can be suggested by the Board.

In addition to the above groups, we also have a Readers Panel who evaluate our public-facing literature and a Rate Your Estate group, who carry out estate inspections.

Corporate Business Planning

Each year we create a Corporate Business Plan which sets out our aims and ambitions over the coming five years and the related Key Business Objectives. Part of the development of this plan is an engagement session with TAG, which gives the Group an opportunity to influence West of Scotland Group's priorities for the coming year. This session is also open to other tenants who wish to attend as a one off.

Recognising that not all customers will be able to attend this one-off session, going forward we hope to identify ways to gather customers' views in advance, so more tenants have the opportunity to voice their priorities for the year ahead.

Customer Satisfaction Surveys

We undertake customer satisfaction surveys throughout the year to gather tenant feedback on how we, and the contractors working on our behalf, are performing. This process allows us to utilise our continuous surveys to gather more in-depth customer feedback on a monthly basis.

Consultation Groups

In addition to TAG, we have community-based residents' groups in Woodlands and Garnethill (Charing Cross) and Cowlairs. These groups focus on community-based issues rather than organisational, but we do involve them in some organisational consultations. We also have a Factored Owners Forum and Mid-Market Rent Tenant Forums to be sure these customers are involved in decision-making relating to them.

Customer Engagement Strategy

We have a Customer Engagement Strategy in place. This strategy sets out how we will engage with our customers to ensure they have real influence over the services we deliver. The chief aim is for WSHA to continue to deliver services which align with customers' needs and priorities whilst also achieving value for money and our Key Business Objectives.

Equality, Diversity and Inclusion at Board level

We report to the Board annually in respect of succession planning and as part of this process we present a Board profile considering gender, age, disability and ethnic background. This was last discussed with the Board in June 2025 and it was recognised that we need to recruit younger, female-identifying members to our Board to improve diversity. We currently have four vacancies on our Board and we are recruiting based on the equalities and diversity gaps as well as gaps in skills and experience following a skills gap analysis.

BOARD MEMBER DIVERSITY

| | |
|--------------------------------------|------|
| % of board that are women | 36% |
| % of board that are BAME | 9% |
| % of board that are residents | 45% |
| % of board that have a disability | 27% |
| Average age of board members (years) | 61.0 |
| Average board tenure (years) | 4.8 |

We take a similar approach to recruitment of staff, including senior management, and focus recruitment on equalities gaps to achieve a more diverse workforce.

(C32) What % of the housing provider's Board have turned over in the last two years? What % of the housing provider's Senior Management Team have turned over in the last two years? Our Board turnover in the past 2 years has been 53%.

Our Senior Management Team turnover in the past 2 years has been 60%.

(C33) Number of board members on the housing provider's Audit Committee with recent and relevant financial experience.

We currently have two Board members on our Audit Committee with recent and relevant Finance experience.

(C34) What % of the housing provider's board are non-executive directors?

100% - All Board members are non-executive directors.

(C35) Has a succession plan been provided to the housing provider's board in the last 12 months?

Yes, we review our Board profile annually and develop an annual succession plan in respect of Board members and Office Bearers. This was discussed by the Board in June 2025.

(C36) For how many years has the housing provider’s current external audit partner been responsible for auditing the accounts?

Our auditors have been in place for five years. We have recently tendered our external audit contract, the same auditors have been re-awarded the contract.

(C37) When was the last independently-run, board-effectiveness review?

An independent review was carried out in August 2019. However, since then our internal audits have carried out an audit in respect of our governance and we received a substantial assurance for this audit. Our internal auditors also carried out an audit of our Assurance processes this year and we received a the high assurance rating for this audit.

(C38) How does the housing provider handle conflicts of interest at the board?

We have a Board Conflicts of Interest Policy. Board Members also sign a declaration as part of the Board Code of Conduct to confirm that they will declare any Conflicts of Interest. Conflicts of Interest is also a standing agenda item on each Board, Sub Committee and Subsidiary Board Agenda. An example of an approach that we would take would be: where a Board member has a conflict of interest in respect of a particular decision or agenda item, they will be asked to leave the meeting for that discussion and not take part in that decision or discussion. We have a register of interests in place which is updated annually.



Theme 11 (T11): *Staff Wellbeing*

(C39) Does the housing provider pay the Real Living Wage?

Yes, we pay the Real Living Wage or above for all staff including our subsidiary staff.

(C40) What is the housing provider's median gender pay gap?

Our median gender pay gap is 12.2% in favour of men. The UK's median gender pay gap in 2024 was 13.1% in favour of men.

(C41) What is the housing provider's CEO:median-worker pay ratio?

Our CEO: Median-worker pay ratio has been calculated as 3:1. In the FTSE 100, the median CEO/median employee ratio was 78.1

(C42) How is the housing provider ensuring equality, diversity and inclusion (EDI) is promoted across its staff?

We have an Equalities, Diversity and Human Rights Policy in place. We incorporate this into our recruitment processes and HR policies and processes. Similar to our Board - we develop an Annual Staff Profile and focus recruitment on areas where we have gaps to encourage a more diverse workforce. All staff complete Equalities & Diversity training and we carry out Equality & Human Rights Impact Assessments for new staff policies, policies reviews or decisions relating to staff. We have include Equalities topic in our training programme over the past few years including Autism Awareness, Dementia Awareness, Age Awareness and LGBTQ+.

(C43) How does the housing provider support the physical and mental health of its staff?

We have an Employee Health & Wellbeing Strategy in place, in addition to this we have policies around Mental Wellbeing, Menopause and Financial Wellbeing. We have an annual programme of awareness raising and activities. Activities include Tea & Talk sessions, Menopause Support Group, cycling sessions, annual health checks, monthly free complimentary therapy sessions and annual flu vaccinations. We have an Employee Assistance Programme in place which offers counselling sessions and Cognitive Behavioural Therapy as well as resources and advice in respect of issues such as divorce, bereavement, financial worries. Over the past year we have implemented a Mental Health Project Plan to provide further support to staff in respect of mental wellbeing particularly where they are dealing with customers with mental health issues. Last year, we received Investors in People Wellbeing Gold Accreditation.

(C44) How does the housing provider support the professional development of its staff?

We have a Learning & Development Policy in place. Professional development priorities are discussed as part of our Staff Performance Framework during one to ones or through the Annual or Mid-Year Review. In addition to this we carry out an analysis of workforce development considerations on an annual basis as part of our Corporate Business Planning process. Key themes from appraisals and the Corporate Business Plan workforce development considerations are used to develop an Annual Training Programme which is implemented from August to April. Individual professional development is taken forward with the individual staff member and their line manager and we have a budget in place for this. We offer the opportunity for staff to apply for the Association to fund a further education qualification and we have a budget in place for this. We fund professional subscriptions for individual staff members such as Chartered Institute of Housing and they can access professional development resources through these memberships. In addition to the above, we offer informal development opportunities such as job shadowing, mentoring and coaching and involvement in organisational working groups. We have recently reviewed our learning and development approach and have moved to the 70/20/10 approach, which we are currently embedding.

Theme 12 (T12): Supply Chain

(C45) How is social value creation considered when procuring goods and services? What measures are in place to monitor the delivery of this Social Value?

We have a Procurement Strategy and Policy in place and one of the key strands of our procurement approach centres around gaining community benefits. We include community benefits in our tender processes. For larger development and works contracts this benefit would be in the form of apprenticeships and work experience. For smaller contracts it would be community enhancements. We monitor through contract management and report annually to the Board.

(C46) How is sustainability considered when procuring goods and services? What measures are in place to monitor the sustainability of your supply chain when procuring goods and services?

Our Sustainability Strategy details our sustainable approach to procurement. This commitment is also reinforced in our Procurement Strategy. We include sustainability in our quality questionnaires as part of our tender process, and this often will have a weighted score. We will develop this further to allow us to monitor and report on key performance indicators around sustainability once a contractor is in place as part of our contract management process.

