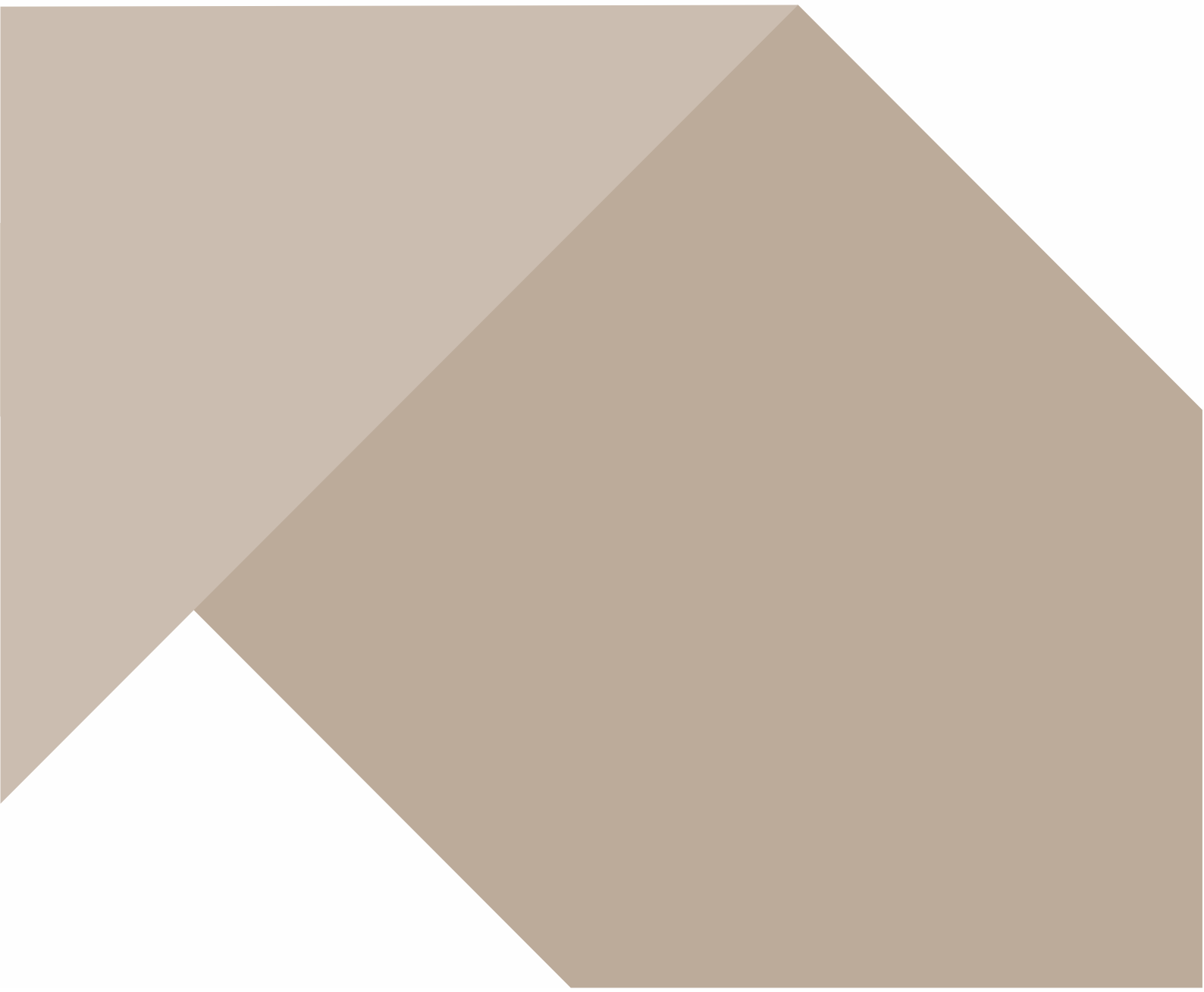


Wheatley Group

Community Benefits

Statement

2024



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Introduction

- 1.1 Owning or managing over 93,700 homes, Wheatley Group (the Group) delivers award-winning services to over 210,000 people across 19 local authorities in Scotland. The Group's partner organisations remain firmly rooted in their local communities whilst drawing on the strength, size, scale and resources of the Group. This helps them contribute on a regional and national level to affordable housing, care and community regeneration across Scotland. Subsidiaries include Wheatley Homes Glasgow, Wheatley Homes East, Wheatley Homes South, Loretto Housing Association, Lowther and Wheatley Care.
- 1.2 Over the next five years, Wheatley will be building 4,000 new homes at over 80 sites across Scotland, from Stranraer to Helensburgh to Longniddry and lots of places in between. This is the biggest social housing construction programme in Scotland and follows on from the 3,141 new homes built by the Group over the past five years.
- 1.3 This Community Benefit Statement supports **Wheatley Group's Procurement Strategy 2024 - 2026** and the Group's **Sustainability Policy 2024**. It ensures compliance with Sections 24 and 25 of the [Procurement Reform \(Scotland\) Act 2014](#), which sets out a requirement to:
 - consider community benefits requirements in public contracts which are regulated procurements over the value of £4 million
 - include a summary of the community benefit requirements in the contract notice or, where not included, a statement of reasons for not including such requirements.

Wheatley Group considers that delivering community benefits is a core part of contract compliance.

- 1.4 The Group is committed to maximising community benefits for its customers and communities through its procurement activities. This will be achieved through the inclusion of specific community benefits requirements in Wheatley Group procurements and Key Performance Indicators (KPIs) within procurement contracts, known as Community Benefit Requirements.

2 What are Community Benefits?

- 2.1 Community benefit requirements are contractual requirements which deliver wider social benefits in addition to the core purpose of a contract. The requirements can be used to build a range of social, economic, or environmental conditions into contract delivery. As an example, this can include provision of jobs and training places for particular groups; or donations of goods, equipment, or expertise to support local community activities.
- 2.2 [Scottish Government Procurement Guidance](#) suggests that community benefit requirements to be considered in public procurements may include (but are not limited to) the following:
- generation of employment and training opportunities,
 - vocational training, up-skilling, equality initiatives,
 - small and medium sized enterprises (SME) / supply chain / third sector development,
 - building capacity in community organisations,
 - educational support initiatives, work experience,
 - minimising negative environmental impacts.
- 2.3 Where appropriate, non-contractual voluntary community benefits may also be sought on a case-by-case basis, where there is deemed a potential to derive positive community outcomes via existing contracts.

3 Community Benefits Legislation

- 3.1 The Scottish Government envisages that enacting community benefit requirements will contribute to achievement of a range of National and Local Outcomes which promote employability, skills development and tackling inequality. The **Procurement Reform (Scotland) Act 2014** aims to increase the use of community benefits within public contracts and framework agreements
- 3.2 Under section 25(1) of the Act, as noted it is a legal requirement that community benefit requirements are considered for all regulated procurements with an estimated value of **£4 million** or more. The Scottish Government has indicated that the £4M threshold may be reviewed in future, as community benefits may potentially be achieved in lower-value procurements. Links to the Legislation and current guidance are included below.

[Public sector procurement: Community benefits in procurement - gov.scot \(www.gov.scot\)](#)

[Procurement Reform \(Scotland\) Act 2014 \(the Act\): statutory guidance - updated June 2021 - gov.scot \(www.gov.scot\)](#)

- 3.3 In line with Sustainable Procurement, the Scottish Government Guidance advises that community benefit requirements should:
- be used where deemed appropriate,
 - be proportionate, and that requirements should not place a disproportionate burden on economic operators,
 - not result in unintended effects such as displacement of existing contractor employees.
- 3.4 The Guidance recognises that training and employment opportunities require an adequate contract length to be undertaken successfully and that, while activities such as mentoring or curriculum support may be delivered via lower value contracts, most community benefits will derive from higher value, longer term contracts.
- 3.5 Overall considerations should include how procurement can improve the economic, social, and environmental wellbeing of areas or target groups and facilitate the involvement of small and medium enterprises, the third sector and supported businesses in supply chains.
- 3.6 The formation of the Group's Community Benefit Statement takes note of Scottish Government Guidance, legislation and the need for requirements to be proportionate. To this end, the Group's community benefit requirements will be included in contract specifications and will form part of procurement selection and award procedures where relevant.

4 Group Approach to Community Benefits

- 4.1 Contractual community benefit requirements can help provide a wide range of opportunities to disadvantaged groups, communities, and neighbourhoods. The aim of Wheatley Group's community benefits requirements is to secure real economic and social benefit for our customers and communities.
- 4.2 From 2005-2017, Group community benefits requirements were used predominantly in works, construction, and investment contracts, utilising a 10% New Entrant labour requirement. This enabled jobs, training, and apprenticeship outcomes to be delivered, derived mainly via Wheatley Homes Glasgow (WHG) investment and development contracts. The Group subsequently reviewed and updated its community benefits approach to ensure current legislative requirements are met across relevant Group contracts.

- 4.3 Community benefits are now considered for inclusion in all relevant Group procurements including Works, Goods and Services contracts. Group requirements seek to maximise benefit to Wheatley Group customers, communities, and neighbourhoods, expanding and targeting the types of community benefits sought and contractually requiring community benefits across all types of suppliers.
- 4.4 This supports the Group's goal to support economic resilience across Wheatley communities, creating jobs and boosting customer access to training and quality, sustainable employment opportunities. This also supports the Group's equality, diversity and inclusion goals, helping to ensure our Community Benefit approach is inclusive. Our community benefit requirements extend across all Wheatley neighbourhoods. In line with the legislation, suppliers are also asked to open-up supply chain opportunities to SMEs, supported businesses and social enterprises.

5 Wheatley Foundation

- 5.1 To support community benefit aims, Group Procurement work closely with business leads and the Group's charitable trust, the Wheatley Foundation: www.wheatley-group.com/better-lives/wheatley-foundation/the-foundation-story.
- 5.2 The Foundation, established in 2016, aims to help thousands of disadvantaged or vulnerable people each year to reach their full potential through a focus on two main priorities:
- maximising access to employment, training and learning opportunities
 - tackling social exclusion and alleviating the impacts of poverty.
- 5.3 Wheatley Foundation delivers customer-focused programmes and invests in Wheatley communities to help create local opportunities, remove barriers and increase access to employment, education and wider wraparound services which help build lasting resilience and improve quality of life. All Foundation programmes support these goals and demonstrate benefits to Group customers.
- 5.4 Maximising job and training outcomes for customers remains a key community benefit priority. To support this, the Foundation runs the **Wheatley Works** programme, helping prepare customers for training, work experience and job opportunities, arising from a range of employability activities, including community benefit requirements. [Employability - Wheatley Works | Wheatley Group \(wheatley-group.com\)](http://www.wheatley-group.com/employability-wheatley-works)
- 5.5 The Wheatley Works employability pathway provides 1:1 support for customers to develop the skills and readiness to take-up employment opportunities. Wheatley Works provides pre-employment training for job opportunities that arise through the Group and our suppliers, with a focus on trade apprentices and environmental opportunities. Suppliers are encouraged to contribute their expertise to pre-employment training and

to recruit from the pool of customers who successfully complete training. Wheatley Works is therefore key in linking customers to opportunities.

- 5.6 The Foundation collect data including equalities data from those involved in our employability and training programmes. From 2023, we will monitor and analyse this against our Group customer equalities data to help identify which groups are / are not accessing our employability programmes, and any potential barriers to this.
- 5.7 Through Wheatley Works, the Foundation has partnered with our group construction contractors to develop our **Construction Pathway programme**, aimed at supporting customers into employment in construction. The Construction Pathway is open to all customers with no limits or restriction on age or experience, providing new, tailored opportunities to access jobs and apprenticeships with Wheatley contractors upon completion.

6 Threshold Values

- 6.1 To maximise customer and community opportunities, the Group considers community benefits in contracts below the £4 million threshold currently required by Scottish legislation. This consideration forms part of the Group procurement approach dependent on contract type, suitability and duration, acknowledging that community benefits are not appropriate to every contract and are included where it is relevant and proportionate to do so.
- 6.2 As appropriate, the Group considers including community benefit requirements when tendering a supply and/or services contract at the contract threshold values noted below:

Community Benefit	Contract Type	Contract Value	Community Benefit Requirements
Contractual	Framework	> £500k	Retrospective, based on spend
Contractual	Works Contract	> £2million	Mandatory or evaluated
Contractual	Goods / Services	> £500k	Mandatory or evaluated
Voluntary	Any – e.g., may apply to existing contract with no current CB requirement	> £500k	Negotiated where appropriate

- 6.3 Further information on how requirements are incorporated is set out in [section 9](#) and the process for implementing community benefits is set out in [section 10](#).
- 6.4 For most types of work, the number and value of community benefit requirements sought is dependent on contract financial value bandings. These are set out in the Group’s Value Tables for **Construction** ([appendix 1](#)) and for **Goods and Services** ([appendix 2](#)).

- 6.5 While there is no requirement to consider or include community benefits within contracts with values below the relevant thresholds, where applicable, the use of voluntary community benefits may be explored to maximise community and customer outcomes.

7 Group Community Benefits

- 7.1 Successful contractors and suppliers are expected to embrace Group community benefits requirements throughout the duration of each contract. Overall, Group requirements focus on **employability, communities, and capacity building**. As the requirements apply across a wide range of contractors and suppliers, Group **Community Benefit Definitions** ([appendix 3](#)) reflect a range of options and activities of benefit to local communities, which are suitable for differing contract size and types.
- 7.2 **Employability Activities** include provision of training, work experience, jobs and apprenticeships, supported by KPIs, which promote economic inclusion and skills development. To maximise customer opportunities, contractor engagement with the Foundation and Wheatley Works includes advertising and notifying vacancies to agencies named by the Group, and agreed programmes of work with employability partners, schools, and local communities.
- 7.3 **Community Activities** are delivered via a range of options including charitable donations, events, community programmes and in-kind activities and projects which support Wheatley customers.
- 7.4 As part of our new build framework, each new build contractor is required to provide a charitable donation of £775 per new build unit to the Wheatley Foundation. The total value of the charitable donation is agreed during the tender process, with payments made at week 26 of site development, or sooner if the development is not on-site more than 26 weeks. This financial contribution adds value by:
- supporting Foundation to deliver employability, social and financial inclusion programmes, and activities for children and young people;
 - supporting and funding local events and Green You Choose Challenges, which welcome residents to their new build communities and include them in decisions about their community.
- 7.5 The Foundation will support Wheatley’s community engagement staff to deliver a local “Green You Choose Challenge” programme. Linked to the Foundation’s Greener Communities programme, customers will consider, choose and vote on Environmental projects they would like to see funded within their local community. Projects could include habitat improvements, environmental or gardening projects, or other locally decided community environmental activities.

- 7.6 This refreshed approach engages customers and communities directly in prioritising the type of local community benefits they most want to see delivered locally, empowering customers to take the lead while raising awareness of key environmental issues.
- 7.7 Capacity Building / Supply Chain Development. Group contractors and suppliers are expected to support activities which develop and widen supply chain opportunities within contracts to the third sector, supported business and SMEs. This may be delivered through mentoring, training, partnership work, events and placing work with such suppliers. Suppliers also have a role to play in building capacity within communities, e.g. by mentoring young people in schools or coaching customers seeking work
- 7.8 Suppliers are directed to the supply chain development support available via **Partnership for Procurement (P4P)**. The Scottish Government supports P4P to develop social enterprises, supported businesses and third sector contract bidding skills and consortia, thereby improving access to public contracts. P4P provides advice, training, collaborative workshops and updates on procurement opportunities. The website (<https://p4p.org.uk/>) hosts information and procurement tools including the “Ready for Business” Third Sector Register and Supported Business resources.
- 7.9 Access to contractor / supplier **Corporate Social Responsibility (CSR)** programmes can also assist delivery of agreed community benefits so that opportunities to draw on contractors’ existing CSR programmes or partnerships may also be explored.
- 7.1.0 Where feasible, the specific community benefits required will be agreed as appropriate to supplier type and specialism. Specific requirements may be included within contracts dependent on local needs, determined on a case-by-case basis.

8 Wheatley Priority Groups

- 8.1 In line with Wheatley Group and Foundation priorities, our community benefit approach aims to provide significant opportunities for Group customers to improve their circumstances. Wheatley Works enables the Group, our partners and contractors to work directly with customers to prepare them to successfully take up the types of opportunities which will arise through Group investment.
- 8.2 Specifically, Group community benefit requirements will generate employment and training opportunities for **new entrants and priority groups**. A **new entrant** is defined as a person who is leaving an educational establishment or a training provider, or who is not employed and is seeking work. Examples of new entrants include:
- new apprentices registered with an industry-recognised body and started in full or in part because of the contract,

- apprentices part-way through, or made redundant by an employer, who are recruited and sustained to complete their apprenticeship by a contractor,
 - people recruited on training courses or with a trainee contract,
 - a person who has been unemployed for 4 weeks or more, prior to commencing employment with a contractor,
 - a person who is leaving an educational establishment or training provider.
- 8.3 Contractors and suppliers will also be encouraged to provide opportunities to Group customers who have experienced barriers to accessing and sustaining employment including, but not limited to, the following **Priority Groups**:
- underrepresented groups
 - lone parents
 - longer-term unemployed people (6-months or over)
 - people accessing welfare benefits
 - People facing redundancy
 - people with disabilities,
 - people who have experienced homelessness
 - people who have criminal convictions
 - people who have a history of addiction
 - refugees / asylum seekers
 - veterans
 - young carers

9 Contractual Community Benefit Requirements

- 9.1 Community benefits are included within procurement activity on a Contractual or Voluntary basis. Contractual community benefits are included in procurement processes as Mandatory or Evaluated requirements. They form part of contract conditions and contractors are required to deliver their commitments with appropriate clauses included in the contract.
- 9.2 All contractual community benefit requirements must be stipulated in Contract Notices and, where applicable, will be included in all relevant procurement documentation at tender stage, and as relevant throughout the procurement process in order that they may form part of contractual requirements and KPI monitoring.
- 9.3 **Quantified Contracts** - Where contract value and outputs are quantified and known at the outset, community benefits will be assessed prescriptively via Mandatory requirements or assessed based on agreed Evaluation criteria.
- 9.4 Where Mandatory and Evaluated community benefits are included within tenders, they will form part of the quality criteria. Weighting of community benefits requirements will be agreed and applied on a case-by-case basis but is likely to range from 5-15% of the quality score.

- 9.5 Failure to respond to the Mandated or Evaluated quality section may result in tenders being non-compliant and rejected unconditionally.

Examples
Mandatory – Specified Requirements:
<p>At tender stage, the Procurement Team will provide the relevant Community Benefit Value Table and guidance for each contract within the Contract Notice. The Value Tables include specific community benefits requirements dependent on contract value. Bidders are required to sign this to demonstrate compliance with the community benefit requirements specific to the relevant value band for the contract.</p> <p>As a Mandatory requirement, this is not evaluated but is scored on a compliance pass / fail basis.</p> <p>As different types of community benefits are likely to be obtained from different contract types, quantified requirements will be based on contract values set out in 2 distinct Value Tables for:</p> <p>a) New Build/Construction works types (appendix 1)</p> <p>b) Goods and Services (appendix 2)</p>
Evaluated Requirements:
<p>Community Benefit is included as part of contractual obligations and evaluated as part of the tender process. At tender stage, the Procurement Team will provide community benefit guidance and agreed community benefit questions, which the bidder must answer, which will be weighted and scored as part of the bidder’s submission. Appendix 4 sets out examples of the types of questions which may be used.</p> <p>The Group may request Community Benefit Method Statements for each contract within the contract notice, which will set out community benefit proposals submitted by the contractor.</p>

10 Framework Contracts

- 10.1 Where contract values and outputs are less predictable or are variable (for example Framework agreements), where appropriate the Group will consider the inclusion of contractual, retrospective community benefits. For example, when drawing on Framework suppliers, the Group may seek community benefits to be delivered retrospectively, based on spend.

11 Voluntary (non-contractual) Community Benefits

- 11.1 Where appropriate, the Group may encourage voluntary community benefits for a particular procurement activity and may explore availability of possible community benefits where deemed reasonable, relevant and proportionate. This may occur where community benefits were not included as part of an existing contract (for example, because the contract pre-dates legislation or the value falls below a threshold).

12 Examples

12.1 Mandatory New Build / Construction Value Table

Group community benefit jobs and training clauses were previously employed successfully within Investment and New Build contracts; the Statement recognises that most community benefit jobs and training opportunities continue to be delivered via the construction sector. The New Build / Construction Value Table is based on Construction Industry Training Board (CITB) community benefit ratios, with a focus on securing jobs, placements, apprenticeships and training places. Dependent on contract value, there is also a requirement to support community activity and the third sector/SME supply chain.

12.2 As an example, for a construction contract with a value of £4.2 million, over the term of the contract the contractor could be required to support as a minimum:

- 6 work placement opportunities
- 1 training place for priority group / new entrant
- 3 existing apprentices and 2 new apprenticeship places (1 to be from a priority group)
- 4 new jobs with 2 being taken up by new entrants
- 2 new entrants to become up skilled and 1 mentoring / school / educational support activity
- 2 activities aimed at developing the supply chain
- And £775 charitable donation per unit.

12.3 Mandatory Goods and Services Value Table

Goods and Services contracts and frameworks vary in nature, delivery, duration and structure. The community benefit requirements within the Goods and Services Value Table recognise that a supplier of goods only is less likely to have capacity to support new jobs and apprenticeship places but could instead support a local community project with time, expertise, goods or services, host a work experience placement, provide support to specific customer groups or make a charitable donation to the Foundation. For example, a stationery supplies contract at a value of £600k over the course of the contract may, as a minimum:

- support 2 agreed community projects with materials
- carry out 3 mentoring / school / educational support activities
- carry out 1 activity aimed at developing the supply chain.

13 Community Benefits Procurement Process

- 13.1 Where relevant to the contract, bidders are required to confirm they can meet relevant requirements with regards to insurance, health and safety, and Protecting Vulnerable Groups (PVG) relating to any relevant community benefit activities. They also need to confirm that delivery of community benefit requirements does not compromise or imply any promise on the part of the Group or their partners to provide suitable trainees, labour, or resources.
- 13.2 Bidders must confirm that proposed community benefit requirements do not result in displacement of existing employees or apprentices by recruiting new entrants. The successful tenderer will be held to have included for all associated management and supervision costs required to deliver the community benefit requirements for the project.

14 Monitoring, Partnership & Communication

- 14.1 The Group works with contractors and suppliers to deliver agreed, proportionate community benefits that provide added value and create opportunities for our customers and communities. Monitoring and reporting on these requirements allows us to:
- demonstrate that we, our partners and supply chain are making a positive difference to individuals, enhancing communities and supporting wider economic resilience;
 - report each year to the Scottish Government on Community Benefits delivered as part of Annual Procurement reporting requirements;
 - promote and share best practice.
- 14.2 The Group may be open to legal challenge if effective community benefit monitoring procedures are not in place. Contractors / suppliers are required to complete quarterly **Contractor Progress Reports** ([appendix 5](#)) incorporating case studies and photographs. Contractors are also required to complete a **New Start Report** ([appendix 6](#)) to help verify the jobs, training, apprenticeship or placement opportunities taken-up by individuals including Wheatley customers. The **Contractor Progress Reports** ([appendix 5](#)) should be completed at the end of each financial year to show the value of works subcontracted to SMEs / Social Enterprises / Social businesses.
- 14.3 The Group is required by the **Procurement Reform (Scotland) Act 2014** to produce and publish an Annual Procurement Report. This must include a summary of any community benefit requirements included in contracts and fulfilled during the year which will be published on the Group website.

- 14.4 There may be instances where community benefit requirements are not appropriate for inclusion in a contract. The Group will always consider their use by examining the contract's nature, its duration and local factors. Where the Group decides not to include any community benefit requirements, we will include a statement of the reasons for this in the Contract Notice, as required of any public contract over £4 million that does not include community benefit requirements.
- 14.5 Community benefits performance will be monitored both by the Foundation and through Procurement Quarterly Contract Monitoring processes forming part of regular contract KPI performance reviews. Failure to achieve target outcomes may impact on supplier KPIs and reduce Supplier Performance Scores.
- 14.6 Lessons learned and Wheatley success stories will be shared in the Annual Procurement Report, in quarterly reporting to the Foundation Board and through internal and external communications channels. Partnership working with contractors and suppliers to deliver community benefits will also support contractors' Corporate Social Responsibility objectives, providing further opportunity to recognise and celebrate a wide range of individual and community impacts.

APPENDICES

APPENDIX 1

NEW BUILD CONSTRUCTION – COMMUNITY BENEFIT VALUE TABLE

This contract has been identified as having a total value of £ _____ and your company and your subcontractors agree to comply with the Community Benefit requirements corresponding to this value, as set out in the table below.

Yes we confirm compliance

 (✓)

No we are unable to comply

 (✓)

Community Benefits minimum requirements:		Band 1	Band 2	Band 3	Band 4	Band 5	Band 6	Band 7	Band 8	Band 9
		£2m-£4m	£4m-£6m	£6m-£8m	£8m-£10m	£10-£12m	£12m-£14m	£14m-£16m	£16m-£18m	£18m+
1	Work placement opportunities (16 plus years) provided – no. Priority Group (New entrant) individuals	3	6	7	8	9	10	11	12	13
2	Other training places for Priority Groups (New Entrants)	1	1	1	2	3	4	4	5	6
3	Total Apprenticeship starts - no. individuals	2	2	3	4	5	6	7	7	8
4	Priority Group (New Entrant) Apprenticeship starts - no. individuals	1	1	2	2	3	4	4	4	5
5	Existing Apprenticeships - no. individuals	3	3	4	5	5	5	5	6	6
6	Apprenticeships completed - no. individuals			1	2	2	3	3	4	4
7	New jobs created on project	2	4	5	5	6	7	8	9	10
8	Jobs taken up by priority groups (New Entrants) - no. individuals	1	2	2	2	3	3	4	5	5
9	Up-skilling – vocational training qualifications achieved by priority groups (New Entrants) - no. individuals	1	2	2	2	3	3	4	5	5
10	Graduates - no. individuals employed or provided with paid work experience			1	1	1	1	2	2	2
11	Mentoring, school and educational support activities	1	1	2	2	3	4	5	5	6
12	Supply Chain development activities & SME, 3 rd sector, Supported Business & Social Enterprises support	1	2	2	3	3	4	4	5	5
13	All Bands - Charitable Contribution to Wheatley Foundation of £775 per each unit									

Contractor Signature _____ Date _____

APPENDIX 2

GOODS AND SERVICE – COMMUNITY BENEFIT VALUE TABLE

This contract has been identified as having a total value of £ _____ and your company and your subcontractors agree to comply with the Community Benefit requirements corresponding to this value, as set out in the table below.

Yes we confirm compliance (☑)

No we are unable to comply (☑)

Community Benefits minimum requirements:		Band 1	Band 2	Band 3	Band 4	Band 5	Band 6	Band 7	Band 8
		£500k-£1m	£1m-£2m	£2- £4m	£4m-£6m	£6m-£8m	£8m-£10m	£10-£12m	£12m+
1	Work placement opportunities (16 plus years) provided – no. Priority Group (New entrant) individuals			1	2	2	4	5	6
2	Other training places for Priority Groups (New Entrants)		2	2	4	4	5	6	7
3	Total Apprenticeship starts - no. individuals				1	1	2	3	4
4	Priority Group (New Entrant) Apprenticeship starts - no. individuals					1	1	1	1
5	Existing Apprenticeships - no. individuals						1	1	1
6	Apprenticeships completed - no. individuals					1	2	2	3
7	New jobs created on project					1	2	2	3
8	Jobs taken up by priority groups (New Entrants) - no. individuals						1	1	1
9	Up-skilling – vocational training qualifications achieved by priority groups (New Entrants) - no. individuals						1	1	1
10	Graduates - no. individuals employed or provided with paid work experience					1	2	2	3
11	Community activities	2	3	4	5	7	7	8	9
12	Mentoring, school and educational support activities	3	3	4	4	5	5	6	6
13	Supply Chain development activities & SME, 3 rd sector, Supported Business & Social Enterprises support	1	2	2	3	3	4	5	5

Contractor Signature _____ Date _____

APPENDIX 3

COMMUNITY BENEFITS DEFINITIONS

Ref	Term	Definition	Evidence Requirement
A	Priority Group/New Entrant	<p>A new entrant is a person who is either:</p> <ul style="list-style-type: none"> - leaving an educational establishment or a training provider - is currently unemployed and is seeking employment (regardless of whether they have previous experience in the field or not). - beginning, or part way through a Modern Apprenticeship - or newly recruited on another type of trainee contract and is receiving on-site training and assessment or offsite training, or a mix of these. <p>The contractor shall not cause any current employee of the contractor or any current employee [or apprentice] of its sub-contractors (or any tier) to become unemployed because of implementing Community Benefits.</p> <p>Priority Groups: Contractors and suppliers are encouraged to provide opportunities to Group customers who have experienced barriers to accessing and sustaining employment including, but not limited to, the following:</p> <ul style="list-style-type: none"> ▪ longer-term unemployed people (6-months or over) ▪ people accessing welfare benefits; ▪ people with disabilities; ▪ lone parents; ▪ people who have experienced homelessness; ▪ people who have criminal convictions; ▪ people who have a history of addiction; ▪ BME groups; ▪ veterans. 	New Start Report
B	Supply Chain Development	<p>SMES: Businesses are defined as follows:</p> <ul style="list-style-type: none"> ▪ Micro – 1–9 employees; ▪ Small – 10–49 employees; ▪ Medium – 50–250 employees; ▪ Small and Medium-sized Enterprises (SMEs) - 250 employees or less. 	Reported in Contractor progress Report

APPENDIX 3

COMMUNITY BENEFITS DEFINITIONS

		<ul style="list-style-type: none"> Large – more than 250 employees. <p>Social Enterprises - independent businesses that deliver social and/or environmental goals/services. All surpluses are reinvested back into their social and environmental purposes. Social enterprises in Scotland have an asset lock on buildings, land and other assets and do not distribute dividends. Examples include Housing Associations, some trusts, training centres, charities and credit unions. Further information: www.socialenterprisescotland.org.uk/our-story/what-is-social-enterprise/</p> <p>Supported Businesses: Competition may be reserved to organisations as defined by regulation 21 of The Public Contracts (Scotland) Regulations 2015; commonly referred to as supported businesses. There are currently 15 recognised in Scotland, where most employees are disabled persons unable to take up work in the open labour market. Further information on Scottish Governments’ approach to supported business is available at: www.gov.scot/Topics/Government/Procurement/buyer-information/SuppBus and a directory of Scotland supported business can be found here: www.base-uk.org/sites/default/files/knowledge/Scottish%20Supported%20Business%20Directory/supported_business_directory_scotland.pdf</p> <p>Social Firms - another type of social enterprise providing integrated employment for people with disabilities or other disadvantages in the workplace. They may be registered charities, a CIC or other model.</p> <p>Third Sector: The term third sector covers a wide range of community groups, voluntary organisations, charities, social enterprises, co-operatives, and volunteer organisations that exist wholly or mainly to provide benefits for society or the environment.</p>	
Ref	Community Benefit Requirement:	Definition	Evidence Requirement
1	No. Work Placements provided to Priority	The duration of work placements should be a minimum of 5 working days and a maximum of 20 working days per individual. Placements should be provided to school, college or university students or individuals who are currently unemployed and are seeking work, work experience or participating in an employability programme. This would include those who are completing a Foundation apprenticeship programme and are attending work placements as part of the criteria to complete this course.	New Start Report

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COMMUNITY BENEFITS DEFINITIONS

	Group/New entrant:		
2	No. Other Training Places for Priority Groups/New Entrants:	Priority groups that have a trainee contract that are not apprentices. For example, semi-skilled operatives on a Wheatley Works, Skillseekers or Skills to Build Programme or people enrolled in other training programmes that will lead to vocational qualifications.	New Start Report
3	Total Apprenticeship starts	The total number of all individuals recruited as Apprentices on the project. This can include Traditional Apprentices, Modern Apprentices, Specialist Apprentices or Adult Apprentices. All apprenticeship opportunities created on the project should be employed for the duration of the Apprentice framework. An apprenticeship outcome is defined as an individual pursuing a formal apprenticeship framework incorporating either NVQ level 2, 3 or above. The contractor will be required to report and evidence the on-going employment of each apprentice until completion.	New Start Report
4	No. Apprenticeship starts for Priority groups/New Entrants	Subtotal of apprenticeship starts which are taken up by priority groups/new entrants. All apprenticeship opportunities created on the project should be employed for the duration of the apprentice framework. One outcome is defined as one individual pursuing a formal apprenticeship framework incorporating either NVQ level 2, 3 or above.	New Start Report
5	No. Existing apprentices	Modern Apprentice(s) working directly on the contract who are already employed by the contractor, (e.g., from another project/business area), or who are recruited while continuing or completing an on-going apprenticeship.	New Start Report
6	No. Apprenticeship completed	Total Existing and New apprentices that complete their apprenticeship framework whilst working on the project.	Apprentice completion certificate
7	No. of New Jobs created on the project	The total number of employment opportunities created because of the project. Employment must be for a minimum of 26 weeks and a proportion must be aimed at new entrants e.g., through advertising or working with training providers/employability programmes such as Wheatley Works, for example.	New Start Report and confirmation of job sustainment at 26 weeks

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COMMUNITY BENEFITS DEFINITIONS

		As part of overarching monitoring requirements, we will also monitor the total number of all jobs supported or sustained because of the project.	
8	No. of New Jobs taken up by Priority Groups/New Entrants	The total number of new employment opportunities taken up by priority groups/new entrants. Employment must be for a minimum of 26 weeks.	New Start Report and confirmation of job sustainment at 26 weeks
9	Upskilling – vocational training certificates achieved by Priority Groups/New Entrants	<p>Priority groups undertaking and completing a recognised qualification/ training certification to increase their skills and knowledge. Training can include SVQ's, IOSH, Advanced H & S, CSCS certification etc.</p> <p>“Upskilling” refers to the development of new skills and qualifications for a new entrant/priority group onsite - for example for an individual on placement, training programme or work experience - through on the job training or bespoke training programme. For this purpose, Upskilling does not include Apprentices progressing from one year of their SVQ to the next. Apprentices are counted separately under KPIs 3-6.</p>	Copy of certification
10	No. Graduates employed or provided with work experience	<p>The number of employment or work experience opportunities for unemployed or underemployed graduates. Graduates must have graduated in the last 2 years with a postgraduate/degree award and be unemployed or underemployed post-graduation.</p> <p>Underemployed graduates may be employed in jobs that do not require the level of skills and knowledge achieved through their college/university qualifications.</p>	New Start Report
11	Mentoring, school, and educational support activities	<p>Can include a range of activities such as:</p> <ul style="list-style-type: none"> ▪ Delivery of a mentoring opportunity and/or work experience taster for unemployed Wheatley Group customer(s), or staff time volunteered within Group communities. ▪ Industry Insight Sessions/Workshops provided to school pupils or college students. One outcome equal to engagement with a minimum of 5 individuals. ▪ Structured half-day/day events for college students or school pupils 16+ to learn about careers in specific industries. ▪ Workplace visit for school, college or university students aimed at increasing awareness of the industry/trade 	Reported in Contractor progress report

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COMMUNITY BENEFITS DEFINITIONS

		<ul style="list-style-type: none"> ▪ Work experience tasters, discussing career opportunities and career advice for priority groups and/or school, college, or university students. One outcome is equal to engagement with a minimum of 5 individuals. ▪ Mentoring programmes or presentations to groups aged 11-18 to raise aspirations and support skills development. One outcome is equal to engagement with a minimum of 5 individuals. 	
12	Supply Chain development actives supporting SMEs, Social Enterprises, Third Sector and Supported Businesses.	<p>Requires contractors to support removal of barriers to participation in supply chain opportunities by supported business/factories, SMEs including micro-SMEs; social enterprises, and the third sector. This can include:</p> <ul style="list-style-type: none"> ▪ Providing at least 5 hours of business support to help local SMEs, Social Enterprises, Third Sector Organisations and Supported Businesses to increase confidence, knowledge, and capacity. ▪ 1-1 or group mentoring, training events and seminars. ▪ Meet the Buyer Events hosted/supported through attendance and representation by the supplier and aimed at identified organisations. ▪ Advertising and placing of sub-contracted work to identified organisations. ▪ Delivering talks, training, or mentoring opportunities to sub-contractors, WHG or other identified groups, with a proportion aimed at SMEs, supported businesses, social enterprises etc. 	Reported in Contractor progress report and case study
13	Charitable Contribution to Wheatley Foundation of £775 per Unit	The appointee will provide a set Charitable Donation per build unit, to the Wheatley Foundation. This will support targeted social and economic customer and priority group programmes, including training, employment, and community–activity based programmes. Donations will be agreed and payment made on week 26 of site development, or sooner if the development is not on site for more than 26 weeks. Applicable to New Build only.	Wheatley Group Invoice to contractor

APPENDIX 4

COMMUNITY BENEFIT CLAUSES

Examples of the clauses and evaluation questions the Wheatley Group may employ to enact community benefit requirements for evaluated contracts are outlined below. This follows Scottish Government Guidance and recommendations as set out in Sustainable Procurement Guidance.

The Group will be as specific as possible when setting out the benefits we expect, as recommended in the guidance, to limit the uncertainty for bidders and contractor/suppliers.

Community Benefit scores and weighting will be determined on a case-by-case basis and set out in all relevant contract documents.

1 COMMUNITIES

The Group may specify community benefits requirements to enhance our communities, social inclusion, and wellbeing:

Contract Requirements – Example Tender Questions	
Below is an example of questions specific to community requirements that the Group may include in evaluation and award criteria:	
Example 1	A requirement of the contract will be that the contractor/supplier describes their proposals and experience of enhancing communities through the design and delivery of services; and includes examples of previous relevant initiatives where measurable improvements to disadvantaged communities have been secured.

Award criteria	
Below are examples of questions specific to communities' requirements that the Group may include in evaluation and award criteria:	
Example 1	Please describe how you will involve the users of your service to contribute to its design and delivery to find opportunities to enhance communities.
Example 2	How will you design your offer to enhance the local community through the provision of this service?
Example 3	The organisation specifically wishes to support the enhancement and wellbeing of local communities, please describe how you will contribute to this aim including reducing the risks within this contract.

APPENDIX 4

COMMUNITY BENEFIT CLAUSES

2 TRAINING AND EMPLOYMENT

The Scottish Government recommends at a minimum, the contracting authority should state:

“Community benefits are included in this requirement. A summary of the expected community benefits has been provided as follows: []

Under this [project/contract/programme] the contractor and its supply chain will be required to actively participate in the achievement of social objectives relating to participation in skills development, employment, and training programmes in accordance with Wheatley Group’s Investing in Our Futures strategy, and other added value contributions by the contractor and its supply chain to support community programmes i.e., Wheatley Works. Accordingly, the contract performance conditions may relate to secondary considerations.”

Contract Requirements – Example Tender Question	
Below are examples of questions specific to training and employment requirements that the Group may include in evaluation and award criteria:	
Example 1	<p>The Wheatley Group is seeking to maximise social considerations that can be delivered through performance of the services. As against this contract for [GOODS/SERVICES/WORKS], the Wheatley Group has included the following KPI's requirements on the [CONTRACTOR]</p> <p>The Contractor will be required to report to the Wheatley Group by completing a Quarterly Progress Monitoring Report reporting details of any community benefit measures and achievements.</p> <p>Sample KPIs to be included as relevant to a specific requirement:</p> <ul style="list-style-type: none"> ▪ Develop a programme to work closely with community organisations in delivery of the services to maximise value to the end-user of the services ▪ Develop a programme to work closely with educational establishments to maximise educational opportunities that arise through delivery of the contract. ▪ Work closely with Wheatley Group representatives to maximise the training and employment opportunities that arise through delivery of the contract. <p>The Group will also specify any of the following as appropriate:</p> <p>DELIVER</p> <ul style="list-style-type: none"> ▪ Work Placement (16-19 years) ▪ Work Placement (14-16 years) ▪ Curriculum support activities ▪ Graduate Trainees/employment ▪ Apprentice starts ▪ Existing apprentices ▪ Apprentice completions ▪ Jobs advertised through local employment vehicles ▪ N/SVQ starts for sub-contractors ▪ N/SVQ completions for sub-contractors

APPENDIX 4

COMMUNITY BENEFIT CLAUSES

	<ul style="list-style-type: none"> ▪ Training Plans for sub-contractors ▪ Supervisor training for sub-contractors ▪ Leadership and management training for sub-contractors ▪ Advanced health and safety training for sub-contractors
Example 2	While contractor site vacancies can be notified to other agencies, every vacancy on site, including those with sub-contractors, is also to be notified to agencies named by the Wheatley Group, and candidates identified by these agencies are to have an equal opportunity in the selection process.
Example 3	In furtherance of this contract the contractor will be required to utilise employment practices that include opportunity for local labour and trainees.
Example 4	As part of this contract the contractor will be required to participate actively in the economic and social regeneration of the place of delivery for the contract, Contract performance conditions may therefore relate to social and economic considerations.
Example 5	<p>The Group may ask the contractor/supplier to describe their experience of incorporating social benefits into previous contracts, including details of any specific steps taken in the design of services to increase employment and training opportunities.</p> <p>If appropriate, the following wording may be included:</p> <p>Employment and Training</p> <ul style="list-style-type: none"> ▪ Creation/delivery of employment opportunities for young and/or unemployed persons targeted at specific groups (for example long-term unemployed, residents of deprived areas, ex-offenders, recovering drug users) – thus contributing to a reduction in inequality. ▪ Creation/delivery of training and up skilling outcomes.
Example 6	<p>The Group will provide pre-employment training (via Wheatley Works) in advance of job opportunities that come up through our contractors and suppliers, with a focus on trade apprentices and environmental opportunities.</p> <p>The Group may therefore ask the contractor/supplier to describe their experience of or approach to pre-employment training initiatives, and recruitment from such initiatives. -.</p>

Award criteria – examples:	
Below are examples of questions specific to employment skills and training that the Wheatley Group may include as award criteria:	
Example 1	What arrangements will you make to provide mentoring and support for trainees and work placements to ensure maximum retention and achievement of industry accreditations?
Example 2	The organisation specifically wishes to support the development of skills in the building and construction industries. Please describe how you will contribute to this aim including developing trade skills within your existing workforce, i.e., support through Construction Skills Certification Scheme training.
Example 3	Describe how you and your sub-contractors will ensure vacancies are published and reach the target audience (Wheatley customers). This is to include details about how you will ensure the co-operation of your sub-contractors.
Example 4	Describe how you will satisfy the core employment and training requirement to ensure you meet the target for new entrants to the project. This is to include targeted recruitment and training linked to identified skill gaps and opportunities for providing sustainable employment for new entrants.

APPENDIX 4

COMMUNITY BENEFIT CLAUSES

Example 5	Describe your experience in delivering pre-employment training (this does not necessarily have to be hands on training, it can involve assertiveness, communication skills etc.)
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Evaluation

Evaluating tenders in relation to community benefit award criteria must include evaluation of the bidder's proposed approach to meeting the requirement and ensuring they demonstrate an understanding of how to achieve the required community benefit.

Training and employment skills are important to the Wheatley Group - below are a range of questions we may ask during the evaluation process in addition to the examples above:

- Who in the organisation will be responsible for managing the training scheme and overseeing the proposals?
- Which education and training providers will be involved with delivery of the project?
- What types of accredited and non-accredited training are expected to be offered and who are expected to be the main beneficiaries of this training?
- Which trades or occupational areas are it envisaged you will be offering Apprenticeship opportunities?
- What types of Apprenticeship are expected to be offered?
- How will the Target Outputs, as set out in the specification, be delivered?
- How will health and safety issues be managed?
- What actions will be taken to ensure the support of trade contractors and sub-contractors working on the project?
- How will compliance be managed [and monitored] with respect to the organising of trade contractors and sub-contractors?

3 **SMALL AND MEDIUM SIZED ENTERPRISES, THIRD SECTOR, SOCIAL ENTERPRISES, SUPPORTED BUSINESSES**

In designing contracts to deliver opportunities for SMEs, social enterprises or supported businesses, early market engagement is important to identify the capacity of the market to deliver these. The Group may consider the following clauses to engender more opportunities and will indicate this on relevant ITTs.

Reserved contracts

Where a contract is being reserved notification of this will be given in the contract notice. For contracts subject to the Public Contracts (Scotland) Regulations 2015, information about reserved contracts is completed in section III.1.5 of the contract notice.

APPENDIX 4

COMMUNITY BENEFIT CLAUSES

Division of contracts into lots

Information on lots is provided in section II.1.6 of the contract notice. The Wheatley Group will explain the decision not to sub-divide procurements subject to The Public Contracts (Scotland) Regulations 2015 into lots.

Use of sub-contracting opportunities

Where a contract includes community benefit requirements, this should be indicated in the call for competition (whether this is a conventional contract notice or in the prior information notice where it is being used as a call for competition). In any instance, the ITT may further explain why the requirement is part of the contracting authority's purposes, policies, and activities.

Contract Requirements - Example Tender Questions	
<p>The Wheatley Group may ask the contractor/supplier to describe their experience of incorporating social benefits into previous contracts, including details of any specific steps taken in the design of services to involve SMEs, social enterprises and/or supported businesses.</p> <p>The Wheatley Group will look for the following:</p> <ul style="list-style-type: none"> ▪ Sub-contractors must advertise all opportunities. ▪ At least quarterly contract performance information must be provided; and ▪ Case studies must be developed at least quarterly. 	
Example 1	<p>"Relevant to Wheatley Group's core purpose of [CORE PURPOSE], the Group is seeking to maximise social considerations that can be delivered through performance of the services. As against this contract for [xx SERVICES] the Group has included the following KPIs / requirements on [CONTRACTOR] to:</p> <ul style="list-style-type: none"> ▪ Advertise sub-contract opportunities relating to this contract ▪ Develop, in partnership, an awareness and capacity building programme capable of delivering more SMEs, community and third sector organisations able to trade with your firm in performance of this contract ▪ Creation/delivery of activities aimed at enhancing the ability of SMEs / Third Sector / Supported Businesses to form part of supply chains.
Example 2	<p>The contract or framework agreement supports the Scottish Government's National Performance Framework, and the National Outcomes which articulate the Government's Purpose 'To focus Government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth'. Contractors/suppliers are expected to support the Wheatley Group's aim to achieve these.</p>

APPENDIX 4

COMMUNITY BENEFIT CLAUSES

Award criteria	
Below are examples of questions specific to the creation of benefits for SMEs and supported businesses that the Wheatley Group may wish to include as award criteria:	
Example 1	Describe the activities you will undertake to develop, in partnership, an awareness and capacity building programme capable of delivering more SMEs, community and third sector organisations able to trade with your firm in performance of this contract.
Example 2	What steps will you take to ensure sub-contractors make opportunities available to SMEs?
Example 3	Describe the elements of your supply chain which you commit to sourcing from organisations who operate supported businesses, supported employment programmes, or supported factories. Include information about the organisations and about the products or services you will engage them to provide.
Example 4	Describe the deliverables you anticipate realising from your activities under the above questions and steps you will take to meet these and to keep the Wheatley Group informed?

More information about social enterprises can be obtained from Social Enterprise Scotland by visiting their website at www.socialenterprisescotland.org.uk

APPENDIX 5

NEW START REPORT

1.	Reporting period (From.... To ...)		Contractor name	
	Site/type of work(s)		Contract value (band)	

2. Please detail below your progress on delivering your community benefit targets on the contract to date. (Please note – You MUST submit a fully completed New Start report, detailing each placement, apprentice, employee and graduate you recruit as a result of the contract).

KPI Category:		No. of individuals – Overall Target:	No. individuals - actual to date:	No. new starts detailed in new start	No. individuals in current employment with you:
1	Work placement opportunities (16 yrs. plus):				
2	Other training places for priority groups (new entrants)				
3	Total Apprenticeship starts – no of individuals				
4	Priority Groups Apprenticeship starts – no of individuals				
5	Existing Apprentices – no. of individuals				
6	Apprenticeships completed on contract:				
7	New jobs created on contract:				
8	Jobs created taken up by priority groups (New Entrants):				
9	New Entrants achieving qualifications through training:				
10	Graduates recruited:				

3. What were your main recruitment methods for placements and new employees? (If you did not carry out any recruitment, please skip to question 5).

Job Centres		External advert		Assessment centre	
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APPENDIX 5

NEW START REPORT

Internal advert		Recruitment agency		Other (please give examples below)	
4. Please provide a short new entrant case study. This should briefly describe the individual's background, overall progress and work they are undertaking. Quotes and photos are encouraged.					
5. Mentoring, school and educational activities – Please describe how your company has supported educational activities which benefit Wheatley Group communities or customers.					
Target No. of activities		Delivered No. of activities			
6. FOR NEW BUILD CONTRACTS ONLY: Please enter the donation agreed and if it has been made to the Foundation.					
Donation agreed	£	Amount paid	£		
7. Supply Chain development activities & support - Please describe how your company has engaged with SMEs, social enterprises and supported business & factories, and any activities undertaken to support supply chain development.					

**APPENDIX 5
NEW START REPORT**

Value of subcontracts		Target No. Activities	Delivered No. Activities
Type of works subcontracted	Subcontractor Company Name	Value of work Placed	Please note below whether the company is <ul style="list-style-type: none"> ▪ SME ▪ Social Enterprise ▪ Supported Business

Please use the guidance and definitions included in your Community Benefits Menu to complete this form. If applicable, please return the form with any evidence of outcomes.

Thank you for completing this progress report. Please return to or for any further guidance please contact:

**APPENDIX 5
NEW START REPORT**

Wheatley Group New Start Report	Yes/No
I can confirm the information below is accurate and up to date	
I can confirm the employees below have been made aware of Wheatley Groups Privacy Policy	



Employee Name	Start Date	Address	Postcode	Tenure	Opportunity	Company	Role	Site	DOB	Gender	Date Last Worked	Previous Employment	New Entrant	Qualifications (level)	Benefits received	Disability status	Type of disability	Ethnicity

APPENDIX 6

COMMUNITY BENEFIT PRIVACY NOTICE

Introduction

Community Benefits opportunities are employment, training and other opportunities which result from Wheatley Group contracts. These opportunities are a requirement of our contracts with the companies we work with and suppliers. It allows our contractors and suppliers to have a positive impact in local areas by creating jobs, training, inclusion, and community opportunities for the people who live there.

The Wheatley Foundation is the charitable trust set up by the Wheatley Group. It is funded by the Group and its subsidiaries to benefit our customers. Maximising social inclusion, jobs, and training and education outcomes for disadvantaged customers is a key Wheatley Group priority. The Wheatley Foundation manages Group Community Benefit Requirements.

Wheatley Foundation will be the "data controllers" of the personal information that you provide to us in this form.

Our Data Protection Officer is Ranald Brown who can be contacted on wheatleydataprotectionofficer@wheatley-group.com

What we need

When you start your new job or training course, created because of a Wheatley Housing Group contract, we will ask you for information about yourself and your background. The information is only used to monitor jobs and training opportunities resulting from Wheatley Group contracts.

We will ask you for the following personal information:

- name, address, date of birth etc;
- Employment stats
- Equalities Data – for example, protected characteristic information including, disability.

APPENDIX 6

COMMUNITY BENEFIT PRIVACY NOTICE

Why we need your personal information – Legitimate interest

We will process your personal information through our legitimate interest to check that our contractors and suppliers meet the terms of their agreement with Wheatley Housing Group to create employment or training opportunities for our customers.

It is necessary for relevant information regarding yourself, and relating only to your placement, training and/or the subsequent course of your employment, to be passed to Wheatley Group to enable it to monitor Contractor and Employer performance in delivering Community Benefits.

In order to inform our employability and training programmes, we may also ask for equalities information. This will allow us to identify any barriers particular groups may face in accessing our employment and training programmes to help ensure these are inclusive. Where we ask for this on a non-anonymous basis, you must give your explicit consent when providing the information. Equality questions are to be answered on a voluntary basis and contain the 'prefer not to say' option.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on 0141 274 8514 or e-mail foundation@wheatley-group.com. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of our customers.

Why we need your personal information – Legal obligation

We are also under a legal obligation to process certain personal information relating to our community benefits to support the completion of an annual procurement report for the Scottish Government as required by the Procurement Reform (Scotland) Act 2014.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. For example, to evaluate the performance of the programme we may ask you to complete questionnaires issued by or on behalf of Wheatley Group, and to participate in evaluations that Wheatley Group or its representatives may conduct. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

APPENDIX 6

COMMUNITY BENEFIT PRIVACY NOTICE

Who we share your personal information with

We may transfer information about you to other Wheatley Group companies for purposes connected with the Community Benefits programme or the management of the company's business.

We may share personal information with our professional and legal advisors for the purposes of taking advice.

Collated Community Benefit data will be provided in reports to our Board, partners and funders including the Scottish Government. Your specific personal information will not be shared in any of these reports.

Wheatley Group employs third party suppliers to provide services, including our case management system Advice Pro. These suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

Our contractors are required to comply with the law and our own Data Processing Agreement or Data Processing Clauses within our contracts to ensure data is managed appropriately and for specified purposes.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

How we protect your personal information

Your personal information is stored on our paper and IT filing systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.

We will process the data in your return strictly in line with data protection law, including by:

- processing your equality data confidentially and restricting access only to relevant staff
- retaining equality information only as long as necessary
- sharing data only as lawfully permitted; and
- destroying data securely

If any of your personal information is transferred out with the European Union or the European Economic Area by any of our contractors, we will ensure that there are adequate safeguards in place to protect your personal information in accordance with

APPENDIX 6

COMMUNITY BENEFIT PRIVACY NOTICE

the General Data Protection Regulations and applicable UK Data Protection Legislation.

How long we keep your personal information

We will only keep your personal information for as long as necessary to monitor the performance of the contract with our contractor or supplier and to safeguard the Wheatley Group in the event of any claims, complaints, litigation, enquiries, or investigation relating to your training or employment opportunity.

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at 0141 274 8514 or foundation@wheatley-group.com

Your rights

You can exercise any of the following rights by writing to us at 25 Cochrane Street, Glasgow, G1 1HL or foundation@wheatley-group.com

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a "subject access request";
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by Wheatley Housing Group will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk

The accuracy of our information is important to us - please help us keep our records updated by informing us of any changes to your personal details.

APPENDIX 7

WHEATLEY PROGRESS REPORT

Contractor Name		Financial year/date completed	
Contract Value		No of units	
Site/type of works		Value of donation	
Projects supported		Number of people supported	
How was your Community Benefit donation spent by the Wheatley Foundation?			
The difference made - Case studies & pictures (case studies will be made anonymous where possible)			