

Group statement on Environmental, Social and Governance **2024/25**

READ MORE



Contents

About

Environmental

Social

Governance

About Wheatley

About Wheatley Housing Group

Wheatley Housing Group ('Wheatley' or 'the Group') is Scotland's leading housing, care and property management group and is committed to providing tailored services to support its customers.



We are committed to supporting our customers as they manage the challenging economic environment and ensure our services reflect their priorities. We continue to deliver high-quality new build homes and invest in our existing properties from a position of financial stability. Our key strategic objective is to ensure our customers have access to safe and secure housing at an affordable rent.

Our efforts to tackle homelessness intensified in 2024/25, with 2,673 homes – 60% of all relevant lets – allocated to people experiencing homelessness, meaning the Group is well placed to achieve its five-year target of 11,000 homeless lets by the end of 2025/26.

Improving the energy efficiency in our homes is crucial as customers face rising living costs and fuel prices. Our fabric improvements, heating upgrades, and deep retrofits have led to 92% of our homes achieving at least an EPC Band C rating, reducing both carbon emissions and heating costs for residents. We were recognised as the UK's largest developer of social rented homes in 2024/25, with a strong commitment to ensuring these properties are prepared for future requirements. All our new homes meet a minimum EPC Band B energy efficiency rating.



About Wheatley Housing Group

Our ongoing commitment to affordable rents remains a key focus. Demand for our properties remains high, with social rents at 34% of comparable private rent levels in Scotland's major cities of Glasgow and Edinburgh. Maintaining a steady supply of new homes is essential to help meet this need.

Incorporating customer perspectives into our decision-making and investment priorities through our Stronger Voices channels enables us to design our services with a comprehensive understanding of our customers' experiences and helps ensure outcomes are closely aligned with their needs. This approach is reflected in our governance structure, where tenant members represent the views of customers on our subsidiary and Group Boards.

The Group operates under the oversight of multiple regulatory bodies, including the Scottish Housing Regulator (SHR), the Office of the Scottish Charity Regulator (OSCR), and the Care Inspectorate.

Existing and prospective investors can get more information by contacting our Investor Relations team. [Click here to get in touch.](#)





Environmental

Environmental

The Group’s sustainability framework focuses on four areas which support our sustainability goals and align with the UN Sustainable Development Goals.



Our framework focuses on:

Existing homes

- Reduce carbon emissions from existing homes by 20,000 tonnes by 2026
- Net-zero emissions from all properties where technically feasible by end 2043

New homes

- All properties at minimum of EPC B and with net-zero heating systems in line with planning timescales (no new build approvals with fossil fuel after 2024)

Business operations

- Carbon reduction from business operations including decarbonise fleet where feasible, and use of green electricity within our corporate estate.

Supporting contributors

- Build understanding and support action including among staff and communities to address climate emergency

Environmental

While enhancing the energy efficiency of our homes and achieving net zero targets remains challenging for some property types due to their age and the availability of suitable solutions, 92% of our housing assets are already rated at EPC Band C or higher.

Existing homes

Upgrading building materials and installing efficient heating in our homes can reduce emissions and residents’ heating costs. This year, our investment cut emissions from our homes by over 3,170 tonnes of CO2. We remain on track to meet our five-year goal to reduce emissions by 20,000 tonnes by 2026.

Carbon emissions in our corporate environment

Carbon emissions are measured across corporate activities, with external validation provided by [SHIFT Environment](#), an independent assessor of the environmental performance of homes and buildings. Our aim is to reduce carbon emissions from our corporate operations while fulfilling our service requirements and maintaining tenant satisfaction.

Tonnes of CO2 arising from corporate activities	2023/24 (tnCO2)	2024/25 (tnCO2)
Scope 1	1859.5	1618.8
Scope 2	0	0
Scope 3	398.1	745.1

Scope 1 emissions are the direct greenhouse gases released by our own activities, such as fuel used for our company vehicles and our heating systems. Scope 2 emissions are the indirect emissions from purchased energy, like electricity used in our offices. Scope 3 covers all other indirect emissions which occur from sources not owned or controlled by us, such as staff travel and emissions from suppliers and tenants.

We have reduced Scope 1 emissions since 2023/24 by improving the efficiency of our fleet to be compliant with the EES6 European standard for lower emission engines, and by improving our heating systems. Our scope 2 emissions continue to be zero due to the use of renewable energy contracts for the supply of our office electricity.

Environmental

The increase in Scope 3 emissions is attributable to a rise in staff travel, as they work with customers in our communities.

In 2024/25, all 844 newly completed homes achieved a minimum energy performance rating of B (709 at EPC B, 135 at EPC A). Any future new-build projects with a building warrant application after 1 April 2024 will have zero-emissions heating systems as the standard source of heating.

Energy Performance Certificate (EPC) overview

Our asset management systems record EPC ratings for all rented properties, including both certificated and cloned SAP scores. Validation for our assumptions for cloned properties have been externally verified using a sampling approach as part of the rolling programme of stock validation surveys undertaken by JLL since 2022.



Investment during 2024/25 saw an increase in EPC ratings on 5.8% of our homes, with 92% now rated at EPC C or above

EPC ratings	% of stock 2024/25	EPC Band C or above
A	0.4%	92%
B	22.0%	
C	69.6%	
D	6.9%	—
E	1.1%	—

Case study: Retrofit project

We carried out deep retrofit projects over the year aimed at improving the energy efficiency of nearly 200 homes across our communities, with £3.7 million in grant support from the Scottish Government.

As part of this work, a specific architectural type called ‘Swedish Timber’, a form of prefabricated post-war housing which typically has limited insulation and higher heating costs, was used in a pilot retrofit project for four homes in Amisfield, Dumfries and Galloway, with the intention of creating a model which could be replicated elsewhere.

Supported by the Scottish Government’s Net Zero Heat Fund, the properties benefited from new external and cavity wall insulation, solar PV on the roofs, battery storage technology and Air Source Heat Pumps, improving the energy efficiency rating of the homes from EPC Band ‘E’ to Band ‘B’, and reducing customers’ energy bills by around £550 per year.



Ecology

Our Neighbourhood Environmental Teams (NETs) operate throughout our communities, ensuring neighbourhoods are kept clean and safe, looking after shared areas and providing various ad-hoc services to customers. NETs are a prominent part of frontline services and contribute to tenant satisfaction across our localities.

The NETs teams conduct four 'weeks of action' annually, with a focus on sustainability and community-related issues. Activities include collaboration with nurseries and primary schools, customer engagement on projects such as tree planting, installing sensory gardens, creating seating areas and planting features, litter-picking, wild-flower planting, and working with key suppliers on a voluntary basis to implement community improvements.

We continue to work with Keep Scotland Beautiful (KSB), with our neighbourhoods now accredited with a five-star rating from KSB. Around 50 customers from our communities have been recruited to serve as KSB customer assessors and participate in estate walkabouts to offer feedback to our staff around project ideas and improvements, helping ensure customers contribute to decisions about local investment.



Ecology

Case Study: Community Benefit programme

Communities across Glasgow received a spring clean thanks to volunteers from some of the UK's biggest businesses who joined Wheatley's NETs during one of these weeks of action. Their efforts focused on cleaning neighbourhoods, enhancing green spaces, and supporting community wellbeing through activities including litter picking, garden improvements, and planting new trees and colourful planters.

In total, 120 volunteers contributed 464 hours and collected two tonnes of litter; helped prevent seven tonnes of waste from going to landfill; and planted 3,400 plants and 500 trees during the week. The initiative exemplified partnership and community spirit, making a tangible difference in Wheatley neighbourhoods.

One of our Livingwell tenants in Glasgow said:

“It was smashing to see all the volunteers take part. We like to sit out in the summer and hopefully it'll look nice once it's finished.”



Resource management

City Building (Glasgow) LLP ('CBG'), our repairs and maintenance company co-owned with Glasgow City Council, is accredited to the BSI ISO 14001:2015 Environmental Management System standard.

Their waste and water management practices, operational procedures, policies, and staff undergo external assessment each year by the British Standards Institute (BSI), with certification maintained for 2024/25. The organisation publishes its annual carbon emissions statement in accordance with Streamlined Energy and Carbon Reporting requirements and outlines climate change risk mitigation strategies within its risk management framework as they relate to service delivery.

CBG has completed its audit of waste management for the 2024/25 financial year, recording a total of 4,470.61 tonnes, compared to 5,047.79 tonnes in 2023/24. This figure includes waste collected from site skips and processed through their Scottish Environmental



Protection Agency (SEPA) accredited waste transfer station. The recycling rate increased from 92% to 96% in 2024/25 due to a reduction in landfill waste and an increase in recycling or conversion to Energy from Waste. Their SEPA-issued waste carrier licence is valid until 4 April 2026. CBG also recycles items through environmental social enterprises.

Resource management

A total of 19% of CBG's electrical operatives have completed training in installing, inspecting, servicing, and maintaining air and ground source heat pumps, photovoltaics, and domestic electric vehicle charging points, preparing them to support the transition to low-carbon heating.

Wheatley's new build framework outlines comprehensive sustainability requirements for contractors, including mandatory membership of the Considerate Constructors Scheme, evidenced by submission of meeting the Gold Standard or equivalent, provision of a site waste management plan in line with the Waste and Resources Action Programme (WRAP) guidance; project designs which must meet the Building Standards Section 7 Silver Standard Aspects 1-8; electronic EPCs which must be supplied for each home at completion; and any damaged trees, hedges shrubs or grassed areas must be protected or replaced.

Under our new-build framework agreements, Wheatley may audit contractors' records or processes for environmental procedures certified to BS EN ISO 14000, BS EN ISO 14001, or an equivalent standard at any time during the contract.

Social



Affordability

Under the Housing (Scotland) Act 2001, we must consult tenants on rent increases and consider their feedback before finalising rent for the coming year. Balancing rent affordability with against the cost of our services is crucial for our financial stability and ensuring we can continue to invest in and deliver high quality homes for our customers.

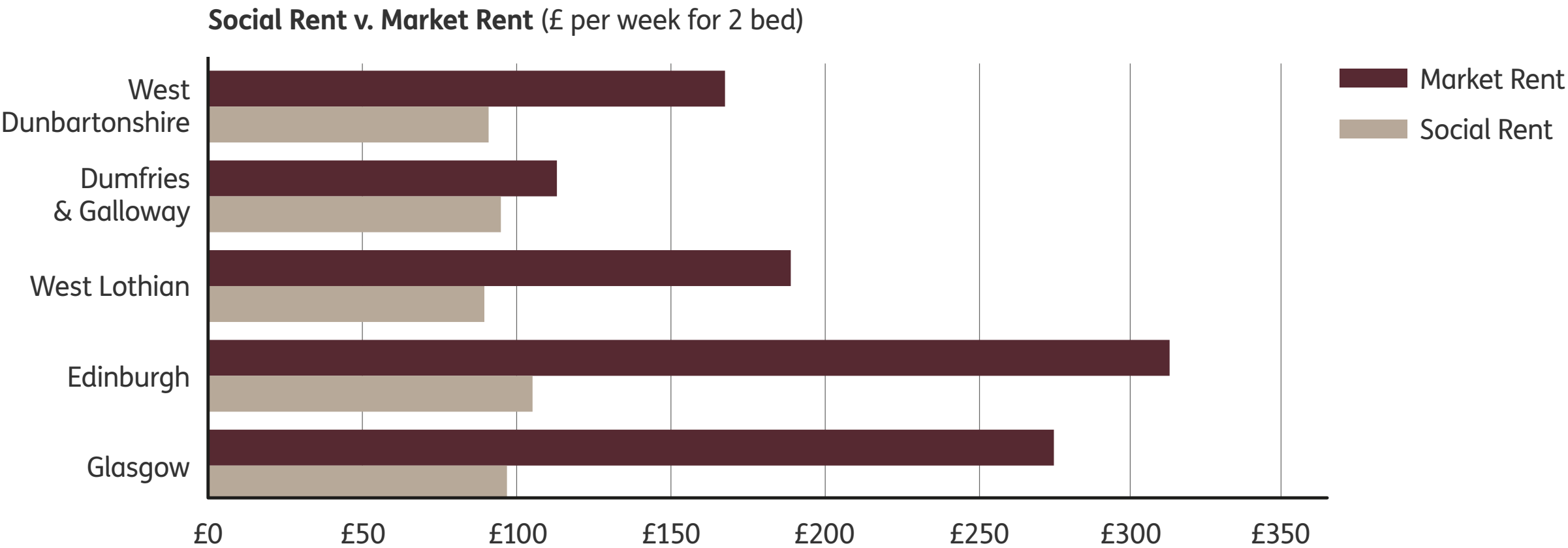
We analyse affordability by geography and house type, comparing rents to sector averages from the Scottish Housing Regulator. We also assess rent as a percentage of household income based on the Scottish Government's affordable rent benchmark (30-40% of income).

The formal 2025 rent consultation process was managed independently by Civica in January 2025. More than 8,350 customers responded to the proposed 6.9% rent increase for social rent properties in 2025/26, with the majority expressing support.



Affordability

In the wider market, a comparison between social rents¹ and market rents² for the same property type clearly demonstrates the affordability of social rent tenures with average social rents for properties in the main urban centres of Glasgow and Edinburgh at 34% of the average private sector market rent in both cities.



1. Average social rents for 2023/24 per Scottish Housing Regulator statistical information. (<https://www.housingregulator.gov.scot/landlord-performance/statistical-information>)

2. Average monthly private rents per Citylets 2024 Q1 for Glasgow, Edinburgh and West Lothian ([Citylets 1Q24](#)) Limited data available for West Dunbartonshire and Dumfries and Galloway. Private rents from Scottish Government Private Sector Rent Statistics, year to September 2024 ([SG private rent Sep24](#))

Building safety

We collaborate with the Scottish Fire and Rescue Service to ensure legal fire safety compliance through our Fire Prevention and Mitigation Framework (FPMF).

The FPMF outlines our strategy for proactively mitigating the risk of accidental dwelling fires through a programme of person-centred risk assessments conducted when housing officers identify customer vulnerability. This year, 537 such assessments were completed. As a result, the fire safety team co-ordinated the installation of enhanced detection systems in 94 homes and provided fire safety products, including air fryers and safe cooking guidance, to 309 customers.

Higher risk buildings, such as high-rise and sheltered or supported living accommodation, are subject to fire risk assessments following specific protocols. These safety assessments are conducted by our fire safety team using the industry standard PAS 79-2:2020 methodology.

Our targeted risk assessments have reduced accidental dwelling fires by 21% year-on-year, with our fire safety teams playing a key role in saving lives.

	2021/22	2022/23	2023/24	2024/25
Fire risk assessments	193	137	113	118
Person-centred risk assessments	547	600	614	537
Accidental dwelling fires	149	147	121	94

Scottish Government guidance on fire safety in high rise buildings recommends a six-monthly inspection of dwelling fire doors in any building over 18 metres / 6 storeys. All 11,271 fire doors have been visited, with 73% accessed and inspected during 2024/25. The remainder will be assessed in the first six months of 2025/26.

All premises within the scope possess valid fire risk assessment certifications and comply with the requirements of the Fire Safety (Scotland) Act 2005 and Fire Safety (Scotland) Regulations 2006.



Building safety



Smoke and heat detection

All our homes are equipped with ceiling-mounted, interlinked smoke and heat detectors as required by Scottish fire regulations since February 2022. We ensure compliance with BS EN14604:2005 for smoke alarms and BS 5446-2:2003 for heat alarms, with carbon monoxide alarms certified by the British Kitemark (EN 50291-1). These alarms are installed in living rooms, hallways/landings, and kitchens across our 65,000 homes.

Gas and electrical safety testing

We have 46,282 homes which require a CP12 annual gas safety inspection with a 100% compliance rate for 2024/25. Electrical Installation Conditions Reports (EICR) are required in all homes on a cycle of no more than five years, with a 99.8% compliance rate at 31 March 2025.

Resident voice

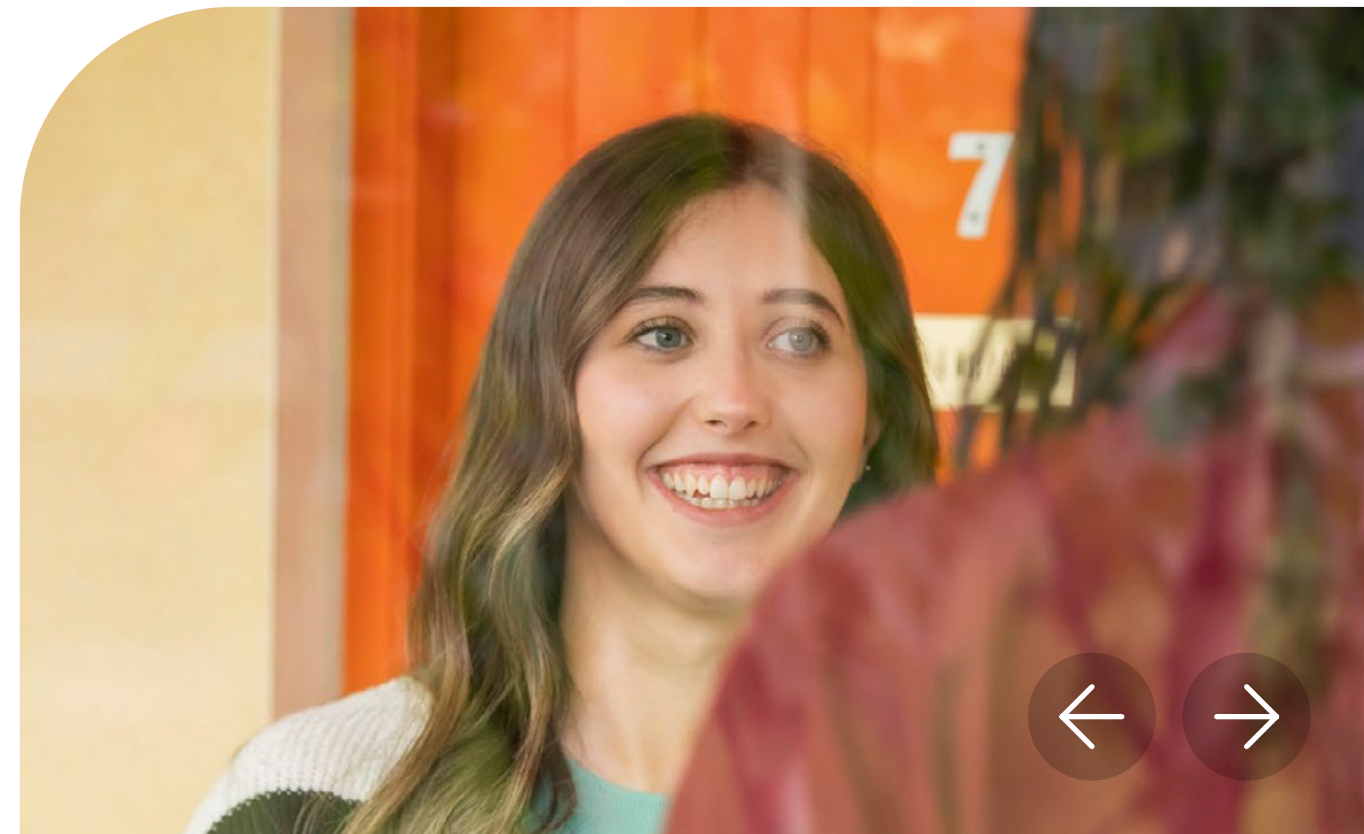
Our engagement framework has played a central role in transforming the way we connect with tenants, enabling us to broaden and diversify the customer voice. Embedding a strong customer perspective throughout the group helps us enhance service delivery for all our customers and communities. Over 1500 customers are now involved in Stronger Voices initiatives, participating in surveys, panel events, and focus groups both in-person and via digital platforms.

Their knowledge, skills, and lived experiences have influenced decisions on local service delivery, policy-making, and strategic projects. As we develop our next five-year strategy, we are reviewing our customer engagement approach to further embed new digital methods. We are also exploring options for a new self-service model and digital platform to make digital engagement with our services easier for customers.

The input from our Stronger Voices contingent is enhanced by our Group Scrutiny Panel and other project-specific customer groups. The Scrutiny Panel reviews the performance of our RSLs, allowing customers to help identify service improvements. Meetings are held across Glasgow, Edinburgh, and Dumfries, with the panel convening four times a year to engage directly with staff.

Panel members examine quarterly performance data against Scottish Social Housing Charter indicators, focusing on priorities such as anti-social behaviour resolution, repairs, complaints, and tenancy-related metrics. They also address environmental issues, fuel and welfare advice.

To strengthen their effectiveness, the panel receives external support from the Tenant Participation Advisory Service (TPAS), including training sessions. This collaborative approach ensures customers are actively involved in shaping services across Wheatley's social landlords.



Case study: Wyndford Futures Focus Group

Wheatley Homes Glasgow is investing £100 million in the regeneration of the Wyndford area of Maryhill, which will see almost 400 new affordable homes and a purpose-built community hub. Residents have been at the heart of the project, with Wheatley tenants on the Wyndford Futures Focus Group (WFFG) actively shaping its direction.



The WFFG helped design thematic surveys and local lettings plans to prioritise residents' needs and have worked directly with architects and Wheatley staff on the masterplan for the area, including proposing improvements such as accessibility, enhanced green spaces, improved walkways, a children's play park, better security, and parking.

Chris Quinn, Wheatley tenant and co-chair of the WFFG said: "These are hugely exciting times for Wyndford. This £100m regeneration will shape our community for the better, not only for the people who live here today, but for families and generations to come."

In June 2024, the group won the Tenant Team of the Year at the Tenant Participation Advisory Service (TPAS) Scotland National Good Practice Awards in June 2024 and also picked up the award for Excellence in Community-Led Decision-Making at the UK Housing Awards in November 2024.

Tenant satisfaction surveys

Providing excellent customer service has always been a priority for Wheatley, with a goal of 90%+ tenant satisfaction during 2021-26. Three of our four RSLs have reached this target, and Wheatley Homes Glasgow will begin its independent survey in 2025/26 from a strong position.

Key performance measures provided to the Scottish Housing Regulator for the 2024/25 Annual Return on Charter are presented below on the following page, along with sector averages for the previous year, allowing for comparison across all measures.

We retained our Customer Service Excellence (CSE) accreditation in November 2024, demonstrating full compliance across all assessment criteria and achieving an additional two criteria rated as compliance plus, meaning there is now a total of 24 compliance-plus criteria across the entire programme.

The CSE assessor noted significant progress in the last year, highlighting outstanding and visible leadership from our Chief Executive, along with improvements in the Customer First Centre through the geographical/specialist model and technological advancements with our telephone system, STORM. Strong evidence of empowering staff and customers was demonstrated via initiatives including our repairs improvement teams in Wheatley Homes East and the investment in the Sandyhills Larder in Glasgow.

The assessor also provided valuable feedback for further improvement, including the need to ensure staff have time to digest updates and new knowledge. Additionally, mechanisms like MyVoice should be used to check how customers feel throughout the repairs process and ensuring staff remain polite and courteous, while promotion of the Stronger Voices team as key contacts for local community groups, as well as involving customers in the procurement process where applicable, will also help enhance our service. Circular customer communication, such as our 'you said, we did' approach, should continue to be a key theme, including explaining why certain actions may not be taken forward.

Tenant satisfaction surveys

Scottish Housing Regulator: Annual Return on Charter (2024/25)					
	Wheatley Homes Glasgow	Loretto Housing	Wheatley Homes East	Wheatley Homes South	Sector Average (2023/24)
Overall service provided by landlord	86.7%	92.8%	95.6%	94.7%	86.5%
Kept informed about services and decisions	93.6%	97.9%	98.1%	96.5%	90.5%
Opportunities for participation in decision making	97.6%	98.5%	99.5%	99.7%	87.7%
Satisfied with the quality of their home	86.3%	94.3%	95%	93.2%	84%
Percentage of anti-social behaviour resolved	100%	100%	100%	100%	94.3%
Does your rent represent good value for money	89.4%	93.1%	95.9%	97.1%	81.6%

Resident support

Well-maintained neighbourhoods are important for maintaining high levels of tenant satisfaction across our communities. Our housing officers manage small patches of around 250 homes, helping them maintain closer contact with residents and offering tailored support where required.

Wheatley's Community Improvement Partnership (CIP) sees staff from Wheatley Homes Glasgow, Police Scotland, and Strathclyde Fire and Rescue Service work together to address anti-social behaviour and support vulnerable tenants to help fulfil our vision of safe, thriving neighbourhoods. By pooling data from partner agencies and closing information gaps where incidents might go unreported to police, the CIP can better identify, prioritise, and resolve issues affecting the community.

Meanwhile, our Group Protection team equips housing and care staff with training to help safeguard customers and respond swiftly to any risk of harm or abuse, whether related to domestic violence, at-risk adults or children, or suicide prevention. They also support staff in managing customers under Multi Agency Public Protection Arrangements, ensuring vulnerable people and the wider community receive timely and appropriate support.



Wheatley Foundation

The Wheatley Foundation, established in 2016, is dedicated to improving the lives of customers and communities by delivering a wide range of initiatives. With many of our communities among the most deprived in the country, the Foundation aims to tackle social exclusion and ease the impacts of poverty, ensuring those most in need receive targeted and meaningful support.

Key areas of focus include alleviating poverty and maximising access to employment, training, and learning opportunities for people of all ages. Through a planned programme of activities, the Foundation works to empower individuals and families, fostering greater inclusion and providing pathways to improved well-being and opportunity within Wheatley's communities.



In the year, the Foundation invested £8.8m, supporting over 12,600 people across our programmes, achieving all annual targets including:

20,472

instances of direct support to alleviate financial pressures;

1,037

Wheatley Works jobs, apprenticeship and training opportunities created during the year;

50

new education bursaries provided to customers in higher education;

3,486

children and young people taking part in targeted programmes; and

£1.7m

almost £1.7m of external grant/contract funding secured to support the delivery of Foundation programmes.

Wheatley Foundation

Our Home Comforts programme delivered 4,862 items of free recycled furniture and white goods to 1,272 tenants, supporting customers to create a home while diverting over 149 tonnes of household items from landfill.

Our Starter Packs provided 708 households with a helpful pack including kettle, toaster, cutlery, crockery, pots and pans, bedding, towels, and cleaning materials to help them settle into their new home.

Our community pantries and larders in Sandyhills and Kennishead in Glasgow continued to provide affordable food and household essentials to hundreds of residents while also offering additional support like benefits advice, employability support. In 2024/25, the G15 Community Pantry Cupboard in Drumchapel and the LINKES Community Shop in Knightswood were launched to help residents access low-cost food and connect with services.



These initiatives, delivered in partnership with local organisations, highlight Wheatley's commitment to addressing local needs and promoting wellbeing through accessible, community-driven solutions. Both spaces serve not only as sources for essential goods, but also as welcoming places for community engagement and support.

The John Wheatley Learning Network offered free internet access and digital support to 2,200 people across 32 local learning centres located in Wheatley communities. Additionally, there were 1,200 enrolments in certificated Wider Access courses, which included Community Achievement awards and SQA qualifications in word processing and Excel.

Wheatley Foundation

The Dolly Parton Imagination Library offers a free book every month to children under five, with 770 children from our homes currently enrolled, with more than 40,000 books delivered since 2016.

Throughout the year, 350 young people from the east end of Glasgow took part in workshops and diversionary activities organised through Streetywzye, is a 12-week educational programme for young people who are at risk of engaging in gang culture, knife crime, and anti-social behaviour.

Wheatley's welfare benefits advisors secured over £20m in otherwise unclaimed support for our customers, over 35% of which directly contributed to the prevention of rent arrears. Our fuel advisors supported 2,177 households with their gas and electricity bills this year.

Our 'My Great Start' initiative, run in partnership with voluntary sector organisations, provided 1,164 new tenants with personalised support on finances, benefits, and energy advice, as well as connections to local services, helped secure financial gains of over £1million.

Social value

The Foundation has integrated the HACT Social Value Tool into its project delivery, employing before and after surveys to monitor impact. This tool uses a well-established wellbeing valuation approach in line with the UK Treasury Green Book methodology to assess and monetise the positive effects of initiatives on individual life satisfaction. For example, the wellbeing benefit of moving someone from unemployment to a job is valued at around £13,000.

During the year, the Foundation delivered more than £17 million in social value through programmes like Wheatley Works and Welfare Benefits and Fuel Advice support. These social value figures have been instrumental in supporting funding applications and providing progress updates to external partners, demonstrating the substantial impact of the Foundation's work in our communities.

Wheatley Foundation

Case study: Wheatley Works

William, a Wheatley tenant from north Glasgow who had been out of work since being made redundant in 2022, joined our 12-month Changing Lives programme over the year. He was offered a permanent role in our Neighbourhood Environmental Team (NETs) at Tollcross.



“When I researched the Changing Lives programme, I knew it was an opportunity to feel valued. Since joining the team, it’s been fantastic. Changing Lives has proved to me that I am capable. I’m proud of myself and Wheatley.”

William, a Wheatley tenant



Homelessness

Our sector-leading commitment to provide 10,000 properties to homeless people by 2026 was increased by 10% during 2024/25 in recognition of the homelessness crisis declared in Scotland.

Steven Henderson, Wheatley Chief Executive said: “We have an important role in supporting the Scottish Government and local authorities in tackling homelessness in this country. When we launched our five-year strategy in 2021, we set an ambitious target of making 10,000 homes available to tackle rough sleeping by the end of 2026. With over a year of the strategy still to go, we have already helped more than 8300 homeless people off the streets and into a place they can call home. Our announcement of

a further 1000 homes over the five years outlines our commitment and determination to support people in greatest need in our communities and to play our part on a national level in tackling homelessness.”

In 2024/25, our lets to people experiencing homelessness made up 60.5% of all lets. Our progress to achieving this target is set out below.

Wheatley provides services such as benefits advice, financial inclusion support, and basic home starter packs to help customers maintain their tenancies. The Wheatley Foundation also supplies items including carpets, furniture, and food vouchers. In addition, we play a leading role in Housing First, a multi-agency partnership to tackle rough sleeping which has provided over 300 homes for people experiencing homelessness and refugees.

	2021/22	2022/23	2023/24	2024/25	2025/26
Lets to homeless	2,475	2,207	2,406	2,673	—
Cumulative total / target	2,475	4,682	7,088	9,761	11,000

Staff wellbeing

Wheatley staff have access to a comprehensive health and wellbeing package, which includes two wellbeing days per year and the opportunity to apply for financial support for dental care, optical fees, physiotherapy, health club memberships, alternative therapies, and menopause care. Additional benefits feature access to the W.E. Benefit discount site, daily discounts and deals, the cycle to work scheme, the option to purchase annual leave, and help with the cost of driving lessons.

Support is also available through the Employee Assistance Programme, PAM Wellness, which offers counselling and emotional help, extending support to colleagues and their immediate household. Mindfulness practitioners offer courses to help staff manage daily anxieties, and specialised workshops such as cognitive behavioural therapy and wellbeing coaching are available to all staff.

Wheatley’s commitment to Equity, Diversity and Inclusion (EDI) and to creating a more inclusive workplace for all staff regardless of age, race, sex, sexuality, or health status is guided by a comprehensive action plan and policy framework. As Wheatley is a member of the Employers Network for Equality and Inclusion (enei), staff benefit from access to expert resources and webinars, while links with Business in the Community further support responsible business practices and the development of an inclusive workforce.

Based on feedback from annual EDI surveys, networking groups have been established to support staff members on various matters identified by their responses as set out below.

Networking Groups

- Carers
- Disabilities
- LGBTQ+
- Neurodiversity & Mental health
- Age
- Pregnancy & Parenting
- Religion and beliefs
- Race and Multiculture
- Menopause & Perimenopause



Equity, Diversity and Inclusion (EDI)

Housing Officer Saad Niaz hosted a Lunch and Learn session at the Race and Multiculture Network event presenting to colleagues on what Ramadan means to him as a Muslim.



“I really enjoyed sharing my experiences. It was an opportunity for me to give others insight into what they might want to be mindful of during Ramadan, not just for colleagues but also for customers as well.”

Saad Niaz, Housing Officer



Living Wage

We were honoured to receive the real Living Wage accreditation during the year, which recognised our commitment to paying employees and contracted staff, the real Living Wage of at least £12.60 per hour. All building contractors within our framework are mandated to pay the Living Wage.

Tom Arthur, Scotland's Employment Minister at the time, said, "It is encouraging to see Wheatley Group join a growing number of employers which are paying the real Living Wage. The Scottish Government has made it a legal requirement for all organisations receiving grant funding from a public body to pay the rate and this has enabled Scotland to have the highest proportion of workers being paid at least the real Living Wage or higher in the UK."



Gender pay gap

Since April 2017, organisations with over 250 employees must publish their gender pay gap data. Four Wheatley subsidiaries have been subject to this requirement over the past three financial years.

In all instances, the mean pay gap figure is determined by adding the total pay and dividing it by the number of staff, indicating that, on average, women receive higher compensation than men across these subsidiaries as shown by the negative gender pay gap in the table to the right.

Mean gender pay gap			
Wheatley Group subsidiary	2022/23	2023/24	2024/25
Wheatley Homes Glasgow GPG report	-21.6%	-24.7%	-26.1%
Wheatley Homes East GPG report	-1.3%	-2.9%	-0.5%
Wheatley Homes South GPG report	-13.2%	-16.5%	-19.6%
Wheatley Care GPG report	-7.4%	-6.2%	-6%

Absence rates

Our Annual Return on Charter (ARC) reports absence rates to the Scottish Housing Regulator. As of 31 March 2025, the table below shows the percentage of absence for our Registered Social Landlord subsidiaries.

	Absence rate: % of working time lost			
Wheatley Group subsidiary	2021/22	2022/23	2023/24	2024/25
Wheatley Homes Glasgow	3.57%	2.74%	2.39%	3.24%
Loretto	4.72%	5.65%	0.45%	0.33%
WH East	3.06%	3.53%	3.50%	4.24%
WH South	1.63%	2.19%	2.52%	2.94%

Case Study: Investors in Young People – Gold Award

We retained the esteemed Investors in Young People (IYYP) accreditation, which we have held since 2015, underlining our dedication to fostering the potential of our younger workforce and our commitment to being an employer of choice for young people.

Our accreditation was reaffirmed after an assessor from Investors in People (IIP) spent three days at Wheatley in August 2024, meeting both young staff and senior leadership. The assessment highlighted our efforts in providing meaningful opportunities and support for young employees to develop their skills and advance their careers.

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

With a workforce of around 3000, Wheatley currently employs 522 people aged between 16 and 28, including 49 Modern Apprentices and 45 people on the Ignite graduate programme.





Governance

Structure and governance

The Group parent company and each of our Registered Social Landlord subsidiary organisations are regulated by the Scottish Housing Regulator (‘SHR’) and comply with the SHR’s Regulatory Framework (“the Framework”) and Regulatory Standards of Governance.

The Parent Company, Wheatley Housing Group, and all Group subsidiary RSLs confirmed compliance with all relevant regulatory requirements set out in Chapter 3 of the Regulatory Framework, all relevant standards in the Scottish Social Housing Charter and all relevant legislative duties.

While all subsidiary RSLs are registered charities, the Parent Company is not a charity and is a private company limited by guarantee without share capital. The members of the company are the members of the Board, who each have membership with equal voting rights. The percentage of voting rights will change from time to time depending on the number of Board members but is currently 8.33% (with 12 Board members).



Strategic direction, board and trustees

Wheatley Group Board includes two independent directors, eight subsidiary chair board members, and two co-opted tenant members. The Board meets seven times a year and holds an annual two-day strategy workshop. Board minutes and Group Standing Orders can be accessed on the Wheatley Group website. The Wheatley Group Board coordinates the group’s activities and takes a strategic overview. It ensures the group leverages its size for maximum value and efficiency for customers and communities.

Our subsidiary companies, including the RSLs, Wheatley Care, and Lowther Homes, maintain autonomy in decision-making on key operational matters through their respective boards. This approach allows them to prioritise their customers and communities by actively listening to and addressing the concerns of residents.

Our Group Board aims to reflect and represent our customers. The 12-person Board includes 7 female members (58%), ethnic group representation (8%), tenant membership (17%), and a disabled person (8%). The average age of Board Members is 61.8 years.

Wheatley Group Board: Diversity representation



Strategic direction, board and trustees

The Group Chief Executive, Steven Henderson, attends Board meetings in a non-voting capacity, maintaining a clear distinction between executive and non-executive roles, as the Board itself is fully non-executive with separate positions for Chair and CEO. Jo Armstrong, who previously served as a board member for six years, was appointed Group Chair in September 2021.

Our auditors, KPMG, were re-appointed in February 2023 for a five-year period, with two 12-month extensions. The most recent strategic governance review was completed in 2022 by Campbell Tickell.

Our Non-Executive Directors undergo an annual appraisal process to evaluate their performance and identify areas for improvement. They are provided with a continuous professional development programme that involves external experts, such as the Institute of Directors, sector and industry specialists, and our external legal advisors. This ensures that our Board Members can update and maintain the necessary skills and experience to fulfil their responsibilities.

Systems and risk management

The Board of Wheatley Housing Group is responsible for ensuring effective systems of internal financial control are maintained within all members of the Group. This is achieved using the following framework:

- **Written policies and procedures:** Includes Standing Orders outlining delegated authorities across Group subsidiaries and the organisational structure, supporting business processes with clear lines of responsibility.
- **Qualified staffing:** Employment of suitably qualified and experienced personnel to take responsibility for key business areas, supported by a formal personal development programme.
- **Risk-based approach:** Adoption of a risk-based strategy to internal control and maintenance of risk registers evaluating the likelihood and impact of identified corporate risks. This also designates responsibility for monitoring and reporting progress against the Group's key risks.

— **Financial planning and budgeting:** Financial plans and budgets support strategic and operational financial targets. Performance against targets and key performance indicators are monitored, forecasted, and reviewed by the Board.

— **Conflicts of interest policy:** Conflicts are managed through a specific agenda item at the start of every meeting, in accordance with Article 38 of our Articles of Association titled 'Interests'.

Systems and risk management

Three sub-committees assist the Group Board in its duties:

Committee name	Function
Remuneration, Appointments, Appraisal & Governance Committee	Oversees recruitment, selection, succession planning, and appraisal of Board members, ensuring they have the skills and experience needed. Continuously evaluate and review the Group’s governance framework.
Group Audit Committee	Provides oversight of the Group’s internal control, compliance assurance, and risk management. It approves and monitors the Internal Audit plan, oversees the external audit process, reviews financial statements, and evaluates the overall risk strategy and strategic risk register.
Group Strategic Development Committee	Tasked with evaluating new significant strategic projects and initiatives for the Group Board, particularly those related to fundraising and strategic partnerships.

Systems and risk management

Each subsidiary has a Board that sets its strategy in accordance with the Group's overall strategic direction, while considering its particular circumstances and customer needs. The Boards are composed of non-executive directors chosen according to a skills matrix applied both individually and across the Group. Currently, 28% of subsidiary RSL board members are tenants.

Our governing bodies review performance measures and KPIs at each meeting, setting strategic aims in their five-year plans. The subsidiary and Group Boards annually update their strategic priorities, considering changes in the environment, risks, policies, and legislation. This process is supported by the Group Audit Committee, our Pathway to Net Zero advisors, the Wheatley Solutions Board, sectoral networks like the Scottish Federation of Housing Associations, and stakeholder groups such as the Scottish Government Housing Investment Taskforce.



Supply chain

The Group's procurement and sustainability strategies are closely aligned with the Procurement Reform (Scotland) Act 2014, ensuring contracts over £4 million integrate community benefit requirements as part of compliance. Social value is embedded through a 'Community Benefits' approach, requiring partners to provide work placements, training, apprenticeships, new jobs, mentoring, and charitable contributions for each property delivered. These requirements scale with contract size; for example, contracts above £500,000 and new-build projects over £2million have set minimum thresholds for such benefits, which increase with contract value.

For the highest-value projects, such as Band 9 new-build contracts exceeding £18 million, contractors must deliver at least 19 work placements and training opportunities, eight apprenticeships, ten new jobs, and a contribution of £775 per new-build unit to charity. This structured approach ensures the economic and social footprint of the Group's activities extends beyond housing, supporting local employment, skills development, and community wellbeing.

In partnership with the construction industry, Wheatley Group's development contracts also mandate sustainability as a central principle. New-build projects are required to prioritise energy efficiency, sufficient floor space, access to green spaces, and provisions for electric vehicle charging points, all of which contribute to creating successful and attractive places for communities.



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