

# West of Scotland Housing Group

Environmental, Social and Governance Report  
on Sustainable Reporting Standards for Social Housing

2023 / 24





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## Welcome

**Welcome to West of Scotland Group's second Environmental, Social & Governance (ESG) report which, for the first time, incorporates our submission to the Good Economy on our performance against the specific criteria contained in Sustainability Reporting Standards for Social Housing (v2).**

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

WSHA provides and supports 4,300 homes across Scotland and has a vision to 'go further to provide housing you call home'. Willowacre Trust is WSHA's charitable subsidiary tackling social disadvantage and supporting the most vulnerable in our communities.

Westscot Living is WSHA's commercial subsidiary, which manages our mid-market rent homes and provides a factoring service to property owners.

WSHA Group's Strategic Aims are to:

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



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# West of Scotland Group's Sustainability Strategy and current challenges

## Overview

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

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

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

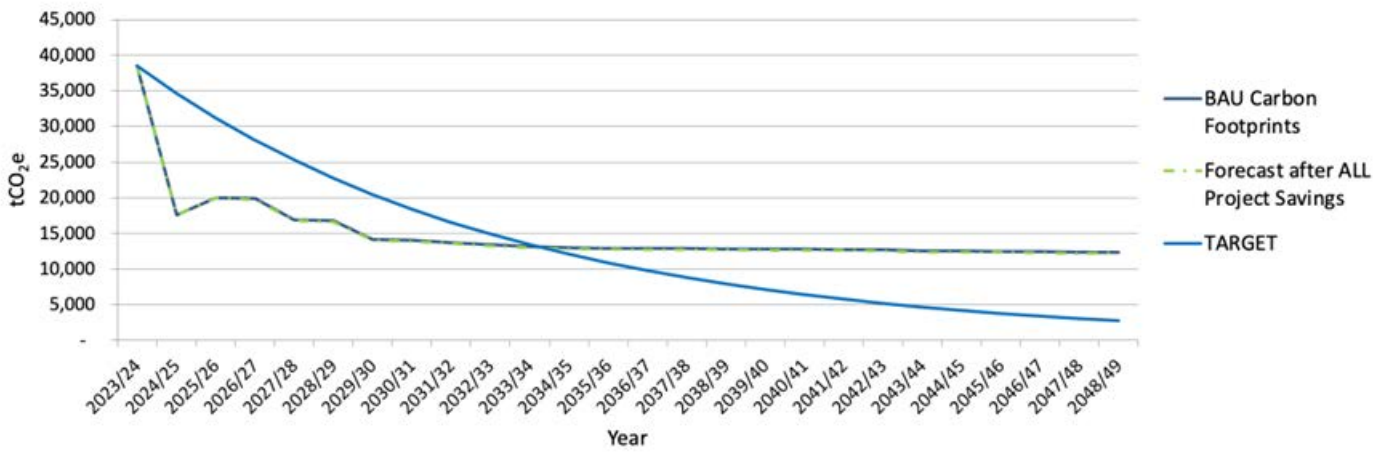
### *Key targets of WSHA's Sustainability Strategy*

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

These are outlined in graphical form in **Figure 2** on the next page:

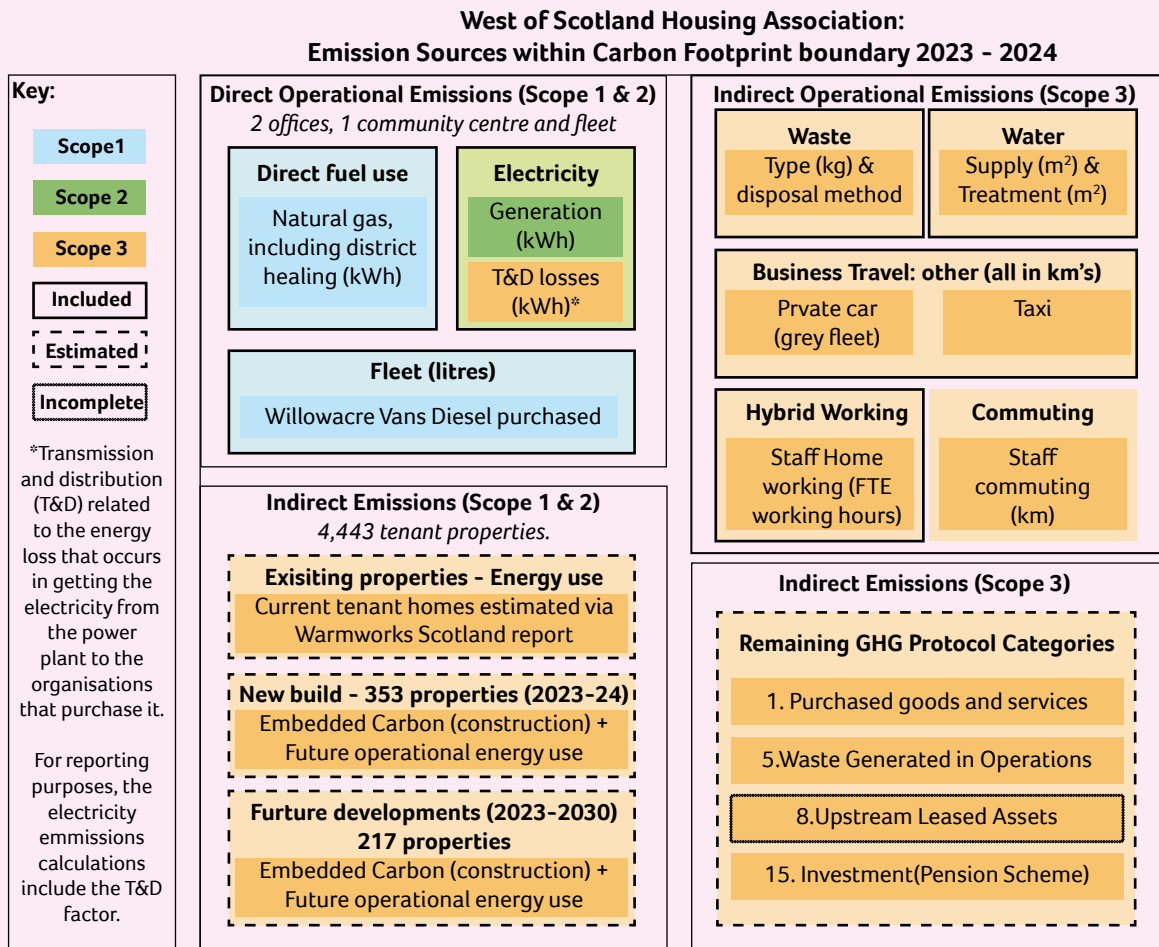


### ALL SCOPES Value At Stake - Carbon (tCO<sub>2</sub>e)





**Figure 3** below displays the direct and indirect emission sources used in our carbon footprint calculations for 2023/24.



**Table 1** (next) shows WSHA's carbon footprint for 2023/24.





West of Scotland Housing Group Carbon Footprint Emissions 2023-24		
Scope 1	Direct Emissions from owned or controlled sources	
	Source	Tonnes CO <sub>2</sub> e
	Gas ◇	72.4
	Fleet - Willowacre Trust vans ◇	3.9
		<b>76</b>
Scope 2	Indirect Emissions from the generation of purchased energy	
	Source	Tonnes CO <sub>2</sub> e
	Electricity ◇	46.5
	Electricity - EVChargers ◇	2.2
		<b>49</b>
Scope 3	All other indirect emissions such as purchased goods, business and commuter travel, waste disposal or leased assets as per Greenhouse Gas Protocol Categories	
	Source	Tonnes CO <sub>2</sub> e
Cat 1	<b>Purchased Goods and Services</b>	
	New Developments (spend) embodied carbon +	21,459
	Component Additions	1,002
	Major and DTD Repairs	1,711
	Maintenance and Health & Safety	166
	Property Insurance	73
	Void Repairs costs	125
	IT Costs	79
	Office Insurance	9
	Offices water supply and treatment ◇	0.6
Cat 5	<b>Waste generated in operations</b>	
	St Andrews and Dundashill Projects	17.3
	Planned Maintenance: kitchens, bathrooms, windows, boilers	4.3
	Office waste & recycling ◇	0.02
Cat 6	<b>Business Travel</b>	
	Taxis and grey fleet - WSHA and Willowacre ◇	22.0
Cat 7	<b>Employee Commuting and Teleworking</b>	
	Staff working from home ◇	15.7
Cat 8	<b>Upstream leased assets</b>	
	WSHA Warehouse (rented)	TBC
Cat 13	<b>Downstream leased assets</b>	
	Tenant property energy consumption ☆	9,788
Cat 15	<b>Investments</b>	
	DB Pension scheme	3,923
		<b>38,395</b>
Offsets	Carbon credits that have been purchased or verified as offsets within the company	
	Source	Tonnes CO <sub>2</sub> e
<b>TOTAL</b>	<b>Absolute Emissions 2023-24 (Tonnes CO<sub>2</sub>e)</b>	<b>38,520</b>

(◇) denotes operational emissions

(+) Calculation modelled using 353 build total, avg social house size (66 m<sup>2</sup> as per England Housing Survey Report) and LETI Embodied Carbon Primer + Passivhaus and Embodied Carbon Report (Apr 22) factors in kg CO<sub>2</sub>e/m<sup>2</sup>

(☆) Warmworks Scotland report total (9,484 tCO<sub>2</sub>e) adjusted to BEIS 2023 factors plus Transmission & Distribution



WSHA established a pre-Covid-19 (2019/20) baseline carbon footprint and have been improving the data quality and supply year on year. Table 1 below provides a summary of the latest operational footprint for 2023/24 and shows a strong like-for-like emissions reduction of 28% compared to the 2019/20 baseline.

However as already mentioned, the data collection has improved to a point where it barely compares to the original calculations and will be re-baselined going forward as part of the overall 2023/24 total footprint.

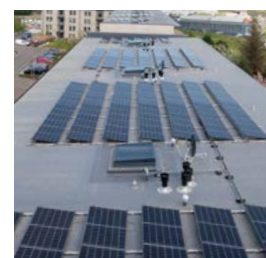
**TABLE 2: WSHA OPERATIONAL CARBON FOOTPRINT 2023-24**

Category	Subcategory	2019/2020 tonnes CO <sup>2</sup> e	2022/23 tonnes CO <sup>2</sup> e	2023/24 tonnes CO <sup>2</sup> e	%age difference
<b>Direct Operations</b>					
<b>Energy</b>	Camlachie House - Gas	11.4	9.9	5.6	
	Camlachie House - Elec	31.3	21.7	19.4	
	31 Ashley Street - Gas ***			2.4	
	31 Ashlet Street - Elec***			2.1	
	Barrowfield Community Centre - Gas*		9.2	64.4	
	Barrowfield Community Centre - Elec*		22.5	25.0	
<b>Water (inc. treatment)</b>	Camlachie House**			0.2	
	31 Ashley Street***		0.1	0.04	
	Barrowfield Community Centre*			0.3	
<b>Waste</b>	Municipal Waste	0.01	0.03	0.02	
	Recycling	0.01	0.01	0.004	
<b>Travel</b>	Fleet**	5.4	7.7	6.1	
	Business Travel - Grey Fleet	24.9	23.5	21.3	
	Business Travel - Taxi	1.1	0.4	0.6	
	Staff Home/Hybrid Working*		16	15.7	
	<b>Subtotal</b>	<b>74</b>	<b>107</b>	<b>163</b>	
	<b>Life-for-Like vs Original BASELINE TOTAL</b>	<b>74</b>	<b>59</b>	<b>53</b>	<b>-28%</b>
	<b>Total</b>	<b>74</b>	<b>107</b>	<b>163</b>	

\* New Entries for 2022/2023 Carbon Footprint

\*\* 2023/24 Fleet totals consist of Scope ii emissions from fleet (3.9 CO<sup>2</sup>e) and Scope 3 emissions from EV chargers (2.2 CO<sup>2</sup>e)

\*\*\*New entries for 2023/24 Carbon Footprint



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

Since its introduction in 2014, EESH has set milestones for the energy efficiency ratings of social rented homes to reduce fuel poverty and greenhouse gas emissions. This Standard, however, is currently being reviewed by the Scottish Government to ensure alignment with the Net Zero targets from Climate Change Plan 2018-2032, Heat in Buildings Strategy and Housing to 2040 route map. Findings are expected at the end of 2023. The resulting new Standard, the Scottish Social Housing Net Zero Standard (SHNZS), is due to be finalised in 2025. SHNZS will set high-level targets to ensure the social housing sector achieves a just transition as it progresses to Net Zero.

In the meantime, however, West of Scotland Group have engaged with Warmworks to undertake an analysis of WSHA's housing stock.

Warmworks' report to the WSHA Board in September 2024 proposes an approach to the decarbonisation process which will support WSHA to achieve the anticipated obligations that will be placed upon all Registered Social Landlords (RSLs) under the upcoming Social Housing Net Zero Standard (SHNZS).

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

## SIGNIFICANT SUSTAINABILITY ACHIEVEMENTS TO DATE

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

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



## The Sustainability Reporting Standards for Social Housing

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

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

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

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

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

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



# West of Scotland Group’s Environmental, Social and Governance Report 2023/24

## Environmental themes

### Theme 1 (T1): Climate Change

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

Prior to this financial year, West of Scotland’s stock fell within the below EPC ratings. With the “NO RATING” properties omitted, our SAP average across our stock is **78** (Band C).

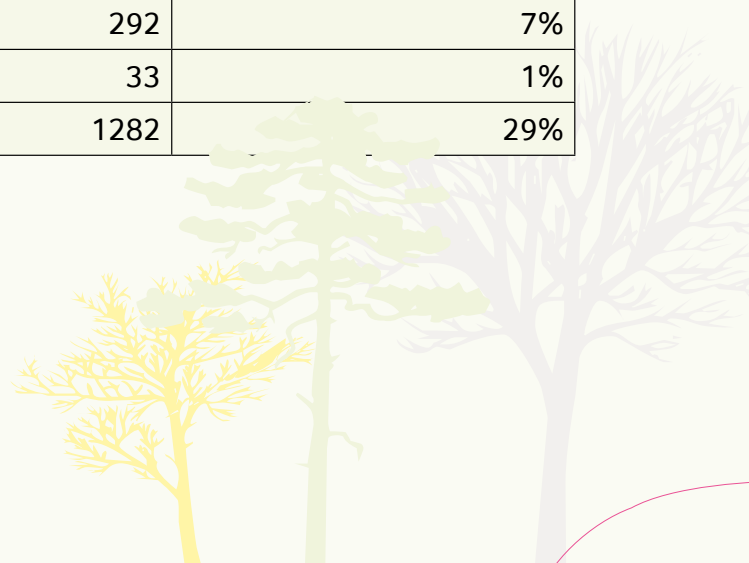
We are currently within the first year of an in-house stock condition survey where the associated data collection will generate a more accurate EPC score for every property.

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

In the last financial year we completed **195** New Build homes. The average SAP rating of these new homes is **84** (7% A rating and 93% are B rating).

#### EPC RATINGS OF EXISTING HOMES

EPC Banding	Number of Properties	Percentage of Stock
A	121	3%
B	1055	24%
C	1605	37%
D	292	7%
E	33	1%
No Rating	1282	29%





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

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

Our Sustainability Strategy notes our targets as:

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

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

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

In the last year we have undertaken a number of retrofitting activities. These have included a full cavity wall insulation extraction and replacement with 'injected bead' insulation, at a block of four properties at Crookston Road, Glasgow. We undertook trials of new innovative clean heating system (NexGen 'infrared' wallpaper) at 11 properties, including 10 properties at Kirkfieldbank, Glasgow and one property on Renfrew Street, Glasgow. We also installed internal wall insulation and replacement of gas central heating with air source heat pumps at two properties: Keppochhill Road, Glasgow and Nursery Avenue, Kilmarnock.

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

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

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

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

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

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

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

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

In 2022 WSHA employed consultants Carbon Change and Marberg to help us measure our Carbon Footprint for the first time. Their latest report for West of Scotland HA Group - *West of Scotland Housing Association Carbon Emissions Summary 2023/24* confirms our carbon footprint boundary and our 2023/24 baseline. All carbon calculations are in line with the Greenhouse Gas Protocol Corporate Standard 1 and thus use the defined approach to the scoping and quantification of Scope 1, Scope 2, and Scope 3 emissions.

	Item	Data	Values
		Scope 1: KgCO <sub>2</sub> equivalent	76,308
		Scope 2: KgCO <sub>2</sub> equivalent	48,670
	Scope 1, Scope 2, and Scope 3 Green House Gas emissions	Scope 3: KgCO <sub>2</sub> equivalent	38,395,256
C5		Scope 1, 2 & 3 : KgCO <sub>2</sub> equivalent	38,520,233
	Scope 1, Scope 2, and Scope 3 Green House Gas emissions per home	Scope 1: KgCO <sub>2</sub> equivalent/home	17.6
		Scope 2: KgCO <sub>2</sub> equivalent/home	11.2
		Scope 3: KgCO <sub>2</sub> equivalent/home	8,871.5
		Scope 1, 2 & 3 : KgCO <sub>2</sub> equivalent/home	8,871.5

All data validated and calculated as per GHG Protocol and using UK Government GHG Conversion Factors for Company Reporting 2023, v1.1

**Scope 3**

Category 1 Purchased Goods and Services emissions calculated with inflation adjustment using Conversion factors kgCO<sub>2</sub>e per £ spent, by SIC code 2021.

**Scope 3**

Category 1 (Developments) emissions from embodied carbon of 353 new homes, (227 to EPC B rating, 126 Passivhaus standard) modelled using social sector home mean floor area 66m<sup>2</sup> (as per English Housing Survey Headline Report 2019-20) and LETI Embodied Carbon Primer and Passivhaus and Embodied Carbon Report - April 2022 (kg CO<sub>2</sub>e/m<sup>2</sup>) sliding-scale averages.



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

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

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

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





## Theme 2 (T2): Ecology

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

We are currently developing a Bio-Diversity Strategy for new homes and existing land owned by the Association, this will be published in 2024. The Association has been working with grounds maintenance contractor Idverde in regard to exploring proposals for habitat creation and refinements to support wildlife and increase biodiversity. A report has been produced containing recommendations across a number of sites which include the creation of:

- Wildflower mounds
- Species-rich grassland
- Community Orchards
- Community 'bioblitz' events
- 3-phase mosaic maintenance regimes (Mosaic mowing)
- Nesting boxes
- Bat roosting boxes
- Road verge wild flowering
- Pollinator-friendly flower turf
- Community gardens

A range of gardening workshops have been delivered within three of our retirement sites as well as to community groups such as our Mental Health and Wellbeing groups based in Barrowfield and Charing Cross, and our Womens' Group based in Barrowfield. The workshops, which were delivered by a highly skilled community gardener, taught participants about:

- Potato planting
- Fruit planting
- Vegetable planting
- Planting Flowers
- Planting herbs & spices

These sessions are due to be rolled out across our other 10 retirement sites as well as to tenants of our new build MMR site in Dundashill.

In addition, we have supported the development and creation of the Barrowfield Burn Community Garden, which was formed out of vacant and derelict land. The garden is now a vibrant growing space where the community come together to plant and grow a variety of flowers, fruit and vegetables. Funding was secured to lay slabs to create a walkway for those who are wheelchair dependent to be able to access the space and take part.

The Association is exploring options for community garden space at five additional existing sites (Alma Street, Gourlay Lane, Glespin, Doonfoot, Hill Street) which will help encourage biodiversity in these areas.





### Theme 3 (T3): Resource Management

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

This will be addressed in the review of our Sustainability Strategy in 2025.



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

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

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

When West of Scotland Group review our Sustainability Strategy in 2025 we will look to set out in that document what our strategy and targets will be in respect of identifying, managing and reducing pollutants together with details on how we will manage our water systems, increase the use of responsibly-sourced materials and in turn minimise waste.

WSHA's current sustainability strategy has the following strategic aim: 'We will work and deliver our functions in a way that is considered most sustainable (acting sustainably)'.



## Social themes

### Theme 4 (T4): Affordability & Security

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

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

Average of Rent as % of LHA	Column Labels								
Row Labels	0	1	2	3	4	5	6	7	Grand Total
East Ayrshire	109.35%	£105.07%	92.08%						102.88%
East Dunbartonshire			36.96%						36.96%
Falkirk				28.04%					28.04%
Glasgow	108.79%	72.09%	59.79%	56.56%	31.75%	31.94%	33.30%		61.89%
North Ayrshire		105.38%	95.09%	84.36%	63.19%				94.19%
North Lanarkshire		102.78%	88.42%	85.46%	54.01%				93.75%
South Ayrshire	107.09%	105.80%	98.22%	87.52%	66.08%				97.88%
South Lanarkshire		97.84%	86.01%	69.94%	47.93%	51.99%		54.65%	87.27%
Grand Total	108.47%	87.66%	74.94%	66.19%	37.19%	35.76%	33.30%	54.65%	76.67%
	108.41%	98.16%	79.51%	68.65%	52.59%	41.96%	33.30%	54.65%	

**% of LHA rent 62.27%**

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

Average of Rent as % of BRMA Median Rent	Column Labels								
Row Labels	0	1	2	3	4	5	6	7	Grand Total
East Ayrshire	91.20%	91.69%	74.33%						88.55%
East Dunbartonshire			25.80%						25.80%
Falkirk				18.26%					18.26%
Glasgow	47.76%	44.76%	38.95%	32.54%	20.15%	20.17%	21.14%		38.67%
North Ayrshire		91.96%	76.77%	66.77%	43.82%				78.09%
North Lanarkshire		77.69%	66.13%	56.25%	38.92%				69.29%
South Ayrshire	89.32%	92.32%	79.29%	69.27%	45.83%				80.32%
South Lanarkshire		77.03%	62.69%	52.84%	32.96%	35.75%		37.59%	65.91%
Grand Total	66.84%	64.53%	53.89%	43.77%	24.29%	23.22%	21.14%	37.59%	54.83%
	76.09%	79.24%	60.57%	49.32%	36.34%	28.01%	21.14%	37.59%	

**% of BRMA-PRS Median Rent 41.91%**



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

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

In 2023/24 we relet 221 of our existing homes, with **64%** being general needs social rent, **19%** being sheltered housing and another **17%** being “other”, which includes amenity and adapted housing.

<b>Category Type</b>	<b>Number of Category Type</b>	<b>Percentage of Category Type</b>
Other	37	16.74%
General Needs	142	64.25%
Sheltered	42	19.00%
<b>Grand Total</b>	<b>221</b>	<b>100.00%</b>



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

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

We completed 195 new build homes in the year 2023/24. **32%** of these homes were allocated for social housing, whilst **68%** were Mid-Market Rent homes, managed by our commercial subsidiary, Westscot Living, on completion.





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

For New Build developments, we are building to a higher energy standard such as Passivhaus and Net Zero. We commission consultants to provide a heating & hot water strategy to consider options including ongoing running and maintenance costs to ensure the most affordable solution is adopted.

For existing homes, in 2023/24 our charitable subsidiary Willowcare Trust, through its Energy Advice Team provided support to 540 tenants and their households.

59.4% of initial referrals were tenants seeking emergency vouchers due to hardship or because they were struggling to pay their bills and/or had energy debt.

Following a successful funding application to an external funder, we provided 161 grants to tenants worth £150 each (£24,150 in total). This funding was specific to those who had not received a warm home discount in the past year but who would have qualified.

In addition we made individual applications for energy debt write-off grants and secured £15,277.91 of energy debt written off for tenants while securing a further £11,466 in energy vouchers for tenants to heat their homes.

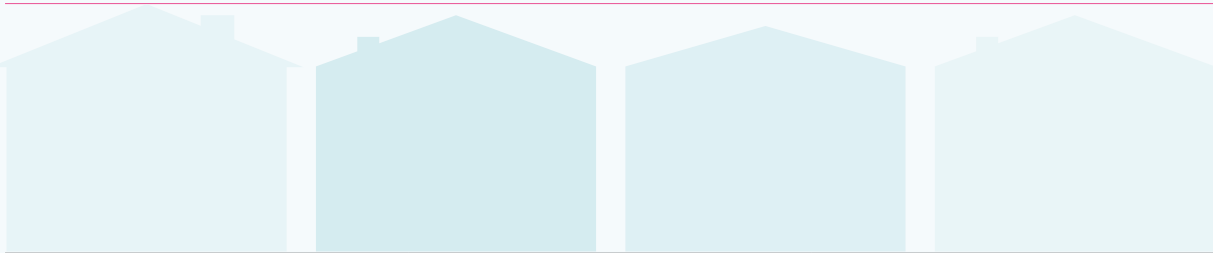


As well as addressing the immediate financial support required for those referred, the team looked at a range of measures to help combat the effect of high energy costs on tenants. These included:

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

**Intervention Type**

The table below shows the initial reason given for referral to WSHA's Energy Advice team. 59.4% of referrals are tenants who are either seeking emergency vouchers (hardship), or who are struggling with bills and/or energy debt.



Type of Intervention	Number	Percentage
Financial Hardship	178	32.9%
Billing Issues	96	17.7%
New Tenants	92	17%
Heating Controls	18	3.3%
Capped Gas Supply	13	2.4%
Meter Problems	17	3.14%
Energy Debt	84	15.5%
Account Review	24	4.4%
Warm Home Discount	18	3.3%
<b>Total</b>	<b>540</b>	<b>100%</b>

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

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

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

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



## Theme 5 (T5): Building Safety & Quality

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

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

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

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

**99%** of properties have a valid electrical safety certificate. We have been unable to access 25 properties and remain in discussions with the associated tenants to achieve 100% of valid checks as quickly as possible.



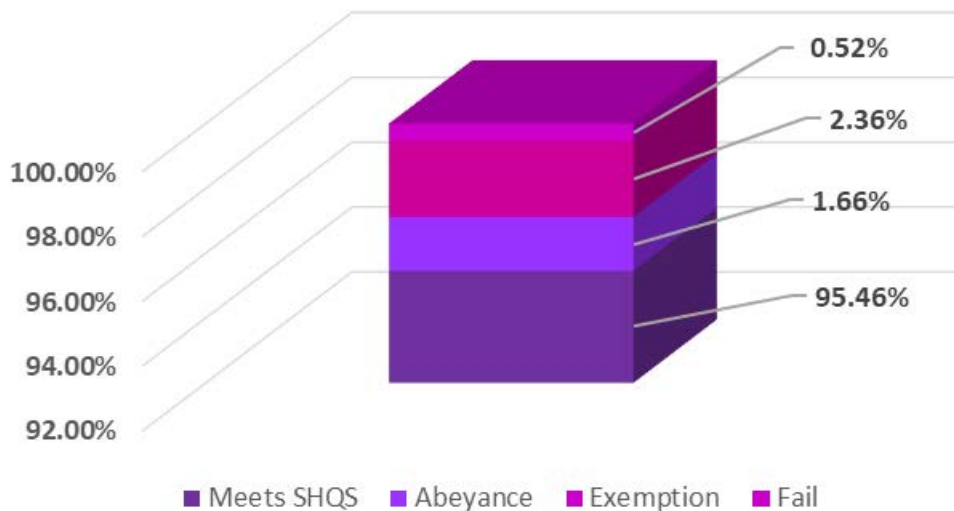
**(C18) What % of homes meet the national housing quality standard? Of those which fail, what is the housing provider doing address these failings?**

All Scottish Registered Social Landlords were required to bring their homes up to the Scottish Housing Quality Standards (SHQS) by 2015. As the standard has changed over time, the position on the number of properties failing to meet the standard can change. By March 2024, **95%** of West of Scotland homes meet SHQS. The graph below outlines the breakdown of the 5% that don't meet the standard.





## PROPERTIES THAT MEET SCOTTISH HOUSING QUALITY STANDARDS



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

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



## Theme 6 (T6): Resident Voice

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

We have a Dampness and Mould Policy that outlines our strategic and operational response to this issue. We have developed clear processes that are consistent with best practice and regulatory guidance. We ensure the work is carried out to the tenant's satisfaction and that any issues with dampness and mould have been fully resolved. Only at this point would we close down the job.

We are also implementing innovative methods to monitor and improve the home environment for tenants in harder to treat scenarios.

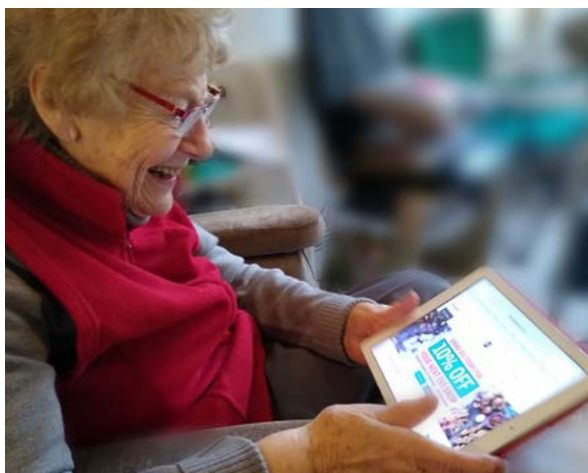
We use a number of methods to help raise awareness among tenants so that they can be more aware of simple measures they can take to reduce condensation inside their homes and decrease the risk of dampness and mould forming.

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

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

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

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



The table below summarises how that percentage has changed since 2019 and how our satisfaction score compares to the SHN average.

<b>Q1 Taking everything into account, how satisfied or dissatisfied are you with the overall service provided by your landlord?</b>	
91%	% satisfied overall 2024
87.7%	% satisfied overall 2022
91.14%	% satisfied overall 2019
86.5%	% satisfied ARC (all landlords) 2024

In 2024, we will present a report to our Board with our findings around customer satisfaction alongside an action plan setting out how we will address any areas of weakness.

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

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

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

In 2023/24, two Stage Two Complaints were escalated to the SPSO by complainants, but were not upheld by the SPSO. Our Complaints process involves Lessons Learned reports being submitted to our Leadership Team as necessary, to reflect on where we have failed in our service delivery and the steps to take to ensure we avoid the issue re-occurring.



## Theme 7 (T7): Resident Support

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

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

Our resident support services include income maximisation, tenancy starter packs, food parcels, membership of Dolly Parton’s Imagination Library, an upcycling project, and Christmas/summer activities. Additional support services have been developed and implemented including money advice, energy advice, volunteering, handyperson services, Community Hubs, a Community Benefit programme, community support & development and older people’s services. This support resulted in over 12,300 forms of contact to our tenants, assisting them in the above ways. In addition, over 34,000 people used our Community Hubs.

Welfare benefits secured in 2023/24 generated income totalling just over £460k by means of 2,500 forms of contact to help support tenants.

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



## Theme 8 (T8): Placemaking

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

We apply our Community Benefit Policy to most of our community investment activities. This identifies the investment requirements including any local initiatives.

West of Scotland Housing Association uses a variety of methods to gather the views of our tenants in order to create organisational action plans based on general and geographically-based emerging themes relevant to our customers and communities.

Through our customer satisfaction survey, we ask tenants to comment not only on their homes, but also their neighbourhoods, services and amenities. The results of these surveys form an action plan which we use to address any improvements or concerns tenants have.



In addition, West of Scotland Housing Association, through our subsidiary charity Willowacre Trust, have taken part in **Place Standard** consultations. The most recent covered Glasgow's Springburn area, with a particular focus on Cowlairs. This led to an action plan being created with issues raised including everything from maintenance of open spaces and community fun days to community facility provision. Since that consultation, the Association has created a new Community Hub for use by the local Cowlairs community, which is scheduled to launch before the end of 2024.





## Governance themes

### Theme 9 (T9): Structure & Governance

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

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

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

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

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

<https://www.housingregulator.gov.scot/landlord-performance/landlords/west-of-scotland-housing-association-ltd/engagement-plan-from-1-april-2024-to-31-march-2025/>

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

<https://shrpublicdata.blob.core.windows.net/public-landlord-documents/West%20of%20Scotland%20Housing%20Association%20Ltd/Assurance%20Statement/Assurance%20Statement%20with%20redacted%20signature.pdf>



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

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

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

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

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

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



## Risk Management Process

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

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

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

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

## Emerging Causes

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

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

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

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



## Theme 10 (T10): Board and Trustees

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

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

### Tenant Board Members

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



### Tenant Advisory Group

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

### Tenant Scrutiny

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

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

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



### Corporate Business Planning

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

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

### Customer Satisfaction Surveys

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

### Consultation Groups

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

### Customer Engagement Strategy

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

### Equality, Diversity and Inclusion at Board level

We report to the Board annually in respect of succession planning and as part of this process we present a Board profile considering gender, age, disability and ethnic background. This was last discussed with the Board in June 2024 and it was recognised that we need to recruit younger female-identifying members to our Board to improve diversity. We currently have four vacancies on our Board and we are recruiting based on the equalities and diversity gaps as well as gaps in skills and experience following a skills gap analysis.



## Board Member Diversity

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

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

**(C32) What % of the housing provider's Board have turned over in the last two years? What % of the housing provider's Senior Management Team have turned over in the last two years?**

Our Board turnover in the past 2 years has been **33%**.

Our Senior Management Team turnover in the past 2 years has been **20%**.

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

We currently have **one** Board member on our Audit Committee with recent and relevant Finance experience. We are currently recruiting for another General Member with this experience, who will also join the Audit Committee.

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

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

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

**Yes**, we review our Board profile annually and develop an annual succession plan in respect of Board members and Office Bearers.

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

Our auditors have been in place for **four** years with a final year before their contract ends. We procure for our external auditors on a three year plus two basis.



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

An independent review was carried out in **August 2019**. However, since then our internal audits have carried out an audit in respect of our governance and we received a substantial assurance for this audit.

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

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

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

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

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

Our median gender pay gap is **13.68% in favour of men**. The UK's median gender pay gap in 2023 was 14.3% in favour of men (down 0.1% from 14.4% in 2022).

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

Our CEO: Median-worker pay ratio has been calculated as **3:1**. In the FTSE 100, the median CEO/median employee ratio was 67:1.



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

We have an Equalities, Diversity and Human Rights Policy in place. We incorporate this into our recruitment processes and HR policies and processes in a similar way to how we action this in relation to our Board. Annually, we develop a Staff Profile and focus recruitment on areas where we have gaps to encourage a more diverse workforce. All staff complete Equalities & Diversity training and we carry out Equality & Human Rights Impact Assessments for all new staff policies, policy reviews or decisions relating to our staff. We have included Equalities topics in our training programme over the past few years including Autism Awareness, Dementia Awareness, Age Awareness, and are currently planning training around LGBTQ+ identities.



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

We have an Employee Health & Wellbeing Strategy in place, in addition to this we have policies around Mental Wellbeing, Menopause and Financial Wellbeing. We have an annual programme of awareness raising and activities. Activities include Tea & Talk sessions, Menopause Support Group, Cycling sessions, annual health checks, monthly free complimentary therapy sessions and free annual flu vaccinations. We have an Employee Assistance Programme in place which offers counselling sessions and Cognitive Behavioural Therapy, as well as resources and advice in respect of issues such as divorce, bereavement and financial worries.

We have mental health first aiders in place and have recently developed a plan to support staff whose mental health is being impacted by dealing with difficult situations with our customers. We have also recently developed a Mental Wellbeing Policy and new Managers' Guidance for modelling and enacting this. We are currently working in partnership with SAMH to deliver a series of workshops to staff on Mental Wellbeing topics.

We have recently received our Gold Accreditation for Investors in People Wellbeing.



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## Theme 12 (T12): Supply Chain

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

We have a Learning & Development Policy in place. Professional development priorities are discussed as part of our Staff Performance Framework during one to ones or through the Annual or Mid-Year appraisal. In addition to this we carry out an analysis of workforce development considerations on an annual basis as part of our Corporate Business Planning process. Key themes from appraisals and the Corporate Business Plan workforce development considerations are used to develop an Annual Training Programme which is implemented from August to April. Individual professional development is taken forward with the individual staff member and their line manager and we have a budget in place for this.

We also offer the opportunity for staff to apply for the Association to fund a further education qualification and have a budget in place for this. We fund professional membership subscriptions for individual staff members such to bodies such as Chartered Institute of Housing, which also allows access to professional development resources through these memberships.

In addition to the above, we offer informal development opportunities such as job shadowing, mentoring and coaching and involvement in organisational working groups

Last year, we implemented an in-house Leadership Development Programme for the Leadership Team and plan to roll this out to the next level of management this year. We also have managers who attended an external Leadership Development course over the past year.

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

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

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

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



## Contact us

Camlachie House  
40 Barrowfield Drive, Camlachie  
Glasgow, G40 3QH

t: 0141 550 5600

f: 0141 550 5601

e: [info@westscot.co.uk](mailto:info@westscot.co.uk)

w: [westscot.co.uk](http://westscot.co.uk)

 [WSHAScotland](#)

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INVESTORS  
IN PEOPLE