



## Board Membership Application Form

Candidates for co – option to the Board of Manor Estates Housing Association (MEHA) should complete the undernoted application form, return it along with your CV to the Chief Executive of the Association by Wednesday 30<sup>th</sup> April 2025, [cironside@manorestates.org.uk](mailto:cironside@manorestates.org.uk)

**Name:**

**Home Address:**

**Contact details:**

Telephone Number \_\_\_\_\_

e mail address \_\_\_\_\_

**Current Professional / Employment Status:**

Please give details of one referee. They should be qualified to comment on your ability and experience for this appointment, we will not accept references from family members

**Please outline briefly why you are interested in joining Manor Estates Group (500 words)**

Signed: .....

Date: .....

Applicants should also complete and return with this application the Association's Equal Opportunities monitoring form. This form will be retained separately from the application form and only be used for monitoring purposes.

**Privacy Statement:**

The information and personal detail contained in this application form will be managed in accordance with the provisions of the Association's Privacy Policy; a copy of which is included within the Information Pack.



**EQUAL OPPORTUNITIES MONITORING INFORMATION**

In line with the Association’s Equal Opportunities Policy, we monitor details of all people applying to join the governing body. This assists in the regular checking of our recruitment and selection process which we carry out to ensure that no group is at a disadvantage, either directly or indirectly.

The information given will be treated as confidential and will be separated on receipt before consideration of applicants takes place.

**POSITION APPLIED FOR:**

--

Male

Female

**Date of Birth:**

<b>Day</b>		<b>Month</b>		<b>Year</b>	
------------	--	--------------	--	-------------	--

**I would describe my ethnic origin as:**

<b>(i) White</b>	
(a) Scottish	
(b) Other British	
(c) Irish	
(d) Any other White background	
<b>(ii) Mixed</b>	
<b>(iii) Asian, Asian Scottish or Asian British</b>	
(a) Indian	
(b) Pakistani	
(c) Bangladeshi	
(d) Chinese	
(e) Any other Asian background	

<b>(iv) Black, Black Scottish or Black British</b>	
(a) Caribbean	
(b) African	
(c) Any other black background	
<b>(v) Other ethnic background</b>	

**Do you consider yourself to have a disability?    Yes \_\_\_\_    No \_\_\_\_**

**MANOR ESTATES GROUP**

**Code of Conduct for Governing Board Members**

**Based on SFHA Model Code of Conduct for Governing Body Members  
(October 2024)**

**Approved by MEHA Board January 2025**

## Contents

1. [Introduction](#)
2. [Who Our Code Applies To and When](#)
3. [How Our Code is Structured](#)
  - a. [Selflessness](#)
  - b. [Openness](#)
  - c. [Honesty](#)
  - d. [Objectivity](#)
  - e. [Integrity](#)
  - f. [Accountability](#)
  - g. [Leadership](#)
4. [Breach of this Code](#)
5. [Acceptance and Signature](#)

## 1. Introduction

- 1.1. All members of the Board must sign this Code of Conduct when they are elected, co-opted or appointed, and on an annual basis thereafter. References throughout this Code of Conduct (the Code) to 'we', 'us' and 'our' mean Manor Estates Group (comprising of Manor Estates Housing association and Manor Estates Associates Ltd). The Code reflects our Values which are: Committed; Agile; Professional and People Focused .
- 1.2 We attach the greatest importance to ensuring that high standards of governance and ethical behaviour are demonstrated by all of our people and in all of our activities.
- 1.3 Our Code of Conduct sets out the requirements and expectations which are attached to your role as a member of our Board. You have a personal responsibility to uphold the requirements of our Code. You cannot be a member of the Board <sup>1</sup> if you do not agree to adopt our Code of Conduct. To confirm that you understand its requirements and accept its terms, you must review and sign this Code annually.
- 1.4 As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct<sup>2</sup>. Our Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations, which the Scottish Housing Regulator (SHR) has confirmed fully complies with its Regulatory Standards.
- 1.5 Our Code of Conduct is an important part of our governance arrangements; it is supported by the Role description which describes your responsibilities as a Board member. You are responsible for ensuring that you are familiar with the terms of this Code and that you always act in accordance with its requirements and expectations. Board Members must always ensure their actions accord with the legal duties of the RSL and with regulatory guidance. You must also ensure you are familiar with any policies which are linked to this code.
- 1.6 If there is a concern that a member of the Board may have breached any part of this Code, the matter will be investigated in accordance with the Protocol that we have adopted. A serious breach of our Code may result in action being taken by the Board to remove the Board member(s) involved.

---

<sup>1</sup> Our Rules state that the Board can remove a member who fails to sign the Code of Conduct (Rule 44.5.2); it is a regulatory requirement that our Rules enable the Board to take such action (SHR Regulatory Framework (2024) Constitutional Standard 19

<sup>2</sup> Scottish Housing Regulator (2024) Regulatory Framework, [Regulatory Standard 5.2](#)

1.7 This Code of Conduct was adopted by our Board on xxx 2024.

## **2. Who Our Code Applies To and When**

2.1 Our Code of Conduct applies to all elected, appointed and co-opted members of our Board and its sub-committees and to the governing bodies of all subsidiaries and members of the Manor Estates Group.

2.2 The expectations of the Code apply in all settings and circumstances where our Board members are representing us or acting on our behalf and where their conduct could reflect on our tenants/organisation and/or their reputation. The Code applies equally to conduct in person, virtually and on social media.

## **3. How Our Code Is Structured**

3.1 Our Code of Conduct is based on the seven principles which are recognised as providing a framework for good governance. They demonstrate honesty, integrity and probity.<sup>3</sup>

3.2 Each principle is described, as it applies to the activities of Manor Estates Group and its Board members, and supporting guidance is offered for each to provide more explanation of our Code's requirements. The guidance is not exhaustive and it should be remembered that Manor Estates Group and our Board members are responsible for ensuring that their conduct meets the high standards that the RSL sector is recognised for upholding (as detailed in para 2.2).

3.3 The seven principles that you must adhere and commit to by signing this Code are:

**A. [Selflessness](#)**

**B. [Openness](#)**

**C. [Honesty](#)**

**D. [Objectivity](#)**

**E. [Integrity](#)**

**F. [Accountability](#)**

**G. [Leadership](#)**

---

<sup>3</sup> Committee for Standards in Public Life (May 1995), [Nolan Principles](#)



## **A. Selflessness**

You must act in the best interests of Manor Estates Group and must take decisions that support and promote our strategic plan, aims and objectives. Members of the Board should not promote the interests of a particular group or body of opinion to the exclusion of others.

- A.1** I will uphold and promote Manor Estates Group's aims, objectives and values and act to ensure their successful achievement
- A.2** I will exercise the authority that comes with my role as a Board member responsibly
- A.3** I will accept responsibility for all decisions properly reached by the Board (or a sub-committee or working group with appropriately delegated responsibility) and support them at all times, even if I did not agree with the decision when it was made.
- A.4** I will consider and respect the views of others.
- A.5** I will not seek to use my position inappropriately to influence decisions that are the responsibility of staff.
- A.6** I will not seek to use my influence inappropriately or for personal gain or advantage or for the benefit of someone to whom I am closely connected<sup>4</sup> or their business interests.

---

<sup>4</sup> See Appendix 1, p13-15 for definition of "closely connected"

## **B. Openness**

You must be transparent in all of your actions; you must declare and record all relevant personal and business interests and must be able to explain your actions.

- B.1** I will use my best endeavours and exercise reasonable skill and care in the conduct of my duties.
- B.2** I will avoid any situation that could give rise to suspicion or suggest improper conduct.
- B.3** I will declare any personal interest(s) and manage openly and appropriately any conflicts of interest; I will observe the requirements of our policy on the matter. I will keep my entry in the Register of Interests complete, accurate and up to date. I will make an annual statement to confirm my declarations are accurate.
- B.4** I will not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety or influence or place me under an obligation to these individuals or organisations. I will comply with Manor Estates Group’s policy on Entitlements, Payments and Benefits Policy.
- B.5** I will ensure that, in carrying out my role as a Board member, I am informed about and take account of the views, needs and demands of tenants and service users
- B.6** I will ensure that Manor Estates Group is open about the way in which it conducts its affairs and positive about how it responds to requests for information.
- B.7** I will not prevent people or bodies from being provided with information that they are entitled to receive.

## **C. Honesty**

You must ensure that you act in the best interests of the organisation and that all activities are transparent and accountable.

- C.1** I will always act honestly and in good faith when undertaking my responsibilities as a Board member.
- C.2** I will use my experience, skills, knowledge and judgement to support our activities.
- C.3** I will ensure that decisions are always taken and recorded in accordance with our Rules and procedures.
- C.4** I will ensure that Manor Estates Group has an effective whistleblowing policy and procedures to enable, encourage and support any staff or Board member to report any concerns they have about possible fraud, corruption or other wrongdoing.<sup>5</sup>
- C.5** I will report any concerns or suspicions about possible fraud, corruption or other wrongdoing to the appropriate senior person within the organisation in accordance with our whistleblowing policy.
- C.6** I will comply with our policies and procedures regarding the use of our funds and resources<sup>6</sup> and I will not misuse, contribute to or condone the misuse of these resources.
- C.7** We forbid all forms of bribery, meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. I will neither accept from nor give bribes or any other inducement to anyone. I will comply with our policy on Preventing Bribery and Fraud and will report any instances of suspected bribery or corruption within the organisation or any of its business partners.
- C.8** I will ensure that neither I nor someone closely connected to me receives or is seen to receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers. I will declare all interests openly and ensure they are effectively managed to demonstrate this.

---

<sup>5</sup> These concerns might include, but are not confined to, suspected fraud, dishonesty, breach of the law, poor practice, non-compliance with regulatory requirements, misconduct, breach of this code.

<sup>6</sup> Resources include people, equipment, buildings, ICT, funds, knowledge, stationery, transport

## **D. Objectivity**

You must consider all matters on their merits; you must base your decisions on the information and advice available and reach your decision independently.

- D.1** I will ensure that the decisions that I take are consistent with our aims and objectives and with the relevant legal and regulatory requirements (including those of the Scottish Housing Regulator, the Office of the Scottish Charity Regulator, the Financial Conduct Authority and the Care Inspectorate).
- D.2** I will attend meetings regularly, prepare for them and ensure I have access to all necessary information to enable me to contribute constructively and make well-informed decisions.
- D.3** I will monitor performance carefully to ensure that the organisation's purpose and objectives are achieved, and take timely and effective action to identify and address any weaknesses or failures.
- D.4** I will use my skills, knowledge and experience to review information critically and take decisions in the best interests of the organisation, our tenants and our service users when acting on decisions presented at Board.
- D.5** I will ensure that the Board seeks and takes account of additional information and external/independent and/or specialist advice where necessary and/or appropriate.
- D.6** I will ensure that policies and procedures are implemented so that all decisions are based on an adequate assessment of risk, deliver value for money, and ensure the financial well-being of the organisation.
- D.7** I will contribute to the identification of training needs, keep my knowledge up to date, and participate in ongoing training that is organised or supported by us.

## **E. Integrity**

You must actively support and promote our values; you must not be influenced by personal interest in exercising your role and responsibilities.

- E.1** I will treat my Board colleagues, our staff, our customers and partners with respect and courtesy
- E.2** I will conduct myself in a courteous and professional manner; I will not, by my actions or behaviour, cause distress, alarm or offence.
- E.3** I will publicly support and promote our decisions, actions and activities; I will not, by my actions or behaviour, compromise or contradict the organisation, its activities, values, aims or objectives. I will notify the Chair quickly if I become aware of any situation or event that I am associated with which could affect Manor Estates Group and/or its reputation
- E.4** I will fulfil my responsibilities as they are set out in the relevant role description(s); I will maintain relationships that are professional, constructive and that do not conflict with my role as a Board member.
- E.5** I will comply with, support and promote our policies relating to equalities, diversity and human rights
- E.6** I will uphold our whistleblowing and acceptable use<sup>7</sup> policies.
- E.7** I will respect confidentiality and ensure that I do not disclose information to anyone who is not entitled to receive it, both whilst I am a member of the Board and after I have left.
- E.8** I will observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information.

---

<sup>7</sup> This relates to the use of ICT, social media and networking, facilities etc., and is specific to each individual RSL.

## **F. Accountability**

You must take responsibility for and be able to explain your actions, and demonstrate that you contribute to our governance.

- F.1** I will observe and uphold the principles and requirements of the SHR's Regulatory Framework, and gain assurance that relevant statutory and regulatory guidance and Manor Estates Group's legal obligations are fulfilled.
- F.2** I will ensure that we have systems in place to monitor and report our performance and that corrective action is taken as soon as the need is identified.
- F.3** I will contribute positively to our activities by regularly attending and participating constructively in meetings of the Board, its committees and working groups.
- F.4** I will participate in and contribute to an annual review of the contribution I have made to our governance.
- F.5** I will ensure that there is an appropriate system in place for the support and appraisal of our Senior Officer and that it is implemented effectively.
- F.6** I will not speak or comment in public on our behalf without specific authority to do so.
- F.7** I will co-operate with any investigations or inquiries instructed in connection with this Code whilst I am a Board member and after I have left.
- F.8** I recognise that the Governing Body as a whole is accountable to its tenants and service users, and I will demonstrate this in exercising my judgement and in my decision-making

## **G. Leadership**

You must uphold our principles and commitment to delivering good outcomes for tenants and other service users, and lead the organisation by example.

- G.1** I will ensure that our strategic aims, objectives and activities deliver good outcomes for tenants and service users. I will make contribution to our strategic leadership.
- G.2** I will ensure that our aims and objectives reflect and are informed by the views of tenants and service users.
- G.3** I will be a positive ambassador for the organisation.
- G.4** I will participate in and contribute to the annual review of the Governing Body's effectiveness and help to identify and attain the range of skills that we need to meet our strategic objectives.
- G.5** I will not criticise or undermine the organisation or our actions in public.
- G.6** I will not criticise staff in public; I will discuss any staffing related concerns privately with the Chair and/or Senior Officer.
- G.7** I will not harass, bully or attempt to intimidate anyone.
- G.8** I will not use social media to criticise or make inappropriate comments about the organisation, its actions or any member of the Board, staff or other partners.
- G.9** I will not act in a way that could jeopardise our reputation or bring us into disrepute.<sup>8</sup>

---

<sup>8</sup> This includes activities on social media, blogs and networking sites.

#### **4. Breach of this Code**

- 4.1 I recognise that each member of the Board has a personal and individual responsibility to promote and uphold the requirements of this Code. If I believe that I may have breached the Code, or I have witnessed or become aware of a potential breach by another member, I will immediately bring the matter to the attention of the Chair.

#### **5. Acceptance and Signature**

I \_\_\_\_\_ have read and understood the terms of this Code of Conduct and I agree to uphold its requirements in all my activities as a member of our Board. I am aware that I must declare and manage any personal interests. I agree to review all relevant Registers regularly to ensure that all entries relating to me are accurate. I understand that, if I am found to have breached this Code of Conduct, action will be taken by the Board which could result in my removal.

Signed \_\_\_\_\_

Date \_\_\_\_\_





Manor Estates Group Strategic Plan 2022 – 2027  
(Year 4 update 2025 – 2027)

Approved by:

Manor Estates Housing Association Board – March 2025

## Content:

1. Executive Summary
2. Who we are
3. Group Mission, Vision, Values and objectives
4. Strategic Objectives
5. Operating Principles
6. Financial Planning & Treasury Management

## Appendices:

- A. Budgets
- B. Scenario Sensitivity Analysis Data
- C. Risk Management and Mitigation
- D. Performance Indicators 2025/26
- E. Operating Environment
- F. Net Zero Scenario

## 1.0 Executive Summary

Welcome to our Strategic Plan which sets out our Plans for the period 2022 to 2027. This Plan (updated February 2025) sets out what we want to achieve, as a Group, over the next two years. It also sets out the foundations for our activities beyond the life of this Plan.

We are starting to explore the challenges of combatting climate change and the desire to live in a carbon neutral Scotland by 2045. As well as the pressure of an ageing population, health inequalities, changing technology and continuing impact of the cost-of-living crisis. The Housing (Scotland) Bill 2024 may significantly impact on our subsidiary MEAL if the government implements rent controls for private tenancies. At the current time, there has been no indication from the government that Mid Market Rent properties would be exempt from any such controls. Homelessness in the city continues to escalate and the City of Edinburgh Council declared a housing emergency in November 2023. Collectively, these all create a volatile and uncertain environment for us to be working in.

The Plan outlines the strategy for the Group to March 2027 and sets out how we will achieve our mission to “Provide excellent quality affordable homes and services that create safe, resilient and inclusive communities”. This document is our Year 4 update and sets out what our priorities and activities are going to be.

The overall strategic direction of the Association as detailed in this Plan, will be subject to annual updates and will be subject to a full review at the end of the five-year period in 2027.

Our subsidiary MEAL will continue to play a vital role in the Group’s strategic direction, by offering mid-market properties for rent and commercial factoring services.

The financial plans that underpin our strategy have been developed to show how we will fund all our activities over the next five years and beyond. In addition, they demonstrate that we are meeting our lenders’ financial covenants and ensuring our rents and services are affordable and deliver value for money to our customers.

This strategy is about placing people in the centre of everything that we do, whether that is our customers, staff, or Board members. We believe that by delivering all the activities in the Plan we will be able to make a real difference to the people and communities within which we work. We are committed to making “our houses, your homes.”

## 2.0 Who we are

Manor Estates group is made up of two entities, each providing a range of landlord and factoring services to almost 3,000 households throughout Edinburgh and parts of Fife.

Manor Estates Housing Association (MEHA) is the registered social landlord and charity. It was established in 1995 following a large-scale stock transfer of housing from Scottish Homes (The National Housing Agency). It provides landlord services to 1016 social rented properties and factoring services to 1,700 homeowners (most having acquired their homes through Right to Buy or subsequent resales). At the end of 2023, the Association completed a new build development at South Queensferry with four 3-bedroom houses for social rent and fifteen 1- and 2-bedroom mid-market flats.

### Current stock as at 31 December 2024:

	Social Stock	Mid- Market Stock	Total Stock	%
House	381	0	381	34.29%
Tenement	409	95	504	45.36%
4 in a Block	150	0	150	13.5%
Other flat / maisonette	76	0	76	6.84%
<b>Total</b>	<b>1016</b>	<b>95</b>	<b>1111</b>	<b>100.00%</b>

	Social Stock	Mid- Market Stock	Total Stock	%
Pre 1919	4	0	4	0.36%
1919-1944	17	0	17	1.53%
1945-1964	426	0	426	38.34%
1965-1982	186	0	186	16.74%
1983-2002	310	0	310	27.3490
Post 2002	73	95	168	15.12%
<b>Total</b>	<b>1016</b>	<b>95</b>	<b>1111</b>	<b>100.00%</b>

The Association is a member of ARCHIE (Alliance of Registered Co-operatives and Housing Associations, Independent in Edinburgh) along with six other organisations. ARCHIE was launched in March 2019, primarily to share skills, experience and resources allowing members to deliver an enhanced service to our customers and the wider community.

We have been awarded the Investors in People Gold award (2022). At the moment we have a staff team of 32, the majority of whom are office based.

The Association is governed by a Board of volunteers who meet at least eight times throughout the year to lead and direct the work of the Association. We have one sub-committee, the Audit Committee, that meets four times a year. It is responsible for overseeing the Association's accounting and internal control systems and the Association's external and internal audit.

Manor Estates Associates Limited (MEAL) is the private letting agent and commercial factoring agent for the Group. It was established in 2008 and currently manages 95 Mid-Market Rent homes and provides commercial factoring services to 20 homeowners.

MEAL has a separate Board that meets at least four times a year.

A separate Business Plan has been developed for MEAL, setting out its areas of activity, scope for business development and financial projections. Any financial surpluses generated by MEAL are gift aided to the Association to assist in meeting its charitable purposes.

### 3.0 Group Mission, Vision, Values, and Objectives

<b>Our Mission:</b>	Provide excellent quality affordable homes and services that create safe, resilient, and inclusive communities.
<b>Our Vision:</b>	our houses, your homes

At Manor we believe in making a difference to the lives of individuals and their communities, through the provision of housing and associated services. We aim to provide housing that is of good quality, affordable and serviced to a high standard. We will encourage and offer support to individuals to make our houses their homes.

We believe in the role of surroundings and community in making a house feel like a home and will support our tenants and owners in developing those where they live.

We prioritise having the appropriate skills, attitudes and focus on wellbeing of our people (our staff, leaders, and Board), as we know that impacts on what we deliver, and how that is experienced by our customers.

## The Group's Values:

As we work towards achieving our Mission, we have identified four corporate values that those who work with us, those who lead us and those for whom we provide a service, experience us as being.

 <b>Our Values</b>	
<i>Committed</i>	<i>We do what we say we will</i>
<i>People Focussed</i>	<i>We will treat you as an individual</i>
<i>Professional</i>	<i>We will be fair, transparent, and respectful</i>
<i>Agile</i>	<i>We will constantly evolve in a changing environment</i>

## 4. Strategic Objectives

To achieve our Mission and Vision, we will focus on a number of activities, all of which have measurable outcomes and indicators. The following table provides the reporting and monitoring framework against which we will report progress to the Board on a six-monthly basis.

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
1	<b>We will provide homes that are sustainable, environmentally sound and accessible</b>	Work towards compliance with SHNZH Standard by target date	% of stock (that can be treated) achieving SHNZH Standard by first milestone target  % of stock (that can be treated) achieve SHNZH Standard by target date	50% of stock achieve SHNZH compliant
		Establish MEHA property standard	% of properties that meet the standard	Property standard established.  100% of properties achieving standard  All void properties are appraised for continued rental or considered for disposal.
		Work with others to develop new build housing opportunities	Number of new build properties added to stock figure	Increased stock numbers
		Deliver the Asset Management Strategy	See Asset Management Strategy for details	Asset Management Strategy delivered

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
		<p>Make the most effective use of adaptation funding and other resources to assist vulnerable tenants establish and sustain their tenancies.</p> <p>Continue to strengthen links with Advice and Assessment Team</p> <p>Work closely with delayed discharge team.</p>	<p>Full spend of allocated funding each year.</p> <p>Additional funding secured.</p> <p>Properties with pre-existing adaptations to be allocated to those that require them</p>	<p>100% of Adaptations spend achieved.</p> <p>Demand for adaptations met.</p> <p>If required, additional funding secured and 100% spent.</p> <p>100% properties with pre-existing adaptations are allocated to those requiring them.</p>
		<p>Target those households that currently do not have energy efficient or no heating in place</p>	<p>The number of households with energy efficient heating systems installed</p>	<p>100% of households (giving access) to have energy efficient heating systems installed</p>
		<p>Provide information/guidance to households on how to heat their homes efficiently and effectively</p>	<p>Number of households being assisted by energy advice project</p>	<p>Establish energy advice project</p> <p>100% of new tenants receive information from gas contractor at recommission of</p>



Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
				<p>services on how to make best use of their heating</p> <p>Detailed information on website offering advice and signpost to agencies who offer specialist advice</p> <p>75 households referred to energy advice project each year</p>
		<p>Work towards Net Zero 2045(or new SHNZH target date), researching methods to upgrade stock</p>	<p>Plan in place for retrofit stock</p> <p>Plan in place for new build stock (post 2025)</p>	<p>Regular attendance at specialist forums</p> <p>Plan in place for all stock (when SHNZH standard released)</p> <p>Current stock assessed for compliance (when SHNZH standard released)</p>
		<p>Develop a Sustainability Plan or ESG equivalent</p>	<p>Plan outlined for homes and the office</p>	<p>Targets to be established</p>

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
	<b>Our properties will be homes that will remain affordable to live in</b>	Review rent and service charges each year and compare with other RSLs	The number of households paying over 30% of their household income on rent and service charges	Less than 10% of households will pay more than 30% of income towards rent and service charge
		Target those in rent arrears	Level of rent arrears	Rent arrears to be less than 2% by 2027 (target subject to annual review due to variables out with direct control)
		Either in partnership with other organisations or signposting a range of advice and information which will aid tenants sustain their tenancy	<p>Number of tenants referred to:</p> <ul style="list-style-type: none"> <li>• Welfare Rights</li> <li>• Energy Advice</li> <li>• Debt Advice</li> </ul> <p>The amount of additional income attained</p> <p>Satisfaction level with services</p>	<p>80 tenants referred to welfare rights service</p> <p>75 tenants referred to energy advice service as above</p> <p>100 (20 per year) tenants referred to debt advice service – dependant on continuation of current arrangement or further partnership being established</p>

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
				85% satisfaction levels with services achieved.
		Deliver tenancy sustainment strategy	<p>Tenancy Sustainment Budget expenditure</p> <p>% of new tenancies sustained in their first year</p> <p>Number of evictions per annum to rent arrears</p> <p>Number of abandonments per annum</p> <p>Number of tenancies sustained for the first five years</p>	<p>100% of Tenancy Sustainment Budget expenditure</p> <p>95% of new tenancies sustained in their first year</p> <p>Less than 2 evictions per annum to rent arrears</p> <p>Less than 4 abandonments per annum</p> <p>95% of tenancies sustained for the first five years</p>
	<b>We will maintain and manage all properties and our open spaces to the same consistently high standard for all customers</b>	Deliver the 5-year Planned works programme	<p>Planned Works procured</p> <p>Level of investment</p>	<p>Planned works programme delivered</p> <p>100% of Planned works investment achieved per annum</p>

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
			Satisfaction results for Planned works	75% satisfaction levels achieved for Planned works
		Deliver cyclical programme	Satisfaction results for cyclical works	90% satisfaction levels achieved for gas servicing  Develop monitoring of satisfaction levels with other cyclical works
		Deliver reactive repair service	Satisfaction results for reactive repairs  % of repairs right first time	90% satisfaction levels achieved for reactive works  92% achieving right first time
		Develop an open space standard	Open space standard outlined  Number of estates that meet the standard  Develop open space register	Open space standard established  75% of estates meeting required standard  Open Space register formulated

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
			<p>The number of estate management inspections carried out</p> <p>Garden Maintenance Assistance uptake per annum</p>	<p>100% of estate management inspections carried out</p> <p>100% garden maintenance assistance budget spent</p>
		Customer satisfaction levels	<p>Customer satisfaction regarding neighbourhood</p> <p>Number of service requests about estate management</p>	<p>90% customer satisfaction with neighbourhood</p> <p>100% of service requests acknowledged within 5 working days and resolved within 30 working days</p>
		Review and enhance factoring arrangements, administration, and engagement with owners	<p>Review of factoring arrangements in light of new Code of Conduct for Factoring</p> <p>All factoring procedures reviewed and updated</p> <p>Review long term debt arrangements</p>	<p>Revised written statement of service in place</p> <p>Compliance with new Code of Conduct for Factoring</p>

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
			Increased satisfaction level with factoring service	Reduction in the number of cases with debt  Increase in the number of cases with formal arrangements in place  75% satisfaction level from owners
	<b>We will deliver services to meet the needs of individual customers</b>	3 yearly customer satisfaction surveys	Satisfaction levels with overall service deliver  Comparison of satisfaction levels against Scottish average (ARC)	96% satisfied with overall service delivery  Customer satisfaction levels are greater than or equal to the Scottish average  Customer satisfaction levels are greater than or equal to the members of ARCHIE
		Deliver ICT strategy in relation to the website and portal	See ICT strategy for deliverables	ICT strategy delivered
		Customer portal	The number of transactions on the	

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
			portal (owners and tenants)  % of tenants registered  % of owners registered	30% of tenants registered on the customer portal  Portal launched for owners  25% of owners using the customer portal
		Contractors' performance	Contractor KPIs (identify them) Satisfaction levels Appointments kept Right First Time	Our contractor KPIs to surpass target
		Explore opportunities for new joint ventures, partnerships to deliver new services that benefit our tenants	To be developed in alignment with the new service	At least one new service to be delivered in the lifetime of the plan
	<b>We will have enhanced our visibility to our customers</b>	Deliver the Customer engagement strategy	See Customer Engagement Strategy deliverables	Customer Engagement strategy delivered
		Estate walkabout with residents	Number of estate walkabouts carried out each year	20% of estate walkabouts carried out each year

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
			Number of residents involved	
		Options for community activity – litter picks, Planting, etc	Activities Planned	2 activities per year
	<b>We will ensure our services are high quality</b>	The Association is compliant with GDPR and FOI	GDPR and FOI enquiries	100% of GDPR and FOI enquiries are responded to within timescales
		Complaints are dealt with in line with SPSO guidance	Stage 1 complaints responded within 5 days  Stage 2 complaints responded within 20 days	100% stage 1 complaints are responded to within 5 working days  100% of stage 2 complaints have been responded to within 20 working days
		Complaints resolved internally	All complaints resolved without need for external intervention	100% of complaints resolved internally  If referred, complaint not upheld by external body
		Customer satisfaction surveys	Customer satisfaction level results	96% of customers satisfied with overall services that are provided



Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
		MEHA to perform above the Scottish average figures (ARC data)	Performance levels compared to Scottish average  Performance levels compared to peer landlords	To be above the Scottish average for all areas of ARC.  Performance levels are greater than or equal to the Scottish average  Performance levels are greater than or equal to the members of ARCHIE
		Internal audit of customer service areas	Results from internal audits	Substantial assurance in respect of service delivery audits
		Factoring services	No complaints on compliance with written statement of services	Provide services in accordance with written statement of services
		Maintain website and portal		Information on website and portal is up-to-date and accurate
		Customer service standards	Promote and work in accordance with customer service standards	Customer service standards reviewed  Customer service standards are adhered to

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
	<b>We will invest in safer resilient and supportive communities</b>	Develop a Community Fund	Community Fund to be established  Level of contribution from community benefits	Community Fund established  100% of funding allocated
		Tenant and Resident Safety Strategy	See Tenant and Resident Safety Strategy deliverables.	Tenant and resident safety strategy delivered
			% of Gas servicing carried out in a year (MEHA and MEAL)	100% of properties to have an annual gas service (MEHA and MEAL)
		Work in partnership with others to address community safety and tackle anti-social behaviour issues	Levels of ASB reported	Number of ASB cases closed within timescale (90% resolved within 30 days)
		Investigate grant opportunities	The amount of additional money awarded and distributed to tenants	Arrears figures below target
	<b>We will know and understand our communities</b>	Carry out a tenant census every 3 years	Tenant census carried out	Census carried out
		Collect equalities data	10% of tenants' equalities data	10% of tenants' equalities data capture each year

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
		Profile the areas where MEHA and MEAL have stock (> 10 units)	Number of area profiles developed	Profiles of areas developed
	<b>We will create communities where people want to live and feel proud of</b>	Customer satisfaction surveys	Level of customer satisfaction	90% of customers are satisfied with neighbourhood
		Allocations	Number of refusals	Less than 5% of lets refused
		Increase use of common area/facilities in Retirement Schemes	Number of residents Use of facilities by other organisations	Increased use of common areas within retirement schemes
		Good neighbour/good garden awards	Open to all customers	Levels of participation in awards
	<b>We will be an agile and robust organisation</b>	Annual Compliance report	Level of compliance achieved	Achieve 100% compliance with Association Rules
		Financial regulations	See financial regulations	Full compliance with our financial regulations
		Invest appropriately to attain Value for Money in the delivery of services	Comply with procurement requirements in Administration and ICT	Full compliance of Procurement Policy across the Corporate Services department and service functions.
			Comply with procurement	Full compliance of Procurement Policy across the Housing

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
			requirements in Housing Management	Management department and service functions.
			Comply with procurement requirements in Property Services	Full compliance of Procurement Policy across the Property Services department and service functions.
		Audited financial statements and external auditors' management letter	External Auditors Report approved by MEHA and MEAL Boards	Unqualified Auditors Reports and minor items (if any) listed on the Management Reports Audited Financial Statements Return sent by 30 September
		Annual return on the Charter	Charter return approved by Board  Charter Return submitted to SHR	Charter return to SHR delivered by 31 May
		Loan Portfolio return	Loan portfolio approved by the MEHA Board  Loan portfolio submitted to SHR	Loan portfolio submitted to SHR by 31 Aug
		Five-year financial projection	Five Year Financial Projection to be approved by the Board	Five-year financial projections completed

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
			Five Year Financial Projection submitted to SHR	and submitted to SHR by 31 May
		Ensure compliance with lenders covenants	Quarterly Management Accounts submitted, covenants achieved / surpassed and returns sent in time	Present Financial covenants: Interest Cover Ratio 110%;Debt Service Ratio 90%; Rolling 2 year Debt Service ratio 95%. Submit all returns in time with set timescales
		Appraise and ensure compliance with all necessary regulatory requirements  Review of all standards carried out during 2025/26, approved by Board and assurance statement submitted to SHR	Compliance with Scottish Housing Regulator's Governance Standards  All standards are reviewed  Assurance statement submitted to SHR on time	Full compliance with Letting Agents Code of Conduct and Property Factors Code of Conduct  100% compliance with Register of returns  Assurance Statement submitted
		Increase quality of services with minimum extra cost to customers	Review procedures Process mapping of activities	98% customer satisfaction with services

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
		Continue investment in ICT to ensure robust and agile	Investment according to ICT Strategy achieved	100% investment in ICT systems incurred as Planned
		Risk Management	Bi-monthly review of risk register  Six monthly risk management Board report	All new and existing risks are managed and appropriate action taken to mitigate impact
	<b>We will have invested in our staff and Board's welfare</b>	Sickness absence	Level of sickness absence	Less than 3% days lost as a result of sickness absence
		Levels of staff satisfaction levels	Three Healthy Working activities per annum Annual staff satisfaction survey  Pulse survey results	3 Healthy working Events arranged for staff participation 75% rate the Association > 8 out of 10 as a good place to work/would recommend (Annual stress/wellbeing survey)
		Staff turnover	Level of staff turnover	< 5% staff turnover
		Training	% of attendance at "all" staff training events	85% attendance
		Level of Board engagement	% of meetings attended % of training attended	75% of meetings attended 75% of training attended

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
		Invest in our ICT	Staff and Boards have the appropriate equipment and software to work from home.	All staff and Boards have appropriate office equipment and software to enable safe working from home
		Staff Training	Annual Training Plan delivered	All staff to have an individual training Plan
		Review of all Board members to be carried out annually	Review carried out  Collective training Plan (annual) developed  Individual training Plan developed	All Board members to have an annual review  Annual collective training Plan developed  Individual Board member training Plan
	<b>We will support a culture that is professional, respectful, approachable and promotes accountability</b>	IIP Accreditation	Level of accreditation achieved	Maintain Gold accreditation
		Best Not for Profit company	Placing achieved	Be in the top 100 best not for profit companies
		All staff to have 6 weekly 1:1s and a mid and full appraisal every year	Compliance with Staff performance policy  The number of staff with an agreed training Plan in place	All staff have at least 6 1:1s, mid-year and annual appraisal  All staff have an agreed training Plan in place

Ref	2022 – 2027 Strategic Objective	Current Approach(es) to achieve Strategic Objective	KPI(s) to be used to indicate success	Desired Results
		All Staff Meetings	Number of staff meetings held per annum	At least 8 staff meetings to be held during the year
		Monthly Team Meetings	Number of team meetings held per annum	At least 12 team meetings held per annum



## 5. Operating Principles:

- The Group is committed to achieving value for money in all activities. We will seek to use its capital, assets, revenue and resources effectively and in a commercial manner that will benefit our customers in all its actions.

## 6. Financial Planning and Treasury Management

7.1 The annual 30-year financial Plan consists of the budget Statement of Comprehensive Income (SOCl) (with interest cover covenant calculations), Statement of Cash Flows (SOcF) and Statement of Financial Positions (SOFP) for each of the 30 years. Figures for the first 5 years of this Plan (2025 to 2030) are attached as Appendix A. They demonstrate our continued viability over the period both in terms of generating surpluses and covenant compliance.

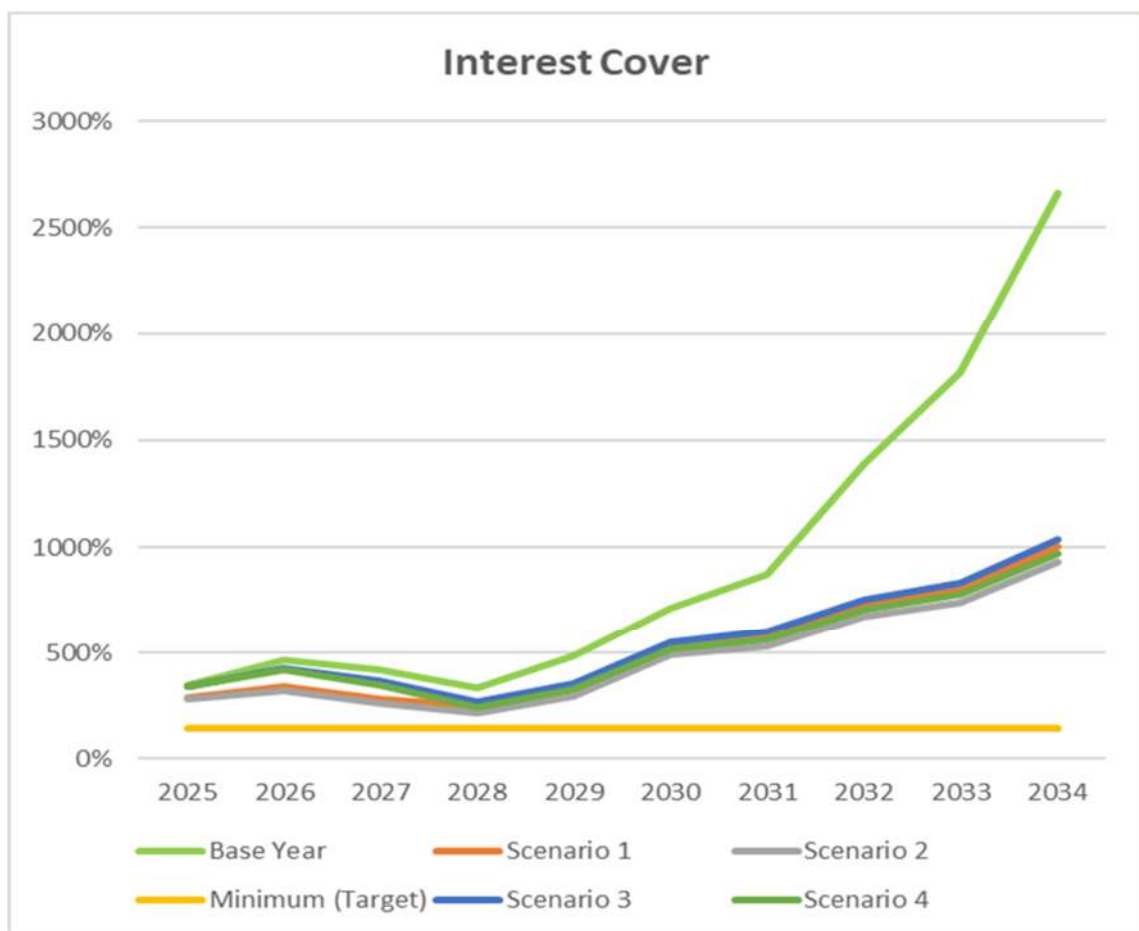
7.2 In drawing up our financial projections for the next thirty years we have had to make a series of assumptions. This year's 30-year financial Plan has been based on the following assumptions:

	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28 and beyond</b>
<b>Rent increase</b>	3.8%	4%	3%
<b>General Inflation</b>	2.7%	2.2%	1.8%
<b>Salary increase</b>	4%	3.7%	3.3%
<b>Planned Maintenance Inflation</b>	3.7%	3.2%	2.8%
<b>Interest</b>	3.7%	3.7%	3.6%
<b>Voids</b>	0.6%	0.6%	0.6%
<b>Bad Debts</b>	0.5%	0.5%	0.5%
<b>Assumed Capital grants</b>	£0	£500K	£500K

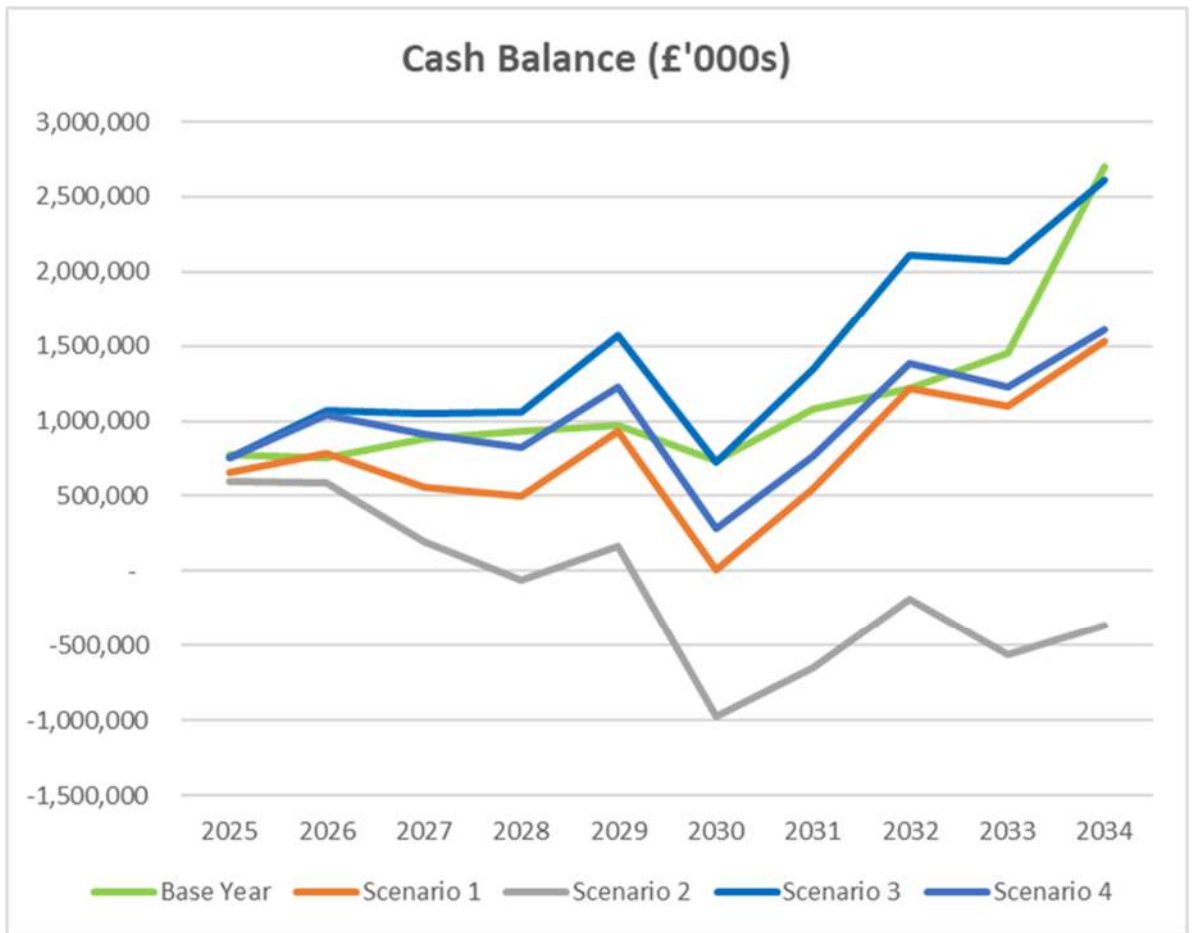
7.3 Having established the assumptions as the baseline, a range of scenarios (varying key factors as detailed in Appendix B) were run to test the robustness of MEHA's financial plan. The details are provided below, and the graphs show the effect the changes have on the Association's viability. If the Association is hit with both increased costs and a rent cap the financial outlook is very poor.

7.4 These scenarios can be described as:

	<b>CPI</b>	<b>Rent</b>	<b>Other</b>	<b>Interest</b>
<b>Scenario 1</b>	BOE +1%	Rise, then falls	Higher voids and bad debts. Grants are replaced with loans.	BOE+2%
<b>Scenario 2</b>	BOE +2%	Stagnant	Higher voids and bad debts. Grants are replaced with loans.	BOE+2%
<b>Scenario 3</b>	BOE	Slight rise, then falls	Salary and construction costs increase. Grants are replaced with loans.	BOE
<b>Scenario 4</b>	BOE	Reducing rates of increase	As base, but grants are replaced with loans.	BOE



Interest Cover: MEHA's lender, RBS requires MEHA to ensure that it can cover the cost of MEHA's interest by 145% (as shown by the orange line). As illustrated above, the interest cover covenant is not broken in any of the scenarios.



Cash Balance: In this comparison of cash balances, scenario 2 results in negative cash balances. In scenario 2, this starts from 2027/28, as the effects of the combination of high inflation, high interest rates and no rent increases are felt. Scenario 1 runs out of cash temporarily in 2029/30.

This year SMT ran a scenario based on the current base position, but including substantial estimates of the investment need to bring the stock to net zero. This was based on inhouse estimates of costs, assumptions of grant aid, with no guidance from SHR or Scottish Government as to what requirements they will set for RSL to achieve net zero. The resultant SOCF is attached as Appendix F. Members will see that £44.4m of grant aid will be needed to pay for the investment.


We have just concluded refinancing our Santander loans with new loans from RBS. We have estimated that our loan requirement over the next few years will be as follows:

Estimated Loans at 31.03.26	£10,810,000
Loans required in 2026/27	£500,000
Loans required in 2027/28	-
Total loans tendered	£14,000,000

The total £14m has been borrowed in a mixture of a term loans and a Rolling Credit Facility (RCF) as follows:

- £5,490,000 borrowed on a 10-year fixed rate basis
- £3,510,000 borrowed on a variable rate, over 15 years
- £4,000,000 on RCF

## Appendix A Budgets (5-year forecast)

		SUMMARY SOCI FOR 2025-2030			
	2025/26	2027	2028	2029	2030
<b>INCOME</b>					
NET RENTS	6,329,386	6,720,055	6,921,657	7,163,915	7,414,652
OWNER OCCUPIERS	599,557	508,909	519,916	536,306	553,215
OTHER INCOME	263,909	195,312	136,254	149,383	171,789
SERVICE CHARGES	259,240	268,663	276,077	283,703	291,545
LEASE CHARGE	580,895	593,675	604,361	622,492	641,167
HAG	320,000	320,000	320,000	320,000	320,000
	<b>8,352,988</b>	<b>8,606,614</b>	<b>8,778,265</b>	<b>9,075,799</b>	<b>9,392,367</b>
<b>EXPENDITURE</b>					
LOAN INTEREST	653,243	624,382	553,866	464,381	414,127
MAINTENANCE COSTS	2,856,995	2,657,182	3,287,803	4,224,177	4,022,981
SERVICE CHARGES	293,016	289,667	333,267	277,613	332,374
STAFF COSTS	1,655,969	1,717,239	1,773,908	1,826,905	1,881,485
ADMINISTRATION COSTS	79,391	81,932	84,279	87,100	90,017
OFFICE OVERHEADS	659,225	719,410	692,728	710,275	727,055
DEPRECIATION	896,470	894,413	900,512	901,134	922,268
OTHER EXPENSES	192,265	97,443	100,062	115,923	106,156
	<b>7,286,575</b>	<b>7,081,669</b>	<b>7,726,426</b>	<b>8,607,509</b>	<b>8,496,462</b>
<b>SURPLUS / DEFICIT</b>	<b>1,066,413</b>	<b>1,524,945</b>	<b>1,051,839</b>	<b>468,290</b>	<b>895,905</b>
<b>INTEREST COVER MIN 145%</b>	<b>346%</b>	<b>465%</b>	<b>417%</b>	<b>334%</b>	<b>484%</b>
<b>GEARING MAX 50%</b>	<b>16%</b>	<b>14%</b>	<b>12%</b>	<b>10%</b>	<b>9%</b>
<b>ASSET COVER MIN 110%</b>	<b>688%</b>	<b>768%</b>	<b>927%</b>	<b>1101%</b>	<b>1255%</b>



# MANORESTATES

Housing Association

## BUDGET SOFP FOR THE 5 YEARS TO 31 MARCH 2030

	2025/26	2027	2028	2029	2030
HOUSING STOCK	48,836,555	49,584,972	49,677,807	49,414,234	49,476,538
OFFICE PROPERTY	915,345	887,138	853,610	820,824	780,337
OFFICE EQUIPMENT	213,269	213,360	207,200	224,381	224,714
MMR FURNISHINGS	200,674	166,422	193,727	157,394	145,698
	<b>1,329,289</b>	<b>1,266,920</b>	<b>1,254,537</b>	<b>1,202,600</b>	<b>1,150,749</b>
INVESTMENTS	100	100	100	100	100
	<b>50,165,944</b>	<b>50,851,992</b>	<b>50,932,444</b>	<b>50,616,933</b>	<b>50,627,387</b>
RENTAL DEBTORS	99,737	123,257	147,483	172,557	198,508
OTHER DEBTORS & PREPMTS	353,937	321,975	300,071	283,298	266,689
BANK & CASH BALANCES	773,468	755,238	884,890	927,084	969,490
	<b>1,227,141</b>	<b>1,200,470</b>	<b>1,332,444</b>	<b>1,382,938</b>	<b>1,434,687</b>
CREDITORS & ACCRUALS	( 1,080,360)	( 1,093,219)	( 1,108,960)	( 1,127,913)	( 1,146,387)
TAX & SOCIAL SECURITY	( 30,895)	( 33,471)	( 36,132)	( 38,872)	( 41,695)
LOANS UNDER 1 YEAR	( 1,126,601)	( 1,102,816)	( 1,000,000)	( 600,000)	( 600,000)
	<b>( 2,237,856)</b>	<b>( 2,229,506)</b>	<b>( 2,145,092)</b>	<b>( 1,766,785)</b>	<b>( 1,788,082)</b>
NET CURRENT ASSETS	( 1,010,715)	( 1,029,035)	( 812,648)	( 383,847)	( 353,396)
CREDITORS OVER 1 YEAR					
LOAN	( 9,710,000)	( 8,610,000)	( 7,610,000)	( 7,010,000)	( 6,410,000)
EET	( 2,217)	0	0	0	0
HAG	( 13,901,004)	( 14,081,004)	( 14,261,004)	( 14,441,004)	( 14,121,004)
PENSION	( 672,000)	( 737,000)	( 802,000)	( 867,000)	( 932,000)
	<b>( 24,285,221)</b>	<b>( 23,428,004)</b>	<b>( 22,673,004)</b>	<b>( 22,318,004)</b>	<b>( 21,463,004)</b>
NET ASSETS	<b>24,870,008</b>	<b>26,394,953</b>	<b>27,446,792</b>	<b>27,915,082</b>	<b>28,810,987</b>
REPRESENTED BY					
SHARES	( 89)	( 89)	( 89)	( 89)	( 89)
ORDINARY RESERVES	( 24,869,919)	( 26,394,864)	( 27,446,703)	( 27,914,993)	( 28,810,898)
	<b>( 24,870,008)</b>	<b>( 26,394,953)</b>	<b>( 27,446,792)</b>	<b>( 27,915,082)</b>	<b>( 28,810,987)</b>
Loans outstanding at year end	<b>10,838,818</b>	<b>9,712,816</b>	<b>8,610,000</b>	<b>7,610,000</b>	<b>7,010,000</b>



<b>30 YEAR SOCF SUMMARY FOR 2025-2055</b>					
	<b>2025/26</b>	<b>2027</b>	<b>2028</b>	<b>2029</b>	<b>2030</b>
<b>Actual Opening Cash Balance</b>	452,647	773,468	755,238	884,890	927,084
<b>Income</b>	8,006,905	8,259,689	8,430,777	8,727,332	9,042,858
<b>Operational Expenditure</b>	( 6,337,971)	( 6,135,854)	( 6,782,343)	( 7,664,515)	( 7,532,730)
<b>Potential Pension Deficit</b>		65,000	65,000	65,000	65,000
<b>GRANT AID</b>		500,000	500,000	500,000	
<b>Capitalised Components</b>	( 1,057,193)	( 1,440,883)	( 784,144)	( 490,517)	( 816,488)
<b>Non CA Capital Spend</b>	( 191,393)	( 74,579)	( 131,820)	( 95,106)	( 116,233)
<b>RCF / New Loans</b>	2,000,000				
<b>Loan Repayments</b>	( 626,603)	( 1,126,603)	( 1,102,818)	( 1,000,000)	( 600,000)
<b>Development HAG</b>	1,298,239				
<b>Development Costs</b>	( 2,771,164)	( 65,000)	( 65,000)		
	<b>773,468</b>	<b>755,238</b>	<b>884,890</b>	<b>927,084</b>	<b>969,490</b>

## Appendix B Scenario Sensitivity Analysis Data

<b>Base information</b>	<b>Scenario 1</b>	<b>Scenario 2</b>	<b>Scenario 3</b>	<b>Scenario 4</b>
<b>Rent increase:</b> Year 1: 3.8% Year 2: 4% Year 3: 3 %	Rent increase: Year 1: 3.8% Year 2: 5% Year 3: 4%	Rent increase: Year 1: 3.8% Year 2: 3.8% Year 3: 3.8%	Rent increase: Year 1: 3.8% Year 2: 4.5% Year 3: 4%	Rent increase: Year 1: 3.8% Year 2: 3.5% Year 3: 2.5%
<b>Inflation:</b> Year 1: 2.7% Year 2: 2.2% Year 3: 1.8%	Inflation: Year 1: 3.7% Year 2: 3.2% Year 3: 2.8%	Inflation: Year 1: 4.7% Year 2: 4.2% Year 3: 3.8%	Inflation: Year 1: 2.7% Year 2: 2.2% Year 3: 1.8%	Inflation: Year 1: 2.7% Year 2: 2.2% Year 3: 1.8%
<b>Salary increases:</b> Year 1: 4% Year 2: 3.7% Year 3: 3.3%	Salary increases: Year 1: 4% Year 2: 4.5% Year 3: 4%	Salary increases: Year 1: 6% Year 2: 5.5% Year 3: 4.5%	Salary increases: Year 1: 4% Year 2: 4.5% Year 3: 4%	Salary increases: Year 1: 4% Year 2: 3.7% Year 3: 3.3%
<b>Construction inflation:</b> Year 1: 3.7% Year 2: 3.2% Year 3: 2.8%	Construction inflation: Year 1: 4.7% Year 2: 4.2% Year 3: 3.8%	Construction inflation: Year 1: 5.7% Year 2: 5.2% Year 3: 4.8%	Construction inflation: Year 1: 3.7% Year 2: 4.2% Year 3: 3.8%	Construction inflation: Year 1: 3.7% Year 2: 3.2% Year 3: 2.8%
<b>Interest:</b> Year 1: 3.7% Year 2: 3.7% Year 3: 3.6%	Interest: Year 1: 5.7% Year 2: 5.7% Year 3: 5.6%	Interest: Year 1: 5.7% Year 2: 5.7% Year 3: 5.6%	Interest: Year 1: 3.7% Year 2: 3.7% Year 3: 3.6%	Interest: Year 1: 3.7% Year 2: 3.7% Year 3: 3.6%
<b>Voids:</b> Year 1: 0.6% Year 2: 0.6% Year 3: 0.6%	Voids: Year 1: 0.6% Year 2: 1% Year 3: 1%	Voids: Year 1: 1% Year 2: 1% Year 3: 1%	Voids: Year 1: 0.6% Year 2: 0.6% Year 3: 0.6%	Voids: Year 1: 0.6% Year 2: 0.6% Year 3: 0.6%
<b>Bad Debts:</b> Year 1: 0.5% Year 2: 0.5% Year 3: 0.5%	Bad Debts: Year 1: 0.5% Year 2: 0.5% Year 3: 0.5%	Bad Debts: Year 1: 0.5% Year 2: 1% Year 3: 0.75%	Bad Debts: Year 1: 0.5% Year 2: 0.5% Year 3: 0.5%	Bad Debts: Year 1: 0.5% Year 2: 0.5% Year 3: 0.5%



## Risk Management and Mitigation

The Association has in place a detailed Risk Management Strategy. Reports on potential risks of threats likely to impact on the work and well-being of the organisation are developed by the Senior Management Team and submitted to the Audit Committee every six months along with mitigating actions as a risk map. Major risks are identified and referred to the Board at six monthly intervals for their review, consideration and reassurance.

The high level risks identified and considered most critical to the future well-being of the organisation and its delivery of services.

1. **Operating environment** - impact of covid and higher levels of unemployment amongst tenants, benefit reductions; benefit cap; universal credit and direct payments, leading to increased arrears and bad debts. The impact of welfare benefit cuts compounded by general austerity and its impact on tenants and customers
2. **Service failure of principal contractor** - a contractor on whom the Association relies in order to deliver services, ceases to trade or where its ability to deliver services are severely compromised.
3. **Cyber security breaches**, impacting on ICT systems
4. **GDPR** – the Association does not manage its information correctly and as a result could be in breach of GDPR legislation.

**Inherent Corporate Risks** – those risks ranked, based on the assumption there are no control mechanisms in place to moderate the impact on the Association

### Inherent Risks

Impact ..					
<b>5 Catastrophic</b>				<b>4</b>	<b>3</b>
<b>4 Major</b>					<b>1 and 2</b>
<b>3 Moderate</b>					
<b>2</b>					

<b>Minor</b>					
<b>1 Insignificant</b>					
<b>Likelihood ...</b>	<b>1 Rare</b>	<b>2 Unlikely</b>	<b>3 Possible</b>	<b>4 Likely</b>	<b>5 Almost Certain</b>
<b>Risk Description</b>			<b>Likelihood</b>	<b>Impact</b>	<b>Exposure</b>
1. <b>Operating environment</b> - impact of, escalating fuel and food costs, benefit reductions; benefit cap; universal credit and direct payments, leading to increased arrears and bad debts tenants' wage and benefits increases below inflation; pressure on future rent increases; impact on income and effects of rising costs.			<b>5</b>	<b>4</b>	<b>Catastrophic</b>
2. <b>Service failure of principal contractor</b> - a contractor on whom the Association relies in order to deliver services, ceases to trade or where its ability to deliver services are severely compromised.			<b>5</b>	<b>4</b>	<b>Catastrophic</b>
3. <b>Cyber security</b> breaches, impacting on our ICT systems			<b>5</b>	<b>5</b>	<b>Catastrophic</b>
4. <b>GDPR</b> – the Association does not manage its information correctly and as a result could be in breach of GDPR legislation			<b>4</b>	<b>5</b>	<b>Catastrophic</b>

Establishing actions to either Tolerate, Treat, Transfer or Terminate the risk has resulted in the undernoted actions being adopted:

As a result, Inherent Risks are reclassified on a Residual Risk matrix which identifies, and records risks posed after mitigating actions have been taken. The residual corporate risk map is set out below:

Risk Description	Control Measures	Revised Likelihood	Revised Impact	Residual Exposure
<p><b>1. Operating environment</b> - impact of, escalating fuel and food costs, benefit reductions; benefit cap; universal credit and direct payments, leading to increased arrears and bad debts tenants' wage and benefits increases below inflation; pressure on future rent increases; impact on income and effects of rising costs.</p>	<ul style="list-style-type: none"> <li>• Include in financial scenario Planning – potential negative impacts of welfare benefit adjustments.</li> <li>• Revise regularly our Welfare Reform Strategy</li> <li>• Develop improved benefits advice and training for staff</li> </ul>	<b>5</b>	<b>3</b>	<b>Moderate</b>
<p><b>2. Service failure of principal contractor</b> - a contractor on whom the Association relies in order to deliver services, ceases to trade or where its ability to deliver services are severely compromised.</p>	<ul style="list-style-type: none"> <li>• Review contingency Plans test Plans where possible.</li> <li>• Maintain watching brief on performance and financial health of principal contractors</li> <li>• Maintain contact with local sector / alternative Contractor capacity</li> <li>• Maintain buyer status Public Contracts Scotland, to access Contractors in marketplace.</li> </ul>	<b>5</b>	<b>3</b>	<b>Moderate</b>
<p><b>3. Cyber security</b> breaches, impacting on our ICT systems</p>	<ul style="list-style-type: none"> <li>• Ensure effective partnership working with contractors and agents.</li> </ul>	<b>4</b>	<b>4</b>	<b>Major</b>

	<ul style="list-style-type: none"> <li>Implement recently agreed ICT strategy.</li> </ul>			
<b>4. GDPR – the Association does not manage its information correctly and as a result could be in breach of GDPR legislation</b>	<ul style="list-style-type: none"> <li>Include GDPR on team meetings</li> <li>Regular training/awareness for staff and Board</li> </ul>	<b>3</b>	<b>4</b>	<b>Major</b>

### Residual Risks

Impact ..					
5 Catastrophic					
4 Major			<b>4</b>	<b>3</b>	
3 Moderate					1 and 2
2 Minor					
1 Insignificant					
Likelihood ....	<b>1 Rare</b>	<b>2 Unlikely</b>	<b>3 Possible</b>	<b>4 Likely</b>	<b>5 Almost Certain</b>

## Appendix D: Group service Delivery and Business Effectiveness KPIs

Indicator	Target 2025/26
Current rent arrears as % of rent due current tenants	2.1%
Former tenant rent arrears as % of rent due	0.5%
Rent collected as % of rent due	98%
Rent loss due to voids (%)	0.5%
Average days to relet voids	28 days
Average time to complete emergency repairs	2 Hours
Average time to complete non-emergency repairs	Urgent – 3 days Routine – 8 days
Repair appointments kept (%)	95%
Repairs completed right first time (%)	95%
Tenant satisfied with repairs (%)	90%
Gas servicing carried out within 12 months of previous service	100%
Complaints are responded to and closed within agreed time deadlines	100%
Staff who have provided the required paperwork are paid accurately on the 28 <sup>th</sup> of each month	100%
Authorised accounts payable invoices are paid within 30 days of receipt	80%
All internal audits	All achieve at least reasonable assurance
External Audit	Clean audit report

## Appendix E Operating Environment

The Group does not operate in isolation and can be at risk to changes out with our control whether political, social or economic. As a Group we need to be continually evolving and be able to respond quickly to changes within the housing system. To do this this effectively we have a number of key strategic documents that underpin all our activities in the Strategic Plan as well as draw from our key partners strategies. Copies of which can be obtained on request:

Internal Reference document/strategies:

- Manor Estates (Group) Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis (November 2024) – reviewed annually
- Manor Estates (Group) Political, Economic, Social, Technological, Legal and Environmental (PESTLE) Analysis (November 2024) – reviewed annually
- 30-year Business Plan;
- Treasury Management Policy (2023);
- Asset Management Strategy;
- Risk Management Strategy;
- Energy Efficiency Strategy (2021), and
- ICT Strategy

External reference documents/strategies:

- City of Edinburgh Council “City Housing Strategy, 2018, November 2017
- City of Edinburgh Council Strategic Housing Investment Plan 2018 – 2023, November 2018
- Edinburgh Health and Social Care Partnership Strategic Plan 2019 – 2022
- City of Edinburgh Council, “Strategic direction for tackling Homelessness in Edinburgh”, February 2017
- Scottish Housing Regulator “Scottish Social Housing Charter, standards and outcomes” April 2012
- Regulatory Standards of Governance and Financial Management
- City of Edinburgh Council, “Programme for the Capital: The City of Edinburgh Council Business Plan 2017 – 2022, August 2017
- City of Edinburgh Council Rapid Rehousing Plan
- Housing Emergency Action Plan 5 December 2023

- [Appendix F Net Zero Scenario](#)



10 YEAR SOCF SUMMARY FOR 2025-2035

	2025/26	2027	2028	2029	2030	2031	2032	2033	2034	2035
Actual Opening Cash Balance	452,647	757,003	1,085,627	1,046,215	734,506	906,797	685,841	747,502	916,536	778,286
Income	8,006,905	8,259,689	8,430,777	8,727,332	9,042,858	9,374,925	9,718,880	10,073,156	10,440,422	10,820,165
Operational Expenditure	( 6,354,435)	( 6,159,000)	( 6,821,407)	( 8,038,418)	( 7,962,845)	( 7,690,529)	( 8,128,595)	( 8,162,795)	( 8,797,339)	( 9,113,815)
Potential Pension Deficit		( 65,000)	( 65,000)	( 65,000)	( 65,000)					
<b>GRANT AID</b>										
Capitalised Components	( 1,057,193)	( 1,440,883)	( 784,144)	( 490,517)	( 816,488)	( 2,219,711)	( 805,192)	( 1,005,816)	( 1,817,083)	( 1,497,655)
Non CA Capital Spend	( 191,393)	( 74,579)	( 131,820)	( 95,106)	( 116,233)	( 85,640)	( 123,432)	( 135,511)	( 114,250)	( 237,198)
RCF / New Loans	2,000,000	500,000		250,000	690,000	1,000,000			750,000	750,000
Loan Repayments	( 626,603)	( 626,603)	( 602,818)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)
Development HAG	1,298,239									
Development Costs	( 2,771,164)	( 65,000)	( 65,000)							
	<b>757,003</b>	<b>1,085,627</b>	<b>1,046,215</b>	<b>734,506</b>	<b>906,797</b>	<b>685,841</b>	<b>747,502</b>	<b>916,536</b>	<b>778,286</b>	<b>899,783</b>



10 YEAR SOCF SUMMARY FOR 2036-2045

	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Actual Opening Cash Balance	899,783	847,641	972,100	647,604	807,097	630,914	613,375	676,167	831,059	855,721
Income	11,214,839	11,627,739	12,055,679	12,496,744	12,953,179	13,427,841	13,919,083	14,427,695	14,963,291	15,516,466
Operational Expenditure	( 9,539,138)	( 9,558,204)	( 10,548,911)	( 11,298,517)	( 10,913,621)	( 11,041,820)	( 11,481,293)	( 11,977,527)	( 13,208,836)	( 12,928,605)
Potential Pension Deficit										
<b>GRANT AID</b>										
Capitalised Components	( 2,006,492)	( 2,275,165)	( 3,016,410)	( 4,989,296)	( 4,706,120)	( 2,342,632)	( 3,671,134)	( 3,335,825)	( 3,301,587)	( 5,726,066)
Non CA Capital Spend	( 371,351)	( 69,910)	( 215,054)	( 191,438)	( 109,620)	( 160,929)	( 103,864)	( 109,411)	( 328,206)	( 329,079)
RCF / New Loans	250,000									
Loan Repayments	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)
Development HAG										
Development Costs										
	<b>847,641</b>	<b>972,100</b>	<b>647,604</b>	<b>807,097</b>	<b>630,914</b>	<b>613,375</b>	<b>676,167</b>	<b>831,059</b>	<b>855,721</b>	<b>788,436</b>



30 YEAR SOCF SUMMARY FOR 2046-2055

	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055
Actual Opening Cash Balance	788,436	615,246	938,905	1,160,773	927,482	617,466	794,477	1,201,843	906,807	775,192
Income	16,064,299	16,675,768	17,288,542	17,928,641	18,589,752	19,267,577	19,983,665	20,714,695	21,464,094	22,258,576
Operational Expenditure	( 14,381,922)	#####	( 15,398,739)	( 14,168,924)	( 15,589,477)	( 15,412,221)	( 15,017,746)	( 16,522,185)	( 16,563,548)	( 16,017,673)
Potential Pension Deficit										
<b>GRANT AID</b>										
Capitalised Components	( 4,770,261)	( 3,624,306)	( 4,952,141)	( 4,752,634)	( 4,975,750)	( 5,110,013)	( 4,383,024)	( 5,284,951)	( 7,128,346)	( 6,914,360)
Non CA Capital Spend	( 255,306)	( 129,528)	( 365,794)	( 140,374)	( 234,540)	( 218,333)	( 175,529)	( 202,596)	( 403,815)	( 428,405)
RCF / New Loans										
Loan Repayments	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)	( 600,000)				
Development HAG										
Development Costs										
	<b>615,246</b>	<b>938,905</b>	<b>1,160,773</b>	<b>927,482</b>	<b>617,466</b>	<b>794,477</b>	<b>1,201,843</b>	<b>906,807</b>	<b>775,192</b>	<b>673,330</b>



## G24 Data Protection Policy

**Purpose of Policy:** The purpose of this Policy is to outline the Association's obligations under UK data protection legislation and how these will be met and managed

<b>Policy Monitoring Details</b>	
<b>Department</b>	All
<b>Author</b>	Data Protection Officer (RGDP)
<b>Status</b>	Group
<b>Date Board Approval</b>	October 2021
<b>Update</b>	October 2023
<b>Planned Review Date</b>	October 2025
<b>Regulatory Outcomes Being Achieved</b>	Regulatory Standards expect the Association to comply with all legislative requirements
<b>Tenant Consultation Required</b>	None
<b>Equalities Impact Assessment</b>	Not required
<b>HRA Implications</b>	<p>The Human Rights Act safeguards the right to respect for private life, including the right to respect for personal information.</p> <p>Lapses in data protection by public sector bodies may also contravene the Human Rights Act.</p>

### Content List

1. Introduction
2. Scope
3. Responsibilities for Compliance
4. Compliance
5. Data Sharing
6. Data Processing
7. Security Incident and Breach Management



- 8. Individual Rights**
- 9. Data Protection by Design**
- 10. Training**
- 11. Breach of Policy**
- 12. Monitoring and Reporting**
- 13. Policy Review**

## **1. Introduction**

- 1.1 Manor Estates Housing Association (referred to herein as 'MEHA') is a Data Controller registered with the Information Commissioner's Office (Registration No: Z6870536).
- 1.2 MEHA is committed to ensuring the lawful, fair and transparent management of personal data. This policy sets out how we will do this.
- 1.3 All Directors, members, employees, volunteers (temporary and permanent) (referred to herein as 'MEHA personnel') have a responsibility to ensure compliance with this policy and associated Appendices which set out MEHA's commitment to process personal data in accordance with the relevant legislation including:
  - UK General Data Protection Regulation.
  - UK Data Protection Act 2018 (DPA 2018).
  - Privacy and Electronic Communications Regulations 2003 (PECR).

## **2. Scope**

- 2.1 This Policy applies to all personal data held by MEHA that relates to living identifiable individuals regardless of the category of data or the format of the data. Personal data is any data which could be used to identify a living individual including, for example, name, address, email, postcode, CCTV image and photograph and video recordings. Special Category personal data is any information relating to racial or ethnic origin, political opinions, religious beliefs, health (mental and physical), sexual orientation, Trades Union membership and criminal convictions.
- 2.2 This policy applies to personal data held or accessed on MEHA premises and systems or accessed remotely via home or mobile

working. Personal data stored on personal and removable devices is also covered by this policy.

### 3. Responsibilities for Compliance

- 3.1 The Board and the Senior Management Team are ultimately responsible for ensuring that MEHA meets its legal obligations.
- 3.2 Failure to comply with data protection legislation could lead to financial penalties, regulatory action, as well as reputational damage.
- 3.3 All MEHA personnel, accessing or otherwise processing personal data controlled by MEHA have a responsibility for ensuring personal data is collected, stored and handled appropriately and must ensure that it is handled and processed in compliance with data protection law, this policy and the data protection principles.
- 3.4 The Data Protection Lead Manager, the Housing Management Director / Depute CEO, with advice and assistance from the Data Protection Officer (DPO), RGDP LLP, is responsible for:
  - monitoring compliance with this policy and data protection legislation;
  - managing personal data breaches and data subject rights requests;
  - recording and maintaining appropriate records of processing activities and the documented evidence required for compliance.

### 4. Compliance

- 4.1 MEHA will comply with its legal obligations and the **data protection principles** by ensuring that personal data is:
  - **processed lawfully, fairly and in a transparent manner in relation to individuals.** Individuals will be advised on the reasons for processing via a Privacy Notice. Where data subjects' consent is required to process personal data, consent will be requested in a manner that is clearly distinguishable from other matters, in an intelligible and easily accessible form, using clear and plain language. Data Subjects will be advised of their right to withdraw consent and the process for Data Subjects to withdraw consent will be simple.
  - **collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.** Personal data will only be used for the original purpose it was collected for and these purposes will be

made clear to the data subject. If MEHA wishes to use personal data for a different purpose, for example for research, the data subject will be notified prior to processing.

- **adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.** MEHA will only collect the minimum personal data required for the purpose. Any personal data deemed to be excessive or no longer required for the purposes collected for will be securely deleted in accordance with MEHA's Retention Policy. Any personal information that is optional for individuals to provide will be clearly marked as optional on any forms.
- **accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay.** MEHA will take reasonable steps to keep personal data up to date, where relevant, to ensure accuracy. Any personal data found to be inaccurate will be updated promptly. Any inaccurate personal data that has been shared with third parties will also be updated.
- **kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.** MEHA will hold data for the minimum time necessary to fulfil its purpose. Timescales for retention of personal data will be stated in a Retention Schedule. Data will be disposed of in a responsible manner ensuring confidentiality and security.
- **processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.** MEHA will implement appropriate security measures to protect personal data. Personal data will only be accessible to those authorised to access personal data on a 'need to know' basis. MEHA personnel will keep data secure by taking sensible precautions and following the relevant MEHA policies and procedures relating to data protection.

4.2 In addition, MEHA will comply with the 'Accountability Principle' that states that organisations are to be responsible for, and be able to demonstrate, compliance with the above principles.

## 5. Data Sharing

- 5.1 In certain circumstances MEHA may share personal data with third parties. This may be part of a regular exchange of data, one-off disclosures or in unexpected or emergency situations. In all cases, appropriate security measures will be used when sharing any personal data.
- 5.2 Where data is shared regularly, a contract or data sharing agreement will be put in place to establish what data will be shared and the agreed purpose.
- 5.3 Prior to sharing personal data, MEHA will consider any legal implications of doing so.
- 5.4 Data Subjects will be advised of data sharing via the relevant the Privacy Notice.

## **6 Data Processors**

- 6.1 Where MEHA engages Data Processors to process personal data on its behalf, it will ensure that:
- Data processors have appropriate organisational and technical security measures in place.
  - No sub-processors are used without prior written consent from MEHA.
  - An appropriate contract or agreement is in place detailing the obligations and requirements placed upon the data processor.

## **7 Security Incident and Breach Management**

- 7.1 Occasionally MEHA may experience a data security incident or personal data breach; this could be if personal data is:
- Lost: for example, misplacing documents or equipment that contain personal data through human error; via fire, flood or other damage to premises where data is stored.
  - Stolen: theft or as a result of a targeted attack on the IT network (cyber-attack).
  - Accidentally disclosed to an unauthorised individual: for example, email or letter sent to the wrong address.
  - Inappropriately accessed or used.
- 7.2 All security incidents or personal data breaches will be reported to and managed by the Data Protection Lead who will be advised and assisted by the DPO in accordance with:
- (i) Our Information Security and Personal data Breach Management Procedure; and
  - (ii) Our Data Breach Procedure (Staff)

The Information Commissioner's Office and the individuals affected will be notified promptly, if required. All security incidents and personal data breaches will be managed in accordance with MEHA's Information Security Incident and Personal Breach Management Procedure.

## 8 Individual Rights

### 8.1 Individual Rights

MEHA will uphold the rights of data subjects to access and retain control over their personal data in accordance with its Data Subject Rights Procedure. MEHA will comply with individuals':

- **Right to be Informed** – by ensuring individuals are informed of the reasons for processing their data in a clear, transparent and easily accessible form and informing them of all their rights.
- **Right to Access** – by ensuring that individuals are aware of their right to obtain confirmation that their data is being processed; access to copies of their personal data and other information such as a privacy notice and how to execute this right.
- **Right to Rectification** – by correcting personal data that is found to be inaccurate. MEHA will advise data subjects on how to inform us that their data is inaccurate. Inaccuracies will be rectified without undue delay.
- **Right to Erasure** (sometimes referred to as 'the right to be forgotten') – MEHA will advise data subjects of their right to request the deletion or removal of personal data where processing is no longer required or justified.
- **Rights to Restrict Processing** – MEHA will restrict processing when a valid request is received by a data subject and inform individuals of how to exercise this right.
- **Right to Data Portability** – by allowing, where possible, data to be transferred to similar organisation in a machine-readable format.
- **Right to Object** – by stopping processing personal data, unless legitimate grounds can be demonstrated for the processing which override the interest, rights and freedoms of an individual, or the processing is for the establishment, exercise or defence of legal claims.

8.2 All requests for the exercise of Data Subjects' Rights shall be processed in accordance with our Data Subject' Rights Procedure.

## 9 Data Protection by Design

9.1 MEHA has an obligation to implement technical and organisational measures to demonstrate that data protection has been considered and integrated into its processing activities.

- 9.2 When introducing any new type of processing, particularly using new technologies, it will take account of whether the processing is likely to result in a high risk to the rights and freedoms of individuals and consider the need for a Data Protection Impact Assessment (DPIA).
- 9.3 All new policies including the processing of personal data will be reviewed by the Data Protection Lead to ensure compliance with the law and establish if a DPIA is required. Advice and assistance will be provided by the DPO and if it is confirmed that a DPIA is required, it will be carried out in accordance with MEHA's DPIA Procedure.

## **10 Training**

- 10.1 All MEHA personnel will be made aware of good practice in data protection and where to find guidance and support for data protection issues. Adequate and role specific data protection training will be provided during induction and annually thereafter to everyone who has access to personal data to ensure they understand their responsibilities.

## **11 Breach of Policy**

- 11.1 Any breaches of this policy may be dealt with in accordance with MEHA's disciplinary procedures.

## **12 Monitoring and Reporting**

- 12.1 Regular monitoring and audits will be undertaken by the Data Protection Lead and/or DPO to check compliance with the law, this policy and associated procedures. Any concerns will be raised with the Board

## **13 Policy Review**

- 13.1 This policy will be reviewed every 24 months or when required to address any weakness in the procedure or changes in legislation or best practice.