

Lochaber Housing Association Business Plan 2024-25 / 2025-26

Providing Affordable Housing
and Services Throughout Lochaber



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1. Introduction

This Business Plan provides a strategic framework for managing our services and overall business for the period 2024-25 to 2025-26. It also informs our relationships with our customers, funders, regulators, and partner organisations.

We have changed the format with the aim of making the plan easier to understand and simpler to update. More detailed information on all areas of our operations can be found in the various appendices attached to the plan.

The plan reflects our belief that the wellbeing and stability of Lochaber Housing Association (LHA) is crucial and will be underpinned by good governance, robust financial modelling, and strategic risk mitigation. This is achieved by effective leadership of the Association by the Board of Management, supported by the senior staff team. The strategic context and direction of our plan continues to be informed by our Board, staff, and the views of our tenants.

The wider global and economic context has remained challenging with high interest rates and inflation increasing the pressures on finances. Careful financial management has been required involving difficult decisions in balancing affordability of rent with the long term business sustainability. We are striving to:

- minimise the rent increases required for our services;
- ensuring our commitment to our tenant's safety and well being; and
- Providing high quality services that makes life for better for our tenants.

Despite these challenges, we remain an ambitious, financially resilient organisation.

2. Our Journey so Far

- 2.1 Lochaber Housing Association is a Scottish Charity (SCO 30951), a registered Society under the Co-operative and Community Benefits Act 2014 and is registered with The Scottish Housing Regulator (Registered Social Landlord No.151).
- 2.2 The Association is a non-profit making organisation, established in 1988 to address an identified chronic housing need in Lochaber's rural communities and to contribute to meeting the perpetual and considerable housing need in Fort William. This need is just as acute now, notwithstanding the work of the Association, The Highland Council, and other agencies in the intervening period.
- 2.3 The Association's principal objective since 1988 has been to provide good quality, affordable housing opportunities and services throughout Lochaber, achieving this by accessing public funding, mainly through the Scottish Government as well as private sector lending facilities, to develop and manage housing, mainly for rent but also through low cost home ownership accommodation and other initiatives.
- 2.4 Over the past 36 years we have provided approximately 900 new housing opportunities for rent and low-cost home ownership. In early 2018 the Board resolved to enhance our capacity to deliver more affordable housing in Lochaber by entering a partnership with Link HA at the Upper Achintore site in Fort William. The initial phase of 82 units was completed and all units allocated by August 2024.
- 2.5 At present LINK HA are unsure, due to both the cut back in grant funding available and the significant increase in build costs when the next phase of this development will go on site.
- 2.6 The Association has done substantial work to utilise renewables, and a significant amount of stock has a renewable element to it. Our intention is to continue to improve the energy efficiency of our housing which will help to keep the heating costs more affordable for tenants.
- 2.7 There is breadth and scope to the group of companies within the LHA family that means that we have never regarded our valuable role over the years in supplying affordable housing as the only means through which we would deliver a social impact.
- 2.8 Along with Albyn Society, Cairn HA, Caledonia HA, Lochalsh and Skye HA, and Highland Council we operate a common housing register and common allocation policy called the Highland Housing Register (HHR). This is a single access point for all applicants wishing to apply for housing in the Highland area.

With the approval of our HHR partners and Link HA, we recently piloted a Local Lettings Initiative for key workers which enabled the allocation of 15 properties in the Upper Achintore Development to key workers. This has been very successful and enabled those allocated the opportunity to remain in Lochaber rather than having to move away due to the lack of availability of affordable housing opportunities.
- 2.9 We also believe that it is important for us to maintain and improve the quality of our management and maintenance services. Throughout the business plan are references to our performance with this information provided to the Scottish

Housing Regulator through the Annual Return on the charter. Comparatives with our peer group and the Scottish average are also provided, with the peer group made up of Albyn Housing Society, Cairn HA, Hjaltland HA, Orkney HA, Lochalsh and Skye HA, West Highland HA and The Highland Council.

- 2.10 The Association also operates and provides services through Lochaber Care & Repair (LCR) which was established in 2006, and which is a not-for-profit company. LCR operates a free advisory service to assist older and disabled people in their own homes to manage improvements, repairs, and adaptations to their properties. LCR also operates a tenure neutral Handyperson service and manages the Community Equipment Service for NHS Highland (NHS).
- 2.11 In 2009 we set up LHA Property Services CIC (LHAPS) as a non-charitable subsidiary company to carry out activities that the Association as a charity, could not, and was established as a Community Interest Company (CIC). This meant that the Association could protect the company's surpluses for the benefit of the community and for the provision of training and employment opportunities. The company provides Estate Management Services as well as comprehensive reactive, cyclical, and planned maintenance service for the Association and its tenants as well as delivering a similar service to our partners Link HA.



3. Executive Summary

- 3.1 LHA' ambition to continuing to play a lead role in developing affordable housing in Lochaber remains as strong as ever. We are about to undertake a review of our Development Strategy, and this will include ensuring we have appropriate lending facilities available to allow for our future investment. We currently have 30 new homes onsite and hopeful we can commence on a further 26 during 2025.
- 3.2 Our Asset Management Strategy is currently being revised to take account of our: updated stock condition surveys; future energy efficient plans; and will also take account of our recent tri-annual satisfaction results. This will ensure our long term investment in maintenance and improvements is targeted and value for money ensuring our homes remain desirable.
- 3.3 While over 98% of our properties currently meet the Scottish Housing Quality Standard (SHQS) we will continue to ensure that we invest and improve where possible our SHQS and the Energy Efficiency Standards for Social housing (EESH). We are currently awaiting the results of the consultation on the introduction of the new Net Zero standards and how the Scottish Government will fund this .
- 3.4 We are about to embark on a project whereby we have been able to attract additional funding for the Swedish style properties we have in our stock which will allow for the installation of solar panels with battery storage, air to wet heating system, external wall insulation and upgrading of existing air extraction.
- 3.5 Over the last three years we have spent £2.8 million on reactive, major and cyclical repairs and a further £5.2 million investment in our properties. In the current year we have budgeted for an amount of approximately £600,000 for major and cyclical costs and the sum of £1.04 million for component investment. Our tenant satisfaction with our repairs service was 96.4% for last year and we aim to continue to improve on this where we can.
- 3.6 We will be reviewing our loan portfolio ensuring we have sufficient resources to meet our development and investment aspirations for the coming years.
- 3.7 The cost-of-living crisis has resulted in a demanding and difficult period for our customers and for us as a business. The impact of multiple economic and political factors has resulted in a high inflation and interest rate environment. Over the next few years, we expect to continue to encounter challenges to service delivery, operational activities, and financial planning.
- 3.8 Balancing investment and controlling costs to limit the impact on rent levels and affordability; overhead costs rising faster than CPI inflation make it challenging when assessing rent levels and business requirements. We will continue to drive efficiencies and value for money across our activities.
- 3.9 In the coming year we will look to undertake a full review our rent policy and invite those tenants within our Your Voice group to be part of our working group.
- 3.10 Supported by grant funding from the Scottish Government, we have been able to

enhance our approach to tenant support at this difficult time to help keep people and homes warm. Funding received will also support our partner ALIenergy to continue to provide much needed energy advice and support to our tenants.

- 3.11 Our people are critical to our success, and we must ensure our board and staff feel supported and encouraged. We will ensure our staff resources deliver the business plan objectives and priorities in the most optimal way and taking account of succession planning.
- 3.12 We will continue to explore new things, provide new services and question whether we can improve by working differently. We consider everyone as an individual and that approach is extended in all aspects of our service delivery. We encourage, support, and protect diversity and this is underpinned by our values.
- 3.13 We have delivered a very successful Modern Apprentice and Trade Apprentice programme and are committed to seeing this continue. We will maintain our links and support with local education providers by attending career fairs, working with employability schemes thus ensuring local training and employment opportunities are promoted.
- 3.14 We have recently undertaken our tenant satisfaction review and will use this feedback along with views from the follow up focus groups to help us shape our future services and delivery.
- 3.15 We plan to develop further online services to our customers making interaction with us more accessible and easier to use. We have recently introduced our new website and will continue to engage in ways to improve our communications.
- 3.16 We will ensure we have the best possible governance and systems in place to steer the organisation forward to meeting the regulatory standards of governance and financial management.
- 3.17 We will continue to manage and mitigate risk where possible through our regular review of our risk register and corresponding actions.
- 3.18 We will continue to ensure our homes are safe and free from health hazards. We have robust systems for managing and monitoring tenant safety ensuring compliance with tenant safety regulations. We will also continue to update our Board regularly on Health and Safety matters which monitor our performance on compliance.
- 3.19 We will continue to ensure that any damp and mould cases which are identified by our tenants or staff are deal with promptly and effectively.
- 3.20 We will highlight the importance of customers providing us with access to their home, to help us meet compliance legislation. We will offer flexible appointments and a way to make and change appointment times which suit. We will continue to implement a range of approaches to attempt to contact customers, including recorded or hand delivered letters, by phone or text, through social media or visits. We will escalate engagement with customers who do not provide early access to homes and at this stage we will consider any vulnerabilities or additional support need which may be affecting arrangements.

At a Glance – 23/24 *(these figures will be refreshed annually)*



All loans achieve covenant compliance



Net Book value of housing properties
£54.5m



Loans repayments per property
£2,291



Revenue from lettings
£4,122,724



Operating surplus
£745,906



Void rent loss
0.29%



Investment and upgrading of properties
£1.9m
Per property
£2,691



Construction of new homes
22 onsite



Amount spent on repairs
£0.99m
Per property
£1,368



Number of new lets in last year
54



Number of tenants who have agreed to participate in our 'Your Voice' tenant group
257



Total instances of financial aid, advice and assistance given
236




Amount of grant funding successfully accessed to assist tenants with cost of living
£121,647



Tenants satisfied with the overall service provided by LHA
92.41% 




Tenants who feel LHA is good at keeping them informed about their services and decisions
94.14% 



Tenants satisfied with the opportunities given to them to participate in LHA's decision making process
94.1% 



Tenants who feel their rent represents value for money
85.17% 



New tenants from waiting lists that sustained their tenancy for more than one year
95.8% 



Properties that meet EESSH
97.8% 



Average number of hours to complete emergency repairs
2.52 hours 



Average number of days to complete non emergency repairs
3.52 days 



Tenants who had repairs or maintenance in the last 12 months satisfied with the repairs and maintenance service
96.4% 

 Better than Peer Group and Scottish Average

4. Mission Statement

Our mission is to facilitate the provision and maintenance of good quality, truly affordable housing opportunities and services for local people in their preferred communities and helping to sustain and develop thriving communities throughout Lochaber.



5. Strategic Objectives

Our strategic objectives underpin our Mission, reflect our core values, and provide a framework for an operational delivery plan.

These strategic objectives are rendered into operational activities detailing how our strategic aims will be delivered and will be continuously monitored by the management team. Each Objective is summarised with supporting documentation provided.

When designing our Business Plan, we have mapped the Regulatory Standards with our strategic objectives, to underpin and illustrate how we manage and govern the Association. Please see **Appendix 19 Regulatory Standards Mapped to our 6 Strategic Objectives.**



Objective 1: Providing High Quality Housing Solutions

We will facilitate the provision of high-quality affordable housing solutions throughout Lochaber. This will be achieved by working with our development partners, Cameron and MacDonald, and Link HA, to increase the number of affordable housing opportunities, prioritising homes for social rent but including the provision of LIFT shared equity housing, mid-market rent homes and other innovative models, such as Rent to Buy or Discounted Plot sales.

We will ensure our properties are well maintained, efficient to heat and adaptable to people's changing needs.

Supporting Documentation

Asset Management Strategy – Appendix 5

Development Strategy - currently under review

LHA Group Core Values - Appendix 13

Highland Council Local Housing Strategy 2023-2028 - Appendix 29

Highland Council Strategic Housing Investment Plan 2025-2030 – Appendix 30

Objective 2: Excellent Affordable Solutions

We will develop and manage a high-quality range of affordable services that meet the needs and preference of customers. This will be achieved by providing locally controlled accessible and friendly services; by ensuring that our customers can occupy their homes within safe, secure and pleasant environments, while demonstrating best value for available resources; by achieving high levels of customer satisfaction and acting on feedback we receive; improving levels of effective customer participation; improving and expanding our digital offering; and by improving our knowledge and understanding of our housing stock and by, using this to manage our assets more effectively.

We will make best use of our resources and ensure they benefit our tenants by benchmarking and reviewing value for money.

Supporting Documentation

Achieving Excellent Affordable Services - Appendix 01

Annual ARC Submissions - Appendix 02

Rent Policy - Appendix 20

SHN Peer Group ARC Comparisons - Appendix 23

Tenant Engagement and Communication (TEC) Strategy - Appendix 25

Who We House – Appendix 27

Objective 3: Robust and Accountable Governance

We will ensure that we manage and govern our affairs effectively and prudently and in doing so will operate accountably and openly in all that we do as evidence in the Annual Assurance Statement to the Scottish Housing Regulator. This will be achieved by developing and cementing the active partnership between the Board, Management Team, and wider staff group in the furtherance of our objectives; putting in place and maintaining the highest standards of governance in relation to the conduct of our business; supporting and developing our Board in acquiring the appropriate skills and knowledge base; and implementing quality assurance measures. All of this has been enhanced by our investment and use of technology to allow remote participation of Board and Staff members.

Supporting Documentation

Annual Assurance Statement - Appendix 03

Equality, Diversity and Inclusion Policy – Appendix 07a

Equality, Diversity and Inclusion Strategy – Appendix 7b

Regulatory Standards Mapped to our 6 Strategic Objectives - Appendix 19

Risk Management Policy - Appendix 21

Risk Register - Appendix 22

SHR Engagement Plan - Appendix 24

Objective 4: Effective Financial Management

We will ensure that our financial management and planning will deliver medium and long-term financial viability. This will be achieved by ensuring financially sound planning and decision making processes; continually monitoring our financial performance; effectively managing all our resources; and maximising our income and controlling our expenditure through the effective management and monitoring of processes across the organisation's activities.

Supporting Documentation

Annual Audited Accounts - Appendix 04

Financial Assumptions and Scenarios - Appendix 08

Financial Base Case Projections - Appendix 09

SHN Peer Group ARC Submissions - Appendix 23

Treasury Management Policy- Appendix 26

Objective 5: Investing in our People

We will support, train, and develop our staff team in the furtherance of our objectives. This will be achieved by investing in training and continuing professional development for our staff; provision of modern apprenticeship opportunities; operating a performance management system; and maintaining effective communication with all staff.

Supporting Documentation

LHA Group Company Values - Appendix 12

LHA Group Organisation Structure - Appendix 14

Office Bearer's and Management Team Biographies - Appendix 15

Our Membership and Board - Appendix 16

Our Staff - Appendix 17

Objective 6: Supporting Positive Social Impact

We will support and guide our subsidiary companies as social enterprises to diversify their services to deliver social impact. This will be achieved by partnering with LHAPS to ensure the appropriate skills and services are available to undertake the growing number of houses that will be required to be serviced through the partnership with LINK HA; and working with Lochaber Care and Repair to support it in establishing income generating activities that will support its funding streams.

Supporting Documentation

Handyperson Service Information Sheet - Appendix 10

LCR Information Sheet - Appendix 11

6. Stakeholder Management

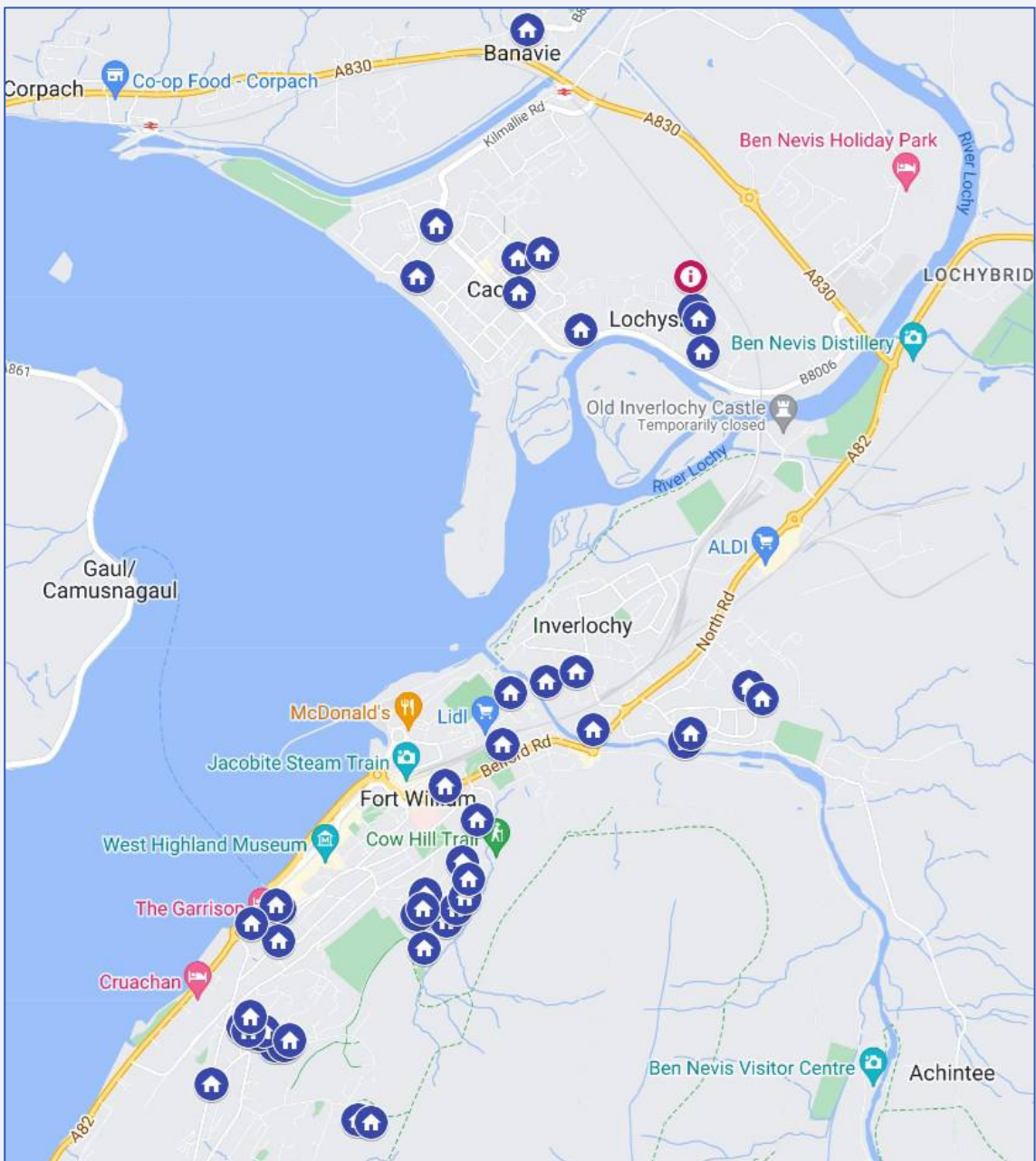
6.1 Our Area

The Association operates exclusively within the Lochaber area.

Our area of work extends to 4,656 square kilometres, has a population of 20,042 with our principal town being Fort William, the Highlands’ second largest conurbation, with a population of 10,428.

For HHR purposes, our properties are in five zones.

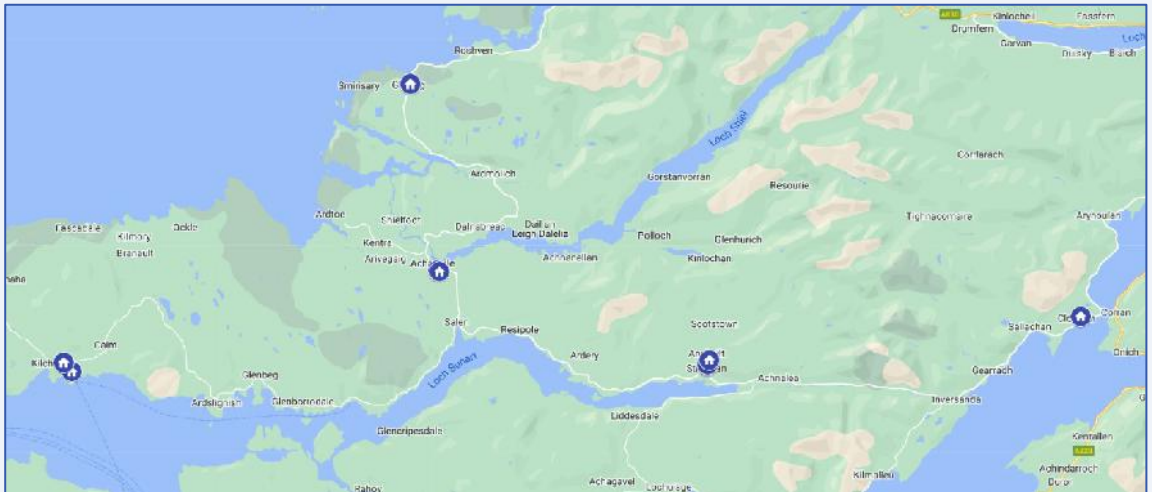
Central Lochaber – 46 locations



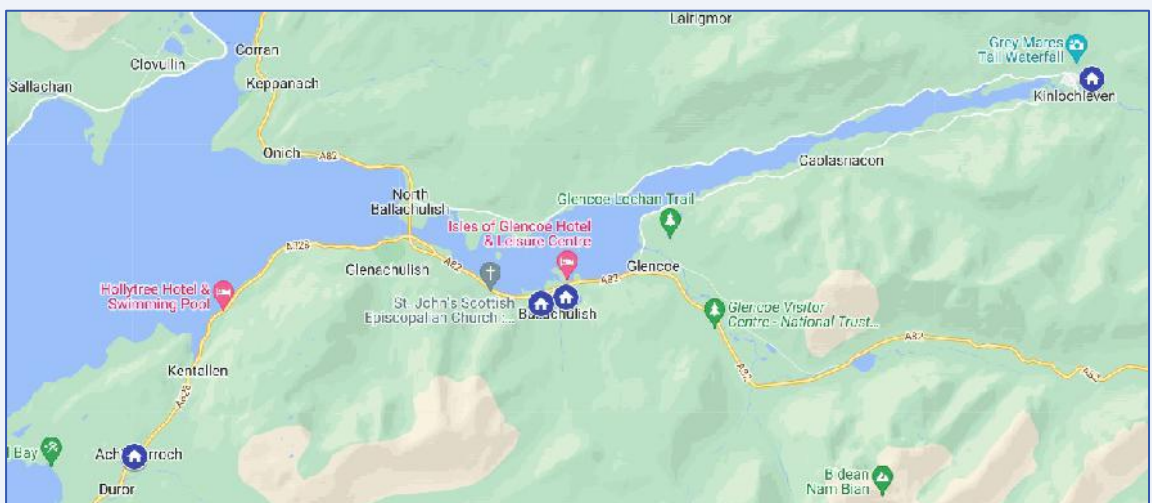
West Lochaber – 11 locations



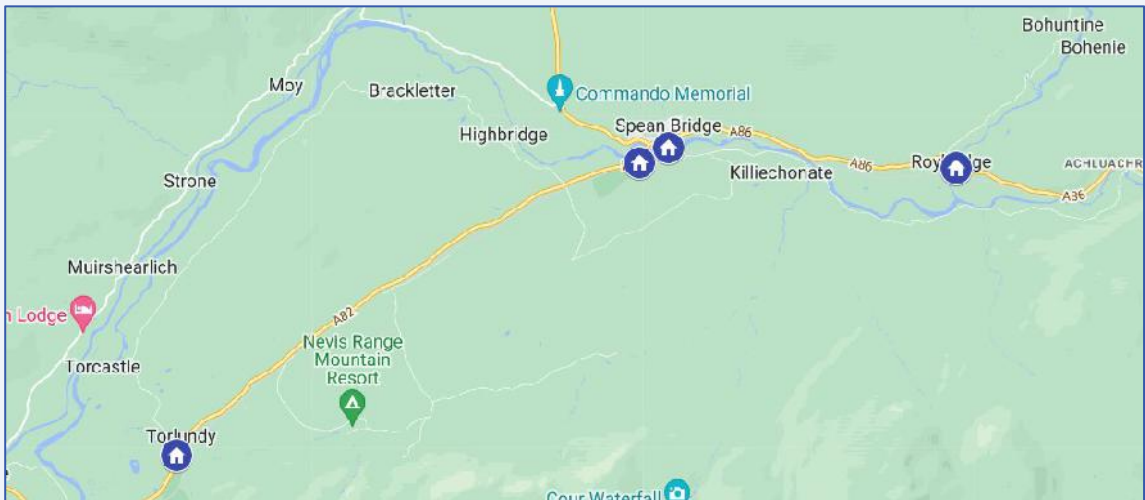
Peninsula – 10 locations



South Lochaber – 5 locations



North East Lochaber – 4 locations



For more specific property details and street locations, you can simply click on an icon on our interactive map: <https://bit.ly/LHA-Property-Locations-Map>

6.2 Our Stakeholders

As a locally based community housing association we have a range of stakeholders that are important to the development and delivery of our services.

- **Our Customers**

Our principal stakeholders are our customers, often also referred to as tenants, residents, service users or clients, depending on context. Whatever terminology is used, it is this group of people (individually and collectively), together with our potential tenants (i.e. those members of the public that would like to access our housing and services), that are the focus of our mission and the principal recipients of our services. Accordingly, this is our most important stakeholder group.

- **Our Communities**

The communities we work with in Lochaber are also very important to us and that people living in Lochaber live in neighbourhoods that are clean and well cared for, where there is real community pride. Through our work in our communities, we help to prevent depopulation and enable communities to thrive.

- **The Highland Council**

We provide services that are intended to assist the Council in meeting its strategic objectives and statutory obligations in connection with housing supply and homelessness. The Local Housing Strategy (LHS) 2023-2028 was approved following an extensive period of discussion with various stakeholders.

- **The Scottish Government**

We are one of several RSLs that, together with the Highland Council, partner with the Scottish Government to deliver targets in relation to the supply of new affordable housing opportunities in the Highlands. We see ourselves as being significant local contributors to the government's strategic objectives, those that

are associated with creating a Healthier, Wealthier & Fairer, Safer & Stronger and Greener Scotland. We recognise the importance of the Scottish Government's sixteen national outcomes.

- **Scottish Housing Regulator**

Whilst we are also within the regulatory aegis of both the Office of the Scottish Charity Regulator and the Financial Conduct Authority, as an RSL, our principal and lead regulatory framework is that supervised by the housing sector's independent regulatory body, the Scottish Housing Regulator, which is charged with protecting the best interests of tenants. We are committed to working with the Regulator through its role in assessing our outcomes against the Social Housing Charter, and in providing it with other information to enable it to carry out its regulatory function. In 2019 the Regulator introduced the requirement for RSL Boards to provide an Annual Assurance Statement reflecting compliance with all the Regulatory Standards.

- **Lenders**

In recent years we have been dependent on our lenders to provide us with the borrowing facilities that we have needed to supplement grants to provide new build affordable housing. In addition, while our cash projections do not forecast the need for borrowing for the purposes of fulfilling our planned maintenance ambitions, it is prudent to assume that this may become a possibility at some point. Accordingly, it is important that we maintain good communications with our lenders, as well as ensuring that our covenants are compliant with the terms of borrowing. Our current lenders are CAF Bank, Allia, Unity Bank, Nationwide and Royal Bank of Scotland with loans totalling £13.8m at 31st March 2024.

- **Partners**

Our partnerships and dependencies sit alongside the Association and its stakeholders in supporting the delivery of services. These local, regional and national partners include: ALIenergy; Centered; Chartered Institute of Housing; Employers in Voluntary Housing; Highlands & Islands Enterprise; Highland Housing Alliance; Highland Communities Credit Union; Cameron and MacDonald; NewStart Highland; Lintel Trust; Link HA; Lochaber CAB; Lochaber Action for Disability; Lochaber Hope; Lochaber Women's Aid; NHS Highland; Rural & Islands Housing Association Forum (RIHAF); Scottish Federation of Housing Associations; SHARE; TPAS (Scotland); Scottish Housing Network(SHN) and Voluntary Action Lochaber(VAL).

7. Housing Services and Rent Affordability

7.1 Who Do We House?

The range of demographics which represents Highland Housing Register (HHR) applicants seeking housing in Lochaber, along with those that LHA house, are summarised in **Appendix 27 Who We Housed 2023-24**. This document is refreshed annually following publication of the HHR Annual Report.

7.2 Homelessness

LHA meets its legal obligation to provide settled accommodation for homeless persons/households through the HHR. We also provide the Council with access to several properties for temporary accommodation.

The Association will continue to review legislative changes to homelessness and homelessness prevention or any statutory guidance that follows, along with any regulatory expectations on the Association as a Registered Social Landlord from

7.3 Rental Income /Arrears

Rent collection is the foundation on which LHA's entire business is based.

Historically LHA has maintained a lower level of arrears and an extremely low level of evictions. ARC results for 2023/24 show that LHA has lower arrears than the average for our peer group and significantly lower than the Scottish Average.

2023/24 results by ARC measure	LHA	Peer Group Average	Scottish Average
% Gross rent arrears of rent due (current and former tenant arrears)	2.94	3.83	6.74

The impact of Universal Credit (UC) was already a major challenge and was identified as a risk for the Association as a whole. The proportion of LHA tenants now receiving UC is increasing and UC has a significant impact on rent arrears, attributing to almost 60% of the current tenant debt owed to the Association.

Ensuring we manage our voids process well is a priority for us to ensure we have empty properties available for new tenants who are on the waiting list but also to ensure we keep our void rental loss to a minimum. In 2023/24

2023/24 results by ARC measure	LHA	Peer Group Average	Scottish Average
Average time to re-let properties	10 days	25 days	57 days
% rent lost when properties empty	0.24	0.60	1.39

7.4 Tenant Engagement

Our tenants are our most important stakeholders. Under our Standing Orders, it is the role of 'Your Voice', our tenant partnership and engagement group, to

scrutinise the performance of the Association across a range of key indicators; in particular, against the outcomes required under the Scottish Social Housing Charter.

Our **Tenant Engagement and Communication (TEC) Strategy - Appendix 25** aspires to:

- continue to develop the Your Voice tenant partnership with engagement opportunities at different levels that suits all;
- develop regular local Your Voice focus groups for engagement along with developing a small group of collaborative voices from these groups to create a scrutiny panel;
- provide detail on how we will consult, the opportunities for tenants to be involved, timescales and the benefits or engaging with the Association;
- widen opportunities for engagement; and
- help and encourage tenants to become candidates for Board membership.

Examples of this engagement and scrutiny include:

- the production of our annual report to tenants, 'Tenant Talk'
- consider any new/revised policy, or decision of the Board, that affects the management or maintenance of tenants' homes prior to its implementation
- conduct consultations and surveys with the wider tenant population in order to inform the decision and policy making of the Board
- scrutinise the quality, efficiency and effectiveness of the Association's services, recommending appropriate change and improvement; and
- consult on the development of the new website.

We currently work with several Resident Tenant Organisations within Fort William and are aiming to reach out to groups in our rural areas such as local community councils, and community groups.

2023/24 results by ARC measure	LHA	Peer Group Average	Scottish Average
% of tenants satisfied with opportunities to participate	95.4	89.98	87.67
% of tenants who feel we are good at keeping them informed about services and decisions	94.14	92.86	90.46

7.5 **Rent Affordability**

Maintaining the affordability of our homes remains a key focus. Any household's financial position is, by its nature, unique and variable with changes over time according to personal circumstances.

LHA recognises this challenge and considers affordability on an annual basis at both a business and personal level. Therefore, as part of our rent review each year we measure our proposed rents using the following tools:

- Our Rent Setting Policy which has established a definition of affordability defined by our Board and agreed by our tenants. Our rents track changes to the living wage each year, so that the amount of rent a tenant pays monthly should never be more than 25% of whatever the monthly living wage is at any time, based on 1 person working 35 hours per week (in a one-bedroomed property) and 1.5 people working (in a two-bedroomed property and above). This means that rents are linked directly to a simple measure of affordability, based on the living wage, and that we will be able to guarantee this affordability for the future. Appendix xx Rent Policy gives more detail.
- SFHA Affordability Tool – to gauge portfolio affordability on a recognised sector-wide basis;
- Review of rent levels against average social housing sector rent levels;
- Consideration of rent increases over previous years;
- Annual tenant feedback through the rent consultation process; and
- Affordability questions in customer satisfaction surveys.

Current indicators suggest that the LHA rent levels are affordable for those on moderate incomes. The Scottish Government's Housing Need and Demand Assessment (HNDA) Guidance provides a framework for considering rents affordable if a household pays not more than 25% to 35% of its income on rent.

Similarly, the SFHA affordability tool used in-house to complete our affordability assessment annually shows rental on all property sizes below 25% of income.

8. Challenges and Risks

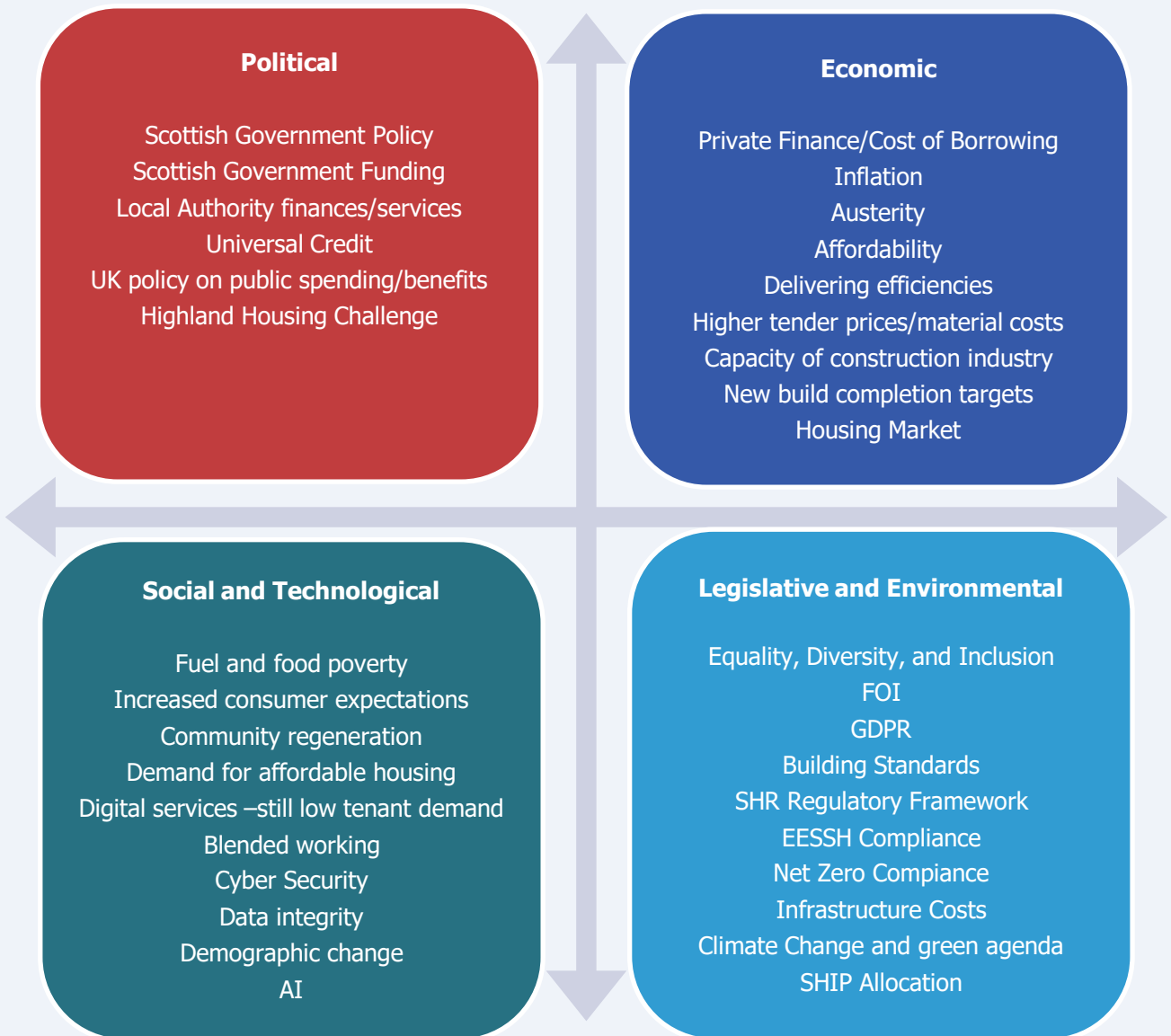
LHA’s business is strongly influenced by external factors. A PESTLE analysis of the wider operating environment addresses the Political, Economic, Social, Technological, Legislative and Environmental factors relevant to LHA’s business and future.

The analysis describes factors that could represent a significant risk to LHA or the achievement of our objectives, with the key risks then feeding through to Section 9 on Risk Management and Mitigation.

8.1 PESTLE Analysis

The future operating environment involves significant challenges and risks ahead for Lochaber HA and indeed for every social landlord in Scotland. We will monitor and evaluate the areas of change that affect us on an ongoing basis.

Sound management disciplines, including business planning, performance management and risk management will be part of our toolkit for navigating our way ahead alongside a focus on sound and stable governance and strong financial management. These have been priorities in the past and must remain so.



8.2 Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis

Our Strengths, Weaknesses, Opportunities and Threats also assist in setting our strategic objectives and the operational delivery plan so that key operational activities address threats and weaknesses and support strengths and opportunities.



9. Risk Management and Mitigation

9.1 Risk and Control Framework

The LHA Group recognises the importance of effective identification, evaluation, and management of all key strategic and operational risks and this is done in conjunction with the above PESTLE and SWOT analysis.

Risk Management is a key element of the LHA Group's overarching governance arrangements as it demonstrates that:

- we have considered those areas which may put the achievements of our strategic objectives under threat;
- have analysed the consequences of things going wrong; and
- identified the actions and controls needed to prevent or limit the consequences.

In addition, by managing risk effectively we can help ensure that:

- LHA makes the most of opportunities and develops them with the confidence that any risks will be managed
- Forward and strategic planning can be improved

As the parent of the group, LHA oversees the governance arrangements of both subsidiaries to address the risks associated with control of activities and managing or risks. This ensures that strong governance arrangements are upheld by both subsidiaries to protect the reputation of the Group.

In considering our approach to risk management, we seek to balance a prudent approach to the risks associated with our business with the need to ensure an innovative and creative approach to opportunities and challenges. We regard effective risk management as an essential component of our business strategy and crucial to maintaining our commitment to sustained viability.

We do not seek to avoid risks that can be properly managed, and which do not jeopardise our business or tenants' interests. Where activities that can support the delivery of strategic and operational objectives are identified as carrying an associated risk, we will only accept those risks following an assessment that confirms they can be effectively managed.

We define risk as any event, action or circumstance that unduly hinders the Association in its delivery of good performance, or achievement of either strategic or operational targets and objectives, or which has an adverse impact on the Association's business or reputation. Risk can, therefore, be defined in both financial and non-financial terms, but the ultimate impact of risk is financial in most cases as this has implications for viability.

9.2 Roles and Responsibilities

Risk Management is the responsibility of everyone in the organisation, however, to ensure the successful implantation of the Risk Management process clear responsibilities have been established.

The Board has overall responsibility for ensuring the effectiveness of this framework, the Senior Management Team is the facilitator of the framework and processes. This includes both compliance and monitoring to ensure the register is kept up to date and new and emerging risks are identified and risk scores are challenged.

We have recently been working with an external consultant to review our risk management strategy and processes, ensuring we continue to have an effective system. **Appendix 22 Risk Register** details this further. **Appendix 21 Risk Management Policy** sets out how we identify, assess, and manage risk; establishes a framework within which we monitor, manage and report risk; and describes the controls that we operate for effective risk management.



10. Value for Money

LHA's purpose is to serve the community, and this shapes our approach to Value for Money (VFM) which is focused on providing quality homes and services at affordable rents.

The pursuit of VFM is likely to be increasingly important in the period ahead:

- There will be pressures on tenants' incomes and on our own income streams and costs because of the continued high cost of living.
- We can expect additional statutory and regulatory obligations that landlords must pay for, as well as continued cuts to neighbourhood and other services by the local authority.
- We must maintain reasonable headroom in our financial business plan, to safeguard LHA's resilience during a period of economic turbulence that could be prolonged.

10.1 LHA's approach to VFM will ensure we:

- Always make the best use of our resources to benefit our tenants and community.
- Seek to continually improve the value that tenants receive from LHA – how we use our resources to enhance the type and quality of the services tenants receive.
- Be efficient and effective in how we make best use of IT solutions both software and hardware to streamline processes and improve customer service.
- Be open to making efficiencies (using available resources differently to better meet our priorities, or reducing costs/resources), and do this without detriment to tenants.
- Make sure that LHA continues to be a financially strong and sustainable social business.
- Compare our performance with that of our peers in relation to performance and to make any improvements needed. **Appendix 23 SHN Peer Group ARC Submissions** is an annual extract from the performance reports produced by Scottish Housing Network demonstrating performance from the ARC submissions.
- make good use of our assets and resources by being clear about our priorities for spending and then spending within our means.

10.2 Rents - Our Performance

Our Board receives and considers a KPI performance report on a quarterly basis. This report provides performance information across indicators for rent collected and rent arrears management; voids management; the delivery of maintenance services; and complaints. Our reporting style has allowed the Board to consider trends in performance, comparing the current quarter with the previous four quarters.

Our KPI performance, and a range of other Scottish Social Housing Charter outcomes, is subject to the scrutiny of the Scottish Housing Regulator, for which

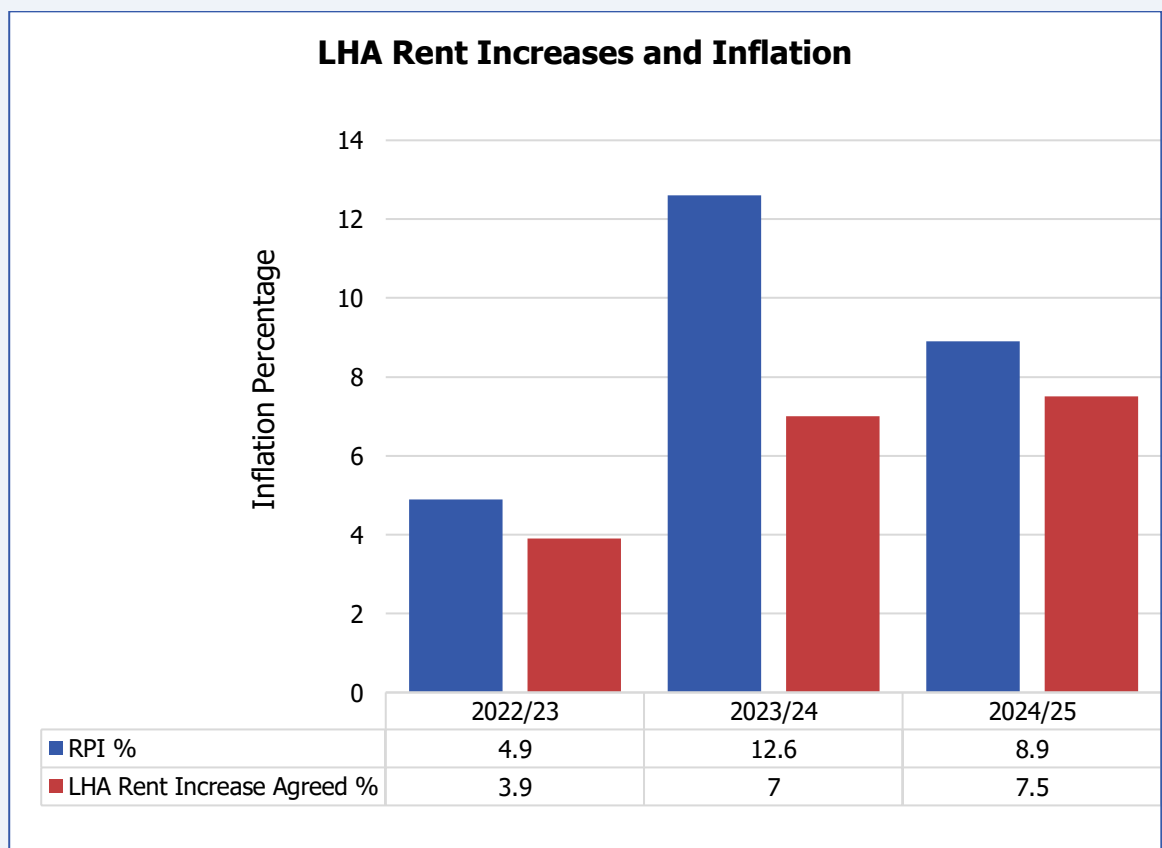
we complete an Annual Return on the Charter (ARC). These outcomes are published on an annual basis on the Regulator’s website and are scrutinised by our Board and tenants, along with benchmarking information, which is presented annually by Scottish Housing Network.

We aim to deliver continuous improvement across our key performance indicators, and this is achieved through tenant feedback, internal audit, and benchmarking.

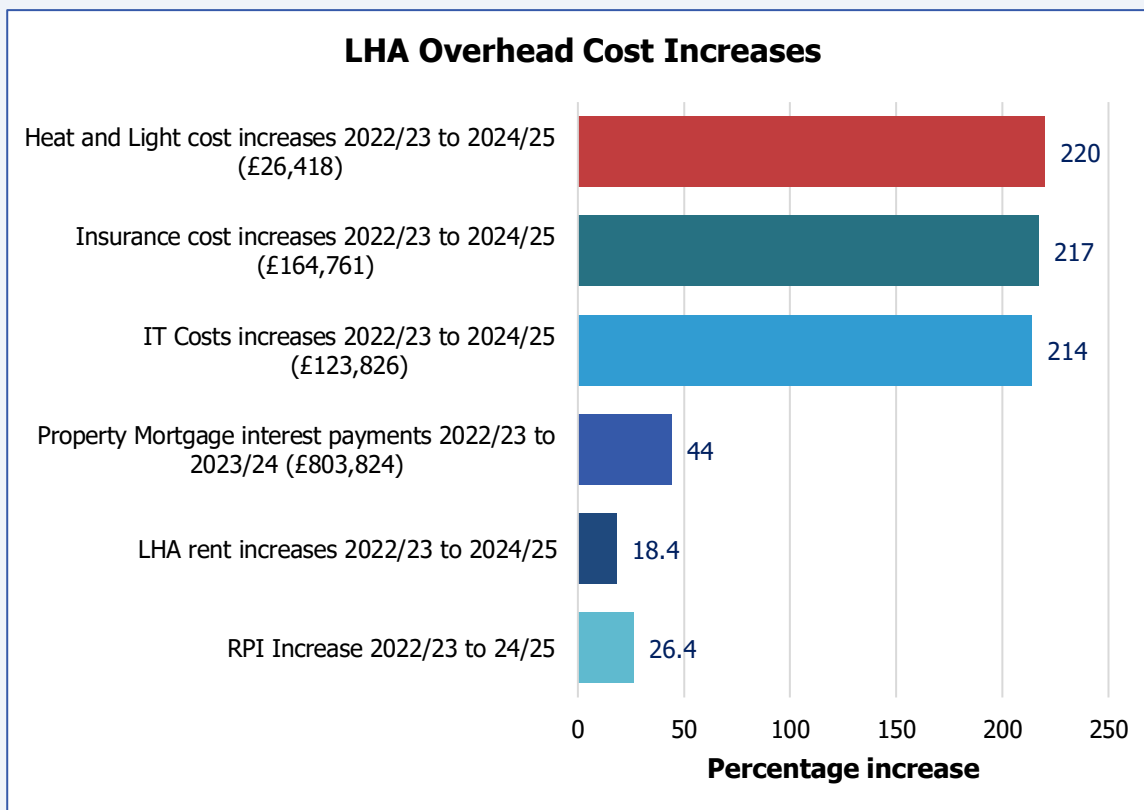
Our performance across KPIs and VFM is reported to tenants each year through ‘Tenant Talk’ and our Landlord Report (issued by the Scottish Housing Regulator), in which we compare ourselves against the average of our peers and across Scotland.

One of our priorities, therefore, is to keep rents affordable, whilst also generating sufficient rental income to meet all our obligations to tenants and maintaining viability in an increasingly challenging economic climate.

The graph below demonstrates how we have tried to protect tenants from unaffordable rent increases with uplifts below the recorded RPI inflation rate.



In the last few years, we have suffered maintenance, mortgage interest and overhead cost increases significantly above the official inflation rates as highlighted with some examples in the table below.



11. Financial Planning and Treasury Management

- 11.1 The achievement of our strategic objectives requires us to be able to maintain a balance between the ability to understand and control costs. This is important to maintain an affordable rent structure and to balance this with the ability to generate sufficient funds to maintain and improve our housing stock. A viable financial plan is also important to ensure our credibility with lenders who will provide the loan finance enabling us to develop new properties.
- 11.2 Underpinning all of this is the requirement for good governance which strengthens our stability and wellbeing. Our guiding principles in this regard are the Scottish Housing Regulator's Regulatory Standards of Governance and Financial Management.
- 11.3 Historically, within our business plan we had modelled increases in rent based on inflation and these generally showed a beneficial outcome in terms of our long-term financial position. However, the recent experience of an "inflation shock", and how our tenants would be impacted by the rising costs, the Association were unwilling to increase rents in line with the high inflation figures.
- 11.4 In addition, there has been the impact of the high interest rates – the increase reaching 5.25%, the highest rate in 16 years. The rate has now fallen back to 5% and there are indications that further reductions may be quicker than expected due to the recent drop in inflation figures.
- 11.5 We continued to carry out detailed stock surveys to ensure an in-depth knowledge of our properties and the findings of these surveys are reflected in this updated Business Plan. We employ the services of an external, independent Quantity Surveyor to annually undertake a programme to test and review our surveys and figures to provide added confidence in our life cycle costings.
- 11.6 **Background**
- Following the very difficult economic times we appear to be heading back to a more benign financial environment having seen a rapid fall in inflation and the start of a reduction in interest rates.
- Keeping the rent increase as low as possible whilst ensuring we have sufficient income to remain viable over the long term is a delicate balancing act.
- In 23/24, given the cost-of-living crisis, we recognised that any rent increase would need to be well below the rate of inflation which reached 11.1%. Whilst we recognised that this would impair our financial viability, we agreed that for one year we would be able to address any impact by revising our plans in future years to address any issues which arise.
- Whilst we must plan for the long term, to ensure that we have sufficient funds to invest in maintaining the standard of our properties, our focus is going to have to shift more to the short-term and ensuring that rents remain affordable whilst dealing with increasing operating costs and a significant increase in interest rates.

To deliver this the Association continues to seek efficiencies and to develop its culture of cost-saving and value for money.

11.7 **Financial Projections**

The outcome of our base case projection is shown at **Appendix 09 Financial Base Case Projections** which includes:

- Cashflow forecast for 30 years
- Statement of comprehensive income for 30 years
- Statement of Financial Position for 30 years

The purpose of the 30-year financial projections is to demonstrate the association's long-term viability to ensure that it can deliver the following objectives:

- To provide quality homes at affordable rents for tenants.
- To protect the health and safety of our tenants and staff.
- To provide a high quality and responsive management and repairs service which also provides value for money.
- To ensure that improvements and major repairs are provided for and carried out as required to protect existing investment in our stock.

The budgets are also based on the following financial objectives:

- To maintain a minimum cash balance of £750 thousand, and to ensure that the Association always has sufficient cash reserves to meet its obligations as they arise.
- To always comply with all loan terms and covenants of our lenders,
- Protect cashflow and making efficient use of our resources.

11.8 **Budget and Assumptions 2024/25**

The plan uses the 2024/25 budget as the basis of the long-term projections for the 30 years to 2054 and is adjusted for changes in subsequent years using the updated information available at the time of preparation.

A summary of the main assumptions used in the plan is given at **Appendix 08 Financial Cashflow Scenarios**, however, we have highlighted our thinking and approach to the assumptions below.

Any predictions about the future must be treated with care as we have significant uncertainties on rent increases, inflation, and interest rates.

11.9 **Rents**

Our base assumption for the rent increase for 2025/26 is 3.1%. This has been based on the Association's long-term policy of increasing rents by inflation plus 0.8%. On average the increases for 2023/34 and 2024/25 have been 2.5% lower than inflation leaving the Association with a gap between the increase in rents and the increase in costs.

For future years the projection assumes a rent increase of inflation plus 0.8%. It

should be borne in mind that this is not a commitment and that future rent increases will be decided each year after a detailed review of the business plan and tenant consultation.

We have also included a scenario showing the impact of a one year rent freeze.

11.10 **Bad Debts and Voids**

For 2024/25 the bad debt provision has been budgeted 1% and voids at 0.70%. These figures were to take account of recent economic uncertainties, however, we have projected lower figures for the long-term of 0.5% for both bad debts and voids. These lower figures more closely match our historical experience.

11.11 **Management Costs**

The major component of management costs is salaries, and we have assumed that these will increase by inflation plus 0.5%. The Association is a member of Employers in Voluntary Housing (EVH). EVH negotiate any increase annually with UNITE and the Board are subsequently balloted on the proposal advised by EVH.

11.12 **Maintenance**

Repair costs have been revised to reflect current pricing and we have assumed that these will increase increased by inflation plus 0.5%.

Although we have updated the costs of our repairs programmes to reflect inflation, we need to monitor these carefully as we go forward.

The stock condition survey programme continues to be updated, and the business plan is revised each year to reflect the refreshed costings.

11.13 **Loans**

The loan balances which the Association had at 31 March 2024 amounted to £13.8 million, with the most recent loan taken out being the £3 million drawn down from Unity Bank in December 2020 to fund development. This loan is being used to fund our current development programme.

There is a mix of loan types including fixed rate loans totalling £4.2 million and variable rate loans making up the balance. The fixed rate loans include £2 million bond finance. This bond finance with Allia is due for redemption on 2026/27 and will be refinanced at that time.

Due to the lower percentage of loans on fixed rates (30%), the sharp rise in interest rates has had a negative effect on the interest payments. However, the Association's net exposure to higher rates is significantly reduced by the cash reserves held on deposit which have benefited from the higher interest rate levels.

The Association has started the process to secure new funds for planned development over the next two years.

11.14 **Sensitivity Analysis**

The outcome of the Association's financial projections is very dependent on the assumptions which we use to build the plan. In preparing our plan we try to ensure that the assumptions which we use reflect the current economic environment and our expectations for the future, however, it is inevitable that some of these

assumptions will prove to be wrong.

As part of our financial planning, we look to examine the effect of alternative scenarios by changing the underlying assumptions which we build into the plan.

In considering the scenarios to model we have tried to reflect what we consider are the key risks to the Association's financial performance. Whilst the base projections already take account of the challenges arising from the inflation and higher interest rates, we have developed our scenarios to examine their impact on our financial plans of other potential risks.

Details and commentary of the scenarios and of the key risks identified and the results of the sensitivity analysis are set out below.

Rent Freeze One Year – A rent freeze of one year would reduce income in 2025/2026 by £137k but this reduction would be compounded over the 30 years of the plan and would require additional borrowing.

Inflation Only Rent – Rent increases of inflation only would significantly impair the business plan. The assumption is that repair costs and overheads will be rising at inflation plus 0.5% and therefore costs will be rising faster than income. The Association's financial position would rapidly become unviable.

Lower long-term rent increases – if we assume that we reduce rent increases from inflation plus 0.8% to inflation plus 0.5% after year 10 there is a significant impact with a drop of 40% on the cash available at year 30. There is no indication that additional borrowing would be required to fund working capital.

Increasing interest rates – assuming long term interest rates would be 3.5% rather than 2.5% would have a limited impact on the long-term viability of the plan. There would probably be a need for limited short-term borrowing in the 2030's where we are facing higher repairs costs but this would not be material.

Increasing spend on repairs – this scenario assumes that the Association borrows an additional £1m and spends that £1m on additional repairs over the next 2 years. This change does show a drop in year 30 cash and would require a small amount of borrowing to fund working capital in the 2030's.

The year-end cash balances over the 30 years of the plan have been shown below.

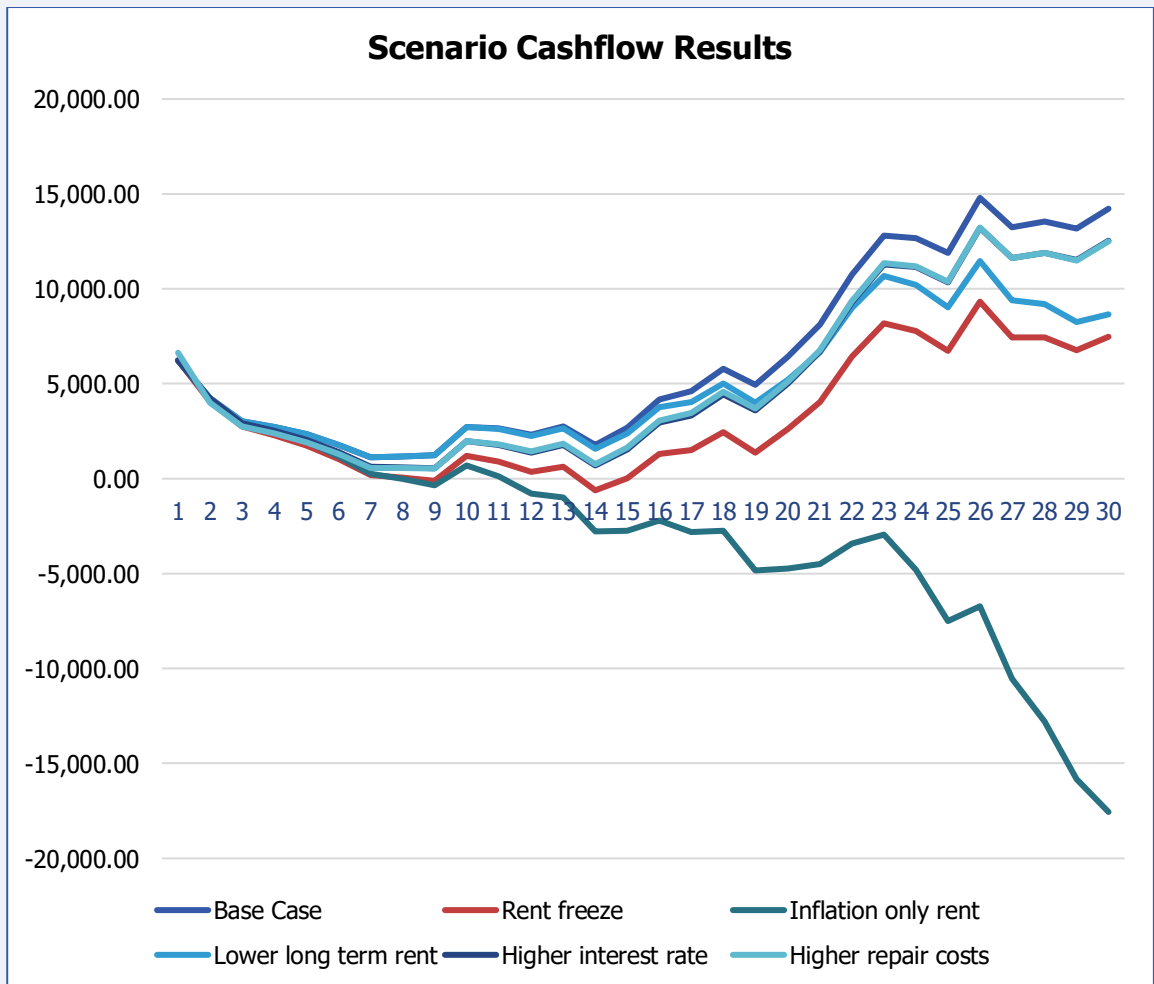
	Ending Cash and Year		Lowest Cash and Year		Additional Borrowing Years	Additional Borrowing
Base Case	£14,215,100	30	£1,178,500	6	None	-
Rent Freeze One Year	£7,474,800	30	-£611,300	14	2031-2040	£1,361,300
Inflation only Rent	-£17,552,300	30	-£17,552,300	30	2031-2053	£18,302,100
Reducing long-term rent increases	£8,659,600	30	£1,178,500	6	None	-

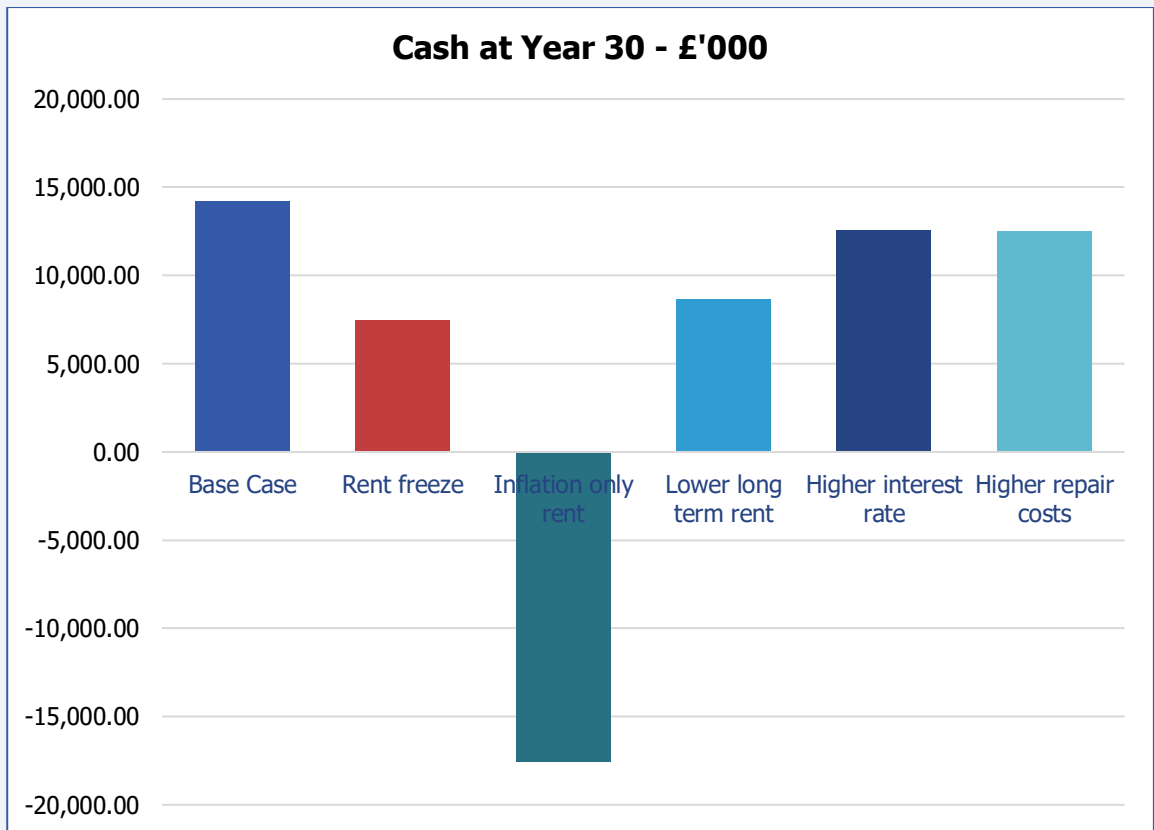
Increasing Interest Rates	£12,532,000	30	£550,500	9	2031-2038	£199,500
Increasing repair costs)	£12,505,000	30	£537,300	9	2031-2038	£212,700

11.15 Results of Sensitivity Analysis

The pattern is similar for each scenario with the period from 2030 to 2040 being the most problematic due to higher costs on component replacements during this period.

The year-end cash balance shown in the projections as at year 30 is shown in the graph and the table below. For the scenario projections carried out, the assumption of inflation only rent increases shows the worst position with the graphs below demonstrating a significant deficit at year 30.





Overall, the scenarios show the business plan is resilient, with positive cash showing at year 30, the exception being the Rent Inflation Only scenario.

It can also be seen that where a scenario weakens the Association's financial position it can go a long way to eroding the Association's financial position and can leave us vulnerable to additional shocks.

In facing the adverse scenarios, the Association could require to actively manage the situation and address the problem with some of the following responses:

- Additional borrowing
- Increased rents
- Investigation of cost savings which could include reducing investment, staff costs and overheads
- Looking at a partnership with another RSL to reduce costs.

11.16 Conclusion

As they stand the financial projections indicate that Lochaber Housing Association's business plan is robust and can demonstrate its long-term viability.

The Association has borne up well in relation to the recent economic difficulties, however, there is no denying that the financial position has been weakened by recent rent increases at below inflation whilst facing significant increases in costs.

Interest rates are predicted to reduce significantly over the new 2 years and the

Association will need to consider our loan portfolio and review the balance of fixed and variable borrowing as new loans are drawn down.

There is still risk from cost increases particularly for repairs expenditure which may not be reflected in expected increases in rents. It is important that we consider reviewing our budgets to cut or postpone expenditure where possible and strengthen our efforts to maximise income through working with tenants to reduce arrears.

This long-term viability shows that the Association has sufficient resources to deliver a good service to those tenants and can raise enough cash to continue investing in our homes so that they are maintained to a high standard.

The results of the scenario tests give the Association clarity as to what problems may create the most vulnerability but also to consider what measures can be put in place to monitor and adapt to such potential problems.

To be relevant as a decision-making tool the plan is regularly reviewed and updated to ensure that it is still relevant in a world where change is a constant.

The plan is a balancing act between two competing objectives:

- Keeping rents as affordable as possible by keeping costs down; and
- Spending sufficiently to ensure a proper service in managing and maintaining the properties.

To achieve this balance, it is important to continue to foster our organisation's culture of constantly striving to deliver an excellent service to our customers, and to ensure that every decision is viewed in terms of "value for money".

The Board has the ultimate responsibility to ensure that LHA is well run, viable and delivering the outcomes for which it has been set up. The Board understands that it is crucial not only to identify risk but how this risk will be managed.

12. Useful Information

Auditors	Alexander Sloan, Glasgow
Bankers	Virgin Money
Lenders	Allia CAF Bank Nationwide Building Society Royal Bank of Scotland Unity Trust
Financial Advisor	David Smith, Oban

Registered as a Society under the Co-operative and Community Benefits Act 2014
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 Financial Services Authority Reg No. 2289RS
 Scottish Charity No. SC030951

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