ACQUISITIONS POLICY

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Craigdale Housing Association can provide this document on request, in different languages and formats, including Braille and audio formats.

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1.0 INTRODUCTION

1.1 Craigdale Housing Association's Mission Statement is: "We are a Housing Association passionate about providing excellent affordable homes and services for our community."

1.2 In order to help us to achieve our Mission Statement and deliver our Strategic Objectives as identified in our Business Plan and within other key strategic documents such as our Asset Management Strategy, we will consider acquiring land and property, where it makes business sense to do so.

1.3 Property acquisitions can include: stock transfer; buying from a developer or acquiring an individual property direct from an owner.

1.4 One of the key objectives of our Acquisitions Policy is to meet housing need by providing quality housing at affordable rents.

2.0 POLICY AIMS

2.1 Craigdale Housing Association has a history of developing new build housing within its area of operation, which has been instrumental in the physical regeneration of our community.

2.2 In order to realise our Mission Statement and deliver our key strategic objectives, we will;

- Continue to seek opportunities to support community cohesion and address housing need;
- Work constructively with Glasgow City Council and consider acquisition and development which is consistent with the Strategic Housing Investment Plan;
- Ensure that staff and Board members act within good governance, good financial management and within our vision and values;
- Ensure our Board have control over making key decisions throughout the acquisition process;
- Ensure compliance with the law and all appropriate Regulatory guidance in respect of acquisitions;
- Define staff responsibilities with regard to acquisitions.
- Ensure adequate assessment of risks associated with an acquisition is carried out at key stages in the acquisition process.
- Ensure the Association takes a proactive approach to realising opportunities for growth within our defined geographical boundaries
- Seek to achieve value for money in the acquisition process
- Ensure any valuation is undertaken by a suitably qualified professional and we will not pay more than the valuation price unless economically advantageous to do so (e.g to gain full control of a close) this will be careful scrutinised and discussed at Board level if it arises;

- Undertake sufficient due diligence to reasonably assess any potential development constraints and costs associated with any subsequent development (e.g. contamination, drainage, utility connections, bearing capacity, mineral stability, planning constraints, essential work required to existing buildings) and;
- Consider the business plan impact of the proposed acquisition or development over 30 years.

2.3 The Association will not:

- Become involved in overly risky acquisitions or development;
- Take decisions which adversely impact on business viability or the best interests of our tenants;

3.0 EQUALITIES & DIVERSITY

3.1 The Association is committed to ensuring equal opportunities and fair treatment for all people in its work. In implementing this policy, our commitment to equal opportunities and fairness will apply irrespective of factors such as gender or marital status, race, religion, colour, disability, age, sexual orientation, language or social origin, or other personal attributes**.**

3.2 In line with our commitment to equal opportunities, this policy can be made available free of charge in a variety of formats including large print, translated into another language or on audio tape.

4.0 STATUTORY & REGULATORY REQUIREMENTS

4.1 Depending upon the type of acquisition there are a number of relevant guidance notes/documents that may have to be referred to however, development work must be consistent with:

- The Scottish Housing Regulator's Regulatory Standards of Governance and Financial Management;
- Regulatory Guidance, including the SHR March 2017 thematic study into the development of affordable housing in Scotland;
- Glasgow City Council's SHIP, their Affordable Housing Strategy, (2026/27 – 2030/31) (and any other relevant documents that may be published from time to time);
- All legislative and planning requirements,
- The Scottish Government's Green and Sustainable Places Agendas, and
- Our own Strategic Housing Development Funding Plan.
- Scottish Government's Housing to 2040 strategy
- Scottish Government Housing Emergency Action Plan 2025

5.0 BOARD RESPONSIBILITY

5.1 The Board will be responsible for overseeing the acquisition process through to its conclusion. This involves:

- Considering options appraisals and risk assessments of possible acquisitions;
- Giving approval at key stages within the acquisition process;
- Agreeing to the acquisition, and
- Approving of all offers of grant and spend.

6.0 STAFF RESPONSIBILITY

6.1 Where one has been appointed, the Development Agent (or CEO in their absence) will:

- Identify in consultation with the CEO, acquisition opportunities.
- Consult as appropriate with the community.
- Present reports to the Board at key stages during the acquisition phase.
- Prepare briefs where required.
- Negotiate price – within defined parameters via standing orders.
- Prepare options appraisals.
- Prepare risks assessments & 30 year costed maintenance programmes.
- Appoint the design team and brief professional consultants, solicitors and valuers and liaise with planning and agencies such as SEPA (Scottish Environment Protection Agency).
- Subject to Board approval complete and submit applications to the City Council, including funding applications, acquisition paperwork and all related responsibilities.
- Ensure compliance at all times with the Association's Policies, such as Procurement and Financial Regulations.
- Once acquisition is complete add the property to the Association's database and property register.

6.2 Our Finance Agent will:

- Carry out a full financial appraisal of the acquisition taking account of: capital costs, expenditure, revenue generated by the acquisition, availability of external funding, private finance, immediate maintenance/refurbishment needs, demolition costs, adaptation requirements and the overall effect of the acquisition on the Association's 30 year financial projections.
- Liaise with the Development Agent (or CEO) and input into the preparation of briefs, risk assessments and production of 30 year financial assessments.
- Ensure private finance is in place prior to works starting.
- Attend Board meetings as and when required to present financial assessments.

Individual Property Acquisitions

6.3 Our Maintenance Consultant or appropriately experienced member of staff will:

- Conduct a technical stock condition survey, taking into account compliance with SHQS (Scottish Housing Quality Standard) and EESSH/EESSH2(Energy Efficiency Standard in Social Housing).
- Obtain a copy of the RICS (Royal Institute of Charted Surveyors) Homebuyers Report (homeowner obtains this at their own cost).
- Prepare a 30 costed maintenance programme for the property.
- Liaise with Glasgow City Council over availability of grants.
- Liaise with the Finance agent over funding options for the acquisition and review the 30 year financial assessments for the Association, inclusive of the property to the acquired.
- Prepare a report for Board's consideration on whether or not to acquire the property, taking account risk assessment, review of 30 year financial projections compliance with SHQS and EESSH/EESSH2.

7.0 DUE DILIGENCE

7.1 When acquiring land for new build appropriate investigations will be undertaken into such matters relating to, but not limited to:

- The legal title of the property.
- Planning and Building Regulation compliance for the existing use and proposed purpose of the acquisition.
- Energy Planning Certificate, where relevant.
- Other statutory consents.
- Pollution/contamination.
- Asbestos if existing property is to be demolished.
- Existing services.
- Feasibility Study.
- Community support.
- Risk assessment.
- Independent valuation compliant with RICS (Royal Institute of Chartered Surveyors) Red Book.
- Value for Money.
- Board approval at key stages throughout the acquisition process.

7.2 If properties are being acquired through Section 75 sites (land is owned by a private developer but the houses are being sold to the Association through a Design & Build Contract) then the Board must see sight of a full risk assessment and 30 year financial projections as part of the acquisition process. The risk assessment should take into account the investigation matters noted in Section 7 of this Policy.

8.0 REVIEW OF THE POLICY

8.1 This policy will be reviewed as necessary every 3 years in line with relevant legislation and/or best practice or earlier if required.

9.0 COMPLAINTS

9.1 We aim to get things right first time and provide a good quality service to our tenants and other customers. However, we acknowledge that things can go wrong and that some tenants or other customers may be unhappy with the service provided.

9.2 We promote our Complaints procedure through our website and periodic articles in our newsletters. This information leaflet is also issued to all new tenants as part of the signing up pack.

9.3 We are required to report specifically to both our Board and the Scottish Housing Regulator on any complaints concerning equalities issues.

10. Risk Management

10.1 In all the key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our material risks which are regularly monitored by our Management Team and Audit & Assurance Committee.

10.2 Key to the mitigation of the risks associated with development and acquisition is having a comprehensive policy in place to manage the process. This policy sets out Craigdale's approach to the management of the risk associated with development and acquisition and the associated. financial and governance risks

10.3 To ensure we continue to manage the associated risks we will periodically review this Policy to ensure compliance with all legislative requirements and regulatory and best practice guidance.

11. Data Protection

11.1 On the 25th May 2018 the legislation governing data protection changed with the introduction of the UK General Data Protection Regulation (GDPR).

11.2 We hold a variety of Personal Data relating to individuals including tenants, waiting list applicants, factored owners, other service users, employees, and Board. Our Privacy Policy sets out the basis on which we can process and share such data with third parties, it also sets out how we will securely store individuals' data, whether electronically or in paper format. It also provides information on individuals' rights under GDPR including: to view personal data held about them by us; to request a restriction of processing of their data; the right to be forgotten and a right to object to us processing their data. In terms of the rights to be forgotten and to restrict or object to processing of Personal Data, any such requests will require to be considered on their own merits and legal advice will need to be obtained in some circumstances. We have the responsibility for accepting or refusing such requests and will do so in writing.

11.3 Under GDPR we are required to provide all customers whose Personal Data we hold with a Fair Processing Notice (also known as a Privacy Notice). The Notice sets out the Personal Data we process and the basis for doing so.

11.4 We will only keep and process Personal Data for the original purpose we gathered it for, and we will not keep it for any longer than necessary. Attached to our Privacy Policy is a table of Retention Periods for Personal Data held and processed by us. We recognise that not all Personal Data can be processed and kept for the same period of time, and this will vary depending on the individual circumstances of each person whose Personal Data we hold.

11.5 The Privacy Policy sets out what should happen in the event of a Data breach e.g., does the breach require reporting to the Information Commissioner's Office and whether the individual affected should be notified. Timescales are set out for dealing with data breaches.

11.6 Full copies of our Privacy Policy are available upon request at our office or from our website www.craigdaleha.co.uk