

Environmental Social Governance

2024 - 2025



Foreword

Housing 21 is committed to providing high quality homes with excellent care and support services. Our priority is to ensure residents are delighted with where they live and are supported to sustain their tenancies. The Board has established an ambitious strategy that focuses on delivering for residents first and in doing so, we aim to do no harm to the environment.

We continue to invest in our properties, alongside growth through new build and acquisitions, seeking to provide affordable homes for older people enabling them to live well with dignity and autonomy.

Our properties are energy efficient and benefit from well-maintained communal areas and grounds. Our services in Retirement Living and Extra Care emphasise the importance of our people. As an Investors In People Platinum organisation, we believe in the value created from motivated and skilled employees delivering local services for residents.

We are proud to maintain the highest regulatory gradings for both governance (G1) and financial viability (V1), reflecting our effective governance arrangements and robust financial profile. We remain focused on delivering a high-quality service to residents, maintaining strong satisfaction levels, and are enhancing the way we consolidate and report our consumer performance information.

During 2024 we formally began collecting data on the social value H21 delivers through its supply chain and contractor partners. We have considerable leverage through our procurement activities for both capital and revenue spending and the Board is keen to evidence our role both as a local employer and place-maker in the communities in which we operate. To date we have over 800 examples of social value captured and have raised more than £90k from fundraising for good causes.

We are proud to work with exemplary contractors who not only deliver quality work but also support our residents throughout their programmes of work in our schemes. As always there is more we can do in collaborative partnerships.

We also acknowledge that achieving EPC C is only the start of our decarbonisation journey and we have set further challenging targets to reduce energy consumption and our carbon footprint.

Elaine Elkington, Chair of the Board

About us

Leading provider of **Extra Care**
and **Retirement Living**



24,000
properties
owned/managed



49,000 hours of
in-house care
each week

215 local
authority
partners



Committed to
developing **400**
new homes per year



99 percent of
homes meet
EPC C or above



G1/V1/C2
regulatory
rating

INVESTORS IN PEOPLE™
We invest in people Platinum



Introduction

Housing 21 is a leading not-for-profit provider of Retirement Living and Extra Care for older people. Our core purpose and commitment is to provide high quality housing with support or care, enabling our residents to live well with dignity and autonomy. Ensuring homes are both environmentally and socially sustainable is integral to our decisions and actions.

Housing 21 is proud to adopt the Sustainability Reporting Standard for Social Housing (SRS). The SRS reporting framework has been developed to establish a transparent, consistent and comparable set of Environmental, Social and Governance (ESG) criteria across the housing sector.

This report details our ESG performance, highlighting the positive work that we do. We are dedicated to going beyond legal requirements, exceeding minimum standards and striving to achieve a position of 'doing no harm'. In addition, we have commissioned an independent assurance of specific criteria from our 2024-25 ESG report.



Our commitment

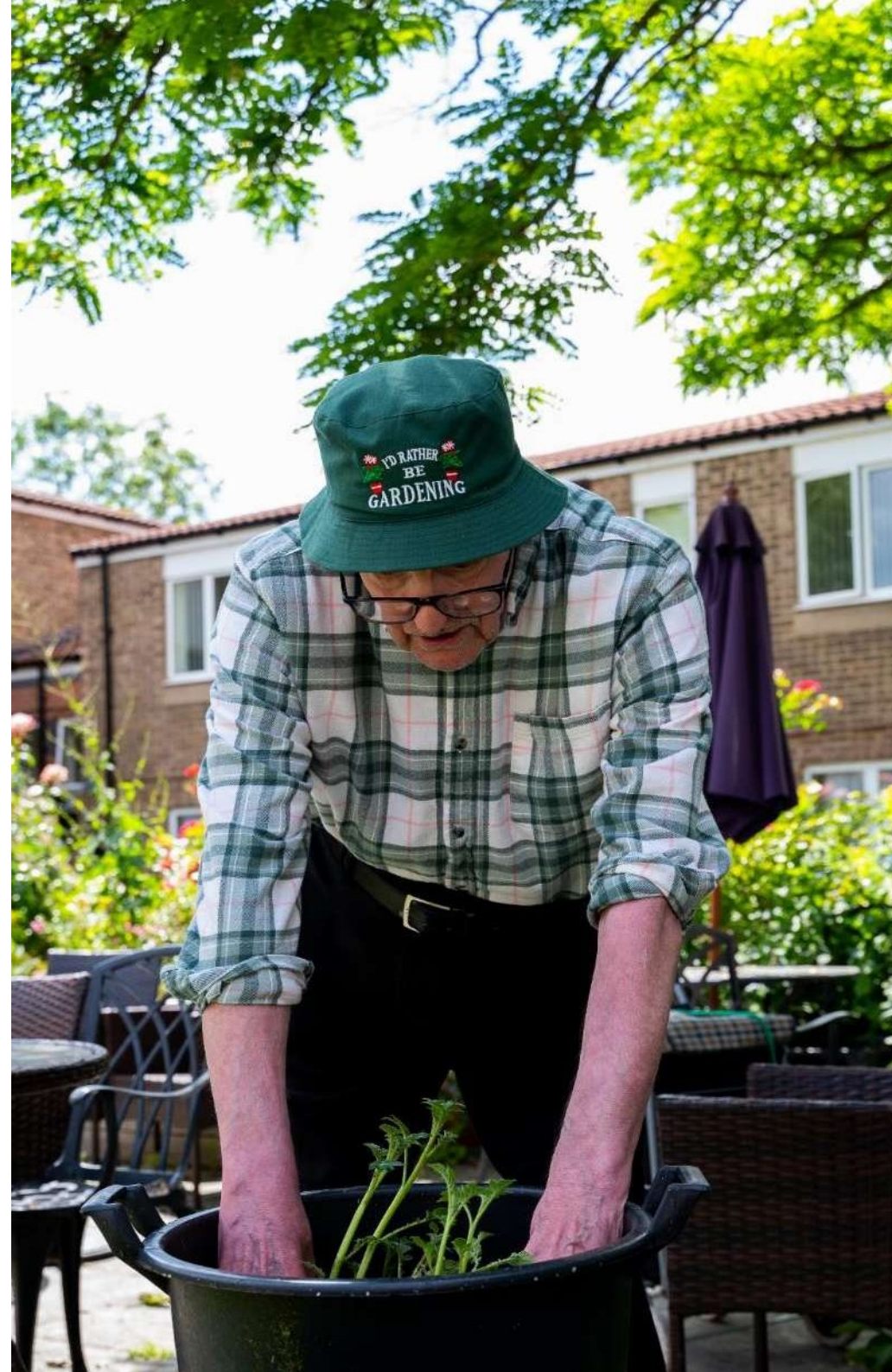
- Achieve EPC C for all properties
- Achieve an Environmental Impact Rating (EIR) of C or better for all properties by 2030
- Reduce kWh/m² by 15 percent for communal heating systems and 10 percent for individual domestic systems by 2030
- We will continue to work with residents, employees and other stakeholders to promote environmental awareness throughout Housing 21, by making sure environmental impacts are a key part of local agreements as well as being central to national strategies

Environmental

We are committed to providing safe, quality and affordable housing for residents, while also prioritising environmental preservation, ensuring we do no harm and embracing innovations to minimise our carbon footprint.

We fully support the UK Government's commitment to a 100 percent reduction of greenhouse gas emissions by 2050. By investing in our stock, we have already successfully achieved an EPC C or above for 99 percent of our properties. However, further action is required to transition to an environmentally sustainable operating model.

Our Net Zero Carbon and Environmental Sustainability Strategy highlights our progress, challenges, and future commitments in areas such as carbon reduction, energy efficiency, waste management, climate resilience and sustainable development.



Climate change

C1 – Distribution of EPC ratings of existing homes (those completed before last financial year)

	24-25	23-24
% of homes rated A	0.1	0.1
% of homes rated B	29.3	33
% of homes rated C	70.2	66
% of homes rated D	0.3	0.6
% of homes rated E or worse	0.1	0.2
% of homes without an EPC rating (unknown)	0.08	0.2

Average SAP rating of existing homes (those completed before the last financial year): 77.6

Energy use intensity of existing homes*: 176.4 kWh/m²

** Following new SRS guidelines published in May 2025 we have updated our Energy Use Intensity (EUI) methodology to rely exclusively on EPC data*

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

	24-25	23-24
% of homes rated A	2	0
% of homes rated B	78	98.8
% of homes rated C	20	1.2

** Above figures excludes leasehold, market rent and Oldham PFI properties*

Average SAP rating of new homes (those completed in the last financial year): 82.5

Energy use intensity [kWh/m²/yr] of new homes: 131.02 kWh/m²

C3 – Does the housing provider have a net zero target and strategy?

Yes, we have a Net Zero Carbon and Environmental Sustainability Strategy which sets out interim targets for 2030 to help us reach the UK Government's 2050 target. This includes reducing communal and residential energy use across our schemes and reducing the number of properties reliant on fossil fuel.

We continue to pilot non-fossil fuel systems to inform decisions on how best to transition our properties to net zero, holistically evaluating our options to consider cost, practicality and the impact to residents.

Our investment programme also includes works to enhance energy efficiency through insulation, LED lighting, controlled heating and windows projects.

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

Providing safe, high-quality properties through a sustainable investment programme is fundamental to Housing 21’s strategy. Within the last 12 months we have carried out the following works towards our goal of net-zero:

- Upgraded to LED lighting across 46 schemes
- Installed EV charging points on six existing schemes
- Carried out heating and hot water improvements across 45 schemes, including replacing storage heaters, communal plant room replacements and the installation of Quantum Heaters
- Installed solar PV on seven schemes
- Improved building insulation following roof replacements across 29 schemes
- Installed cavity wall insulation at one site and External Wall Insulation at one site
- Replaced doors and windows across 58 schemes

The number of homes that have benefitted from the above activities in the last financial year (as part of the journey towards the net zero strategy), also expressed as a proportion of the total homes we aim to retrofit: 5,919 (27 percent)



C5 – Greenhouse gas emissions:

Scope 1, Scope 2 and Scope 3 Green House emissions

Scope 1, Scope 2 and Scope 3 Green House emissions per home

The UK Government's Streamlined Energy and Carbon Reporting (SECR) Policy was implemented on 1 April 2019. Housing 21 is outside the SECR qualification criteria in the UK but will follow the same protocols in its carbon reporting. The reporting period is 1 April 2024 to 31 March 2025. The increase is mainly due to new acquisitions with the Carbon intensity ratio intensity ratio of 0.82 tCO₂e per property compared to 0.78 tCO₂e per property in 2023/2024. We have opted to use the operational control boundary definition to define our carbon footprint boundary. Included within that boundary are Scope 1 and 2 emissions from gas and electricity, as well as emissions from grey fleet, all in the UK.

- Scope 1 consists of the gas and biomass usage within the communal spaces of our schemes: 7,566 tCO₂e
- Scope 2 consists of the electricity usage within the communal spaces of our schemes and within our head office: 6,150 tCO₂e
- Scope 3 currently consists of our business car mileage and emissions related to the transportation of the fuels used in our communal energy consumption: 5,429 tCO₂e

	Apr 24 – Mar 25	Apr 23 – Mar 24
Total electricity use	29,697,881 kWh	27,030,224 kWh
Total gas use	41,314,165 kWh	33,276,448 kWh
Total transport fuel	6,532,123 kWh	3,748,062 kWh
Total energy from other fuels	812,800 kWh	744,748 kWh
Total energy use (all sources)	78,356,969 kWh	64,799,482 kWh
Total carbon emissions (electricity)	8,163 tCO ₂ e	7,429 tCO ₂ e
Total carbon emissions (gas)	8,806 tCO ₂ e	7,093 tCO ₂ e
Total carbon emissions (transport fuel)	2,139 tCO ₂ e	1,227 tCO ₂ e
Total carbon emissions (other sources)	36 tCO ₂ e	34 tCO ₂ e
Total carbon emissions	19,144 tCO₂e	15,783 tCO₂e
Carbon intensity ratio	0.82 tCO₂e per property	0.78 tCO₂e per property

SECR Intensity Ratio for Total Emissions (Scope 1–3) –
0.82 tCO₂e per property

Case study: Marigold Court heat network

In February 2025, Marigold Court transitioned from its former gas-powered heating system to a sustainable, low-carbon district heat network.

The Extra Care scheme operated its own gas-powered plant room for several years to supply heating and hot water to the building. Connecting to the heat network has phased out gas consumption, drastically reducing its carbon footprint.

The pioneering Gateshead heat network has been operational for several years and uses old mining infrastructure to provide clean, sustainable heating to the surrounding community.

Residents at Marigold Court can enjoy the benefits of this innovative system, experiencing reliable, efficient heating and hot water without the need to adjust to unfamiliar systems or bear the cost of a major retrofit.

Heat networks are a major strategic part of the UK's plan to reach net zero. Following the success of Marigold Court, Housing 21 will continue to look for heat network opportunities.



**C6 – How has the housing provider mapped and assessed the climate risks to its homes and supply chain, such as increased flood, drought and overheating risks?
How is the housing provider mitigating these risks?**

Yes, we have mapped our sites using UK Government (DEFRA) data. We found that 290 schemes are in ‘flood risk areas’ and 33 schemes are in ‘high/medium’ flood risk zones. Further risk analysis for these schemes will be carried out in 2025. Housing 21’s data indicates that in the last five years, nine schemes have had flooding incidents, including near misses. These sites were surveyed to identify the cause of the floods and plans are being put in place to mitigate the effects in the future.

Building overheating has been raised as a concern, particular in some newer Extra Care sites. Overheating is often exasperated in modern buildings due to high levels of insulation and reduced levels of natural ventilation. Our Net Zero and Environmental Sustainability Strategy outlines commitments around overheating. These include adding weather compensation to communal heating systems, increasing ventilation in communal areas and improving education for operational teams on how to manage temperatures.

While the measures we have taken on overheating and flood risk have been effective, as the climate changes there is an increased risk for flooding and overheating within our properties. As such we will continue to review our data and policies to fit the changing landscape.

Case study: Farmers Court heating switch off

Farmers Court experienced uncomfortably hot indoor temperatures during the warmer months. A seemingly simple solution, to turn the heating off, has provided some valuable and positive lessons learned.

The Extra Care scheme has a communal gas plant room and underfloor heating. Like many newer builds with this arrangement, it struggled with overheating. Residents were uncomfortable and windows were left open to try cooling the building.

The system’s configuration allows for the heating to be switched off in isolation while continuing to provide hot water. Following close consultation with residents throughout, the heating was switched off in spring 2024 until the cooler autumn months. This exercise has been met with strong enthusiasm from residents and Farmers Court’s housing and care teams. Benefits included:

- ✓ A cooler and more comfortable environment
- ✓ Reduction of 490,000kWh to 367,000kWh gas consumption per annum
- ✓ Approximate saving of £11,000 per annum (£240 per flat) for residents

Following this success, we are assessing similarly configured schemes to see if the approach can be replicated more widely.

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

Yes, this is included within our Net Zero Carbon and Environmental Sustainability Strategy. We appreciate that outdoor spaces are invaluable for biodiversity, wellbeing and socialising. Following a desktop survey, we found that 98 percent of our existing schemes benefit from a communal green space, with 75 percent having trees and 62 percent with an outdoor seating area. We ensure that our new developments incorporate outdoor areas within their designs.

Many residents enjoy gardening, and we actively encourage their participation in enhancing the outdoor space at their schemes. In 2024/2025 we awarded £10,000 to support resident-led garden projects at 47 schemes. We also widened participation for the 'In Bloom' gardening competition to run across all our Retirement Living schemes in 2024/25. The competition hopes to encourage residents to get involved in maintaining green spaces in their community, with a variety of different categories to enter and prizes donated by contractors.

Where possible, we promote sensory planting and covered areas, both of which can increase enjoyment of the space while promoting biodiversity.

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

We have a robust asbestos management programme and ensure that any asbestos removal is carried out in the appropriate manner. We have removed all asbestos containing materials with a high material score and have a monitoring programme in place for medium and low materials.

With regards to other pollutants, we do not have a specific strategy, although we have referenced this within our Net Zero Carbon and Environmental Sustainability Strategy and recognise that we need to do more in this area.

Our efforts to decarbonise, provide infrastructure for cleaner transport, and promote green spaces, will assist in reducing pollutants.



Case study: Lavender Meadows community orchard

Green space at Lavender Meadows (Stratford-upon-Avon) was transformed into a flourishing community orchard. The collaborative initiative from residents and employees at the Extra Care scheme focused on conservation, sustainability and community engagement.

The project began with a simple idea to use the land surrounding the building for more than just a well-kept lawn. A conversation between residents sparked interest in reimagining the space as something that could benefit both people and local wildlife.

Through existing connections with a local voluntary organisation, CAVA, residents were introduced to Forest of Hearts and its Green Therapy Programme where they proposed their idea of the community orchard. Residents worked together gathering ideas and building support, forming a dedicated working group.

With funding from Forest of Hearts, along with personal donations, the orchard began to take root. Wildflower seeds have been planted along the bank and the

community has embraced the 'No Mow May' initiative to promote biodiversity and support pollinators.

Plans are now underway to make the orchard fully accessible with an all-weather path. When the trees begin to bear fruit, the community hopes to host seasonal harvest events.



Resource management

C9– Does the housing provider have a strategy to use or increase the use of responsibly sourced materials for all building and repairs works?

If so, how does the housing provider target and measure performance?

Yes, this is included within our Net Zero Carbon and Environmental Sustainability Strategy and incorporated within our procurement quality assessments. We continuously review our building materials, specifications and methods of working to minimise our environmental impact and wherever possible we will avoid using scarce, non-renewable materials.

By incorporating the new Part L and the use of our sustainability brief in our new builds, we can offset the use of embodied carbon. We continue speaking with our contractors regarding new and innovative products that are more environmentally friendly and sustainable.

A large proportion of materials used on new build sites are from UK manufacturers. This also helps reduce long lead in times and reduces transportation of these materials.

Case study: Housing 21's purchased products

Our main supplier of facilities and stationary products, Lyreco, has set a target to supply 90 percent of all products from within each category they supply to be sustainable by 2026.

Lyreco's product data highlights the positive environmental impacts of Housing 21's purchased products:

- ✓ 41 percent have green credentials
- ✓ 33 percent are recyclable, biodegradable, or compostable
- ✓ 26 percent have recyclable packaging
- ✓ 14 percent are made from recycled materials
- ✓ 28 percent of deliveries in 2024 were made by electric vehicles

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

Yes, this is included within our Net Zero Carbon and Environmental Sustainability Strategy and incorporated within our procurement quality assessments.

New build construction contractors are required to provide a waste plan as part of the pre-construction information, which requires sign off from the local Environmental Officer. Waste plans ensure that waste to landfill and non-recyclables are minimised. Planning departments request a percentage of non-recyclable or hazardous waste removed from sites as standard and this is monitored in line with the Construction Waste Plan and key performance indicators (KPIs) issued to both the contractor, supply chain and client prior to construction commencement. As a client and housing provider, we monitor the KPIs through monthly site meetings and discussion with our principal contractors.

For building works on our current stock, we will continue to work with our supply chains to create less waste and use less materials, by not over-specifying requirements and not renewing products before the end of their lifecycle.

When disposing of materials, we will only add ‘accepted’ waste to skips. These items can be separated at the waste

management plant and either recycled or used for cleaner fuels. Restricted materials, including asbestos, are disposed of in the authorised and appropriate way. We use specialist contractors to remove and dispose of any asbestos containing materials.

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

Yes, this is included within our Net Zero Carbon and Environmental Sustainability Strategy and we are committed to reducing unnecessary water usage. As part of our stock investment programme, we have replaced all baths with showers and are installing water-efficient toilet syphons and shower heads.

Where appropriate, we are replacing water heaters for point of use water heaters. These upgrades can further reduce water consumption as point of use heaters typically result in less water runoff.

We also encourage our schemes to adopt sustainable measures. Where possible, we will install rainwater butts and reuse this in garden areas during drier periods. We will continue to examine further ways and innovations to demonstrate our commitment to water management and are intending to start monitoring the use of water on our schemes.

Social

Our residents are at the heart of our decisions and actions. We want to maintain our status as landlord of choice for older people by providing safe, secure and high-quality homes.

We will always be guided by our social purpose and Doing the Right Thing is a principle that drives the decisions and actions of Housing 21.



Affordability and security

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

1) Rent compared to median private rental sector (PRS) across the relevant local authority

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

Rent compared to median private rental sector (PRS) 79.95 percent (previously 81.23 percent)

Our rent policy is to use social (formula) rents which are more affordable for residents.



C13 –Share, and number, of existing homes (owned and/or managed) completed before the last financial year

Existing homes	This year 2024-25	Previous year 2023-24
General needs / social rent	27 (0.1%)	40 (0.2%)
Intermediate rent	0 (0%)	0 (0%)
Affordable rent	5 (0%)	0 (0%)
Supported housing	235 (1%)	235 (1%)
Housing for older people	21,698 (90.4%)	19,421 (84.9%)
Low costs home ownership	1,595 (6.6%)	1,470 (6.4%)
Care homes	40 (0.2%)	40 (0.2%)
Private rented sector	116 (0.5%)	209 (0.9%)
Other (leaseholder)	288 (1.2%)	1,470 (6.4%)
Total	24,004	22,885

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

*Figures combine new and disposed properties

New and acquired	This year 2024-25	Previous year 2023-24
General needs / social rent	-13 (-1.2%)	-10 (-1.7%)
Intermediate rent	0 (0%)	0 (0%)
Affordable rent	5 (0.4%)	0 (0%)
Supported housing	0 (0%)	0 (0%)
Housing for older people	2,277 (203.5%)	647 (112.9%)
Low costs home ownership	125 (11.2%)	-17 (-3.0%)
Care homes	0	0 (0%)
Private rented sector	-93 (-8.3%)	-1 (-0.2%)
Other (leaseholder)	-1,191 (-106.4%)	-46 (-8.0%)
Total	1,119	573



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

Improving the energy efficiency of our existing homes and building more sustainable housing reduces the environmental impact of our properties while helping residents to reduce their fuel bills. Energy efficiency is one of our key property standards and by attaining an EPC rating of C or higher across 99 percent of our stock we have helped residents to make energy savings.

Energy and utility costs have been embedded within our resident engagement. Local managers are equipped with resources to support and signpost residents with maximising their income. We have also run resident campaigns to raise awareness on ways to lower utility bills.

Our Helping Hands Service encourages residents to speak to their manager about any rent or finance concerns. This service includes the Helping Hands Fund, and we awarded £275,950 to applicants in 2024/2025. This fund has been used by residents for food, utility debts and other household goods to aid residents with the effect of fuel prices and subsequent cost-of-living crisis.

In April 2024, Housing 21 subscribed to the Housing Perks app and £44,481 has been saved through the service. Housing Perks supports with the cost of living by allowing residents and employees to claim discounts at a range of supermarkets and retailers, helping them to save on the essentials.

C16 – How does the housing provider provide security of tenure for residents?

Housing 21's core tenancies are assured tenancies for social rent properties, or Older person's shared ownership (OPSO). These agreements offer tenants stronger legal protection than many other tenancy types, especially against eviction. Our operating model also means most residents have an onsite manager, who is available to support them to sustain their tenancies. We provide further support through:

- ✓ Reducing our rents to social rents to ensure our properties are affordable
- ✓ Offering the Helping Hands service, which aims to enhance wellbeing and to help residents maintain tenancies
- ✓ Implementing a 'Collect with Care' approach to rent and charges and a commitment to 'Seeing People Not Pounds'
- ✓ Through our Choice and Consensus Agreements, we engage and empower our residents to make local decisions to ensure the services on offer provide an environment that they want to continue to live in
- ✓ Working closely with local authorities to ensure we develop homes and services which meet demand

Building safety and quality

Property compliance is a critical function to Housing 21. Our objective is to ensure we meet full statutory compliance across our property portfolio and have a robust management approach to protect our residents, employees, visitors and the business from foreseeable and unreasonable levels of risk. In March 2025 we commissioned an external auditor to carry out a 'health check' of our approach to managing property compliance and received 'substantial assurance'.



C17 – percentage of homes for which all required safety checks have been carried out

	24-25	23-24
Gas safety	100	100
Fire risk assessments	100	100
Electrical safety	99.8	99
Asbestos management surveys	100	100
Legionella risk assessments	100	100
Communal passenger lift safety checks	99.6	99

C18 – What percentage of homes meet the national housing quality standard?

As of 31 March 2025, 100 percent of our owned rented stock was Decent Homes compliant*. We invest significantly in our properties and will continue to do so to maintain the high standards we have set for the renewal of kitchens and bathrooms, refreshing of communal areas and achieving a minimum Energy Performance Certificate Level C whilst working to transition to digital call systems in advance of the switch over.

*Figures exclude Oldham PFI, market rent and Somers Court which is due for demolition and redevelopment

C19 – How do you manage and mitigate the risk of damp and mould for your residents?

Housing 21 is committed to providing dry, warm and healthy homes for our residents. We have established a combined method to tackling these issues to ensure we effectively resolve known cases and undertake preventative control measures.

We advise residents and managers on how to identify damp and prevent issues from occurring. We avoid assuming that cases of damp, mould and condensation are due to lifestyle factors. Therefore, each reported instance should be individually reviewed.

The Surveying Team undertakes annual HHSRS inspections and any outstanding hazards are continually reviewed. We have implemented a robust set of Property Compliance Key Performance Indicators (KPIs), which include damp and mould monitoring, to provide full transparency and highlight outstanding issues. The KPIs are included in our regular Property Compliance Report, which is shared with our Board, Health and Safety Forum and presented in the Scorecard.

Over the period April 2024 to March 2025 we identified six properties through the HHSRS survey which had damp and mould (0.02 percent of our portfolio). As of the end of

April 2025, these have all had actions taken, and a third them have been resolved.

Local operational teams complete individual People and Property Visits every six months in Extra Care and annually for Retirement Living. Managers use these visits as an opportunity to inspect each room for signs of damp or mould growth. Managers also inspect properties before being re-let, ordering any necessary repairs.



Resident voice

C20 – What are the results of the housing provider’s most recent tenant satisfaction survey? How has the housing provider acted on these results?

Overall satisfaction: **89 percent** (previously 86 percent)

We undertake an annual anonymous survey to find out how satisfied residents are with the services provided by Housing 21, including questions relating to Tenant Satisfaction Measures (TSMs). This is in the form of a census to enable all residents to have their voice heard. Every scheme with over 10 responses receives a bespoke scheme report which also includes data on the organisation’s performance.

The results are used to inform future decision making. We value our residents’ feedback and continuously strive to improve their living experience, and our survey provides valuable insights into our performance, highlighting areas of strength and opportunities for growth. The survey is taken as a starting point for scheme level conversations leading to action plans which are collated in an app and analysed at a national and regional basis.

We have developed action plans, targeting our lower scoring results. The plans are organised into emerging themes, with each area containing specific, detailed actions and measures to increase resident satisfaction.

As part of our resident satisfaction work, in 2024/2025 we dedicated £2.23m to support schemes to develop initiatives or make meaningful local changes. We arranged visits to directly listen to residents’ views on what could enhance their satisfaction living at a Housing 21 scheme. Examples include games to facilitate regular social events, an air fryer so residents can enjoy meals together, or a community shop where residents can get the basic necessities without having to travel far outside of the scheme. Following the visits, managers worked with residents to create improvement plans which were presented to Head of Service for approval.

We are also developing an engagement tool, which will look at TSMs, employee surveys and our care survey, to assist us in identifying schemes with low satisfaction results and understand the underlying issues behind them.

Our surveys are carried out using telephone, online, and postal methods. In 2024/25, over 12,500 surveys were completed as part of a full census rather than a sample, providing high statistical accuracy and robust, actionable data at scheme level.

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

Following the introduction of the Social Housing (Regulation) Act 2023, residents living in rented properties have been given increased rights to ensure they are living in safe, quality homes with reputable landlords. We have included the act as a standing agenda item in our national resident meetings.

We have carried out enhancements to the ‘Resident Information’ section of our website, including publishing our TSM results, to allow for greater transparency and easier access to information.

There are a range of resident forums where members discuss emerging issues, input into our strategies and policies and review our services. To ensure we include a diverse range of perspectives and have a forum for minority groups.

We have introduced a scrutiny element to forum meetings. There are many examples where residents have impacted on the services of Housing 21 through changes to policies, co-producing policies and critically assessing resident facing materials.

We also continue to carry out the following:

- **Local Court Agreements** allow residents to agree and monitor services
- **Resident events** provide an opportunity to directly meet senior management
- **Building safety meetings** with residents to review home safety and general repairs
- **Engagements and involvement opportunities** including annual resident events, satisfaction surveys, court business plans, service charge consultations
- **On-site Local Housing Managers** at Retirement Living schemes
- **Dedicated Care and Catering Teams on site** at Extra Care schemes
- **Service charge consultations** carried out on schemes
- **We are an Investors in People Platinum organisation** and continuously invest in our people to ensure we provide a consistently high-quality and responsive service to our residents

C22 – In the last 12 months, in how many complaints has the national Ombudsman determined that maladministration took place?

In 2024/2025, the Ombudsman determined two complaints where maladministration took place.

- One case determined a maladministration for the handling of a complaint about heating and property temperature
- One case determined maladministration for the handling of a complaint about anti-social behaviour

We aim to provide high quality services and welcome all feedback. We apply a clear, simple and accessible policy around complaints to ensure they are resolved promptly and fairly.

Housing 21 has a panel of residents who look at a sample of the complaints we receive and the associated responses. Our panel of residents is trained and ready to review complaints received into the organisation. This includes reviewing complaints where complainants are not satisfied with the outcome and making recommendations to resolve it, reviewing statistics and how we might learn from complaints. We work with this Resident Complaint Panel to coproduce the self-assessment against the Ombudsman Complaint Handling Code and the annual

Complaints Performance and Service Improvement Report which is reported to Board and published on the website alongside their response.

Additionally, each respondent to a complaint is asked to consider what lessons can be learnt from that complaint and this results in improvement recommendations for practice, policy or our service.



Resident support

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

95 percent satisfaction with care

88 percent satisfaction with Housing Management Team

As a specialist provider, Housing 21 offers residents a range of services to support them to live well with dignity and autonomy. These include:

- On-site Care Workers available 24/7 for planned and emergency care (Extra Care only)
- Wrap-around support and emergency response reactions for all residents within our services, regardless of their care needs
- Supporting residents in maintaining independence within their own property
- Supporting residents with financial matters including assistance in benefit claims, utility bills or any uncertainties they have with their budgets
- Assisting with transport for hospital, doctors and dental appointments
- Supporting residents with online shopping tasks
- Assistance in maintaining a link and presence within the local community
- Supporting the use of communal areas for activities and meals to reduce social isolation
- Assisting residents to get online to access digital services, breaking the digital divide and enabling them to access the associated benefits of being online
- Administering and helping residents access a utility voucher funding run by HACT
- Providing our Helping Hands service, including the Helping Hands Fund which offers one-off grants for residents to support with emergencies or unexpected bills
- Providing access to the Housing Perks app, allowing residents to claim discounts at a range of supermarkets and retailers, helping them to save on the essentials.

We measure and closely monitor improvements through a series of resident engagement methods, such as satisfaction surveys, forums and resident meetings.

Placemaking

C24 – Describe the housing provider’s community investment activities, and how the housing provider is contributing to positive neighbourhood outcomes for the communities in which its homes are located

Housing 21 actively encourages schemes to be part of their local neighbourhoods, creating vibrant and sustainable communities and inspiring social interaction.

Our devolved operations model encourages the use of local repairs contractors to carry out work. We have established a social value group, which brings together teams from across the organisation to learn from each other and capture good practice.

Many residents show support through fundraising for local and national causes. Extra Care schemes are often hubs within their local communities, and provide amenities such as restaurants and hairdressing facilities.

We provide a Community and Wellbeing Fund as part of the Helping Hands service. The fund is available to start or further develop a project on scheme, with the aim to improve the wellbeing and reduce social isolation through building connections with neighbours and the wider community. Projects have included adding cookers to communal kitchens, a pergola in a communal garden,

starting a craft club and much more. Initiatives such as our Kerb Appeal Fund and gardening campaigns encourages the use of green spaces, promoting health and wellbeing.

Our flagship cohousing project, Rupali Court, is under construction and expected to complete in 2025/2026. The cohousing model encourages residents to share communal facilities to create a strong sense of community. This can help to tackle social isolation and bring about social, environmental and economic benefits by sharing resources.



Case study: Sydney Jones Court community day

In a heart-warming display of community spirit and intergenerational friendship, young players from FC United of Manchester's youth team traded their football boots for gardening gloves to lend a hand to residents and spent the day planting a vibrant collection of hanging baskets alongside residents.

The football club is located next to Sydney Jones Court. Over the years the club has built a strong and meaningful relationship with residents. From offering complimentary match tickets, to hosting a shared walking club, they are dedicated to staying connected with the community.

FC United striker, Kade shared his thoughts: "It's been a great day sprucing up the gardens for Housing 21's residents."

Festus Igbinehi has been the Local Housing Manager for 11 years and said: "This relationship is all about helping residents stay active and enjoy the community in which they belong and give them the best resident experience from Housing 21. We are now in discussions with the club to provide meaningful bespoke exercise classes for those residents who feel able to participate."

One of the residents, Veronica said: "We plant these baskets every year, and they're always beautiful and everyone gets involved. It's a really nice day and we enjoy being together."

"We get help from the young men at FC United next door because they're all taller than us! And they put the plants up on the wall for us. All in all, it's a lovely place to be."



Governance

We recognise the importance of robust governance practices in ensuring the trust and confidence of our stakeholders.

The Board and members play a significant role in ensuring Housing 21 achieves the highest standards of governance, and act both collectively and individually in the best interests of Housing 21 in the knowledge that they are the organisation's ambassadors and custodians.

The Board formulates strategy, both directly and through delegation to its committees and considers a wide range of matters which safeguard the organisation, whilst having a positive impact for current and future residents and employees.



Structure and governance

C25 – Is the housing provider registered with the national regulator of social housing?	Yes
C26 – What is the housing provider's most recent regulatory grading/status?	V1/G1/C2
C27 – Which Code of Governance does the housing provider follow, if any?	NHF Code
C28 – Is the housing provider a not-for-profit?	Yes
C30 – Has the housing provider been subject to any adverse regulatory findings in the last 12 months (data protection breaches, bribery, money laundering, HSE breaches etc.) that resulted in enforcement or other equivalent action?	No

C29 – Explain how the housing provider's Board manages ESG risks. Are ESG risks incorporated into the housing provider's risk register?

ESG risks are incorporated within Housing 21's overall risk framework, ensuring they are identified and mitigated by the owners of the risk. For example, decarbonisation of properties is an asset management risk with a clear plan to

mitigate this. This is tracked by Board, Audit and our Investment and Development Committee.

Risk management is embedded across the organisation with regular reviews of both operational and strategic risk taking place. A well-established framework is used where risks to organisational objectives are documented along with preventative controls and mitigating actions.

Directorate risks are escalated to the Executive Team who, alongside the Board, identify strategic risks. The identification of risks arises from the triangulation of organisational objectives, organisational performance, internal and external influences and horizon scanning. The methodology includes the scoring of risks in relation to the probability and impact of the risk materialising. The Board reports highlighting the direction of travel of risks and expected direction, either as a result of implementing mitigating actions or known changes in both the internal and external environment. While the Board oversees strategic risks, each committee of the Board also maintains sight of risks relevant to their remit.

The Board has set out its risk appetite. There is an adverse appetite for risk taking in relation to compliance with law, regulation and achievement of good governance, internal control and financial viability. In other areas the Board has agreed a measured approach to risk, ensuring we continue to innovate and develop, but in a cautious and controlled

[C29 continued]

way. The measured approach balances the need to be innovative in pursuit of the organisation's overall aims for our customers and employees, while overall maintaining the financial viability and reputation of the organisation, through robust decision making based on sound information, options appraisals and assumptions.

Board and trustees

C31 – How does the housing provider ensure it gets input from a diverse range of people, into the governance processes? Does the housing provider consider resident voice at the Board and senior management level? Does the housing provider have policies that incorporate Equality, Diversity and Inclusion (EDI) into the recruitment and selection of Board Members and senior management?

Housing 21 considers it important that our Board is informed from a resident's perspective so that residents have input into the strategic direction of the organisation, and our Board Members can hear their views directly.

The organisation's guiding principles set by the Board, as well as the Board's documented values, include actively seeking to understand the customer perspective. We strive to look to the future to ensure we meet the needs of our customers, while being mindful of lessons from the

past. The Board reviews the impact on residents and their involvement in management decisions, with specific narratives in Board papers. Listening and responding to residents are core to Housing 21's mission, with an objective to achieve 95 percent overall resident satisfaction.

An effective Board comes from having a range of skills and experiences and diversity of thought from lived experience. Regular reviews of skills, experience and diversity take place to inform Board succession and recruitment processes which also includes adopting the organisation's Respect and Inclusion Charter. Similarly, the Board recognises the importance of succession planning throughout the organisation and is particularly focused on ensuring effective executive leadership and succession to maintain Housing 21's success. Working with the Chief Executive, the Board provides direction and mentoring to develop Executive skills.

To ensure a resident perspective, Board membership includes resident members on the main Board as well as co-optee resident members on our Retirement Living and Extra Care operational committees. In addition, residents' voices are represented even more widely with a range of focus groups and opportunities for residents to engage and influence as per Housing 21's Resident Engagement Strategy.

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

60 percent of Board (previously 56 percent)
0 percent of Executive Team (previously 33 percent)

Board Members serve a maximum term of six years and an additional year by exception. Therefore, turnover is seen as inevitable and positive.

C33 – Number of Board Members on the housing provider's Audit Committee with recent and relevant financial experience.

Three out of four Board Members

C34 – What percentage of the housing provider's Board are non-executive directors?

100 percent

C35 – Has a succession plan been provided to the housing provider's Board in the last 12 months?

The Board regularly reviews the succession plan for Board and Board Committees. This alongside skills audits informs recruitment of non-executives.

Succession planning for executive roles and for roles throughout Housing 21 is led by the Executive.

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

Beavers and Struthers have been responsible for auditing Housing 21's accounts since 2021 (four years).

C37 – When was the last independently-run, Board-effectiveness review?

December 2024



C38 – How does the housing provider handle conflicts of interest at the Board?

No Board Member, co-optee or member of a committee shall have any financial interest in any contract or other transaction with the association or with any other group member, or be granted a benefit by the association, unless such interest or benefit:

- is expressly permitted by our rules;
- or would not be in breach of, and would not be inconsistent with, any guidance, standard or code published by the Regulator, section 122 of the Housing and Regeneration Act 2008 or any code of conduct and/ or governance adopted by the Board

The rules permit an interest, provided it is first disclosed to the Board before the matter is discussed. Where there is a material conflict of interest, any individual concerned will be requested to withdraw from the Board's discussions and decisions on relevant matters by the Company Secretary/ Chairperson/ Chairperson of Committee. In the case of a fundamental or ongoing material conflict, the Board will determine whether the person concerned should cease to be a Board Member.

We have adopted the National Housing Federation's (NHF) Code of Governance 2020 as our chosen code of governance. This includes that Board Members must take

all reasonable steps to ensure that no undeclared conflicts arise or could reasonably be perceived to arise between Board Member duties and personal interests, financial or otherwise.

The Governance Committee conducts an annual review of Housing 21's governance framework, including (but not limited to) the roles and responsibilities of the Board, duties and responsibilities of Executives and Officers, standards of behaviour, conflicts of interest procedures, gifts and hospitality, and procedures for nomination, selection and removal of Board Members and Directors.



Staff wellbeing

C39 – Does the housing provider pay the Real Living Wage?

No, although Care Workers are paid the National Living Wage + 6 percent, which is greater than the Real Living Wage. We benchmark our pay against similar organisations and monitor the voluntary Real Living Wage as published by the Living Wage Foundation, taking these into consideration when looking at recommendations around the annual pay review.

C40 – What is the housing provider's median gender pay gap?

As at April 2024, our median gender pay gap is 19.5 percent in favour of males (previously 24.8 percent as at April 2023). Our workforce profile is predominantly care and ancillary roles, which are mainly occupied by female employees (89 percent of the total workforce). Housing 21 has a committed action plan to ensuring fair recruitment and employment practices and we seek to challenge societal norms by demonstrating the benefits of careers in care and housing for all.

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

As at April 2024, our CEO: Median Employee ratio is 11.87:1. This was previously 12.01:1 in 2023.

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

We thrive on ensuring that respect and inclusion is embedded in our culture and that activities are informed by education, empowerment and equality impact assessments to ensure that everything we do is fair and accessible.

Housing 21 has a Respect and Inclusion Strategy that drives our equality, diversity and inclusion agenda and informs all our ongoing actions. The strategy covers leadership commitment, policy review and development, training and education, recruitment practices, performance management, employee engagement groups, leadership development, feedback mechanisms, recognition and external engagement. Our innovative strategy embeds the behaviour of 'Respect', as this concept is universal to all activities. As part of the strategy, we have a Respect and Inclusion Charter based on four key principles:

- We treat everyone with dignity and respect
- We create a safe and respectful environment where people can be themselves
- We seek out diverse perspectives and hear all voices

- We seek to understand other cultures, practices and experiences

Each element has several key actions and/ or measures applicable to our workforce, our residents and all our partners. We have taken several actions to fully embed our strategy and charter throughout the organisation.

We are introducing a series of resources and training materials to empower everyone at Housing 21 to role model inclusion. Employees can access dedicated respect and inclusion guidance, factsheets and case studies via the dedicated intranet page, allowing for continuous development on relevant subject matters.

The intention is to embed inclusive behaviours, actions and development across the organisation, making it part of our culture. We have specific resource groups for disability, neurodiversity and LGBTQ+ employees. Leading Inclusion training for all people managers, equality impact assessments overseen by the corporate Policy Steering Group, intranet microsites and blogs on inclusion and diversity, as well as an organisation diversity calendar to acknowledge and celebrate our diverse communities.

Housing 21 has an action plan that informs all our practices and embeds an inclusive lens on all aspects of our activities. Our activities are monitored through our

Executive Team and Board and communicated through People and Culture and organisational channels.

C43 – How does the housing provider support the physical and mental health of its staff?

Our Employee Wellbeing Strategy informs actions, and we strive to maintain a balance between proactive and preventative education and facilitation, while also acknowledging the need for reactive support and management. Within our activities we acknowledge the wellbeing pillars of physical, mental, financial, social and environmental wellbeing and align our principles to them. Wellbeing is embedded within all stages of our people activities including recruitment, development, retention and the monitoring of trends through data.

Key activities include:

- ✓ An Absence and Wellbeing Policy, with a focus on early intervention and wellbeing support
- ✓ Employee wellbeing embedded within management and leadership development programmes
- ✓ Company-funded health plan to employees as an automatic benefit upon commencement
- ✓ KPIs available to managers through data reporting to inform required actions
- ✓ Wellbeing-themed employee engagement groups

- ✓ Annual employee survey around approaches and activities to support their wellbeing
- ✓ Communication channels with wellbeing-themed updates and activities
- ✓ Creating a self-serve environment with a variety of tools and development available for employees when they need it
- ✓ Wellbeing and Inclusion podcasts and newsletters
- ✓ The introduction of Wellbeing Action Plans for use at quarterly reviews

C44 - How does the housing provider support the professional development of its staff?

Housing 21 provides learning pathways for all roles, covering fundamental topics and tailored learning that is role specific. All of our care learning is endorsed by Skills for Care; our Housing learning by the Chartered Institute of Housing and our leadership Learning by the Institute of Leadership and Management.

We also offer a full suite of technical qualifications, utilising the apprenticeship levy and fully funded by the organisation. There are currently 288 people enrolled on apprenticeships across the business.

We also partner with De Montfort University to provide a Level 5 and Level 7 Leadership and Management diploma and we are part of the Henley Business School Employer

Partnership which enables our leaders to access a unique and carefully curated programme of learning and development webinars and master classes.



Benefits to support employee wellbeing

We are committed to being an employer of choice and making Housing 21 a fantastic place to work.

We offer a range of benefits to support our employees' wellbeing and to help them achieve a healthy work/ life balance.



Flexible working,
including a nine-
day fortnight



Holiday trade
scheme and
volunteer leave



Funded health
cash plan



Occupational
maternity/
paternity pay



Pension
contributions



Occupational
sick pay



Access to discounts
through Blue Light Card
and Housing Perks



Eyecare
vouchers



Learning and
development
opportunities

Supply chain

C45 – How is social value creation considered when procuring goods and services?

What measures are in place to monitor the delivery of this Social Value?

How much Social Value has been delivered from the housing provider's supply chain in the last 12 months?

Housing 21 ensures that social value is a key consideration in our procurement processes. We achieve this by:

- Incorporating social value and sustainability requirements in our Procurement Policy
- Including proportionate social value evaluation criteria in our procurement activity with measurable outputs embedded within high value contracts
- Considering the environmental impacts of contracts at the outset of the procurement. Asking suppliers to tell us what they are doing to manage their environmental impact, and monitoring outputs where it is appropriate to do so
- Considering the use of small and medium-sized enterprises to support local communities or determine

how larger suppliers will contribute to the local economy

- Promoting local business growth through low value opportunities
- Keeping residents' experiences at the forefront of all planning, aiming to meet residents' expectations
- Incorporating good practice dementia design and standards

In tenders above the UK threshold, Housing 21 prioritise and assess award criteria on contractors' quality, capability and best value. At the request of residents, we also consider the benefits contractors can offer individuals, communities and the environment through social value. Whether investing in the economy, championing environmental sustainability, or supporting health and wellbeing, we are keen to support organisations whose activities bring benefits to the local area. Examples of this may include:

- Offering training sessions to support digital inclusion
- Providing tools and resources to enhance communal outdoor spaces for the benefit of individuals and community
- Creating opportunities for inclusive social engagement to reduce the risk of loneliness

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

We ensure sustainability is embedded within our processes by incorporating it within our Procurement Policy and considering the environmental impacts of contracts from the outset. We request suppliers to share what they are doing to manage their environmental impact and monitor outputs where it is appropriate to do so.

To support Housing 21's net zero carbon ambitions, we will build sustainability evaluation mechanisms into our tendering procedures. This focuses on contractor environmental awareness and sustainable mitigation processes and influences contractual awards. To do this, we will ensure that a minimum percentage of the Quality Evaluation score for any high value tendering exercise will focus on the environmental sustainability of suppliers.

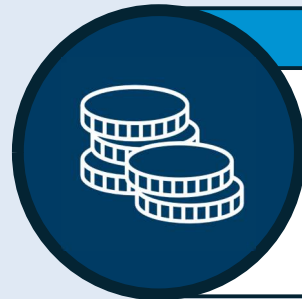


2024/2025: Social value examples



Resident wellbeing

- Nazeing Heating and CEC Electrical and Building Maintenance have supported with numerous initiatives, including social gatherings, outdoor equipment, Christmas meals and vouchers for residents
- Citrus Group Ltd supported educational workshops for residents about energy efficiency
- CB Services Group Ltd supported computer literacy workshops
- SWH have supported community engagement programmes



Economic outputs

- CLC donated vouchers to numerous schemes
- Armour Heart delivered goods
- Bell Group donated materials to create hard standing area for residents and built a pergola
- TIS have donated funding for In Bloom celebrations



Environmental

- Bath property Maintenance Ltd, Briggs Fire and Security Ltd, Citrus Group, Nationwide Ltd and Anglian Building products have all pledged emission reductions



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Regulated by the Social Housing Regulator Reg. No. L0055
Community Benefit Society FCA Reg. No. 16791R
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We invest in people Platinum

AA1000 Assurance Statement

The Good Economy Partnership ('TGE') was engaged by Housing 21 to provide independent assurance of selected SRS criteria (see 'Scope and Criteria' below) reported as of 31st March 2025 for inclusion in the Housing 21 – ESG Report 2024/25. Assurance is based on AccountAbility's AA1000 Assurance Standard V3 ('AA1000AS') with Type 2 moderate-level assurance.

Responsibilities

As the reporting organization, Housing 21 is responsible for the preparation and presentation of their reporting and corresponding data. As the assurance provider, TGE has a responsibility to express an opinion on the quality and reliability of Housing 21's reporting in line with the scope of this engagement and based on the AA1000AS assurance process.

Intended Users

The intended users of this assurance statement are the management of Housing 21 and their stakeholders.

Scope and Criteria

The scope for this assurance is Housing 21's portfolio as at 31st March 2025.

As a Type 2 Moderate Assurance engagement, TGE has gathered limited evidence, assuring the extent of Housing 21's adherence to the AccountAbility Principles (inclusivity, materiality, responsiveness, impact) as well as the reliability and quality of the data related to the SRS criteria selected. This includes a review and assessment of evidence of the use of relevant processes, systems and controls, and available performance information.

The scope of this engagement is limited to Housing 21's portfolio. The Subject Matter includes three SRS criteria, reported in the Housing 21 – ESG Report 2024/25, which were selected through discussion between Housing 21 and TGE. The selected criteria are C1, C12 and C20.

Data relating to the selected criteria was prepared by Housing 21 and reported to TGE. The reporting year covered the 12-month period to 31st March 2025.

TGE has not performed any procedures with respect to other information included in the Housing 21 – ESG Report 2024/25 and, therefore, no conclusion on the ESG Report as a whole is expressed.

Approach

The assurance procedures and principles used for this engagement were drawn from the AA1000 Assurance Standard V3. The activities conducted in performing this moderate-level assurance included:

- Inspecting submitted documentation related to Housing 21's process, systems and control related to activities covered within scope of the engagement.
- Inspecting documentation and records related to the selected SRS criteria, assessing their completeness and accuracy.
- Applying analytical procedures to reconcile the figures for the selected SRS criteria.
- Inquiring with responsible persons in Housing 21 to inspect adherence, quality and reliability on a sample basis.
- Assessing the evidence gathered and providing findings and conclusions.

Limitations

A moderate-level assurance involves limited evidence gathering and provides lower confidence than a high-level assurance. With a focus on the plausibility of information, the depth of enquiries and analytical procedures is restricted to evidence gathered from internal sources.

Independence and Competence

TGE has conducted this assurance independently and impartially in line with AA1000AS requirements and TGE's internal controls, including:

- Each member of the assurance team has received internal training on undertaking assurance in line with AA1000AS requirements.
- The assurance team includes at least one Certified Sustainability Assurance Practitioner (CSAP).
- Each member of the assurance team has signed a Code of Practice which requires declaration of any conflicts of interest.

- The TGE assurance team for this engagement is operationally separate from the TGE team who provide advisory services in its role as technical secretariat for the SRS, as described below.

TGE led the working group and development of the Sustainability Reporting Standard for Social Housing ('SRS') in 2020, and now acts as the technical secretariat. In its role as secretariat, TGE typically provides administrative support in relation to on-boarding, fees, arranging events, and educating organisations about what it means to be an SRS 'adopter'. The secretariat role can also involve TGE providing some advisory services to Housing Association adopters on how to effectively report SRS performance, in line with the stated SRS guidance. In its role as SRS secretariat, TGE has not previously provided any advisory services to Housing 21.

TGE's verification practice, Impact Assured, has verified impact management processes and performance claims representing over \$6 billion in assets under management. Team members have extensive knowledge of non-financial reporting and technical expertise in sustainability, including social and economic factors.

Findings and Conclusions

Adherence to AccountAbility Principles Inclusivity

Housing 21 is a not-for-profit provider of Retirement Living and Extra Care. Its commitments to accountability and engagement vary by stakeholder group:

Residents: As part of its Strategic Commitments, Housing 21 ensures residents have a voice in key decisions through a Resident Engagement Strategy. This includes having two resident Board members, offering resident involvement in Board committees and staff recruitment, and a requirement for all committees to consider resident perspectives in their decisions.

Employees: Housing 21, an Investors in People Platinum organisation, has an Employee Wellbeing Strategy and is committed to equipping frontline staff with the tools and systems needed to deliver personalised, devolved services. This supports its wider aim of empowering local staff through devolved decision-making.

Suppliers: Housing 21 incorporates social value and sustainability requirements in its procurement policy.

Investors: Housing 21 delivers annual Investor Updates and maintains a commitment to active, ongoing engagement with its investors.

At a broader level, Housing 21 also has a stakeholder map of all key stakeholders within the housing and care sectors whom it aims to develop and maintain relationships with.

Materiality

Housing 21 has defined key sustainability priorities through internal consultation and collaboration. Each housing scheme ('court') also has its own business plan, regularly reviewed and supported by site-specific environmental assessments. These assessments reflect a double materiality approach, evaluating initiatives from both resident and business perspectives.

Housing 21 is also an adopter of the Sustainability Reporting Standard for Social Housing (SRS) – an industry-wide initiative to identify and prioritise the most material sustainability topics in the context of social housing sector.

Responsiveness

Housing 21 uses various channels to detect and address potential resident concerns, as defined within its Resident Engagement Strategy. This includes resident forums where members discuss emerging issues, and input into Housing 21's strategies and policies. Post-project evaluation reports capture resident feedback and lessons learned to inform future asset-management plans.

Housing 21 also has a panel of residents who review a sample of complaints received and the associated responses. On an annual basis, an anonymous survey is conducted in the form of a census. Each court with over 10 responses receives a bespoke scheme report, with action plans developed where relevant, targeting the lower scoring results and any issues identified.

In relation to employees, Housing 21 has a Respect and Inclusion Strategy which includes details on resident feedback mechanisms and channels. Employees are also empowered to raise potential ideas or concerns through its devolved decision-making structure.

Impact

Housing 21 tracks internal Sustainability KPIs related to the energy efficiency and environmental performance of the properties in its portfolio. These are reported quarterly to the Board and, where relevant, to the property steering group.

On an annual basis, it produces a publicly available ESG report which is accessible by all relevant stakeholders. This report outlines Housing 21's performance against the SRS and also complies with Streamlined Energy and Carbon Reporting (SECR) standards.

Reliability and Quality of Subject Matter

The subject matter selected for this assurance engagement includes three SRS criteria, to be included in the Housing 21 – ESG Report 2024/25. The criteria selected includes quantitative and qualitative criteria (see details in the 'Scope and Criteria' section).

Housing 21's response for each relevant SRS criteria was provided to TGE by Housing 21, together with relevant supporting documentation. The calculation methodology and/or basis for qualitative disclosures evidently varies across the different criteria. However, the basis for TGE's review remained consistent across the relevant criteria to inform an assessment on the reliability and quality of the reported information.

As a result of analytical procedures carried out during this assurance, some small differences were noted in some of Housing 21's reported figures. Where identified, these were due to minor differences in the sample of properties included in the calculation, or due to differences in rounding. However, these differences were within the materiality threshold of 5%.

Following TGE's initial review of the data provided, Housing 21 requested to change the calculation method for one data point (energy use intensity under C1). This was updated to align with new SRS Reporting Guidance, published in April 2025, to calculate the figure based on 'primary energy use' as stated in each property's Energy Performance Certificate (EPC). There were no changes made to the underlying data, only the calculation methodology.

Also, following TGE's initial review of the data, Housing 21 requested to insert additional qualitative detail to one criterion to align with SRS Reporting Guidance. This consisted of adding a note alongside the resident survey results (C20) to explain the collection method used, sampling approach, dates of collection and sample size. There were no changes to the results stated.

Overall, Housing 21's disclosures for the in-scope criteria were all found to be in line with the minimum requirements for SRS reporting. For one of the in-scope criteria, the 'Enhanced reporting option' was also met.

Conclusion

Based on a moderate-level assurance, nothing has come to our attention that leads us to believe that Housing 21 does not adhere to the AA1000 AccountAbility Principles (2018). Furthermore, nothing has come to our attention that causes us to believe that the selected in-scope SRS Criteria reported by Housing 21 are materially misstated.

The Good Economy Partnership
London, United Kingdom
15th July 2025



AA1000
Licensed Report
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