

Environmental Social Governance

2023 - 2024



Foreword

Housing 21 is committed to delivering 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. Therefore, the Board has set an ambitious strategy that focuses on delivering for residents first and in doing so, we aim to do no harm to the environment.

We have continued to invest in ensuring properties are fit for purpose and we have also grown through new build and acquisition, seeking to provide affordable homes for older people in most need.

All our properties are energy efficient (being at least EPC C), let on social rents or shared ownership and benefit from well-maintained communal areas and grounds. Our services in Retirement Living and Extra Care recognise the importance of our people; as Investors In People Platinum we believe in the value created from motivated and skilled people delivering services locally for residents.

Although there is good progress, we know there is still much more to do. Resident satisfaction at 86 percent overall is below where we strive to be and so work is going on at each scheme to understand what and how we can improve further. We also know that achieving EPC C is only the start of our decarbonisation journey and we have set further challenging targets to remove fossil fuels and reduce energy consumption.

We welcome the Government's commitment to EPC C by 2030 for all social landlords, however for Housing 21 our focus is on how to go beyond that target and move towards carbon neutral. Therefore, we advocate for more funding via the Warm Homes Fund (to be announced) for social landlords to further improve the energy and carbon performance of social rent properties.

In the year we celebrate our 60th anniversary, Housing 21 continues to grow and provide the quality homes needed by many older people. Our strong foundations mean we can continue to invest in services, driving improvement in resident satisfaction and our overall environmental, social and governance performance.

Elaine Elkington
Chair



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

60 years' experience



Manages over
23,000 properties



Operate in **215** local
authority areas



Provide **49,000** hours of in-
house care each week



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



G1/V1 regulatory
rating



99% of homes meet **EPC**
C or above

Introduction

Housing 21 is a leading not for profit provider of Retirement Living and Extra Care for older people of modest means. 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.

The Sustainability Reporting Standard for Social Housing (SRS) was launched in November 2020 by the Environmental, Social and Governance (ESG) Working Group. The SRS reporting framework has been developed to establish a transparent, consistent and comparable set of ESG criteria across the housing sector. In 2023 we became official adopters of the standard.

ESG encompasses all aspects of sustainability. This means tackling and mitigating climate change. It also means supporting our residents through subsidising our social housing residents' rent, delivering new affordable homes and providing wellbeing and financial support.

This year, we commissioned **The Good Economy (TGE)** to conduct an independent assurance of specific criteria in our ESG report. The assurance process followed **AccountAbility's AA1000 assurance standard**, and a copy of the assurance statement can be found at the end of this report. We believe this external assurance provides further **confidence** both in our **commitment towards sustainability** and assurance on **disclosure reliability and quality**.



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 not only providing safe, quality and affordable housing for our residents, but also to preserving the environment, 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. We have already made significant progress by investing in our stock and achieving EPC C or above in over 99 percent of our properties. However, more action is required to transition to an environmentally sustainable operating model.

We have recently developed a Net Zero Carbon and Environmental Sustainability Strategy. This 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).

	23-24	22-23
% of homes rated A	0.1	0.1
% of homes rated B	33	32
% of homes rated C	66	67
% of homes rated D	0.6	0.4
% of homes rated E or worse	0.2	0.2
% of homes without an EPC rating (unknown)	0.2	0.2

Average SAP rating of existing homes (those completed before the last financial year): 78

Energy use intensity of existing homes: 134 kWh/m²/yr

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

	23-24	22-23
% of homes rated B	98.8	96.6
% of homes rated C	1.2	3.4

Average SAP rating of new homes (those completed in the last financial year): 85

Energy use intensity [Kwh/m²/yr] of new homes: N/A

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

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

Housing 21 is committed to reaching net zero by 2050 in line with Government targets.

We have developed a Net Zero Carbon and Environmental Sustainability Strategy which sets out interim targets for 2030 to help us reach our 2050 goal, including reducing the energy usage of our properties, adding solar panels to our schemes and transitioning away from fossil fuel heating systems.

We recognise that further investment may be needed to achieve net zero and have assigned budget to carry out non fossil fuel pilots in our current programme. Our investment programme also includes works which help reduce carbon and enhance energy efficiency, such as insulation, LED lighting, controlled heating and windows projects. We have included additional investment from 2032 to fully address our stock decarbonisation, and will implement any lessons learned from the pilots.

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?

Within the last 12 months, Housing 21 has:

- Upgraded to LED lighting across 23 schemes
- Installed EV charging points on 20 existing schemes
- Carried out heating and hot water improvements across 62 schemes, including replacing storage heaters, communal plant room replacements and the installation of Quantum Heaters
- Installed solar PV on one scheme
- Improved building insulation following roof replacements across 25 schemes
- Replaced doors and windows across 39 schemes

Number of homes that have been retrofitted in the last financial year: 9,825

Homes that have been retrofitted in the last financial year as a percentage of the total homes the housing providers is aiming to retrofit: 48 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. We have opted to use the operational control boundary definition to define our carbon footprint boundary.

The reporting period for this is 1 April 2023 to 31 March 2024. 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.

The Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard and UK Government's GHG Conversion Factors for Company Reporting have been used as part of our carbon emissions calculation. For this calculation we have only opted to use energy consumed by Housing 21 and have made no estimates for gas and electricity used in residents' homes where they have their own supplies.

In most schemes, residents have a separate metered supply for energy into their homes (the residential area) and there is a communal supply for other areas. For the few sites with communal supply only, the energy used by residents in their homes is estimated and recharged on an apportionment basis.

The carbon emissions improvements are due to a combination of more robust data collection, energy efficiency enhancements made to our stock, and a milder winter in 2023.

	Apr 23 – Mar 24	Apr 22 – Mar 23
Total electricity use	27,030,224 kWh	29,240,545 kWh
Total gas use	33,276,448 kWh	38,771,982 kWh
Total transport fuel	3,748,062 kWh	4,464,908 kWh
Total energy from other fuels	744,748 kWh	388,019 kWh
Total energy use (all sources)	64,799,482 kWh	72,865,454 kWh
Total carbon emissions (electricity)	7,429 tCO ₂ e	8,518 tCO ₂ e
Total carbon emissions (gas)	7,093 tCO ₂ e	8,317 tCO ₂ e
Total carbon emissions (transport fuel)	1,227 tCO ₂ e	1,442 tCO ₂ e
Total carbon emissions (other sources)	34 tCO ₂ e	94 tCO ₂ e
Total carbon emissions	15,783 tCO₂e	18,371 tCO₂e

SECR Intensity Ratio for Total Emissions (Scope 1-3) – 0.8 tCO₂e per property

Please note above figures include Scope 1 and 2 and emissions from grey fleet



**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?**

Our schemes have been surveyed for climate change resilience. Where risks were identified, we have taken reasonable action to mitigate.

We found our schemes are predominantly in low flood risk areas. Following the surveys, building overheating was raised as a concern, particularly 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.

Diagnosis and works have already taken place to remediate overheating within the buildings. This has included work to thermostatic and heating controls and increasing natural ventilation. Managers have received training on the use of controls and other measures available to reduce overheating.

While the measures we have taken have proved effective, as prolonged periods of high temperatures and increased rainfall are becoming more common across the UK, it is important that we continue to monitor the risk and develop strategies which counteract the effects of climate change.

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 wellbeing and socialising and intend to enhance our approach. Following a desktop survey, we found that 98 percent of our existing schemes benefit from a communal green space. We also ensure that our new developments incorporate outdoor areas within their designs. Not only do green spaces provide a place for socialising, they also improve the quality of the air and promote biodiversity.

Our gardens are often a hub of social activity, especially during warmer months. Many residents enjoy gardening and we actively encourage their participation in enhancing the outdoor space at their schemes.

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

98 percent of our schemes have
a communal **green space**



Case study:

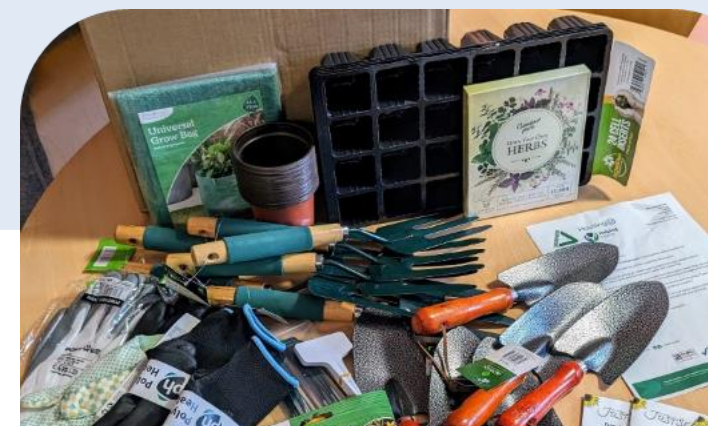
Helping Hands – ‘How Does Your Garden Grow?’

‘How Does Your Garden Grow?’ is a pilot funded by the Community and Wellbeing Fund. The project provides starter gardening packs for our communal gardens.

The packs include gloves, tools, pots, seeds and labels. The boxes were created by Groundwork, a charity whose aim is to support people and businesses to be more ‘green’. In addition, Housing 21 provided a £30 voucher to each scheme to support with gardening materials (e.g. compost).

The pilot is in direct response to resident engagement. Initial feedback has been overwhelmingly positive, with residents who do not usually engage getting involved in the project.

**Starter gardening packs provided to
50 schemes**





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?

No, 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 enhance our green spaces, will assist in reducing pollutants and improve our environmental impact.

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

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 are able to offset the use of embodied carbon. We continue speaking with our contractors regarding new and innovative products that are more environmentally friendly and sustainable. This includes the use of volumetric offsite manufacture.

In addition, a large majority of materials used on new build sites currently are from UK manufacturers. This also helps reduce long lead in times and reduces transportation of these materials.



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. In addition, we require our new build construction contractors 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 to ensure that we play our part in supporting the long-term sustainability of our planet.

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 and where possible, 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

We want to maintain our status as landlord of choice for older people of modest means by providing safe, secure and high-quality homes.

Strong values are crucial in achieving this; our residents are at the heart of our decisions and actions.

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:

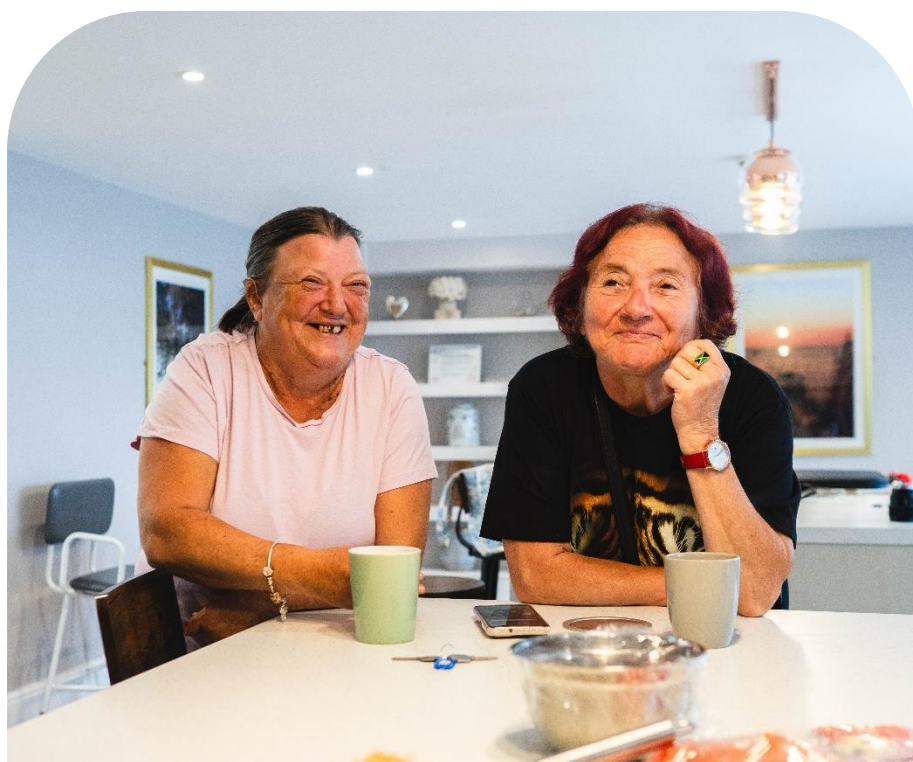
1) Rent compared to median private rental sector (PRS) across the relevant local authority

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

Rent compared to median private rental sector (PRS)

81.23 percent (previously 79.3 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 2023-24	Previous Year 2022-23
General Needs / Social Rent	40 (0.2%)	61 (0.3%)
Intermediate Rent	0 (0%)	0 (0%)
Affordable Rent	0 (0%)	0 (0%)
Supported Housing	235 (1%)	223 (1%)
Housing for Older People	19,421 (84.9%)	18,780 (84.6%)
Low Costs Home Ownership	1,470 (6.4%)	1,393 (6.3%)
Care Homes	40 (0.2%)	40 (0.2%)
Private Rented Sector	209 (0.9%)	210 (0.9%)
Other (leaseholder)	1,470 (6.4%)	1,497 (6.7%)
Total	22,885	22,204

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 2023-24	Previous Year 2022-23
General Needs / Social Rent	-10 (-1.7%)	-21 (-3.1%)
Intermediate Rent	0 (0%)	0 (0%)
Affordable Rent	0 (0%)	0 (0%)
Supported Housing	0 (0%)	12 (1.8%)
Housing for Older People	647 (112.9%)	641 (94.1%)
Low Costs Home Ownership	-17 (-3.0%)	77 (11.3%)
Care Homes	0 (0%)	0 (0%)
Private Rented Sector	-1 (-0.2%)	-1 (-0.1%)
Other (leaseholder)	-46 (-8.0%)	-27 (-4.0%)
Total	573	681



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

Through improving the energy efficiency of our existing homes and building more sustainable housing, we can reduce the environmental impact of our properties while helping residents to reduce their fuel bills.

Energy efficiency is one of our central 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.

33.1 percent of rented and shared ownership properties have an **EPC B or above** (previously 32 percent)

65.9 percent of rented and shared ownership properties have an **EPC C** (previously 67 percent)

**figures exclude leasehold and Oldham PFI properties*

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. Our 'Operation Lightbulb' campaign specifically raised awareness on ways to lower utility bills.

In 2020, we launched our Helping Hands Service to encourage residents to speak to their manager about any rent or finance concerns. This service includes the Helping Hands Fund which residents can apply for to help with emergency situations. This has been used for food, utility debts and other household goods to aid residents with the effect of fuel prices and subsequent cost of living crisis.



£273,455 was awarded to applicants through the **Helping Hands Fund** in 2023/ 24

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

We provide the right support when it is needed to help our residents to continue to live independently with security of tenure. We do this by:

- Working closely with local authorities to ensure we develop the right homes and the right services where they are needed
- Reducing our rents to social rents for all residents to ensure our properties are affordable
- Providing local support with tenancy issues with a manager based in most of our schemes
- Offering the Helping Hands service, which aims to help residents maintain healthy tenancies and enhance wellbeing
- 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



We are committed to **making tenancies work** and helping our residents feel more **comfortable talking to us about money**

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.



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

	23-24	22-23
Gas safety	100	100
Fire risk assessments	100	100
Electrical safety	99	-
Asbestos management surveys	100	-
Legionella risk assessments	100	-
Communal passenger lift safety checks	99	-

Note: Electrical safety, asbestos management surveys, legionella risk assessments and communal passenger lift safety checks were not reported on last year's ESG return

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

100 percent of our owned rented stock was Decent Homes compliant as of 31 March 2024.

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 by 2026.

* 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?

Over the period April 2023 to March 2024 we identified 57 properties, through our in-house HHSRS inspections, which had damp and mould (0.3 percent of our portfolio). As of the end of April 2024, these have all had actions taken, and over half of them have been resolved.

Housing 21 is committed to providing dry, warm and healthy homes for our residents. We have strengthened our approach to how we identify, address and report on cases of damp and mould. We have established a combined method to tackling these issues to ensure we effectively resolve known cases and undertake preventative control measures.

Additional training has been provided to ensure an adequate and consistent level of knowledge across the Surveying Team. Damp diagnostic equipment has been provided to Surveyors to assist in any damp and mould inspections.

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.

Where rectification works are more complex, it is important that this is clearly communicated to the resident and Local Housing Teams. Managers inspect properties before being re-let, raise repairs as required and have the support of our Surveying team when needed.

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 on the Scorecard.



Housing 21 is committed to providing dry, warm and healthy homes for our residents. We have strengthened our approach to how we identify, address and report on cases of damp and mould

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: **86 percent** (previously 89 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).

We use the results 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.

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 work to improve resident satisfaction, we launched a new fund to support schemes to develop initiatives or make changes based on consultation with residents.

We arrange 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 their visits, managers will work together with residents to create an improvement plan which will be presented to their 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.



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, we recently introduced a forum for minority groups.

We are currently working towards introducing a scrutiny element to forum meetings. We will work with resident forum members to ensure they are equipped with the skills to effectively scrutinise Housing 21’s performance and feel empowered to hold us to account.

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?

Three Ombudsman determinations had aspects where we were found to be at fault.

- Two of these we were found at fault for service failure.
- One case was found as maladministration for failures in investigating a resident's concerns, complaint handling and record keeping. We received no complaint handling failure orders.

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.

Additionally, each respondent to a complaint is asked to consider what lessons can be learnt from that complaint

and this results in a number of improvement recommendations for practice, policy or our service.

We report annually to Board, and will publish the Board response on our website to coincide with the new complaint handling code.



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?

As a specialist provider, Housing 21 offers residents a range of support services that enable them to live longer and remain in their own homes for as long as they wish. These include:

- Core support/ wellbeing services with 24-hour cover
- 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
- Escorting residents to communal areas for activities and meals to reduce social isolation
- Assisting residents to understand digitalisation and the benefits of social media to engage with their families and obtain services. We are running a pilot in 53 schemes to provide smart TVs and attracted external funding for several free tablets with data
- Educating residents in the importance of hydration
- We administer and help 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

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

We actively encourage our schemes to be part of their local neighbourhoods, creating vibrant and sustainable communities and inspiring social interaction. 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 have started a Social Value Group, bringing together teams from across the organisation to learn from each other and capture good practice.

The Community and Wellbeing Fund is a new addition to 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.

The 'How Does Your Garden Grow?' initiative (detailed in question C7) encourages the use of green spaces, further promoting health and wellbeing. In addition, we offer a Kerb Appeal Fund for residents to make small exterior enhancements at their schemes, such as adding plants or outdoor furniture.

Our devolved operations model encourages the use of local repairs contractors to carry out work. We are looking to further enhance this by piloting a new 'match my project' initiative.

All **Extra Care** schemes have **life saving defibrillators** on site which are registered on **The Circuit**. The Circuit is a national central defibrillator network, designed to **help emergency services** access them when needed, and **help save lives in the community**



Governance

We recognise the fundamental 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
C27 – Which Code of Governance does the housing provider follow, if any?	NHF
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, whilst 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

C 31 – 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?

56 percent of Board (previously 40 percent)
33 percent of Executive Team (previously 17 percent)

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

Housing 21 has made some changes to the structure within the Executive Team and the roles reporting into them. These aim to maintain focus on achieving the core purpose of providing quality housing with care and support for older people of modest means, enabling them to live with dignity and autonomy.

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

Two, former audit partners KPMG/ PWC; Significant Audit Committee experience; Housing Association CFO (previously four)

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 (three years).

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

June 2021



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 Transformation and Treasury 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. However, we monitor the voluntary Real Living Wage as published by the Living Wage Foundation and take this into consideration when looking at recommendations around the annual pay review. Housing 21 pay Care Workers a minimum of National Living Wage plus 10 percent with further enhancements to pay based on qualifications. In addition, our corporate roles are all graded using a standardised methodology.

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

As at April 2023, our median gender pay gap is 25 percent in favour of males (previously 28 percent as at April 2022). 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 2023, our CEO: Median Employee ratio is 12.01:1. This was previously 13.1:1 in 2022-23.

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

Housing 21 have a Respect and Inclusion Strategy that informs all of 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. 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

We thrive on ensuring that respect and inclusion is embedded in our culture and that activities are informed by equality impact assessments to ensure they are fair and accessible. Housing 21 has an action plan that informs all of 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?

Housing 21 is an Investors in People Platinum organisation and is fully committed to providing a culture that supports our employees.

Our activities are informed by our Employee Wellbeing Strategy 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:

- The launch of a new Absence and Wellbeing Policy with a focus on early intervention and wellbeing support
- Employee wellbeing embedded within management and leadership development programmes
- The widening of a company-funded health plan to employees as an automatic benefit upon commencement

- The availability of key performance indicators available to managers through data reporting to inform required actions
- Wellbeing-themed employee engagement groups
- Annual survey of employees around approaches and activities to support their wellbeing
- Communication channels with wellbeing-themed updates and activities

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 322 people enrolled on a qualification across the business.

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



Eyecare
vouchers



Car salary
sacrifice and
leasing scheme



Learning and
development
opportunities

Supply chain

C45 and C46– 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 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?

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

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.



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Community Benefit Society FCA Reg. No. 16791R
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INVESTORS IN PEOPLE®
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 31 March 2024 for inclusion in the Housing 21 ESG Report 2023/24. Assurance is based on AccountAbility's AA1000 Assurance Standard V3 ('AA1000AS') with Type 2 moderate-level assurance.

Responsibilities

As the reporting organization, Housing 21 are responsible for the preparation and presentation of their reporting and corresponding data. As the assurance provider, TGE have 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 2024.

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 all the data related to the selection of SRS criteria reported. This includes a review and assessment of evidence of the use of relevant processes, systems and controls, and available performance information.

The Subject Matter includes seven [SRS criteria](#), reported in Housing 21's ESG Report 2023/24, which were selected through discussion between Housing 21 and TGE. The selected criteria are C1, C2, C12, C17, C19, C20 and C31.

Data relating to the selected criteria was reported to TGE by Housing 21. The reporting year covered the 12-month period to 31 March 2024.

TGE has not performed any procedures with respect to other information included in Housing 21's ESG Report 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.
- 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 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 '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 \$4 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 seeks to ensure residents have input into key decisions. This is operationalised through a dedicated Resident Engagement Strategy which Housing 21 monitor progress against. In addition, there are two resident Board places, scope to appoint residents to Board committees and residents are involved in recruitment for all resident facing roles.

In addition, all Board committees are required to identify how they take account of resident perspectives in decision making.

Employees: Housing 21 is an Investors in People Platinum company and has an Employee Wellbeing Strategy. It has made a commitment to support and equip frontline staff with the technology, equipment and systems to effectively deliver a devolved and personal service to residents. This is part of a broader approach to empower local employees through devolved decision making wherever possible.

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

Investors: Housing 21 provides annual Investor Updates to its investors, and is committed to active investor engagement.

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 identified a broad range of material topics within its overall sustainability approach. These priority areas were identified and agreed based on an internal consultation and collaboration exercise.

In addition to Housing 21's overall sustainability strategy, each of its housing schemes (or 'courts') have individual business plans defined. These are reviewed regularly and are complemented by Court-specific environmental assessments, which enable it to develop strategies to reduce environmental impact.

Within these environmental assessments, there is evidence of Housing 21 undertaking a double materiality approach, through assessing the viability of proposed asset management initiatives from the

perspective of residents, and from a business perspective for Housing 21.

Responsiveness

Housing 21 has various mechanisms in place to identify and respond to potential resident concerns. These mechanisms all form part of Housing 21's overall Resident Engagement Strategy.

Evaluation reports are prepared when asset management initiatives have been undertaken and show evidence of Housing 21 gathering resident feedback, and recording relevant learnings to be factored into future project planning.

Impact

Housing 21 has defined a set of internal Sustainability KPIs – these are reported to the Board quarterly and, depending on the specific project or area, they may also be reported to and discussed at the property steering group.

Housing 21 discloses its performance in an annual ESG Report, which is publicly available and distributed to stakeholders. The Report discloses performance against SRS criteria and follows the Streamlined Energy and Carbon Reporting (SECR) protocols in its carbon reporting.

Reliability and Quality of Subject Matter

The subject matter selected for this assurance engagement includes seven SRS criteria, to be included in Housing 21's ESG Report. The criteria selected included both 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 differences in the calculation methods used. However, these errors 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 which had been calculated by percentage of courts, as opposed to percentage of units, to align with the SRS Enhanced Reporting Option guidance. There were no changes made to the underlying data, only the calculation methodology.

Overall, Housing 21's disclosures for the in-scope criteria were all found to be in line with the minimum requirements for SRS reporting. In some cases, the requirements of the 'Enhanced Reporting Options' and additional 'Notes/Guidance' were 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
27th June 2024



AA1000
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