

Environmental Social Governance

2025 / 2026



Foreword

Housing 21 remains committed to providing high quality homes with 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, particularly the provision of affordable heating options and, in doing so, we aim to do no harm to the environment.

We continue to invest in our homes and services, maintaining strong performance across our managed estate of properties. We recognise that achieving EPC C is only the beginning of our decarbonisation journey and we have set further ambitious targets to reduce energy consumption and our overall carbon footprint. Listening to feedback from residents is central to our improvement journey, especially on the quality of the built environment and sustainability.

We have strengthened our approach to social value, embedding it more firmly within our procurement and partnership arrangements and increasing the positive impact we deliver within our communities.

We are also pleased to have joined PlaceShapers this year, reinforcing our commitment to collaboration and our role in creating thriving, inclusive communities. Through benchmarking with the Housemark group, we are

strengthening our insight into ESG performance, enabling us to better understand our position and identify opportunities for continuous improvement.

The physical and mental wellbeing of our employees is central to our success as an organisation. We firmly believe that motivated and skilled employees are central to delivering outstanding local services for residents. We are therefore proud to have retained both our Investors in People Platinum accreditation and our Investors in Wellbeing Gold accreditation, recognising our continued commitment to our workforce. The appointment of a Board Member Champion for Diversity, Equity and Inclusion ensures there is a strong people focus in Board decision making.

Housing 21 continues to maintain the highest regulatory gradings for governance and financial viability (G1/V1) and is now also proud to have achieved a C1 grading for Consumer Standards. This is a significant milestone, reflecting the strength of our governance, our financial resilience and the quality of the services and outcomes we deliver for residents.

Elaine Elkington
Group Board Chair

Introduction

Housing 21 is a leading not-for-profit provider of Retirement Living and Extra Care. We help older people live well, with dignity and autonomy, by providing support or care in quality social rent or shared ownership housing services. 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.

Each year, Housing 21 publishes its ESG report which is a comprehensive document detailing our performance and highlighting the positive work across the organisation. 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 2025 / 2026 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 per cent for communal heating systems and 10 per cent for individual domestic systems by 2030
- We will continue to work with residents, employees and other stakeholders to promote environmental awareness through Housing 21, by making sure environmental impacts are a key part of local agreements as well as being central to national strategies

Environmental

Housing 21 remains committed to providing safe, quality and affordable housing, while also prioritising protecting the environment. Our approach is guided by a commitment to do no harm and we continue to adopt innovative solutions that help reduce our carbon footprint.

We fully support the UK Government's commitment to a 100 per cent reduction of greenhouse gas emissions by 2050. 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.

Through a strategic stock investment programme and data-driven approach, we have already made notable progress towards achieving these targets. Recent Government updates to EPC methodologies, Minimum Energy Efficiency Standards and heat network regulations will continue to shape our sustainability plans and influence our direction. These changes highlight the need for ongoing investment and adaptation as we transition towards a low-carbon future, ensuring homes and services remain resilient, efficient and sustainable for residents.

Climate

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

	25-26	24-25
% of homes rated A	0.2	0.1
% of homes rated B	31.4	29.3
% of homes rated C	67.8	70.2
% of homes rated D	0.3	0.3
% of homes rated E or worse	0.12	0.1
% of homes without an EPC rating (unknown)	0.08	0.08

Average Standard Assessment Procedure (SAP) rating of existing homes (those completed before the last financial year): 77.47

Energy use intensity of existing homes*: 182.3 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

Figures exclude leasehold, market rent and Oldham PFI properties

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

	25/26	24/25
% of homes rated A	17.4	2
% of homes rated B	79.4	78
% of homes rated C	3.2	20

Average SAP rating of new homes (those completed in the last financial year): 86.75

Energy use intensity [kWh/m²/yr] of new homes: 77.2 kWh/m²

Figures exclude leasehold, market rent and Oldham PFI properties



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.

While we do not currently have Science Based Target initiative (SBTi) validated targets or a fully costed transition plan, we remain committed to reducing our environmental impact and improving the energy performance of our homes over time. A key part of our approach is strengthening our data and insight. By improving the accuracy, consistency and depth of our environmental data, we are building a clearer understanding of our current position, our risks and opportunities, and the scale of action required. This evidence base is helping us make informed decisions, prioritise investment and plan for long-term decarbonisation in a realistic and measured way.

Our current strategy focuses on practical, achievable steps such as continuing to invest in our stock, exploring low-carbon technologies and responding to evolving regulation. Through this ongoing work, we aim to develop a clearer pathway towards a more sustainable operating model, while maintaining a positive and forward-looking approach.

C4 – What progress has the housing provider achieved in the last 12 months towards its Net Zero targets and strategy?

What retrofit activities has the housing provider undertaken in the last 12 months in relation to its housing stock?

Over the past 12 months, we have enhanced our reporting of Scope 3 emissions, improving visibility of both key emission sources and data gaps. We currently estimate emissions across 11 of the 15 GHG Protocol categories and recognise the need to strengthen data collection and reporting for the remaining four. This work is helping to inform our priorities for both improved disclosure and targeted emissions reduction.

We continue to maintain over 99 per cent EPC C across our stock and have increased the number of properties with EIR C or above by two per cent in the last 12 months.

Currently, 18 per cent of our properties are electrically heated and therefore aligned with net-zero transition. In addition, three schemes are heated using biomass systems and one via a district heat network. We also have solar photovoltaic (PV) panels across a total of 61 schemes, supporting the generation of low-carbon electricity for communal energy use.

We recently acquired ECO4 grant funding which allowed us to:

- Renew flat roofs and install increased insulation across 160 properties
- Install solar panels across 71 properties
- Treat cavity wall insulation at 328 properties

Additional retrofit activities within the last 12 months have included:

- Replaced windows across 26 schemes
- Installed new roofs with 400mm insulation levels across 20 schemes
- Upgraded communal lighting in 23 schemes
- Renewed communal plant rooms at 21 schemes
- Installed solar panels at six schemes
- Installed Electric Vehicle (EV) charger at one existing site (EV chargers are installed as standard in all new developments)
- Installation of a biomass boiler at one scheme
- Converted gas communal hot water supply to point-of-use electric hot water in six schemes

We continuously optimise our existing heating systems to ensure efficient performance.

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 is 4,386 (22 per cent).

C5 – Greenhouse gas emissions

Scope 1, Scope 2 and Scope 3 Greenhouse Gas emissions

Scope 1, Scope 2 and Scope 3 Greenhouse Gas emissions per home

Scope 1

Calculated within our SECR return, this consists of the gas usage in our communal spaces

6,994 tonnes CO₂e (0.29 tonnes CO₂e per home)

Scope 2

Calculated within our SECR return, this consists of the electricity use in our communal spaces and offices

5,247.7 tonnes CO₂e (0.21 tonnes CO₂e per home)

Scope 3

Our Scope 3 emissions are calculated in line with the Greenhouse Gas Protocol (GHG) and, where available, using government carbon factors. While some Scope 3 categories remain under development, we are now able to report emissions across 12 of the 15 categories set out by the GHG.

86,780 tonnes CO₂e (3.55 tonnes CO₂e per home)

Combined carbon emissions across all scopes are:

99,021.7 tonnes CO₂e (4.05 tonnes CO₂e per home)

Scope 3 Category	Description	Tonnes CO ₂ e
1	Purchased goods and services	9,684
2	Capital goods	29,663
3	Fuel and energy related activities	2,609
4	Upstream transportation and distribution	Unknown
5	Waste generated in operations	Unknown
6	Business travel	553
7	Employee commuting	2,116
8	Upstream leased assets	3,164
9	Downstream transportation and distribution	N/A
10	Processing of sold goods	N/A
11	Use of sold products	2,056
12	End of life treatment of sold products	Unknown
13	Downstream leased assets	36,935
14	Franchises	N/A
15	Investments	N/A
Total		86,780

The UK Government's Streamlined Energy and Carbon (SECR) Policy was implemented on 1 April 2019. Housing 21 is outside the SECR qualification criteria in the UK, but we voluntarily report against the SECR standard. The reporting period is for 1 April 2025 – 31 March 2026. 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.



	Apr 25 – Mar 26	Apr 24 – Mar 25
Total electricity use	29,648,154 kWh	29,697,881 kWh
Total gas use	38,118,696 kWh	41,314,165 kWh
Total transport fuel	1,778,651 kWh	6,532,123 kWh
Total energy from other fuels	988,640 kWh	812,800 kWh
Total energy use (all sources)	70,534,140 kWh	78,356,969 kWh
Total carbon emissions (electricity)	5,248 tCO ₂ e	8,163 tCO ₂ e
Total carbon emissions (gas)	6,974 tCO ₂ e	8,806 tCO ₂ e
Total carbon emissions (energy related activities)	3,329 tCO ₂ e	-
Total carbon emissions (transport fuel)	481 tCO ₂ e	2,139 tCO ₂ e
Total carbon emissions (other sources)	20 tCO ₂ e	36 tCO ₂ e
Total carbon emissions	16,052 tCO₂e	19,144 tCO₂e
Carbon intensity ratio	1.0 kg CO₂e per sqft	1.2 kg CO₂e per sqft

Case study: Eric Long Court

In November 2025, Eric Long Court underwent a transformative retrofit project, drastically improving its sustainability credentials.

Originally built in 1975, the Retirement Living scheme transitioned away from a fossil-fuel based heating system. The gas plant room was replaced with a biomass boiler and a solar PV system was installed generating 60 percent of the site's electricity needs. Furthermore, both systems are integrated through a communal metering system that benefits all residents.

These upgrades have dramatically reduced carbon emissions, with individual flats now emitting just 0.15 tonnes of CO₂ annually, down from 1.9 tonnes. All flats are achieving the target A rating on the EIR and the site is on track to achieve net zero by 2035, aligning with national grid decarbonisation targets.

Resident engagement has been overwhelmingly positive, and the project demonstrates how legacy housing stock can be future proofed through innovative, cost-effective solutions. Eric Long Court is now one of the lowest carbon Retirement Living schemes of its kind in the region, combining environmental impact reduction with long-term affordability for residents.



C6 – How has the housing provider mapped and assessed the increased flood risks to its homes caused by climate change in the last two years?

How is the housing provider mitigating these risks?

We have mapped our properties against DEFRA flood risk data. This shows us that 7.8 per cent of all properties are in a flood risk area related to rivers and seas and 36 per cent are in areas at risk from surface water flooding.

In addition, Surveyors collect data on an annual basis as part of their on-site checks as to whether a scheme has experienced a flooding incident within the last five years. We have identified 31 instances of flooding in the last five years, however only six of these were where water entered a building, the rest were contained to the car park or grounds flooding. Where possible, works have been carried out to reduce the likelihood of these instances happening again such as drain clearing.

C7 – Has the housing provider mapped and assessed the increased water stress risks to its homes caused by climate change in the last two years?

How is the housing provider mitigating these risks?

We have mapped our properties against the Environment Agency's Water Stress Areas (2021 classification) and found that 61 per cent of our properties are located within

areas of serious water stress. This highlights the importance of responsible water management across our operations.

To better understand our water consumption, we collect water usage data across communal areas where feasible. We currently hold data for 45 per cent of our schemes, which has enabled us to estimate an average annual water consumption of 52m³ per property. This equates to approximately 143 litres per person per day, broadly in line with the UK average of 140–143 litres per day.

We have implemented a range of measures to reduce water consumption and improve efficiency across our portfolio, including:

- Installing showers only within properties, reducing overall water usage compared to baths
- Fitting low-flow toilets to minimise water consumption
- Using high-efficiency communal washing machines
- Installing water butts as standard when replacing rainwater goods, supporting water reuse

These initiatives contribute to our ongoing commitment to managing water resources responsibly, particularly in areas of high water stress.

C8 – Has the housing provider mapped and assessed the increased overheating risks to its homes caused by climate change in the last two years?

How is the housing provider mitigating these risks?

We have assessed our portfolio against DEFRA's 'Overheating in Buildings' meta-model and associated overheating risk data. This analysis indicates that all our properties are projected to experience more than five per cent of overnight hours exceeding 26°C by 2030, highlighting exposure to increased overheating risk as a result of climate change.

To address and manage overheating risk across our portfolio, we are implementing the following measures:

- Temperature-controlled heating systems, ensuring that heating automatically switches off when indoor temperatures exceed defined thresholds, preventing unnecessary heat gain
- Alignment with current industry guidance on overheating, alongside ongoing engagement with operational teams to improve awareness and preparedness
- Proactive preparation for regulatory changes, including Awaab's Law. Ensuring our approach remains compliant and forward looking



Nature

C9 – 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 recognise that well-designed outdoor spaces play a vital role in supporting biodiversity, enhancing wellbeing, and providing opportunities for social connection. A desktop survey showed that 98 per cent of our existing schemes benefit from communal green space, with 75 per cent incorporating trees and 62 per cent featuring outdoor seating areas. We also ensure that all new developments integrate high-quality outdoor environments within their design principles.

The Environmental Checklist for schemes highlights practical, local actions residents and employees can take to enhance green spaces and promote biodiversity. Measures such as planting native wildflowers, reducing mowing, creating hedgehog passages and installing bird feeders help to create habitats that support a wide range of wildlife. Using water butts, composting, and adopting

sustainable waste practices also strengthens local ecosystems and improves resource efficiency. Gardening is a valued activity across many schemes and we actively encourage resident involvement in maintaining and enriching these shared spaces.

Each year, regional In Bloom competitions are held, often supported by contractor social value contributions, to celebrate residents' efforts. These competitions aim to inspire greater participation in the care and enhancement of community green spaces, offering a range of categories to recognise different types of contributions.



C10 – 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 operate a comprehensive asbestos management programme to ensure that any asbestos-containing materials are identified, managed and, where required, removed safely and in line with regulatory standards.

For other potential pollutants, we do not yet have a dedicated standalone strategy. However, our Net Zero Carbon and Environmental Sustainability Strategy recognises the need to broaden our approach in this area, and we have identified pollutant management as a priority for further development.

In the interim, a range of operational and environmental controls contribute to reducing pollutant risks across our portfolio. These include:

- The promotion of environmentally-friendly cleaning products through our Environmental Checklist for schemes
- The use of oxygen removal systems within communal heating systems, which prevent corrosion without the need for chemical additives, thereby reducing the risk of harmful chemicals entering the water system

- The implementation of reverse osmosis processes, supporting improved water quality and reducing contaminants
- Broader environmental initiatives, including decarbonisation activities, investment in infrastructure to support cleaner transport, and the enhancement of green spaces, all of which contribute to reducing pollutants across homes and communities

We will continue to build on these measures as part of the ongoing development of a more formal, measurable approach to pollutant identification, management and reduction.



Resource management

C11 – 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, our use of responsibly sourced materials is embedded within our Net Zero Carbon and Environmental Sustainability Strategy and applied through our procurement and contractor assessment processes. Material selection is regularly reviewed to minimise environmental impact and reduce the use of scarce or non-renewable resources.

New developments are delivered in line with Part L, our Sustainability Brief, and our ambition to meet the Future Homes Standard, supporting reductions in operational energy use and embodied carbon. Performance is monitored through specification compliance, procurement quality assessments and ongoing engagement with contractors, with a preference for UK-manufactured materials to reduce transport emissions and support responsible supply chains.

C12 – 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.

For new build developments, contractors are required to produce a Construction Waste Management Plan as part of pre-construction information, approved by the local Environmental Officer. These plans set targets to minimise waste to landfill and manage non-recyclable and hazardous waste. Performance is monitored through agreed KPIs, reviewed at monthly site meetings with principal contractors.

For works to existing homes, we work with our supply chain to reduce waste through efficient specification, lifecycle-led replacement and avoiding over-ordering of materials. Waste is managed via licensed contractors, with recyclable materials segregated where possible and restricted materials, including asbestos, removed and disposed of safely by specialist providers in accordance with regulatory requirements.

C13 – 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. Through the 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 systems. These units typically help to reduce water wastage by limiting excess runoff before the water reaches the desired temperature.

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.

C14 – How is sustainability considered when procuring goods and services?

What measures are in place to monitor the sustainability of the housing provider's supply chain when procuring goods and services?

We embed sustainability across our operations by integrating it into our Procurement Policy and assessing the environmental implications of contracts from the very beginning. We also ask suppliers to outline how they manage their environmental footprint and review their performance where appropriate.

To help drive Housing 21's ambitions for achieving net zero carbon, we will incorporate sustainability-focused assessment criteria into our tendering processes. This will emphasise contractors' environmental awareness and the robustness of their sustainability measures, and these factors will play a meaningful role in awarding contracts. As part of this approach, a defined proportion of the Quality Evaluation score for any high-value procurement exercise will be allocated to evaluating a supplier's environmental sustainability.

Social

Residents are at the heart of our decisions and actions. Our core focus is to deliver housing and services that are co-created with residents and centred around their needs so we can achieve 95 per cent resident satisfaction.

Supporting tenancy sustainment, ensuring every resident voice is heard and embedding strong mechanisms for complaints and accountability are fundamental to our approach.

Guided by our principle of 'doing the right thing', we work in partnership with residents to continually improve, ensuring our homes and services remain responsive, inclusive and resident led.

Affordability

C15- 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) 78.68 per cent (previously 79.95 per cent).

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



C16 – Share, and number, of existing homes (owned and/or managed) completed before the last financial year

Existing homes	This year 2025/26	Previous year 2024/25
General needs / social rent	28 (0.1%)	27 (0.1%)
Intermediate rent	0 (0%)	0 (0%)
Affordable rent	4 (0%)	5 (0%)
Supported housing	210 (0.9%)	235 (1%)
Housing for older people	21,958 (90.70%)	21,698 (90.4%)
Low cost home ownership	1,622 (6.7%)	1,595 (6.6%)
Care homes	40 (0.2%)	40 (0.2%)
Private rented sector	106 (0.4%)	116 (0.5%)
Other (leaseholder)	250 (1%)	288 (1.2%)
Total	24,218	24,004



C17 – 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 2025/26	Previous year 2024/25
General needs / social rent	1 (0.5%)	-13 (-1.2%)
Intermediate rent	0 (0%)	0 (0%)
Affordable rent	-1 (0.5%)	5 (0.4%)
Supported housing	-25 (11.7%)	0 (0%)
Housing for older people	260 (121.5%)	2,277 (203.5%)
Low cost home ownership	27 (12.6%)	125 (11.2%)
Care homes	0 (0%)	0 (0%)
Private rented sector	-10 (-4.7%)	-93 (-8.3%)
Other (leaseholder)	-38 (-17.8%)	-1,191 (106.4%)
Total	214	1,119

C18 – How is the housing provider trying to reduce the effect of high energy costs on its residents?

Improving the energy efficiency across our existing homes remains a key priority. Through targeted investment programmes and ongoing property upgrades, we support residents to lower their energy usage and benefit from more efficient, affordable homes.

Managers are also equipped with guidance and tools to help residents maximise their income, access support services and understand practical steps to reduce household energy consumption.

Housing 21 offers the Helping Hands service, encouraging residents to speak to their manager about any rent or money worries. Through the Helping Hands Fund residents can access assistance for essential items, such as utility debts. In 2025/2026 we awarded £196,500 to applicants. Housing 21 is registered a referral partner for the Housing Associations Charitable Trust (HACT) prepayment meter hardship fund, enabling eligible residents who use pre-payment meters to receive fuel vouchers to prevent self-disconnection and manage rising energy costs. The Housing Perks app gives residents access to discounts at supermarkets and retailers, helping reduce everyday living costs.

Together, these measures form a comprehensive support package designed to help residents stay warm, secure and financially resilient.

Building safety and quality

Housing 21 is committed to maintaining the highest standards of building safety and quality across all homes.

We take a proactive, preventative approach to property compliance, ensuring our properties meet or exceed all legislative and regulatory requirements. Our programmes for fire safety, stock condition, servicing, maintenance and asset management are designed to keep residents safe and provide assurance that our homes remain fit for purpose.

We prioritise regular inspections, timely remedial work and continuous investment in our buildings, supported by strong oversight and clear governance.



C19 – Percentage of homes for which all required safety checks have been carried out

	25/26	24/25
Gas safety	100	100
Fire risk assessments	100	100
Electrical safety	99.7	99.8
Asbestos management surveys	100	100
Legionella risk assessments	99.6	100
Communal passenger lift safety checks	100	99.6

C20 – What percentage of homes meet the national housing quality standard?

As of 31 March 2026, 100 percent of our owned rented homes met the Decent Homes Standard*. In 2015 we introduced our enhanced Property Standards to go beyond the national minimum standard. We continue to invest significantly in our stock to maintain these higher standards, including the renewal of kitchens and bathrooms, improvements to communal areas, achieving a minimum EPC C rating and preparing for the transition to digital call systems.

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

C21 – How do you manage and mitigate the risk of emergency hazards, including damp and mould?

How do you reduce the likelihood of damp and mould hazards occurring?

Housing 21 is committed to providing safe, high-quality homes and takes a proactive approach to managing and mitigating emergency hazards, including damp and mould.

Responsive repairs are managed locally, enabling residents to report issues directly to their manager. This devolved model allows managers to appoint local contractors, minimising delays and supporting prompt resolution. Emergency repairs are targeted to be resolved within 24 hours.

In line with Awaab's Law, which came into effect on 27 October 2025, Housing 21 investigates reports of significant damp and mould within statutory timescales (24 hours for emergency cases and 10 working days for non-emergency significant hazards). In 2025/2026, 76 per cent of emergency hazard investigations were completed within 24 hours, and 84 per cent of non-emergency significant hazard investigations were completed within the required timescale of 10 days. We are preparing for future phases of the legislation as it extends to additional HHSRS hazards.

We implement a range of preventative measures to reduce the risk of damp and mould occurring:

- Significant investment in improving thermal efficiency through our stock investment programme
- Ongoing resident communications and engagement campaigns to promote good practice in managing condensation and to encourage early reporting of concerns
- Annual People and Property Visits to all homes, during which managers proactively check for signs of damp and mould
- Annual Building Safety and Investment meetings between residents and Surveyors provide a forum for residents to raise concerns and for Surveyors to share key building safety information
- Annual Housing Health and Safety Rating System (HHSRS) inspections carried out by the Surveying Team, with all identified hazards monitored until fully resolved
- Monthly performance reporting to the Board on damp and mould and other hazards identified through operational reports and HHSRS assessments

Residents and community

C22 – 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: **91 per cent** (previously 89 per cent)

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).

The most recent survey ran from September – November 2025. In total, 12,563 surveys were completed, meaning a 58 per cent response rate was achieved.

We undertake a census approach, providing all residents with an opportunity to respond. Paper surveys are sent to each scheme via batches and distributed by local managers. Included with each paper survey is the option to complete an online digital survey, detailed in each residents covering letter.

Every scheme with over five responses receives a bespoke scheme report which also includes data on the organisation’s performance. We have also developed an engagement tool, and comments relating to resident activities are inputted and collated nationally. This assists

us in identifying schemes with low satisfaction results and to understand the underlying issues behind them.

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.

During 2025/2026, Housing 21 committed £2.3m to support residents across different initiatives, primarily the Resident Trust Fund and the Helping Hands Fund. We launched the Resident Trust Fund in January 2026 to support resident and community-led initiatives focused on wellbeing, inclusion and resilience. Successful projects include gardening clubs, planting schemes and a range of social and wellbeing activities such as exercise classes, games and community events. The Helping Hands scheme provides one-off grants to those in crisis, including vouchers for essentials such as food and energy.

C23 – What arrangements are in place to enable residents to hold management to account for the provision of services?

Housing 21 has several arrangements in place to enable residents to hold management to account and influence the services they receive.

A range of resident forums provide opportunities to discuss emerging issues, contribute to strategies and policies and scrutinise our performance. A structured scrutiny element ensures a diverse mix of residents can challenge and influence our work, from reviewing policies to co-producing resident-facing materials.

We have improved the ‘Resident’ section of our website to strengthen transparency and make key information easy to find. This includes a clear, accessible complaints and feedback process, along with our TSM results, quarterly performance reports and other important documents, giving residents a clear view of how we are performing throughout the year.

In 2025/2026, we worked closely with residents to develop a new Resident Engagement Strategy, which will launch next year. The strategy sets out how we will involve residents in shaping our services, hearing their views and acting on their feedback. It is built around four resident-identified priorities, each focused on improving

day-to-day experiences and delivering clear, measurable benefits.

We also continue to offer the following services and arrangements to residents:

- On-site Local Housing Managers at Retirement Living schemes and dedicated Care Teams on site at Extra Care schemes, providing visible accountable front-line support
- Local Court Agreements allow residents to agree and monitor services
- Resident events provide an opportunity to directly meet senior leaders
- Building safety meetings with residents to review home safety and general repairs
- Engagements and involvement opportunities including annual resident events, satisfaction surveys, Court Service Agreements, service charge consultations
- 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 residents

C24 – Report one or both of the following metrics:

– % of Stage 1 and Stage 2 complaints responded to within target timeframes

– Average time in working days to respond to Stage 1 and Stage 2 complaints

How have reported complaints resulted in change of practice within the housing provider?

In 2025/2026, 100 per cent of Stage 1 and Stage 2 complaints were responded to within the timeframes set out in the Housing Ombudsman Complaint Handling Code. We are further strengthening our complaints reporting framework to enable more robust monitoring of average response times and to support continuous improvement in service delivery.

We are committed to delivering high-quality services and to using complaints as an important source of learning and improvement. Our complaints policy is designed to be clear, simple and accessible, helping to ensure concerns are addressed promptly, fairly and consistently.

Complaints continue to inform changes to practice, policy and service delivery across the organisation. Complaint investigations require consideration of lessons learned, with recommendations used to strengthen local practice, improve communication, and address any gaps in record

keeping, service delivery or decision-making identified through complaints.

Resident oversight remains an important part of our approach. Our Resident Complaints Panel reviews a sample of complaints and responses – including cases where the complainant remains dissatisfied – to provide challenge, insight and recommendations. The panel also reviews complaint trends and learning, and works with us to co-produce both our annual self-assessment against the Housing Ombudsman’s Complaint Handling Code and our annual Complaints Performance and Service Improvement Report. These are presented to Board and published on our website alongside the panel’s response.

We have also strengthened governance arrangements by increasing the frequency and depth of complaints reporting to the Board, with monthly, quarterly and annual reporting now in place. This provides greater oversight of complaint volumes, themes, compliance, lessons learned and service improvement activity and helps ensure complaints are used to drive accountability and continuous improvement.

C25 – In the last 12 months, what additional support have you provided to your tenants?

Housing 21 is a specialist provider of housing for older people, some of whom are vulnerable due to age or health needs. Supporting resident wellbeing and tenancy sustainability is therefore a core part of our everyday service, delivered consistently throughout the year.

Over the past 12 months, we have continued to provide the following support, with impacts monitored through resident surveys, forums and meetings:

- **On-site housing support:** Managers provide daily support, act as a key point of contact and offer housing advice to help sustain tenancies
- **Person-centred care:** At Extra Care schemes, tailored care services enable residents to live as independently as possible
- **Repairs and building safety support:** A devolved responsive repairs service and dedicated Building Surveyors ensure timely resolution of issues and ongoing safety oversight

- **Financial support and advice:** Assistance with benefits, budgeting and utility costs, including access to the Helping Hands Fund and utility voucher support delivered with HACT
- **Everyday and digital support:** Practical assistance with appointments, shopping and digital access, including the Housing Perks app to help residents reduce living costs
- **Community engagement and wellbeing:** Use of communal spaces, activities and local connections to reduce social isolation and promote wellbeing



C26 – In the last 12 months, what interventions has the housing provider made or enabled to foster stronger communities and places, considering both:

- Physical changes to shared spaces or public realm
- Events, activities, and signposting

Our schemes are designed to act as community hubs, providing various accessible shared spaces such as lounges, gardens, restaurants and hairdressing facilities that support social interaction and wellbeing. Over the past 12 months, Housing 21 has delivered and enabled a range of interventions to foster stronger communities and enhance place-making across our schemes.

Resident Trust Fund

In 2025/2026 over £390,000 was distributed via the Resident Trust Fund to support close to 400 innovative and community-focused projects, enabling both physical improvements and social activities across schemes.

The fund has supported enhancements to shared spaces, creating more welcoming and inclusive environments. For example, at Marigold Court, residents partnered with The Little Onion Club to develop and maintain garden spaces, including creating flower beds, improving the entrance with planting and hanging baskets, and upgrading seating areas. This not only enhanced the physical environment but

also encouraged resident participation and strengthened links with the wider community. Other examples include the development of a sensory garden at Holm Court and the creation of a games room at Fern Meadows, alongside memorial spaces that support wellbeing and reflection.

Alongside this, the fund has enabled activities that strengthen community cohesion, including social trips, digital inclusion programmes and creative initiatives such as music and animal care projects. Together, these interventions help reduce isolation, build connections, and support resilient, thriving communities.



PlaceShapers

In addition, Housing 21 has recently joined PlaceShapers, a national network of community-focused housing associations. This partnership enhances our ability to collaborate, share learning and advocate for thriving, inclusive communities for older people.

Communities and local impact

We actively support schemes to play a positive role within their neighbourhoods, helping to create vibrant and connected communities. Schemes regularly host events and activities that are open to residents and the wider community, encouraging participation and social connection. Residents are also supported to engage in volunteering and fundraising initiatives, contributing to both local and national causes.

Our devolved operations model enables schemes to work with local contractors and organisations, strengthening local partnerships and supporting local economies. This is complemented by our Social Value Group, which shares best practice and captures the wide range of community-focused activities delivered across the organisation.

Cohousing

Opened in April 2026, our flagship cohousing scheme, Rupali Court further embeds this approach. The cohousing model prioritises shared spaces, resource sharing and community-led living, helping to reduce isolation while delivering social, environmental and economic benefits.



C27 – How is social value creation considered when procuring goods and services? What measures are in place to monitor the delivery of this Social Value?

Housing 21 ensures that social value is a key consideration in its 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

In tenders above the UK threshold, Housing 21 prioritise and assess award criteria on contractors' quality, capability and best value. 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 providing tools and resources to enhance communal outdoor spaces, additional training sessions for employees and residents and creating opportunities for social engagement to reduce loneliness.



Case study: Broadway Gardens' Summer Fete

Broadway Gardens, an Extra Care scheme in Wolverhampton, hosted its annual fete in August 2025 in partnership with Prestbury Medical Practice. The event was a fantastic display of local collaboration and celebration.

The event helped raise money for local Brownies, Wolverhampton's Veterans Association and a community defibrillator at the medical centre. It was attended by local MP Sureena Brackenridge, who spent time speaking with the residents.

Sonia Felton, Housing Manager at Broadway Gardens, said: "The day was a real celebration of togetherness – bringing residents, families and neighbours together with wonderful music, stalls and laughter. It's events like this that make Broadway Gardens such a vibrant and supportive place to live".

Entertainment on the day was led by a performance from a local children's marching band that brought music and colour to the afternoon. There was a variety of stalls offering everything from crafts and local produce to games and refreshments. MP Sureena Brackenridge said:

"You can tell a lot about a place when you walk in and there is a lovely feeling of community here."

Following the success of the partnership with Prestbury Medical Practice for the summer fete, Broadway Gardens will be joining forces again, along with the Wolverhampton Veterans Association, to organise a special Christmas Fete later in the year.

This event represents just one of many ways Housing 21 invests in its communities and works positively with its neighbourhoods to strengthen connections, wellbeing and local pride.



Governance

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

The Board 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 Board

C28 – What is the housing provider's most recent regulatory grading status?

VI/G1/C1

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

[C29 continued]

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 highlight 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 way.

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

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

C31 – How does the housing provider ensure it gets input from a diverse range of people, into the governance processes?

Housing 21 considers it essential that governance processes are informed by a diverse range of perspectives. Ensuring that the Board is shaped by lived experience supports better decision-making and keeps the organisation closely aligned with resident needs. Board Members are able to hear residents' views directly, strengthening the connection between strategy and customer experience.

The organisation's guiding principles and Board values emphasise actively seeking to understand the resident perspective. We look ahead to meet future needs while learning from past experiences. Board papers include specific narratives on the impact of decisions on residents, and there is a strong focus on reviewing how residents are involved in shaping management decisions.

[C31 continued]

Listening and responding to residents is central to Housing 21's mission, alongside the ambition to achieve 95 per cent overall resident satisfaction.

An effective Board reflects a broad mix of skills, experience, and diversity of thought, including lived experience. Regular reviews inform succession planning and recruitment, supported by the organisation's Respect and Inclusion Charter. The Board also places strong emphasis on leadership development and succession across the organisation, working closely with the Chief Executive to mentor and strengthen executive capability.

Resident perspective is embedded structurally through Resident Board Members as well as co-opted resident members on Retirement Living and Extra Care operational committees. Beyond formal governance, residents contribute through focus groups and wider engagement opportunities that influence decision making at multiple levels.

In addition, the appointment of a Board Member Champion for Diversity, Equity and Inclusion ensures there is a strong people focus in Board decision making. This role reinforces the organisation's commitment to inclusion and helps ensure that diverse voices are actively considered in shaping strategy and governance.

C32 – Does the housing provider have policies that incorporate Equality, Diversity and Inclusion (EDI) into the recruitment and selection of Board Members and senior management? How do they do this?

Yes, Housing 21 has embedded EDI within its recruitment and selection processes for Board and senior leadership roles. For Board recruitment, we engage executive search agencies with contractual EDI requirements, ensuring they promote equality of opportunity and provide diverse longlists and shortlists, supported by EDI data monitoring. For senior leadership and all other roles, our approach includes:

- Using inclusive language in adverts and ensuring diverse representation across recruitment materials
- Applying CV anonymisation to reduce bias in shortlisting
- Training hiring managers on inclusive recruitment practices, including unconscious bias and diverse panels
- Embedding Housing 21's Respect and Inclusion Charter principles within recruitment processes

Progress is monitored through KPIs and EDI metrics, supported by external accreditations, such as Disability Confident and Investors in People Platinum, and feedback from affinity groups to drive continuous improvement.

**C33 – 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?**

43 per cent of Board (previously 60 per cent) and six new members have joined.

20 per cent of Executive Team (previously 0 per cent), one member has left.

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

C34 – Number of Board Members on the housing provider's Audit Committee with recent and relevant financial experience.

Four out of six Board Members.

C35 – What percentage of the housing provider's Board are non-executive directors?

100 per cent.

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

Menzies LLP have been responsible for auditing Housing 21's accounts since 2025, after merging with Beavers and Struthers who were the previous auditor.

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

March 2026.



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.



Employees

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

No, however 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 of April 2025, our median gender pay gap is 20.4 per cent in favour of males (previously 19.5 per cent as at April 2024). Our workforce profile is predominantly care and ancillary roles, which are mainly occupied by female employees (89 per cent 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 of April 2025, our CEO: Median Employee ratio is 12.1:1. This was previously 11.87:1 in 2024. The ratio remains relatively consistent due to the annual pay award review process incorporating executive pay increases.



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

We seek to understand other cultures, practices and experiences. Each element has several key actions and/ or measures applicable to our workforce, residents and 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 resources, 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.

There are 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, dedicated intranet pages and blogs, 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 ensures that every employee, regardless of role, has access to high-quality, relevant and progressive development opportunities.

- **Structured learning pathways for every role**

We offer clear, tiered learning pathways covering essential training and role-specific development. These pathways ensure employees receive the learning they need at the right time, aligned to external regulatory standards.

Care learning is endorsed by Skills for Care, housing learning is endorsed by the Chartered Institute of Housing and leadership learning is endorsed by the Institute of Leadership and Management, ensuring high-quality and externally recognised professional development.

- **The Learning Hub**

There is a centralised Learning Hub where employees can book courses, complete e-learning, view their training records and follow learning pathways. This ensures easy access to ongoing development opportunities.

- **Leadership development at all levels**

Housing 21 invests heavily in developing leadership skills through a suite of internal and external programmes, including the ILM-endorsed Leading to Excellence programme. In addition, partnerships with De Montfort University (Level 5 and Level 7 qualifications) and the Henley Business School Employer Partnership provide access to advanced leadership learning, masterclasses and webinars.

- **Apprenticeship opportunities**

Housing 21 fully funds a wide range of technical and professional apprenticeships through the apprenticeship levy. These programmes support both new entrants and existing employees seeking to progress. There are currently 302 employees enrolled on apprenticeships.

- **Organisational development support**

There is a dedicated Organisational Development team who support employees' development beyond technical training by building skills for change, digital capability and team effectiveness. Their remit includes change engagement and adoption, digital skills development, bespoke team development and arranging productive employee events.

Supporting employee wellbeing

Employee benefits

Reflected in our Investors in People Platinum accreditation, we are committed to being an employer of choice and making Housing 21 a fantastic place to work.

We offer a range of benefits that support colleagues' physical, mental and financial health. These include:

- ✓ Flexible working, including a nine-day fortnight
- ✓ Competitive annual leave allowance, holiday trading scheme and volunteer leave
- ✓ Pension contributions
- ✓ Funded health cash plan
- ✓ Occupational sick pay
- ✓ Occupational maternity and parental leave
- ✓ Learning and development opportunities
- ✓ Eyecare vouchers
- ✓ Retail discounts available through Blue Light and Housing Perks schemes, as well as ongoing learning and development opportunities.

Working SMARTer Principles

Housing 21 has introduced its Working SMARTer Principles as a proactive approach to supporting employee wellbeing and creating calmer, healthier working routines.

The principles focus on self-care, respectful meeting etiquette, clearer email communication, regular breaks, and effective use of digital tools. By encouraging protected focus time, reducing meetings and setting clear boundaries around working hours, the approach helps employee better manage workload, reduce stress, and improve overall wellbeing.





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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 31st March 2026 for inclusion in the Housing 21 – ESG Report 2025/26. 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 2026.

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 2025/26, which were selected through discussion between Housing 21 and TGE. The selected criteria are C4: Progress towards Net Zero; C15: Affordability; and C22: Tenant satisfaction survey.

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 2026. TGE has not performed any procedures with respect to other information included in the Housing 21 – ESG Report 2025/26 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

As a not-for-profit provider of Retirement Living and Extra Care, Housing 21 commits to engage with the following stakeholder groups:

Residents: Housing 21 commits to recognising residents' contributions and using their voices to inform and improve its services, as set out in its Resident Engagement Strategy. Residents are involved in board committees and staff recruitment.

Employees: Housing 21 is committed to equipping staff with the tools and systems needed to deliver tailored, devolved services for residents. It is an Investors in People Platinum organisation, has an Employee Wellbeing Strategy and several topical employee wellbeing groups.

Suppliers: Housing 21 works with its suppliers to incorporate social value and environmental considerations within its procurement.

More broadly, Housing 21 has a stakeholder map of relevant organisations across the housing and care sectors, to keep informed, monitor, consult or engage with.

Materiality

Housing 21's key sustainability priorities are set out in its Environmental Sustainability Strategy. These were developed through a collaborative internal engagement process. A business plan and environmental assessment are prepared for each scheme ('court'), demonstrating Housing 21's application of a double materiality lens to its activities.

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 social housing sector.

Responsiveness

Housing 21 uses a range of engagement mechanisms to identify and respond to resident concerns, as set out in its Resident Engagement Strategy. Residents are encouraged to share feedback through multiple channels, including resident groups, engagement meetings, surveys, direct engagement with on-site housing managers and participation in the development and review of policies and resident-facing materials.

Housing managers maintain a regular on-site presence, enabling residents to raise concerns and discuss issues directly.

Housing 21 also conducts an annual anonymous census survey, with scheme reports produced for courts receiving more than ten responses and targeted action plans developed where required. Through these and other engagement mechanisms, residents have influenced service delivery, including the co-production of policies, review of resident communications, and environmental initiatives relating to energy efficiency, recycling and green spaces.

For employees, Housing 21's Respect and Inclusion Strategy provides formal channels for raising feedback, concerns and ideas, supported by a devolved decision-making structure that encourages employee participation.

Impact

Housing 21 monitors several sustainability KPIs relating to the energy efficiency and environmental characteristics of its property portfolio. Progress is reviewed quarterly and reported to the Board on an annual basis.

Housing 21 publishes an annual ESG report, which is publicly available and aligned with both the SRS and Streamlined Energy and Carbon Reporting (SECR) requirements. Sustainability-related information is also shared with residents through meetings, communications and updates on the organisation's website.

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 2025/26. The criteria selected includes quantitative and qualitative criteria: C4: Progress towards Net Zero; C15: Affordability; and C22: Tenant satisfaction survey.

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 a limited number of Housing 21's reported figures. These were attributable to minor variations in underlying data inputs and property categorisation. All identified differences remained within the materiality threshold of 5%.

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, C4, 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
30th June, 2026



AA1000
Licensed Report
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