



# SUSTAINABILITY POLICY 2015 - 2018

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Rochdale Boroughwide Housing Limited is a charitable community benefit society.

FCA register number 31452R.

Registered Office: Sandbrook House, Sandbrook Way, Rochdale OL11 1RY.

Registered as a provider of social housing. HCA register number: 4607



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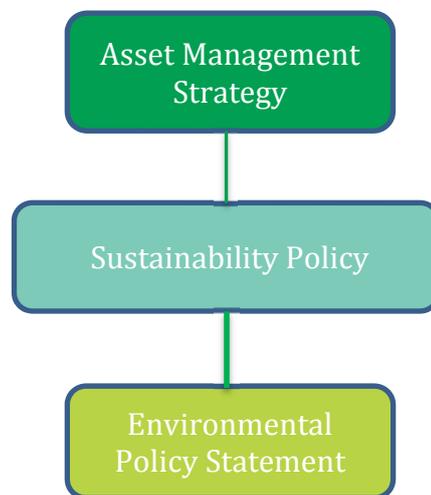
## 1. Introduction

### 1.1 Sustainability can be defined as:

*'Meeting the needs of the present generation without compromising the ability of future generations to meet their needs'*

1.2 This document sets out RBH's plans for taking forward its Environmental Sustainability Policy to 2018. The Environmental Sustainability Policy is necessary to ensure RBH's environmental aims and objectives are clearly defined and effectively implemented and managed.

1.3 The Sustainability policy will link in to the over arching Asset Management Strategy.



## 2. Methodology

2.1 The Environmental Sustainability Policy aims to address the following broad principles:

- Where is the society with regard to environmental sustainability?
- Where does the society want to be?
- How will the society achieve its environmental sustainability aims and objectives?

2.2 This policy has been developed with the following input:

- Consultation with Saffer Cooper to scope Energy Efficiency within RBH
- Consultation and feedback from the Homes Panel
- Reference to the over arching Asset Management Strategy
- Recommendations from the SHIFT report

## Sustainability Policy

- 2.3 In 2014 RBH subscribed to take part in a SHIFT assessment. SHIFT (Sustainable Homes Index for Tomorrow) is the sustainability standard for the housing sector and is an independent assessment and accreditation scheme run by Sustainable Homes which is recognised by the Homes & Communities Agency and backed by government.
- 2.4 The assessment process measures an organisations progress over 50 environmental criteria including CO2 emissions, water use, landfill waste and response to Climate Change.
- 2.5 In April 2016 RBH received a Bronze Award for the assessment with a score of 31.4.



- 2.6 This policy will build on recommendations from the SHIFT assessment in order for the society to improve its environmental sustainability.

### **3. Policy Aims**

- 3.1 The aims of this policy are to ensure:
- Overall sustainability and improved financial performance of our homes.
  - A reduction in CO2 emissions from work activities and associated costs.
  - An action plan is devised in line with the SHIFT Assessment to improve the Society's environmental credentials.
  - To help tenants reduce their energy bills and maximise their income.

### **4. Targets**

- 4.1 Our targets will ensure RBH achieves continuous improvement in line with our commitments stated in the Environmental Policy:
- All our homes to have a minimum SAP (energy efficiency rating) of 60 with average of 71
  - To improve our scoring within the SHIFT Assessment and achieve a minimum of Gold accreditation by 2018.
  - To make Environmental Sustainability an item on each Team Plan.
  - Reduce fuel costs around RBH campus

## **5. Key Principles of the Policy and Consistency with our Values**

**Responsibility – We take responsibility for, and answer for our actions.**

- 5.1 For this policy, this means accepting that our work activities have a negative effect on the environment and doing all that is reasonably practicable to improve or mitigate the effects.

**Equity – We will run our mutual in a way that is fair and unbiased.**

- 5.2 This policy will encompass the whole organisation; looking at all business activities and identifying where changes can be made to make the society more sustainable. Included within the Action Plan and Targets is to make Sustainability more visible in the organisation so that everybody has the opportunity to contribute.

**Democracy – Members have a say in how RBH is run.**

- 5.3 The policy will be adopted and approved via input by our Homes Panel with tenant representation and the delivery of the strategy will be monitored by the Executive Management Team.

**Pioneering – Together we will seek to be leaders in the way we meet challenges and solutions.**

- 5.4 RBH will explore opportunities to participate in Energy Saving initiatives and consider options where the society and/or tenants can save money reduce CO2 emissions and alleviate the affects of fuel poverty.

**Open & Honest – We will share information, do what we say we will do and when we make a mistake we will own up to it.**

- 5.5 This policy will be made publically available. The 2015 SHIFT assessment will also be made public and RBH will be benchmarked against peer organisations ensuring transparency throughout the process.

Caring – We will listen and respond to the needs of our members, tenants and employees.

- 5.6 We will care for the environment and protect it for future generations. We understand that some of our tenants are at risk of being fuel poor and RBH will investigate ways to alleviate this issue.

Championing – we will seek to reduce economic inequality within our communities.

- 5.7 RBH will champion the ‘Green Agenda’ and set to build on the society’s environmental credentials. This will improve resource efficiency and be excellent for the organisations public relations and corporate social responsibility.

## **6. Scope**

- 6.1 The scope of this policy will encompass the whole organisation – looking at which activities have the most damaging effect on the environment and prioritising action to reduce or mitigate those impacts.

## **7. Policy Statement**

- 7.1 Each of the business areas set out below are synchronised with the areas covered within the SHIFT assessment.

### **Vehicles - Operational Fleet**

- 7.2 RBH has an operational fleet of approximately 170 vehicles. In 2014 RBH received funding from the Energy Saving Trust to carry out a Green Fleet Review which provided an assessment of measures to improve the fleet’s environmental impact. The report provides recommendations to reduce annual fuel consumption and CO2 emissions.

### **Vehicles - Grey Fleet**

- 7.3 RBH also has a large Grey fleet which has environmental impacts that also need to be addressed. The details of which are included in the Green Fleet review and subsequently in the Sustainability Action Plan.

## Offices

- 7.4 RBH operates two main sites at Sandbrook House and St Albans House. In addition to these sites are RBH Stores (Kingsway), Rugby Road (Contracts Section), satellite offices and agile bases around the borough. All office practices have an impact on the environment. Each location requires heating and lighting and this is likely to include the use of electricity and gas. Alongside the use of fossil fuels RBH uses significant quantities of paper each year contributing to deforestation. While the promotion of recycling is present in most office locations more needs to be done to reduce the amount of paper used.

## Climate Change

- 7.5 The Climate Change Act (2008) set a national target of 80% reduction in Green House Gas emissions from 1990 levels by 2050. In response to this, organisations need to be proactive in recognising and taking action to raise awareness. The daily work activities of RBH have an impact on the environment and so in turn contribute towards climate change.
- 7.6 Recommendations from the SHIFT Report sets clear targets for how RBH can reduce carbon emissions. Alongside the SHIFT Report, RBH have joined a consortium of housing providers, retailers and universities in a world first Carbon Literacy Project where each employee will be able to access one days worth of Carbon Literacy training making for a more aware and empowered workforce.

## Waste Management

- 7.7 Waste disposal is a major environmental and financial impact for RBH, with an annual spend of over £200k. Recycling forms a big part of waste disposal and RBH have had good recycling figures for the past several years. Each major office environment has recycling facilities where employees are encouraged to recycle plastics, paper, glass & aluminum, toners and batteries. RBH also has a recycling depot at Kingsway stores depot where maintenance teams take their waste to segregate. Recycling figures for Kingsway & Rugby Road depot were 89% in 2014 and targets need to be set to increase this by a minimum of 1% each year.
- 7.8 RBH are required to hold a Waste Carriers License issued by the Environment Agency and a copy of the license is kept in each RBH vehicle.

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## Procurement

- 7.9 All suppliers and contractors undergo an in depth assessment to determine their suitability and to ensure they have all the relevant prerequisites. Sustainability forms part of this assessment and each applicant has to prove their environmental credentials.
- 7.10 RBH routinely look for sustainable options when choosing materials. All timber should be sourced from FCS accredited suppliers and the use of recycled paper will be used in every office location by early 2016. Tea and coffee purchased for employees is sourced from a local fair trade supplier.

## Legal Register

- 7.11 There is a significant amount of legislation around Environmental Management ranging from the control of waste to pollution control and energy management. RBH have a legal register but no longer have an effective way of monitoring and updating this register as new legislation is released. It would be good practice to subscribe to an online law registration service such as Environmental Legislation Update Service (ELUS) to ensure legal compliance across the society.

## Water Conservation

- 7.12 There are currently no policies, procedures or best practice put in place around the efficient use of water. Water is a precious natural resource and the increase in population combined with the effects of climate change will soon put pressure on all organisations and households to take action to reduce the amount of water used. The SHIFT report has highlighted areas where RBH can take action and this will be the starting point for RBH to address this issue.

## Work to Homes

- 7.13 RBH currently have 13,650 homes with an average SAP rating of 71.3. Work within the Mutual Investment Programme has included
- New 'A' rated energy efficient boilers
  - Loft & Cavity Wall insulation
  - Replacement of single glazed windows with double glazing
  - Installation of LED lighting in Sheltered Accommodation
  - Investment in renewable technologies (solar photovoltaic) at specific sheltered schemes
- 7.14 Included within the Asset Management Strategy are targets for all our homes to have a minimum SAP (energy efficiency rating) of 60 with average of 71<sup>1</sup>.

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<sup>1</sup> Based on the 2009 SAP methodology

## Sustainability Policy

- 7.15 A review of properties with SAP rating of under 60 will be done and an action plan devised to do all reasonably practicable in order to increase the SAP rating.

### Energy Efficiency

- 7.16 In 2014 RBH created Energy Smart Clubs (ESC's) around the borough to give tenants the opportunity to become energy aware and to save money. The ESC's were created within neighbourhoods and offered tenants energy switching advice and tips on how to be energy efficient. Unfortunately the concept was not successful and had poor attendance with the exception of sheltered schemes where uptakes of switching sessions were well received. RBH also issue energy efficiency information to all new tenancies and all tenants who request this advice through a Tenant Satisfaction Survey following work through the mutual investment programme.

### Energy Efficiency (Energy Management Systems)

- 7.17 International Accreditation Schemes such as ISO14001 or ISO50001 have been designed to help organisations in all sectors to use energy more efficiently through the development of environmental and energy management systems. Organisations who have undergone this accreditation have often seen significant financial savings through resource efficiencies, however it should be noted that an initial investment is often required before savings are seen. Any future business case outlining the merits of whether or not to seek formal accreditation will need to be set in the context of the programmes of work around Facing the Future.

### Funding Options

- 7.18 Over recent years the government has backed energy saving initiatives such as the Green Deal, Energy Company Obligation, and Renewable Heat Incentive. RBH will continue to review and prioritise such initiatives based on reducing costs to the society and tenants, generating income for the society and reducing CO2 emissions.

### Fuel Poverty

- 7.19 Up until September 2013 fuel poverty was defined as a household that spends more than 10% of their income on their energy bills which was an easy and effective way of identifying fuel poor households.
- 7.20 In September 2013 a new controversial methodology was introduced which was more complicated; the Low Income High Costs definition considers a household to be in fuel poverty if:

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- they have required fuel costs that are above average (the national median level)
- were they to spend that amount they would be left with a residual income below the official poverty line

7.21 Statistics provided by the Department of Energy & Climate Change (DECC) show that in 2011, 16.4% of Rochdale residents were in fuel poverty. Due to the increase in fuel prices since 2011 and the impact of Welfare Reform this figure is likely to have increased.

## **8. Associated Risk Management**

8.1 Risk Management continues to be embedded throughout the society at all levels. Detailed monitoring of risks is undertaken on behalf of the Board by the Audit Committee, though the Board is ultimately responsible for managing the risks faced by the society. An established framework is in place to regularly identify and analyse risks faced by the society and capture these on a series of risk registers. These in turn are reviewed and updated on a regular basis by the senior management team with regular reports being provided to Board, Audit Committee and EMT.

8.2 As a result of this, the following risks which could impact on the Sustainability Strategy are highlighted below:

- Increasing environmental legislation
- Energy levies
- Financial impact of Welfare and Housing Benefit Reform – resulting in more tenants experiencing fuel debt issues
- Increases in energy prices
- Properties with low SAP being unattractive because they are expensive to heat
- Increase in mould, damp & condensation complaints as tenants can't afford to adequately heat their home
- Changes in government policies relating to Sustainability (e.g. renewable technology, CO2 targets)

## **9. Stakeholder Analysis**

9.1 This policy has been developed in line with the SHIFT Assessment RBH undertook following a decision approved by the Executive Management Team.

9.2 Partnerships will be developed to ensure the strategy is executed as effectively as possible through liaison with internal and external colleagues from across the society, RBC, Sustainable Homes and the Environment Agency.

## **10. Equality & Diversity**

- 10.1 An Equality Impact Assessment relevance test has been carried out for this policy and the outcome was found not to warrant a full Equality Impact Assessment.

## **11. Monitoring**

- 11.1 The Sustainability policy will be monitored by the Homes Panel initially through the provision of six monthly progress reports.

## **12. Review**

- 12.1 All RBH strategies, policies and procedures are reviewed on a regular basis in order to ensure that they are 'fit for purpose' and comply with all relevant legislation and statutory regulations.
- 12.2 This policy, including any other related policies and procedures will be reviewed annually by the Head of Assets and Investment in order to ensure its continued appropriateness and formally reviewed and submitted to EMT for approval every three years.

## **13. Links with other RBH Strategies and Policies**

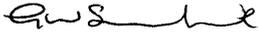
- Asset Management Strategy
- Environmental Policy Statement
- Sustainability Action Plan

Rochdale Boroughwide Housing (RBH) is a membership based charitable registered provider of Social Housing and the owner and landlord of over 13,700 homes throughout the borough of Rochdale.

RBH accepts its environmental responsibilities and recognises its obligations to contribute to the resolution of local and global environmental issues by reducing its environmental impacts and by taking an active role in promoting environmental good practice; therefore Rochdale Boroughwide Housing will:

- Continue to comply with all relevant legislation and Codes of Practice.
- Maintain continuous improvement of our environmental performance by setting achievable targets which will be monitored, measured and reviewed.
- Conserve energy and water wherever possible, aiming to reduce the company's carbon footprint, and work along side tenants helping to promote environmental awareness and good practices.
- Be committed to preventing pollution by controlling work activities and effectively managing our environmental impact.
- Integrate biodiversity conservation into our business decision making, to avoid or minimise potential harm to wildlife, habitats and ecosystems.
- Encourage contractors and suppliers to develop sustainable management practices, and consider the environment in the procurement of materials and supplies.
- Encourage employees to recognise their responsibilities regarding the protection of the environment, through awareness and training.
- Work towards minimising waste and maximising the re-use, recovery and recycling of materials.
- Make the Environmental Policy available to employees, stakeholders and members of the public.

These commitments will be demonstrated through the introduction of suitable policies, practices and procedures, and the setting and reviewing of environmental objectives and targets. Their effectiveness will enable Rochdale Boroughwide Housing to make meaningful contributions to the quality of the environment.

**Signed**   
**Gareth Swarbrick**

**Date** 17<sup>th</sup> December 2017

**Chief Executive, Rochdale Boroughwide Housing Ltd**

The actions below have been identified through the SHIFT report and these are areas where the society scored very poorly.

These actions are what the Homes Panel considered a priority and what was agreed would be addressed first. The Sustainability Policy and Action Plan will be reviewed in January 2018 in consultation with the Homes Panel.

<b>Action</b>	<b>Target</b>	<b>Status</b>
Continue to train frontline employees on Energy Efficiency	March 2018	In progress
<b>Review of fuel management practices.</b>	March 2018	In progress
Target homes with <60 SAP rating or no SAP rating	March 2018	In progress
<b>More sustainable office practices.</b>	March 2018	In progress

**Increase of front line staff to advise on energy efficiency**

20 front line employees were trained in energy efficiency in 2016. In response to fuel poverty issues more front line staff will be offered basic energy efficiency training so they are able to help customers with related queries.

**Review of fuel management practices**

In 2014 RBH participated in a Green Fleet review which was carried out free of charge by the Energy Saving Trust. This report has highlighted potential savings which will be investigated over the next 12 months. Some recommendations may have budget restrictions but where possible we will introduce better fuel management practices.

**Target homes with <60 SAP rating or no SAP rating**

In order to meet our minimum SAP target, homes with no Energy Performance Certificate will be targeted along with homes with SAP less than 60.

**More sustainable office practices**

Several recommendations to improve office sustainability have been highlighted in the SHIFT report including a percentage of office consumables responsibly sourced. The use of recycled paper and printing facilities will be reviewed as a priority with a target date of June 2016 to be reviewed.