



Policy Outline

Sustainability Policy

Overall purpose of policy

The aim of this policy is to ensure we are a responsible organisation that strives to improve the sustainability of our communities, protect the environment and combat climate change, as well as tackle fuel poverty and support good health and wellbeing.

How the policy will be implemented

This policy will be adopted at the highest level of management, in line with our [2025 Business Strategy](#).

This policy will be implemented through our [Sustainability Plan 2020 to 2025](#). The Sustainability Team has responsibility for delivery of the plan with strategic direction provided by the Corporate Management Team.

It is the responsibility of all employees to give due consideration to this policy when carrying out their day-to-day duties.

Performance measures, targets and triggers

- Achieve net zero carbon operations by 2030.
- Embed sustainability into purchasing decisions for products and services.
- Improve all existing housing stock to band C Energy Performance Certificate (EPC) rating by 2030 except where exempt.
- Identify and gain approval to build a 'net zero carbon' development, with properties achieving EPC band A where viable.
- Appraise and implement renewable heating options in a new build development, through the new build specification review, in advance of the Future Homes Standard, where viable.
- Develop and implement a Green Space Framework.
- Implement a plan to upskill and train our workforce for a low carbon economy.

Further measures, targets and actions are set out in the Sustainability Plan 2020 to 2025 and related Sustainability Action Plan.

Date Approved by CMB:

17 January 2023

Date Approved by Compliance and Assurance Committee:

14 February 2023

Date Due for Review:

14 February 2026

Responsible Officer:

Sustainability Manager

Sustainability Policy

1 Statement of intent

- 1.1 We will show leadership and demonstrate our credentials as a responsible organisation by playing a key role in improving the sustainability of our communities, protecting the environment and combatting climate change. We will support national efforts to deliver on the United Nation's Sustainable Development Goals and the UK Government's 2050 net zero greenhouse gas emissions target.
- 1.2 We will consider sustainability and climate change as part of our corporate decision making process and during the day-to-day running of the business.
- 1.3 We will, wherever practical and cost effective to do so, purchase sustainable products and services
- 1.4 We will, where applicable, work with contractors who have an environmental management system, such as ISO 14001, or can demonstrate their environmental credentials, as part of all procurement exercises.
- 1.5 We will take a proactive approach to reducing our waste and moving towards circular economy principles. This requires us to move away from a linear approach where materials are used once to create products and are then disposed of as waste, to a circular one in which we eliminate waste, operate more efficiently, or use products that can be, or have been, re-used, remanufactured and/or recycled. As part of this, we will minimise single use items across our operations and eliminate the single use items in our corporate buildings, such as plastic and paper cups.
- 1.6 We will support national decarbonisation efforts through our Development programme. Where possible, newbuild schemes will be built to EPC Band A and more specifically, we will assess opportunities to progress a site as 'net zero carbon'. We will appraise and implement renewable heating options in a new build development, in advance of the Future Homes Standard where possible and viable.
- 1.7 We recognise an effective Sustainability Policy relies on employee, customer and stakeholder participation and we will prioritise engagement about sustainability issues and initiatives. In doing so we aim to realise potential for wider social and economic benefits for the communities we serve.
- 1.8 We will lead by example and will communicate and disseminate best practice to internal and external stakeholders. This will include monitoring and evaluation of projects to ensure continual improvement and inform future ways of working.
- 1.9 We will, where appropriate, seek advice and guidance on various aspects of sustainability and climate change and use best practice to learn and encourage change throughout the business.

- 1.10 We will engage in national and regional debate to influence the housing sector's response to sustainability and climate change.
- 1.11 We will look to identify and secure partnering and funding opportunities to enable the delivery of further innovative sustainability initiatives.
- 1.12 We will monitor and evaluate progress against objectives and targets set out in the Sustainability Plan and associated documents and will, where possible, benchmark the organisation against others.

2 Outline of service

- 2.1 We will, through the Sustainability Plan 2020 to 2025, set a range of objectives and targets to protect the environment, promote biodiversity and combat climate change, as well as tackle fuel poverty and support good health and wellbeing.
- 2.2 Both the Sustainability Manager and Decarbonisation and Environment Manager are the champions for sustainability and climate change issues throughout the business.
- 2.3 We will aim to achieve net zero carbon operations by 2030 through the implementation of measures related to energy, water, transport and waste.
- 2.4 We will aim to purchase sustainable products and services and will do this by reviewing all our specifications and embedding our supplier charter that sets our minimum expectations.
- 2.5 Our assets will be fit for the future by ensuring our properties are energy efficient and our homes and estates are climate ready.
- 2.6 We will promote biodiversity and protect the environment by creating and operating within a Green Space Framework to set out our strategic approach to maintaining and improving our green spaces.
- 2.7 Our approach to training, engagement and governance will respond to the growing requirements of a low carbon economy. We will do this by engaging with our stakeholders and taking a planned approach to upskilling our employees to meet future requirements.
- 2.8 We will continue to maintain our environmental management system to ISO 14001 standard to achieve continual improvement, environmental best practice and continued compliance with legal requirements.
- 2.9 We will ensure the Sustainability Plan 2020 to 2025 and this Sustainability Policy are available through our Employee Hub and website.
- 2.10 We will report annually to the Board on performance against the Sustainability Plan.

3 Specific needs

- 3.1 We will take into account the specific needs of all employees, customers and other stakeholders which may arise in accordance with this policy. These needs relate to taking account of all differences, whatever they may be. We will particularly promote equality and inclusiveness, in accordance with our Equality, Diversity and Inclusion Policy, based on the nine protected characteristics. During the review and development of this policy an equality assessment has been completed to consider those with protected characteristics and mitigate any impact on them from delivery of this policy.

4 Consultation

Internal

- 4.1 We will continue to consult, as appropriate, on sustainability activity and seek the views of stakeholders internally in a variety of ways through the delivery of the policy.
- 4.2 Consultation with all WDH3 managers was carried out during the review of this policy.

External

- 4.3 We will continue to consult, as appropriate, on sustainability activity and seek the views of stakeholders externally, in a variety of ways through the delivery of the policy.
- 4.4 Customer consultation was carried out by the Engagement team during the review of this policy.

5 Responsibility for implementation

- 5.1 Our Board and Chief Executive are responsible for ensuring this policy is implemented.
- 5.2 Under the delegated authority contained within our [Standing Orders](#), it is the responsibility of all employees and those working on our behalf, to ensure their work is carried out in line with this policy and any related procedures.

6 Monitoring

- 6.1 Our Board will receive regular monitoring reports to evaluate the effectiveness of this policy in meeting customer expectations.
- 6.2 We will undertake surveys to monitor the satisfaction of our tenants with the service provided and will publish the results.
- 6.3 Where relevant information is available, we will benchmark our performance against other organisations to ensure the highest standards of service delivery.

7 Review

- 7.1 We will undertake a review of this policy whenever there are any relevant changes to legislation, regulatory requirements, case law or good practice that would impact on this policy or in the light of any required service improvements identified through internal audits, service reviews, learning from complaints or regulatory judgements. Considerations will also be made where performance against the policy's measures and targets meet or are forecasted to hit the triggers identified.
- 7.2 We will regularly review service provision and will undertake reviews, when appropriate, to ensure continuous improvements and value for money in the delivery of our services.
- 7.3 Our Board and / or the Corporate Management Team will be responsible for ensuring reviews of this policy are carried out and the policy contributes to, and complements, our strategic objectives.
- 7.4 In carrying out any such review, account will be taken of our commitment to equality, diversity and inclusion. For further information please refer to our Equality, Diversity and Inclusion Policy.

8 Risk

- 8.1 The potential risks relating to this policy have been identified and are being managed in line with our Risk Management Policy.

AM1 – Asset portfolio meets current and future needs of the business, delivers VFM and meets stock condition and compliance standards.

AM2 – Failing to achieve our climate ambitions and obligations.

9 Legislation and other documents

- 9.1 We will ensure that this policy complies with all relevant legislation and takes account of current best practice.

- [The Climate Change Act 2008 \(2050 Target Amendment\) Order 2019](#)
- [Environment Act 2021](#)
- [Sustainability Plan 2020 to 2025](#)
- [Sustainable Travel Policy](#)
- [The Clean Growth Strategy – GOV.UK](#)