

# **ESG** Report

2024/2025





# Message from the Chair & Chief Executive

We are pleased to present Broadland Housing Association's ESG Report for 2024–2025. This report reflects our continued commitment to delivering meaningful environmental, social and governance outcomes for our residents, communities and stakeholders.

Over the past year, we have taken significant steps to embed sustainability into every aspect of our work. Our newly approved Corporate Strategy, shaped by our Board and Leadership Team, sets out our priorities for the next four years. It is built around our value chain, which recognises that we do more than provide housing—we create homes and communities where people can thrive.

Central to this strategy is our commitment to "Whole Value"—a principle that guides us to consider not only what we deliver, but how we deliver it and the wider impact we have. This means thinking deeply about our environmental footprint, the social outcomes of our services, and the governance structures that ensure accountability and transparency.

We are proud of the progress we've made. During the year, we committed an additional £40 million to improving our existing homes, bringing our total planned investment to £335 million over 30 years. We also made the difficult decision to plan to sell 260 homes over the next four years that would require disproportionate investment to meet energy efficiency standards. This will enable us to reinvest in new, affordable homes that meet local housing needs and support our development programme of at least 50 homes per year.

Affordability remains a cornerstone of our approach. A significant proportion of our homes are let at social rent levels—below 70% of market rent—and we cap most rents in line with Local Housing Allowance rates. This ensures our homes remain accessible to those who need them most.

Our environmental performance continues to improve. As of 31 March 2025, 90.3% of our homes had an EPC rating of C or above. Our new build programme is equally ambitious, with 34% of homes achieving EPC A and 66% EPC B ratings. These achievements reflect our commitment to reducing carbon emissions and improving energy efficiency across our portfolio.

We have also made strides in securing sustainable finance. Working with Lloyds Banking Group, we agreed ESG-linked Key Performance Indicators tied to our £30 million Revolving Credit Facility. Meeting these targets earns us a discount on interest payments, demonstrating that sustainability can be both principled and pragmatic.

Social impact is central to our mission. We were a founding member of Homes for Cathy, and our Chief Executive serves on its board. Our strategy includes a renewed commitment to ending homelessness and sustaining tenancies. We will not evict any resident on the grounds of rent arrears as long as they engage with us to address their situation.

As we look ahead, we do so with optimism and resolve. The challenges facing the housing sector are complex, but we believe that by staying true to our values, listening to our residents, and working collaboratively with partners, we can continue to make a meaningful difference.

Jenny Watson CBE, Chair Michael Newey, Group Chief Executive

# **About Broadland**

### **Our History**

Broadland Housing Association was established in 1963, initially to provide affordable rented homes in the Norwich area. Since then, we have expanded to help families and individuals in housing need across Norfolk and north Suffolk. Today we own or manage 5,832 quality homes across this region, improving the lives of 6,701 residents and their families.

Our primary purpose is to use our resources to provide high-quality affordable homes to those who cannot afford a home without our help. We also provide a range of support services to residents and vulnerable people across our communities to enhance their life opportunities.

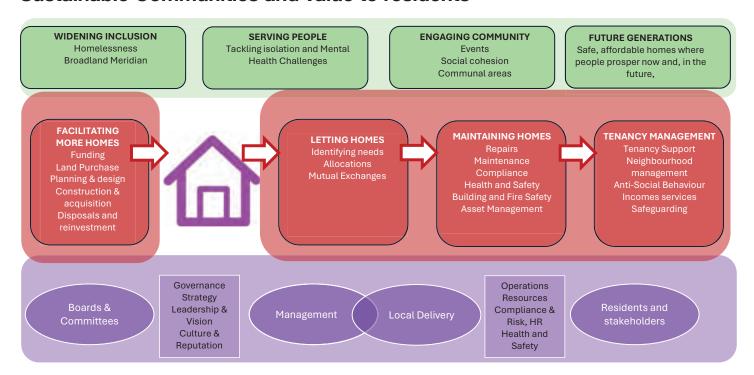


### **Our Corporate Strategy**

Over the past few months, we have undertaken a review of our Corporate Strategy that will set out our priorities for the next four years.

Our new Corporate Strategy was approved at our June Board and has been 'reframed' in the context of our value chain as presented below:

#### Sustainable Communities and value to residents



Our value chain explains that we do more than just own houses and flats. We aim to create homes and communities where people can thrive. This is guided by the principle of "Whole Value", which considers not just what we deliver, but how we work with people and the wider impact we have, ensuring our actions contribute meaningfully to residents, communities and society as a whole.

Our consideration of whole value demonstrates our focus on sustainability, and the environmental, social and governance activities that underpin it.

Our six core priorities over the next four years linked to our value chain are:

- Providing people with affordable homes
- Looking after our tenants' homes
- Helping people living in our homes
- Empowering residents to shape Broadland
- Ensuring the long-term viability of Broadland
- Running Broadland efficiently and effectively

### Our Approach to Sustainability

Sustainability is a clear theme running through our Corporate Strategy and everything we do is intrinsically linked to environmental, social and/or governance matters, as is the case with many housing providers.

That being said, we have a number of priorities in our new Corporate Strategy that set us apart from our peers:

- In a climate of enhanced regulatory and legislative expectations, we continue to commit to sensibly stretching our financial resources to build new energy efficient homes that help address local housing need. As part of our new Corporate Strategy and supporting Business Plan, we are investing c£40m more in our existing homes to meet enhanced requirements/expectations, a total of c£335m over a 30-year period. To offset this, we will be selling 260 homes over the next five years that would require significant investment to bring them up to a suitable energy efficiency standard. In doing so, we remove the financial burden of the substantial investment that would have been required in these homes and generate proceeds/ surpluses to support our affordable homes development programme of a minimum of 50 homes per annum.
- A significant proportion of our homes are let at a social rent, meaning that they are below 70% of market rent, as opposed to affordable rent, which can be as high as 80% of market rent. We also cap most rents in line with Local Housing Allowances

- (i.e. the housing benefit available to people living in private rented accommodation). Our focus on affordability means that our homes are truly accessible to people that cannot afford a home on the open market.
- 90.30% of our homes had an EPC 'C' rating or above on 31st March 2026 and we have incorporated the investment required to reach a minimum EPC 'C' across all of our homes in our latest Business Plan. As explained above, the sale of 260 homes with a poor energy efficiency rating will also contribute to this target being met.
- We have achieved Gold status for the Sustainable Homes for Tomorrow (SHIFT) report.
- The mixed tenure schemes that we build are 'tenure- blind', meaning that it is very difficult to distinguish between social/affordable rent homes and those built for the open market. This approach challenges social perceptions and helps create communities that can flourish.
- Broadland is a founding member of Homes for Cathy and our Chief Executive is a board member.
  Our new Corporate Strategy introduces an ongoing commitment to do everything we can to work with partners to end homelessness.
- We have also extended our commitment to sustaining tenancies and will not evict any resident on the grounds of rent arrears as long as they continue to engage to address their arrears.

During the 2024/25 financial year, we worked alongside Lloyds, one of our significant bank funders, to agree and adopt ESG Key Performance Indicators/targets linked to our £30m Revolving Credit Facility (RCF). It targets are met, Lloyds provide us with a discount on the interest payable on our RCF. The table below shows our performance against agreed targets for the 2024/25 financial year:

ESG KPI	Target agreed for 2024/25 financial year	Actual 2024/25 performance
1 - % homes with an EPC 'C' or above	89.50%	90.30%
2 - % of homes allocated to those at risk of homelessness where (a) they have been allocated by local authorities (b) have undertaken a risk assessment and (c) appropriate homes are available	100%	100%
3 - No. of new affordable homes developed	40	92

Moving forward, we will continue to work with existing and new funders to demonstrate our sustainability credentials with the intent of attracting cheaper funding that will help us deliver our Corporate Strategy priorities.

### 2024/25 at a glance



















### **Sustainable Reporting Standard (SRS)**

Broadland are proud to have adopted the Sustainable Reporting Standard (SRS) for Social Housing. Sustainability is a key theme running through our new Corporate Strategy and we intend to use our adoption of the SRS, and the accompanying Environmental, Social and Governance (ESG) Report that we will produce, as a way of ensuring we maintain this focus and work in partnership with other similar organisations to provide thought leadership and adopt good practices.



# **Environmental**

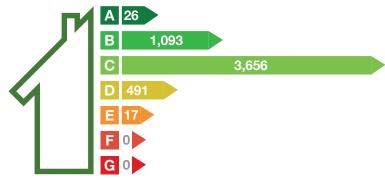
### Climate Change

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

90.30% of our homes have an energy efficiency rating of EPC C or above.

The table below provides a breakdown of the energy efficiency of our homes:

#### Homes by EPC band



EPC Band	%
Α	0.5%
В	20.7%
С	69.1%
D	9.4%
Е	0.3%
F	0%
G	0%

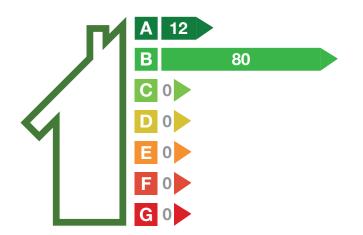


#### C2. Distribution of EPC rating of new homes (those completed in the last financial year)

Broadland acquires new build housing through two main routes, section 106 purchases from local developers and direct construction of its own acquired development sites. The strategy is to acquire properties at a minimum level of an EPC B, which is a contractual element of the purchase agreement with a local developer. Our New Homes Plan (April 2022) outlines Broadland's Climate targets around our direct build developments, both operational and embodied carbon and future minimum

EPC Levels for Broadland's developments. The secondyear results of this approach have seen delivery of additional net zero operational properties in Salthouse and Hindringham, two North Norfolk exception sites for local people. The full programme delivery has seen 34% EPC A and 66% EPC B homes, which underlines the above commitment.

#### New Homes by EPC band



EPC Band	%
Α	13%
В	87%
С	0%
D	0%
E	0%
F	0%
G	0%

### C3. Does the housing provider have a Net Zero target and strategy? If so, what is it and when does the housing provider intend to be net zero by?

Broadland has a Sustainability Policy, linked to which we have a Decarbonisation of Existing Homes Plan, a Sustainable Business Plan and a New Build Homes Plan.

**Decarbonisation of Existing Homes Plan** 

BHA's Decarbonisation of Existing Homes Plan sets out our ambition to:

- 1. Improve the energy performance of all our homes to an EPC 'C' or above by 2030.
- 2. Achieve an average EPC of 'B' or above, (average SAP of 86) across all our homes by 2050.

We recognise that our objectives contribute to only part of the solution. In helping to achieve our ambition, we will:

- Not take measures that have a negative impact on the affordability of heating our homes.
- Work with residents to learn, adopt and champion new low carbon technologies.
- Assess measures installed with a wider view of the overall performance of the property. For example, ensuring adequate ventilation is in place when improving the thermal performance of our homes e.g. external wall insulation.

We are focused on achieving a minimum EPC C across our homes by 2030 and have built the investment required to achieve this into our business plan. Energy efficiency/decarbonisation works are being funded by a disposal programme of homes that are either financially unviable or unsuitable for social housing.

Longer-term, our aim is to achieve the government's net carbon zero target by 2050 and we have set aside c£90m in our business plan to achieve our target.



#### Sustainable Business Plan



Our Sustainable Business Plan sets out our goals to becoming a more sustainable business and how we aim to achieve these. Some of our key goals are to:

#### Environmental

- Reduce our impact on air quality by improving our fleet and operational processes.
- Support the development of green skills.
- Work in partnership with Independent East, a group of four other local housing providers, to support the wider decarbonisation across our region.
- Procure sustainable materials

#### Social

 Create green spaces that support wellbeing, mental and physical health and are biodiverse.

- Encourage the growth of 'green' skills and supply chain.
- Raise awareness of sustainability and climate-related action by engagement with our residents.

#### Governance

- Transition energy contracts within our commercial buildings to low-carbon alternatives, which started with a switch to green electricity in October 2021.
- Build sustainability into our strategic decision making.
- Assess and mitigate climate change-related risks effectively.

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

**Gas Boilers** 

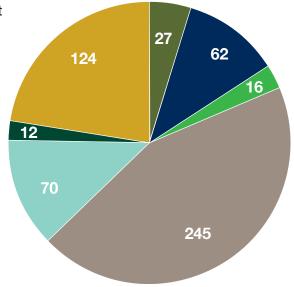
The following retrofit activities have been undertaken over the last 12 months to enhance the energy efficiency of our homes:





**External doors** 

These measures all contribute towards our 'Decarbonisation of Existing Homes Plan' as detailed within section C3 and support enhancements to our EPC ratings as detailed in section C1.





#### C5. GHG Emissions

Broadland groups its carbon footprint into scope 1, 2 and 3 emissions:

Scope 1 covers direct emissions from sources that Broadland owns or controls directly e.g. burning fuel in our fleet of vehicles.

**Scope 2** are emissions that Broadland causes indirectly and come from where the energy it purchased e.g. the emissions caused when generating the electricity that we use in our offices.

**Scope 3** encompasses emissions that are not produced by Broadland and are not the result of activities controlled by us but by those that we are indirectly responsible for e.g. the carbon emissions produced by our suppliers.

We follow the Government's Streamlined Energy and Carbon Reporting methodology in calculating our emissions. Our emissions over the past three financial years are presented below:

Scope	<b>FY2025</b> (kgCO2e)	Increase/ decrease on emissions for previous year	<b>FY2024</b> (kgCO2e)	Increase/ decrease on emissions for previous year	<b>FY2023</b> (kgCO2e)
Scope 1 & 2 GHG emissions	2,320,970	3.6%	2,239,958	8.1%	2,072,104
Scope 3 GHG emissions	63,621	132.3%	27,382	4.5%	26,208
Total GHG emissions	2,384,591	5.2%	2,267,340	8.1%	2,098,312

The increase in scope 1 and 2 emissions reflect an increase in homes connected to communal heating, hot water systems and fluctuations in usage that can reflect seasonal differences in temperature.

An increase in scope 3 relates to business mileage for private vehicle usage. This is an area we will monitor more frequently moving forward to determine where possible we can reduce our kgCO2e consumption.

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

We mapped all of our existing homes against the Environment Agency flood risk map. 83.33% of Broadland homes are at low risk for flooding. The flood level risk has been added to our asset database. For the homes that are at medium risk of flooding, we have a business incident plan to protect the homes should there be a flood alert.

Using a overheating risk assessment tool from the SHIFT report, 92.1% of Broadland homes are at low risk of overheating. In homes with a higher risk of overheating, we are investigating measures to reduce this risk.

When building new homes, surface water and flooding has been a major consideration for design. Every site is reviewed in line with the local flood authority mapping service, and we are currently designing to both 1:100 and 1:1000 years flood risk, meaning we are assuming that a flood of a significant magnitude will occur between once every 100 years or 1000 years depending on the information available.

The other consideration is how to deal with stronger rainfall through Sustainable Urban Drainage Systems (SUDs) including permeable paving. The design approach of the surface water system is then important; underground concrete pipe and pump system or natural attenuation solution. Broadland's strategy is based around a natural solution of attenuation ponds, which we accommodate on site or purchase additional land for. This connects to the embodied carbon strategy and biodiversity strategies of Broadland's new build housing.

Overheating calculations are undertaken on all new build schemes, in line with UK Building Regulations. This approach looks at limiting solar gains in window design, orientation and building external features whilst still designing great places to live. We are currently reviewing the way ground source pumps can be reversed to create cooling, so a solution is ready for the future if required.



### **Ecology**

### C7. Does the housing provider have a strategy to enhance green space and promote biodiversity on or near homes?

We have introduced wildflower areas and increased the use of mulching from grass cuttings in the communal areas we manage. We have recently purchased a license for GIS mapping, which will allow us to establish a baseline for above ground biomass. Following this we will be able to see what impact these enhancements have on our biodiversity.

Broadland has established a plan in Elizabeth Fry Road in Norwich including the seeding of grass, planting bulbs and creation of wildflower areas to encourage wildlife. Additionally, hedges and beds have been re-established.

#### Our biodiversity net gain for new homes is summarised below:

Biodiversity Net Gain (BNG) of new homes	Increase/decrease on BNG of new homes for previous year	Biodiversity Net Gain target for new and existing homes	Increase/decrease on BGN target for new and existing homes for previous year
0	0%	10%	0%



Biodiversity Net Gain (BNG) for new build developments only became planning policy in April 2024 for new applications. Over the past 12 months we have been getting ready for the standard, the conclusion being that a piecemeal approach to biodiversity is not the way forward and the organisation needs a more strategic approach. We are currently talking to consultants to pull together a delivery plan that will give structure to our biodiversity delivery, not just annually but for the next 10 years. In the meantime:

- Little Snoring will be our first development with a 10% net gain target which completes in 26/27. The scheme starts on site in September 2025.
- Northrepps has been planted and offers 100% additional biodiversity over the developments open space obligations. This will be used to offset a future development.
- Martham, as part of the strategic plan around biodiversity credits is in design for planting to commence Autumn 2025.

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

Broadland does not currently have a strategy or monitor/measure performance for this area. Construction is being carried out operationally, for example new build are carried out under a Hazardous Waste Consignment Note (HWCN) supplied by the third party waste contractor electronically to Broadland.

Mechanical and electrical consultants were instructed to review coolants in air source heat pumps with an outcome of which coolant to specify in the Broadland new build design guide that minimises harm.

Our provider of fire, smoke and heat sensors are required within their contract to collect and dispose of old units at the point of delivery.

With hazardous waste, chemical waste generally poses the highest risk to both people and the environment and are covered within the Broadland Control of Substances Hazardous to Health (COSHH) policy and

procedures. All movements of hazardous chemicals are carried out under a Hazardous Waste Consignment Note (HWCN) supplied by the third party waste contractor electronically to Broadland.

Chemical waste that is low risk and non-hazardous to the environment is washed through the water system and the containers washed thoroughly and disposed of as recycled or general waste depending on their construction material.

Clinical waste is disposed of on sites by the approved waste management contractor using suitable clinical waste or sanitation bins. This is certified and recorded by Broadland.



### Resource Management

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



Broadland uses a Five Es (Economy, Efficiency, Effectiveness, Equity and Environmental) Procurement Policy value for money framework to procure our contracts. As part of this, suppliers are asked to demonstrate that they share our sustainability credentials.

Broadland receives a 'green report' from its supplier Lyreco, detailing which products were clearly classified as sustainable or fair trade. This also included a breakdown of spend, from which a total of 72.8% was responsibly sourced office consumables.

For our SHIFT assessment, Broadland estimated that 37.32% of the materials used by contractors for maintenance activities are from responsible sources.

For new build homes, as part of the Employers' Requirements (part of the contractual arrangements between Broadland and a Contractor) Broadland requires climate targets to be met.

Broadland's policy for schemes moving forward is to develop ways of achieving Homes fit for the Future. It has been identified that, developments need to focus on 'building light,' 'building wise', 'building low carbon', 'building for the future' and 'building collaboratively'.

Therefore, the following elements will need to be included and addressed within each scheme for any factors focusing on health and wellbeing, user experience and social value

- Circular Economy Focusing on resource efficiency, environmental, health impacts and the overall number of resources/materials and waste
- Energy & Carbon Focusing on operational energy and Whole Life Carbon
- Ecology & Biodiversity Focusing on land use, biodiversity net gain and nature-based solutions
- Water focusing on water use and quality, including Nutrient Neutrality
- Connectivity & Transport Focusing on compactness of the development, walkability, and low carbon transport

Broadland will be developing a new contractor framework which will be live in 2025, this will focus on the above elements and the monitoring of building materials.

#### C10. Does the housing provider have a strategy for waste management incorporating building materials?

We were able to source data from in-house maintenance operations and three of five external contractors. The SHIFT default was applied where data was unavailable. It was calculated that 96.14% of waste is recycled and/or diverted from landfill. Our target for this is 100%. We will continue to work with our contractors to gain more representative data.

For new build homes, a Broadland contractor is required to submit a draft Site Waste Management Plan to Broadland's Employer's Agent prior to works commencing on site. It is a requirement that 100% of recyclable site waste is recycled and responsibly disposed of in line with industry best practice. The main contractor is required to obtain a report from their waste management contractor to evidence this is being achieved and is reviewed at monthly site meetings.

Content of the Site Waste Management Plan includes the following:

- Proposed principal contractor
- Location of site
- Description of project
- Estimated project cost
- Types and quantities of waste that will be generated
- Resource management options for these wastes, including proposals for minimisation and / or recycling
- The use of appropriate and licensed waste management contractors
- Record keeping procedures
- Waste auditing protocols

#### C11. Does the housing provider have a strategy for water management?

We have both a Sustainability Strategy and accompanying Sustainability Business Plan which support our commitment to reduce our own Carbon Footprint and that of our residents.

In addition, we have a Sustainability Action plan which includes annual and long term targets for both our operations and our homes.

#### **Operations:**

Long Term target: Average water usage of 12m3/ employee/yr

The water consumption (intensity) in business operations is 15.02m3 per employee for 2024/25 (based on average office users). It is hoped that our new strategy of moving from leasehold to freehold office premises will also allow us to better monitor and manage water usage.

#### **New Build**

We have recently installed rain water harvesting tanks at a new scheme to deal with surface water drainage. We also install waste-water recovery units in new builds which use the residual heat from shower water to reheat the incoming cold feed, which reduces energy usage.

	Absolute measure	Intensity	SHIFT Platinum target	2050 goal
Water – offices	691m3 per employee	15.02m3 per employee	7.1m3/ employee/yr	3m3 employee/yr by 2030
Water – homes	0.51 million m3	145.1 lpd*	138.2 lpd*	130 lpd by 2030

## Social

### Affordability and Security

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

- 1) Rent compared to median private rental sector (PRS) rent across the relevant Local Authority
- 2) Rent compared to the relevant Local Housing Allowance (LHA)

We mostly cap our rents at Local Housing Allowance (LHA) rates, which is the maximum amount of housing benefit available to people living in a private rented home. The LHA is dependent on the geographical location and the size of the property being rented.

Capping our rents at LHA rates provides us with assurance that rents are affordable.

The table below presents Broadland's average weekly rent figures based on number of rooms (as per our 2024/25 Statistical Data Return), to equivalent rents in the private rented sector and LHAs:

Weekly rents compared to private market rent and Local Housing Allowance (LHA):

Category	Average Private Market Rent £	Average LHA £	Average BHA rent £	% Rent Compared to private market rent	% Rent Compared to LHA
CAT A (one bedroom, shared facilities)	n/a	93.27	68.67	n/a	73.09%
CAT B (one bedroom, exclusive use of facilities)	147.50	127.11	104.12	70.59%	81.91%
CAT C (two bedroom)	189.77	155.06	119.08	62.75%	76.80%
CAT D (three bedroom)	231.46	181.81	126.03	54.45%	69.32%
CAT E (four bedroom)	330.58	248.84	137.58	41.62%	55.29%

#### C13. Share, and number, of existing homes (owned and/or managed) completed before the last financial year allocated to:

- General needs (social rent)
- Intermediate rent
- Affordable rent
- **Supported Housing**
- Housing for older people
- Low-cost home ownership
- **Care homes**
- **Private Rented** Sector
- Other



Existing homes	Number	Percentage (%)
General Needs (social rent)	3877	65.9%
Housing for older people	599	10.2%
Affordable rent	556	9.4%
Low-cost home ownership	319	5.4
Supported Housing	132	2.2%
Intermediate Rent	96	1.6%
Homes managed for others	131	2.2%
Social housing owned but managed by others	122	2.2%
Other	52	0.9%
Total Homes Managed / Owned	5884	100%

#### C14. Share, and number, of new homes (owned and/or managed) that were completed in the last financial year, allocated to:

- General needs (social rent)
- Intermediate rent
- Affordable rent
- **Supported Housing**
- Housing for older people
- Low-cost home ownership
- **Care homes**
- **Private Rented** Sector
- Other

Over the last reporting period we have continued to sensibly stretch our financial resources to develop new homes and play our part in addressing the need for new affordable homes in Norfolk and North Suffolk. During the financial year, we invested c£15m in new homes, with our investment being focussed on affordable rent and shared ownership homes, thereby supporting local housing need.



Units (existing homes)	Number	Percentage (%)
Affordable Rent	72	78%
Low-cost home ownership	20	22%
Total Homes Managed / Owned	92	100%

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

Our Tenancy Support Team access grants for residents who are struggling with their energy bills and access emergency funds to prevent a resident being without heating and hot water. The team work with residents who have had their gas meters capped due to unaffordability. They support residents to clear the debts either by liaising with the utility company where bills are incorrect or by applying for grants. Once the meter is uncapped the team assist the resident to look into the best tariffs for their needs.

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

We offer the most appropriate type of tenancy when a resident moves into a home. This is considered during the allocation process, when we review an applicant's tenancy history. Most new residents moving into a general needs home are offered a starter tenancy which converts to an assured tenancy after one year if the tenancy has been conducted well. Broadland no longer use fixed term tenancies as residents told us that they did not feel

settled because they did not have security of tenure. Our aim is to build strong communities and stable homes for people, and we believe that security of tenure is an important part of this. All first-time residents living in a general needs home are referred to our Tenancy Support Team for short term support to set up their home to help them sustain their tenancy.



### **Building Safety and Quality**

C17. Describe the condition of the housing provider's portfolio, with reference to:

% of homes for which all gas safety checks have been carried out.

% of homes for which all required fire risk assessments have been carried out.

% of homes for which all required electrical safety checks have been carried out.

We take building safety extremely seriously. Our building safety performance as at the end of March 2025:

	% of Homes
Percentage of homes for which all required gas safety checks have been carried out	99.9%
Percentage of homes for which all required fire risk assessments have been carried out	100%
Percentage of homes for which all required electrical safety checks have been carried out	99.6%

The small percentage of safety checks that have not been undertaken is due to lack of access. Our typical approach in the circumstances is to refer the case to a solicitor for an injunction to be granted so that the check can be undertaken.

Subsequently to the year end, outstanding safety checks have been completed.

With regard to our asbestos management, legionella assessments and passenger lift safety checks, our performance is tracked and reported monthly. Our performance at the end of the 2024/25 financial year was as follows:



of homes required asbestos surveys



of homes required legionella assessments



100% of homes required communal passenger lift safety checks



#### C18. What % of homes meet the national housing quality standard? Of those which fail, what is the housing provider doing to address these failings?

The Decent Homes Standard (DHS) is a governmentagreed technical definition of the statutory minimum requirement for a home to be classed as 'decent'.

This is a standard notional criterion that provides insight into the condition of a Housing Provider's stock.

Where any of our homes fail this standard, we will seek to remedy the defect as a priority. In some cases, where the defect will take a longer period of time to resolve, we will support our residents moving into

temporary accommodation until all works have been completed. In exceptional circumstances, where the home will not be available for a sustained period of time, we will work with local authorities to find a permanent move.

> % of homes meet the national housing quality standard?

> > 99.96%

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

We use our own rating system for damp and mould cases that is closely linked to the Housing, Health and Safety Rating System (HHSRS) methodology.

All members of our operational teams receive training on damp and mould, which includes a zero-tolerance approach to damp and mould cases that could impact on the safety of residents.

We regularly report on damp and mould cases and the remedial work that is being undertaken.

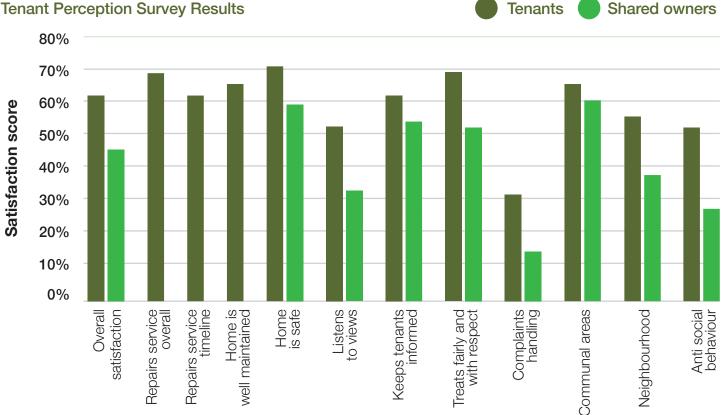
We had 291 cases of damp and mould reported during the 2024/25 financial year, which accounts for 5.5% of our homes.

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

Our tenant perception survey was carried out in October 2024 using a census approach, meaning that all of our residents were given the opportunity to take part in the survey.

1078 tenants and 64 shared owners responded to the survey (a 21.19% and 21.62%) response rate respectively).

#### **Tenant Perception Survey Results**



We saw a small increase in most of the scores for our rented homes

### **Resident Voice**

There were two areas where we saw the scores go down compared to the previous year. These are:

- Complaint Handling
- Keeps Tenants Informed

To try and improve in these areas we are doing the following:

#### **Keeping Residents Informed**

- Sending out more proactive emails and text messages when we are doing works where residents live.
- Writing to all residents after each Out and About sharing the feedback with all residents who live there and telling them what we can or can't do about the issues they have raised.
- We will communicate with residents when they have a change in Neighbourhood Officer.

#### **Complaint Handling**

- Continuing to review our policies and procedures
- Carrying out regular staff training
- Making enhancements to our systems to improve how we manage complaints.
- Look at the language we use when talking about reports of Anti Social Behaviour so these do not get confused with formal complaints.

The results for the survey completed by shared ownership residents show that the scores have dropped in all areas compared to the previous year. We want to understand more about this and we are in the process of arranging engagement sessions with these residents to talk to them about the services we provide and how we can improve. These sessions will take place before the next survey in October.



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

We continue to provide our residents with meaningful ways to be involved and provide feedback on our services. We have three residents who are part of our board.

The Tenant Assurance Panel (TAP), which has 6 members and an independent chair, continues to grow. Over the last year they have held an in-depth review of the Tenant Satisfaction Measures alongside key performance indicators. This has given them areas of focus. They have decided that they wanted to open up the scrutiny to other residents and held 3 workshops across the county. These first workshops focused on customer enquiries, gaining feedback and forming an action plan.

Some of the other opportunities residents have to review services and give us feedback are:

- The Digital Panel, which carried out 10 surveys over the last year. These include feedback on our corporate strategy, allocations process, mutual exchange policy and tenant chart to name but a few.
- The Housing for over 55's Panel (HOP), which has continued to meet and discuss issues that are meaningful to them. They have reviewed both the allocation policy and mobility policy.
- Out and About The traditional door knock has had a refocus Those schemes with high dissatisfaction from the Tenant Perception Survey are prioritised so that we can determine what issues there are. Each visit is followed up by a letter to the whole scheme keeping residents informed of actions.
- **Events** we hold events across the whole of the county. The events are a way residents can meet us face to face to discuss any issues and get to know the communities they live in. We encourage other members of the Broadland team to attend.
- Mystery Shoppers our team expanded last year with 3 new members being trained. They continue to shop homes before they are let to new residents ensuring we are meeting our Empty Homes Standard.
- Community Inspectors our community inspector teams has also grown this year with 2 new inspectors. Their inspections ensure that health and safety issues are addressed with speed. They also ensure that we are meeting our obligations on cleaning and gardening services to ensure that we are provide our residents the best possible service.



Feedback from these resident engagement opportunities is shared with the TAP who include information in their yearly update to Board. Regular updates are published in our Door to Door magazine, which residents can receive via email, in the post or CD and audio version.

This year we have published a new Resident Engagement Policy. The policy sets out our commitment to how we will engage and involve our residents in our decision making and improvements throughout the business.

Following consultation with our Digital Panel we have published a brand new Tenant Charter. The Charter sets out our commitment to our residents for the services that we provide to them.

Following a re-focus and engagement of an independent Chair, the Independent East Resident Voice Panel has reviewed the Tenant Satisfaction Measures results from all five organisations. They have decided to focus on two areas for their first scrutiny exercises, damp and mould and anti-social behaviour. They will be sending their recommendations to all organisations.

Feedback received from residents has initiated change across many parts of the business, including enhanced communication in relation to repairs being undertaken, better provision of information around communal services and a more comprehensive post inspection process.

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

Three Housing Ombudsman Determinations were issued during 2024/25:

There were five cases of maladministration identified by the Housing Ombudsman across these three determinations. These were in connection to:

**Determination 1:** maladministration by the landlord in relation to:

- Property condition issues
- Handling of the residents move to a new property

Determination 2: maladministration by the landlord in relation to its handling of:

- Complaint handling
- Health and safety concerns (including gas inspections and safety)

**Determination 3:** maladministration by the landlord in relation to:

- Responsive repairs (leaks/damp/mould)
- Orders and compensation

We have and continue to take steps to improve our complaints process and service delivery:

- Continuing to review our policies and procedures
- Carrying out regular staff training
- Making improvements to our systems to improve how we manage complaints.
- Looking at the language we use when talking about reports of Anti Social Behaviour so these do not get confused with formal complaints.

These actions reflect our commitment to learning from complaints and using them as a driver for positive change.



### **Resident Support**

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

Our Tenancy Support Service is made up of Tenancy Support Co-ordinators and Welfare Benefit Officers. The team are able to support with the following:

- Residents struggling to maintain their tenancy.
- Residents having problems with their utilities.
- Residents who have not had their own tenancy before.
- Make referrals to Adult and Children Services when residents and families need some more intensive support to be able to stay safe in their home.

The team have successfully made applications to charities to reduce or clear fuel debts so that residents can stay warm in their homes. They have provided food and supermarket vouchers for residents and families in times of crisis.

When a resident has not had a tenancy before, a referral is made to the team to provide short term support with setting up utilities and finding the best tariffs. We will make sure the resident is getting all the benefits they are entitled to so their home is affordable. We can also help with setting up bills and applying for grants for furniture and white goods.

When a resident is finding it difficult to live independently, the team will make a Care Needs Assessment to Adult Social Services to get a suitable care package. The team can also support residents to apply for aids and adaptations to help them continue to live in their home or give advice and support to apply to move when their current home is no longer suitable for them.

If a resident has been awarded the incorrect rate of welfare benefits the Welfare Benefit Advisors can

support a resident to challenge the decision and if needed support them at a tribunal hearing. They can also support residents who are being moved from one benefit to another as this can be quite daunting.

Where a household is struggling with debts the team will signpost to debt agencies for professional advice and support. The team are able to provide budgeting advice to residents who request it. This is often provided when a resident is struggling to meet their rent payments.

We are working in partnership with Norfolk County Council and NHS England on a project called "Smoke Free Homes" to signpost those residents who wish to guit smoking for professional support.

Broadland Housing Association achieved our accreditation with the Domestic Abuse Housing Alliance (DAHA). Broadland is committed to supporting residents to feel safe in their home. Some examples of support we can provide are:

- Supporting victim/survivors of Domestic Abuse to feel safer in their home.
- Signposting for personal or domiciliary care where a resident is struggling to manage.
- Supporting a resident to live safely in their home where there is a presence of self neglect or hoarding and access funds to pay for Cognitive Behaviour Therapy.

Residents can find out more about the Tenancy Support Team and the work they do on our website where you can self refer. Alternatively, you can speak to a member of staff or contact our Customer Services team who can provide more information.

### **Placemaking**



C24. Describe the housing provider's community investment activities, and how the housing provider is contributing to positive neighbourhood outcomes for the communities in which its homes are located. Provide examples or case studies of where the housing provider has been engaged in placemaking or placeshaping activities

There are times when green areas become old and outgrown and need refreshing. George Fox Way, one of our large housing schemes in Norwich had reached this point. Following consultation with residents on what sort of planting they wanted, beds were renewed. The children at the scheme got the opportunity to plant some wildflower borders as well.

Our staff have also been using their volunteer days to support our residents in their communities. One team of staff did a garden clearance, where a resident was unable to maintain their garden. Another team used their day to revive old benches on an over 55's scheme. The residents were physically unable to carry out this work, but now that the benches have been refurbished they are able to sit out in the communal garden once again.

Broadland Meridian Mental Health and Wellbeing Fund has helped 544 people over the last year. The Fund has supported 7 projects all centred around helping and supporting local charities and communities in the area of mental health.

Our communities, where our residents live, need our support more than ever. Reaching out to rural communities with support was the West Norfolk Befriending service. The service, which provides socially isolated individuals with telephone and face to face visits. Demand for the service continues to grow, highlighting the ever growing need for our older neighbours and friends.

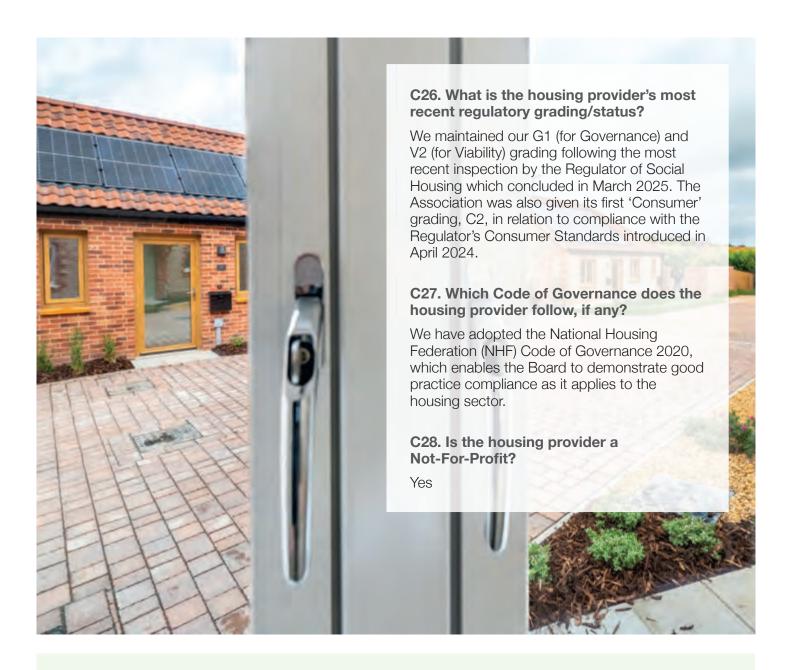
## Governance

### Structure and Governance

C25. Is the housing provider registered with the national regulator of social housing?

We are registered with the Regulator of Social Housing.





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

Oversight of risk registers for Broadland, which include risks relating to ESG, is delegated to the Group Audit and Risk Committee and reported twice annually to the Broadland board. Risk registers, including ESG risks, relating to each subsidiary entity are discussed at their individual board meetings. BHA board has access to minutes of all GARC meetings.

Reisgo, our risk management system, is used to record and rate the level of each identified FSG risk and all other risks. This is a live system which is discussed by Leadership Group on a monthly basis and reported on and discussed at each GARC meeting. Each board member has access to Reisgo so that they can view and comment on ESG and other risks. Risk tolerance is set by the Broadland board in line with the corporate strategy, and when

reported on, risks are ordered according to how far they are from the approved Board risk tolerance. This focuses board's and operational attention on risks that need it most.

In terms of mitigation of risks, the system also allows us to set actions with responsibilities and timescales. We are able to monitor our response to risks and ensure that that improvement actions are implemented.

ESG related risks are documented within our Strategic Risk Register.

New and emerging ESG risks identified anywhere within the organisation are documented within our horizon scanning register. These are monitored until their potential impact is clear, at which point they are recorded within the standard Reisgo registers.

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



### **Board and Trustees**

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

Broadland proactively seeks to ensure it has residents on its board in accordance with the provisions for this set out in its constitution (which allows residents to be board members as long as they do not constitute more than one third of board members).

The Tenant Assurance Panel is part of Broadland's governance framework and is comprised of residents and an independent Chair. Its core purpose is to scrutinise the services provided by Broadland to ensure they meet the agreed standards and to monitor key performance indicators in relation to:

- **Customer Services**
- Tenancy Support
- Reactive Repairs
- Planned Maintenance
- **Empty homes**
- Complaints
- Value for Money

Broadland provides data to the Panel when this is requested and if appropriate.

For Board and Senior Manager level recruitment we 'recruit for difference'. We promote this clearly on the adverts and that we shortlist based on anonymous scenario questions (and do not use a CV until interview stage).

Demographics of the board		
What % of the board are women?	36%	
What % of the board are BAME?	28.5%	
What % of the board are residents?	27%	
What % of the board have a disability?	14%	
Average age of the board	60 years	
Average tenure of the board	2 years	



#### C32. What % of the housing provider's Board have turned over in the last two years? What % of the housing provider's Senior Management Team have turned over in the last two years?

#### Board and senior management turnover is presented in the table below:

	FY
Board member turnover in the last two years	57%
Senior management turnover in the last two years	11.5%

Our Senior Management team comprises 26 people currently - this includes our Executive Team, Assistant Directors, Heads of Services as well as some key Operational Management roles.

Board turnover is based on an average of 10.5 members on the Broadland Housing board members with 6 board members leaving across 2023-24 and 2024-25.

#### C33. Number of board members on the housing provider's Audit Committee with recent and relevant financial experience.

The former Chair of GARC (in service until 31 December 2023) also had considerable finance experience at a senior level and had been a Chartered Public Finance Accountant. In Spring 2024, recruitment was undertaken to identify a new Chair with relevant skills, experience and a relevant financial qualification. The successful candidate was appointed as Chair Designate of the GARC and co-opted to the board in May 2024. He assumed the GARC Chair role fully in September 2024.

'Financial or Accountancy Qualification' is listed as a required skill on the Board Skills Matrix. One Member of GARC (the Chair) currently rates themselves as 'Green' for this and has provided details of his associated qualifications.





#### C37. When was the last independently-run, board-effectiveness review?

The Board commissions a governance review by an external consultant, which includes a review of board effectiveness, every three years.

This was last undertaken by The Connectives in Spring 2022 with recommendations being reported to the Broadland board in July 2022.

An invitation to tender was issued to 10 consultants in May 2025 with a deadline for submission of quotes of 8 July 2025. The Connectives were again selected by our Nominations Committee to carry out an independent review which commenced at the end of July and will report findings to the Board in January 2026.



#### C38. How does the housing provider handle conflicts of interest at the board?

Conflicts of interest are dealt with in line with the requirements in the Group Standing Orders which reflect the NHF Code of Governance and NHF Code of Conduct. Declarations of interest are a standing item on all board and committee agendas. Declarations made at meetings are then recorded in the minutes of the meeting. Where conflicts of personal interest arise,

these must be recorded and, if material, the individual concerned must be excluded from the discussion or decision by a resolution of the non-conflicted members present. In the case of a fundamental or ongoing material conflict the board must consider and determine whether the person concerned should cease to be a board member.

### Staff Wellbeing

#### C39. Does the housing provider pay the Real Living Wage?

Broadland is proud to have been a Living Wage Foundation 'Real Living Wage' member since 2016. We are members of the Norwich Living Wage City

Action Group. A cornerstone of that membership is that we ensure that all our staff are paid the Real Living Wage.

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

As of 31 March 2025, the gender pay gap is 4.5%

	FY2025	FY2024	Increase/decrease on median pay for previous year
Median Gender Pay Gap Using Hourly Pay	4.52%	6.67%	-2.15%

We pay fair wages for staff based on their role, not their gender. We are proud to have a low gap but recognise that there is always more that can be done and each year set ourselves areas of focus on this area - from training, to more general work on our EDI commitment.

Due to its size, Broadland is not legally required to produce or publish its gender pay gap report. However we have produced the report for our own guidance on this important issue since 2017.

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

	FY2024/25
CEO: Median Worker Pay Ratio	100:482

The CEO-worker pay ratio demonstrates the pay dispersion between the CEO and the organisation's median earner.

We pay fair wages for staff based on their role, not their gender. We are proud to have a low gap but recognise that there is always more that can be done and each year set ourselves areas of focus on this area.



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

Broadland is very proud of its long-standing commitment to EDI matters - recognising, however, that there is always more that could be done to improve. For instance, we aspire to have a more diverse range of applications at recruitment, and then ultimately within our staff group; and we have plans in place to support achieving this.

As an organisation we ensure EDI is promoted across staff. This ranges across training, providing opportunities to broaden our knowledge, collaborating on initiatives with other Housing Associations, establishing key behaviours, analysing data, having clear policies and guidance, gaining external awarded accreditations and supporting our employees. Annually, Broadland trains all staff in EDI. We alternate this between online and in person training. In 2024 our EDI training was on line and, in line with our commitment, it will be run in person by an external provider in 2025 for all staff.

Twice a year we run our Challenge and Change (C&C) events which have a focus on EDI and wellbeing issues. Sessions cover a huge range of topics - our most recent C&C had sessions on Neurodiversity, Jehovah's witnesses and

miscarriages, as well as wellbeing activities such as a hot pod yoga, dog walking and table tennis.

Broadland is a Disability Confident employer demonstrating its commitment to supporting those with disabilities both at the recruitment stage and within employment.

Broadland is also a Mindful Employer - this evidences the strategies and support we have in place to make our organisation an inclusive and supportive employer for those struggling with their mental health - as well as sustaining those in good mental health.

Broadland has proudly sponsored part of the Norwich annual PRIDE event for the last few years of its running.

We are currently working on ensuring our recruitment website and practices remain as inclusive as possible. We have been deploying anonymised application screening for over a year now to eliminate any bias in the shortlisting process. We soon hope to revamp our website to ensure it promotes Broadland as a great place to work for everyone.

#### C43. How does the housing provider support the physical and mental health of its staff

Broadland has a team of Mental Health and Wellbeing Champions - employees who have received extra support and training in order to provide this facility to staff.

They are available to provide advice, to signpost and to be a listening ear. They are easily accessible for all staff and have supported many over the 6 years they have been set up. They also challenge the stigma around mental health by running talks periodically and sending out informative postings about the topic.

The Champions also promote that good physical health can promote good mental health. An example of this is their promotion of wellness lunchtime walks local to offices and healthy snacks during Mental Health Awareness week.

At Broadland's twice yearly 'Challenge and Change' event, a range of physical activities are offered for staff - these are done as tasters in order that staff may find new enjoyable physical pastimes.



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

Over many years, Broadland's commitment to learning and development has been reflected in providing a healthy training budget and has enabled us to provide a wide range of relevant training opportunities for staff. We recognise that this is key to providing an excellent service to tenants and to ensure knowledge and competence remains high.

This has traditionally comprised professional qualifications and skill enhancements, as well as mandatory/compliance training. Annually, managers are asked to speak to their teams to establish training that is both needed and wanted. Training is

approved subject to budget constraints and managerial support.

All staff have access to our online training platform, where they can choose to undertake a wide range of courses. There are hundreds to choose from, ranging from IT skills (e.g. Excel) to more involved legislative updates. It also includes courses on line management or self-improvement such as time management.





26% of our staff have obtained a qualification relevant to their professional development. This data relates to certificated professional development courses. This ranges from Locksmith qualifications to CIH in Housing, and from Biohazard training to Electrical qualifications.

Annually, over 4000 hours of training is completed by our staff team.

The majority of our training is compliance - including Health and Safety, EDI, Asbestos Training (about three quarters).

Our trade staff need to retain and update their skills and knowledge in particular areas - these are often certificated training e.g. Gas Works, Electrical Regulations.

We support staff gaining professional qualifications – particularly through the Chartered Institute of Housing (CIH) or the Royal Institution of Chartered Surveyors (RICS).

### **Supply Chain Management**

C45. How is social value creation considered when procuring goods and services? What measures are in place to monitor the delivery of this Social Value? What is the relative weighting of Social Value considerations in procurement policies?

Social value falls within Equity (Spending Fairly) within our 5Es value for money framework and a social value question is included in every tender which give suppliers an opportunity to provide a cash or non-cash social value 'offer'. We apportion 10-15% of our procurement scoring to sustainability linked questions, including social value delivery.

We have a social value fund which suppliers contribute towards, this is monitored monthly on our Business Performance Report. Our annual target is to raise £25,000 of social value funds, which are donated to Broadland Meridian, to support local charities.

Some suppliers may also offer non-cash social value offers, e.g. supply of staff time to assist with social value projects, and we continue to look at ways we can tap into these to support us on social value initiatives.



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

Sustainability falls within Environmental (spending sustainably) within our 5Es value for money framework. When tendering we apportion 10-15% of the total scoring to Environmental. We question suppliers on their carbon reduction plans and their path to net zero emissions.

Our Quarterly Procurement Report measures our sustainability performance and explains how sustainability has been considered as part of each procurement activity. Sustainability is a key agenda item at each contract review meeting and we ask for Environmental Product Declarations for as many products as possible.





### **SRS/UN SDG Index**

ESG Area	Theme Number	Theme Name	SDG Goal		Reported on in this ESG report
Environmental	T1	Climate Change	13	Climate Action	<b>✓</b>
	T2	Ecology	15	Life on Land	<b>✓</b>
	Т3	Resource Management	12	Responsible Consumption and Production	<b>✓</b>
Social	Т4	Affordability and Security	11	Sustainable Cities and Communities	
			10	Reduce Inequality	
	Т5	Building Safety and Quality	11	Sustainable Cities and Communities	<b>✓</b>
	Т6	Resident Voice	11	Sustainable Cities and Communities	<b>✓</b>
	Т7	Resident Support			<b>✓</b>
	Т8	Placemaking			<b>✓</b>
Governance	Т9	Structure and Governance	4.0	Peace, Justice and Strong Institutions	<b>✓</b>
	T10	Board and Trustees	16		<b>✓</b>
	T11	Staff Wellbeing	8	Decent Work and Economic Growth	<b>✓</b>
	T12	Supply Chain Management	12	Responsible Consumption and Production	<b>✓</b>











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