SUSTAINABILITY POLICY

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Policy	Sustainability Policy						
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Policy Review	Director of Asset Management						
Who this policy affects	Board	X	Customers	X	Contractors	x	Members of the Public	
Where this policy affects	General needs	X	Supported	x	Office / staff base	x

1. Introduction

This Policy aims to set out Almond Housing Association Limited's approach to sustainability and ensuring works, services and new homes are delivered with as little environmental impact as possible and in a manner than ensures we are creating thriving communities.

1.1 At Almond we recognise that improving our overall performance, and especially the performance of our buildings in relation to sustainability, will mean that we are better placed to meet our commitments to best value, net zero and to respond to current pressures as well as to changing economic and social policy.

1.2 The Scottish Government has set ambitious targets to achieve a reduction in carbon emissions by 80% by 2045, compared to 1990 levels. The Scottish Housing Net Zero Standard (SHNZ) is set to replace the previous EESSH standard and the final version is yet to be finalised. Environmental sustainability is also wider than the decarbonisation agenda and we will also address other issues such as water use, biodiversity, the circular economy and training opportunities. as part of our ongoing sustainable delivery of works and services for customers.

1.3 We recognise that sustainability is not only about meeting targets or even reducing emissions – it is about changing lives and communities for the better.

2. Aims of the Policy

2.1 Our overall aim in pursuing this policy is to make a positive contribution to the quality of life in the areas in which we are involved. In all our activities we will seek to adopt an approach that recognises the role of social and environmental issues in enhancing the delivery of services. We will seek to improve our knowledge and understanding of sustainability issues and increase our operational efficiency.

2.2 We are committed to reducing our impact on the environment through a reduction in our carbon footprint, increased recycling and working with our contractors who are committed to sustainable procurement chains. We aim to reduce our energy usage and we will, wherever possible, encourage green travel options within our organisation.

2.3 In our overall activities we will ensure that we:

- Recognises the role of social and environmental issues in enhancing the delivery of services and take the opportunity to review services to identify opportunities for improved sustainability
- Improve our knowledge and understanding of sustainability issues and how we can make positive changes to reduce our carbon footprint.
- Increase operational efficiency and effectiveness as a method of ensuring our carbon footprint is minimised.
- Contribute to meeting the current and future needs of customers and how decarbonisation and wider sustainability can benefit them.
- Improve our data to ensure we are in a position to submit a voluntary return utilising the Sustainability Reporting Standard framework
- Our Business Plan is aligned with the aims of the policy

2.4 Our objectives in delivering this policy will include seeking to:

- provide homes which will provide a good living environment for our customers
- enable residents to reduce the running costs of their homes

- avoid building on 'greenfield' sites, where the use of redevelopment land is feasible
- reduce the dependence on non-renewable resources
- promote the re-use and recycling of materials
- avoid the use of potentially toxic and environmentally damaging materials and processes
- reduce the use of resources in our daily operations, both inside and outside our office
- reduce the number of new tenancies which end in less than one year
- explore and deliver where possible net zero heating options and renewable technologies

3 New Build Developments

3.1 The Association will seek to integrate sustainability measures at all stages of the new-build process, including decisions on:

- the location, mix and function of the project
- the layout, design and specification
- the integration of external space
- the most effective form of procurement
- construction methods and materials specification including cosideration re embedded energy/carbon and whole life sustainability
- energy sources and energy efficiency
- the future use and maintenance of the buildings
- waste management and site management.

3.2 We will ensure delivery of sustainable developments and sustainable communities by:

- providing homes that people want to live in, both now and in the future
- creating living environments that are healthy, safe and secure
- encouraging designers and developers to adopt an approach to sustainability that is based on reliable, affordable and replicable techniques that offer social, environmental an economic advantage
- reducing fuel poverty amongst tenants where we are able to make a practical contribution.

3.3 The Association will consider the sustainability, both environmental and social. as we look to regenerate our existing stock through our Development and Regeneration Strategy.

4. Asset Management

4.1 We will maintain good stock condition information to allow us to maximise the life of our components by installing high quality products in the first instance and ensuring these are appropriately maintained and repaired during their life cycle.

4.2 Standard specifications will be regularly reviewed, taking into account the environmental impact of individual products and materials such as heating boilers, paint, timber etc to ensure a more sustainable product is not available.

4.3 Procurement practices will be regularly reviewed to maximise local sourcing of materials and the reduction of transport (energy) costs, where this is feasible and practicable to achieve

4.4 We will continue to invest in fabric energy efficient measures, seeking grant funding where available, to ensure we maximise the energy efficiency of our customers homes, in turn reducing the costs of heating.

4.5 In line with the SHNZ standard and the Scottish Governments Heat in Buildings Strategy we will explore and delivery where possible Net Zero heating for customers. In the short term and until the standards are net zero technologies have been improved for retrofit we will do this only where we are confident it will not result in higher costs for customers.

4.6 On publication of the SHNZ standard a delivery strategy will be developed.

4.7 We will seek to influence the sustainability practices of the contractors we use, where appropriate including sustainability targets in contract conditions.

5. Wider Role Activities

5.1 Through maintaining and developing the role of Almond Enterprises Ltd, Almond will seek to contribute to the economic benefit and sustainability of the local community.

5.2 We will implement, regularly review and update our Community Impact Strategy, including a focus on food poverty, fuel poverty, along with digital and financial inclusion.

5.3 Our Community engagement Officer will work with local residents and community groups to improve the local environment.

6. Housing Management

6.1 Within Housing Management our approach to sustainability includes seeking to support tenants in maintaining their tenancies and addressing social and economic issues.

6.2 Working in conjunction with local partners and other relevant organisations we will strive to improve the social and economic wellbeing of those we house and the communities in which we operate, including securing funding for specific initiatives, eg, for energy advice projects

6.3 through tenant newsletters, our website, or seeking funding for specific initiatives:
- provide tenants with appropriate energy advice, or direct them to sources of advice, to reduce their energy costs and create healthy internal environments
- provide tenants with information about how they can play their part in addressing environmental issues
- encourage tenants to maximise their use of local recycling facilities.

6.4 We will work closely with customers to maximise the number who are able to sustain their tenancies beyond the first year.

6.5 Through developing and implementing a comprehensive range of housing policies, in particularly those dealing with the issues arising from rent arrears and anti-social behaviour, Almond will seek to prevent homelessness and help tenants to sustain their tenancies.

6.6 We will continue to review ways to engage with customers regarding sustainability via our tenant participation strategy.

7. Workplace

7.1 Almond will seek to maximise sustainability measures in our office through:

- reducing waste
- reducing energy consumption and considering 'green' energy when reprocuring utilities
- reducing the proportion of information held in paper files and increasing the proportion held in electronic format
- maximising recycling opportunities
- maximising use of space within the building to benefit local community
- Promote hybrid working and use of online meeting to reduce the impact of travel

7.2 We will encourage colleagues to utilise 'green' methods of travel by offering cycle to work, electric car salary sacrifice schemes as well as well as hybrid and electric options for company cars.

8. Sustainability Reporting Standard

8.1 Amond will put a plan and framework in place to ensure that the relevant data can be captured to allow a return to be made in relation to the Sustainability Reporting Standard.

9. Equality, Diversity & Inclusion

9.1 Almond aims to ensure that equality, fairness, dignity and respect are central to the way we work and how we treat our customers. We support diversity and uphold equal opportunities in all areas of our work as an employer and service provider.

9.2 Almond will not discriminate against tenants, staff, visitors, suppliers or others based on their age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity or gender reassignment (collectively referred to as 'protected characteristics' in the Equality Act 2010).

10. Data Protection

10.1 Our policies and procedures foster an approach of 'data protection by design and by default'. What this means in practice is that:

- Policies and procedures consider data protection issues, ie how to protect the data subject served by the policy or procedure;
- New systems, services, products and business practices involving personal data are designed and implemented to ensure personal data is protected by default;
- That the Data protection principles and safeguarding of individuals' rights (such as data minimisation, pseudo anonymisation, and purpose limitation) are clear in the policy or procedure;
- And that if the policy or procedure aims to provide service to vulnerable groups (e.g. children) that the personal data is treated with extra protection.

What this requires users of this policy to do is:

- Make sure that staff understand why data protection is important for the implementation of this policy, for instance via training or by reading the data protection policies;

- If we are undertaking a review of the policy, change to process or change to system, that we must consider doing a Data Protection Impact assessment, if the change is likely to result in a high risk to individuals.
- It is also good practice to do a DPIA for any other major project which requires the processing of personal data.

We will consult our data protection officer, if there is doubt over these requirements.

11. Policy Review

11.1 This policy will be reviewed every 3 years or as required due to legislative or regulatory change. The review will be completed by the Director of Asset Management and circulated to the Board of Management for approval.

12. Associated Policies & Guidance

12.1 This Policy takes account of the following documents:

Sustainability Strategy

Asset Management Strategy

Procurement Policy

Development and Regeneration Strategy (draft)

Tenancy Sustainment Policy

Customer Engagement Strategy

13. Responsibilities Chart

13.1 The chart below illustrates the responsibilities of all staff in relation to this policy.

	Board	CEO	Director of AM	Managers	All Staff
To Implement the policy		✓	✓	✓	
Ensure Almond HA staff have an understanding of Policy				✓	
Policy Review			✓		
Ensure Policy Reviewed	✓				
Ensure Equality & Diversity guidance is adhered to					✓
Appeals process					

Health & Safety Assessment

Does this policy have the potential to affect:

	Yes	No
Lone Working	☐	☒
Safety and/or wellbeing of customers	☐	☒
Safety and/or wellbeing of staff	☐	☐

Equality Impact Assessment

Does this policy have the potential to affect:

	Yes	No
Age	☐	☒
Disability	☐	☒
Gender reassignment	☐	☒
Marriage and Civil Partnership	☐	☒
Pregnancy and Maternity	☐	☒
Religion or belief	☐	☒
Sex	☐	☒
Sexual orientation	☐	☒
Race	☐	☒

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.

Data Protection Impact Assessment

Carrying out a Data Protection Impact Assessment [DPIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

A Data Protection Impact Assessment [DPIA] must be completed if the policy involves one or more of the following (please tick each that apply to this policy):

Evaluation or scoring	☐
Automated decision-making with significant effects;	☐
Systematic monitoring	☐
Processing of sensitive data or data of a highly personal nature	☐
Processing on a large scale	☐
Processing of data concerning vulnerable data subjects	☐
Innovative technological or organisational solutions	☐
Processing that involves preventing data subjects from exercising a right or using a service or contract	☐
Use systematic and extensive profiling or automated decision-making to make significant decisions about people	☐
Process special-category data or criminal-offence data on a large scale	☐
Systematically monitor a publicly accessible place on a large scale	☐
Use of new technologies involving significant innovation	☐
Use profiling, automated decision-making or special category data to help Make decisions on someone's access to a service, opportunity or benefit	☐
Carry out profiling on a large scale	☐
Process biometric or genetic data	☐
Combine, compare or match data from multiple sources	☐
Process personal data without providing a privacy notice directly to the individual	☐
Process personal data in a way that involves tracking individuals' online or offline location or behaviour	☐
Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them	☐
Process personal data that could result in a risk of physical harm in the event of a security breach	☐
There is a change to the nature, scope, context or purposes of our processing	☐

If a DPIA is not carried out, please summarise the reasons below

None of the above apply. Application for membership is by choice and consent, and there will be no automated scoring or profiling of applicants. Membership form will ask for basic personal information, and will does not ask for special category data.