



**Drumchapel
Housing**

Co-operative Limited

Sustainability policy

Date Approved by Board:

April 2018

Due for Review:

March 2023

1. Introduction

1.1 The purpose of this policy is to guide how the Co-operative will change the way it works to:

- Improve the quality of life of our tenants by reducing fuel poverty; helping them use energy more efficiently; and improve the environment.
- Make a contribution to mitigating the effects of Global Warming and adopting more sustainable practices to reduce our adverse impacts on the environment by using resources more efficiently and reducing waste.

2. Equality and Diversity

2.1 Through its equality & diversity policy, the Co-operative aims to promote the commitment to zero tolerance to unfair treatment or discrimination and to ensure that no person, group of persons or organisation who deal with the Co-operative in any way or who requires a service, assistance or advice from the Co-operative, or who is employed by (or serves) in any capacity by the Co-operative is treated less favourably than any other person, group of persons or organisation.

2.2 As part of our commitment to ensuring equal opportunities for all, the Co-operative has installed an induction loop system in the reception area. Where a need is identified, all written information can be provided in Braille; larger font; translated into an alternative language; or on CD where data is converted to voice.

2.3 In accordance with the Equality & Diversity policy, the Co-operative has applied a screening process to determine whether this policy should be subject to an equality impact assessment. This assessment has revealed that it is appropriate, and the Equality Impact Assessment is attached as Appendix 1 to the policy.

3. Background

3.1 In framing the policy, the Co-operative has been guided by our Vision and Values:

The Co-operative will be the landlord of choice in our neighbourhood, working with our customers, communities and local stakeholders to create an area

where people choose to, and are happy to, live. Great service and value for money will be our core and we will strive relentlessly to balance both.

3.2 The following values underpin all the work that we do:

Excellence - We are committed to providing a quality, customer focused service that demonstrates value for money, delivered by great staff. We will publicise information on how we are performing, welcoming challenge and feedback to continuously improve the effectiveness and relevance of the service we provide.

Accountability - Our Board and senior staff team will provide strong strategic leadership and oversight, with non-senior staff at the forefront of delivery, ensuring tenants' interests are protected in all that we do. We will ensure that our actions are transparent.

Partnership working - We will work collaboratively with all sections of the local community. This includes working collectively and individually with our customers, other registered social landlords, and statutory and voluntary sector partners working in Drumchapel to improve the lives of our residents. We will continue to be a proactive member of the local community, seeking out new, innovative ways to address issues that impact our residents.

4. Policy context

4.1 Fuel Poverty

4.1.1 A household is currently defined a fuel poor if it spends more than 10% of household income on fuel. In Scotland since 2009 around 35% of Scottish Households defined as fuel poor (i.e. spend more than). There are four factors that interact to influence this definition of fuel poverty:

- Household income
- Energy costs
- Energy performance
- How energy is used in the home

4.1.2. In 2017 the Scottish Government launched a [consultation](#) on fuel poverty, which closed on 2 February 2018. It proposes a new definition of fuel poverty, based on a minimum income standard, that aims to more sharply focus resources and support on the people most badly affected. This would form the

basis of a new Warm Homes Bill. At present it is unclear how this might impact on the work of the Co-operative or the availability of resources for investment in our stock or support for our tenants. However, under the proposed new definition, fuel poverty would stand at 25% of Scottish households. Targets to address fuel poverty would see it reduced to below 20% by 2030 and to less than 10% by 2040. The draft strategy neither proposes a minimum energy efficiency standard nor sets levels of investment to address fuel poverty.

- 4.1.3 It should be noted that measures to address fuel poverty might not necessarily lead to positive environmental impacts. It is not uncommon for fuel poor household to limit the fuel they consume to the level they feel they can afford. Improving the thermal efficiency of their home may improve the physical comfort of the household, but not necessarily reduce the energy they consume.

4.2 Climate change

- 4.2.1 The Scottish Government has announced that it intends to bring forward a [Climate Change Bill](#) in 2018 to increase the ambition of the targets in the [Climate Change \(Scotland\) Act 2009](#) in response to the [Paris Agreement](#). This is expected to increase the target for the reduction of carbon emissions to 90% by 2050.
- 4.2.2 The Scottish Government's [Energy Efficiency Action Plan](#) indicates that domestic energy use accounts for 30% of the national total. The domestic sector therefore has a significant role to play in helping to achieve targeted reductions. For new buildings, this is being addressed through the building standards, with the ambition of achieving whole life zero carbon by 2030. Glasgow City Council are promoting the adoption of higher thermal standards in the social housing sector through a new [Glasgow Standard](#).
- 4.2.3. A more pressing problem is that it is estimated that 75% of the current housing stock will still be in existence in 2050 and generally has poor thermal efficiency. The Co-operative originally took transfer of properties from Glasgow City Council in 1988. 55% (266 units) of its stock is rehabilitated property originally built in the 1950s and 45% (214 units) is new build properties built during the period 1999 – 2005. Measures have been taken to improve the thermal performance of this older stock, for example through the installation of loft and external wall insulation. The government has driven improvements in the existing social housing stock by establishing the Energy Efficiency Standard for Social Housing (EESH). Currently our stock is 97.5% compliant with the EESH and all will be compliant by the target date 2020,

except two properties with exemption for valid financial reasons. However, the Scottish Government will be consulting on a higher EESSH 2 in Spring/Summer 2018 which will require further investment in the stock over the coming years.

4.2.4 The MacIntosh Environmental Architecture Research Unit (MEARU) has identified two problems associated with the implementation of EESSH:

- EESSH is based primarily on thermal measures such as wall and loft insulation, double glazing and improved heating systems. It makes no consideration of other issues with environmental impacts, such as ventilation or internal air quality which might significantly influence householders' health and comfort.
- Compliance is based on EPCs which are achieved at design stage with theoretical assumptions. No measure of actual performance is carried out, which might reflect the real-life experience of tenants in their homes.

4.2.5 To address both of these issues, the Co-operative may consider carrying out research to determine how best to invest in the stock and shape the advice given to tenants. MEARU has been working with John Gilbert Architects to develop the Hab-lab concept to address this.

4.3 Waste and pollution reduction

4.3.1 It is the long term aim of Scottish Government to move to zero waste. Its interim targets and impacts are:

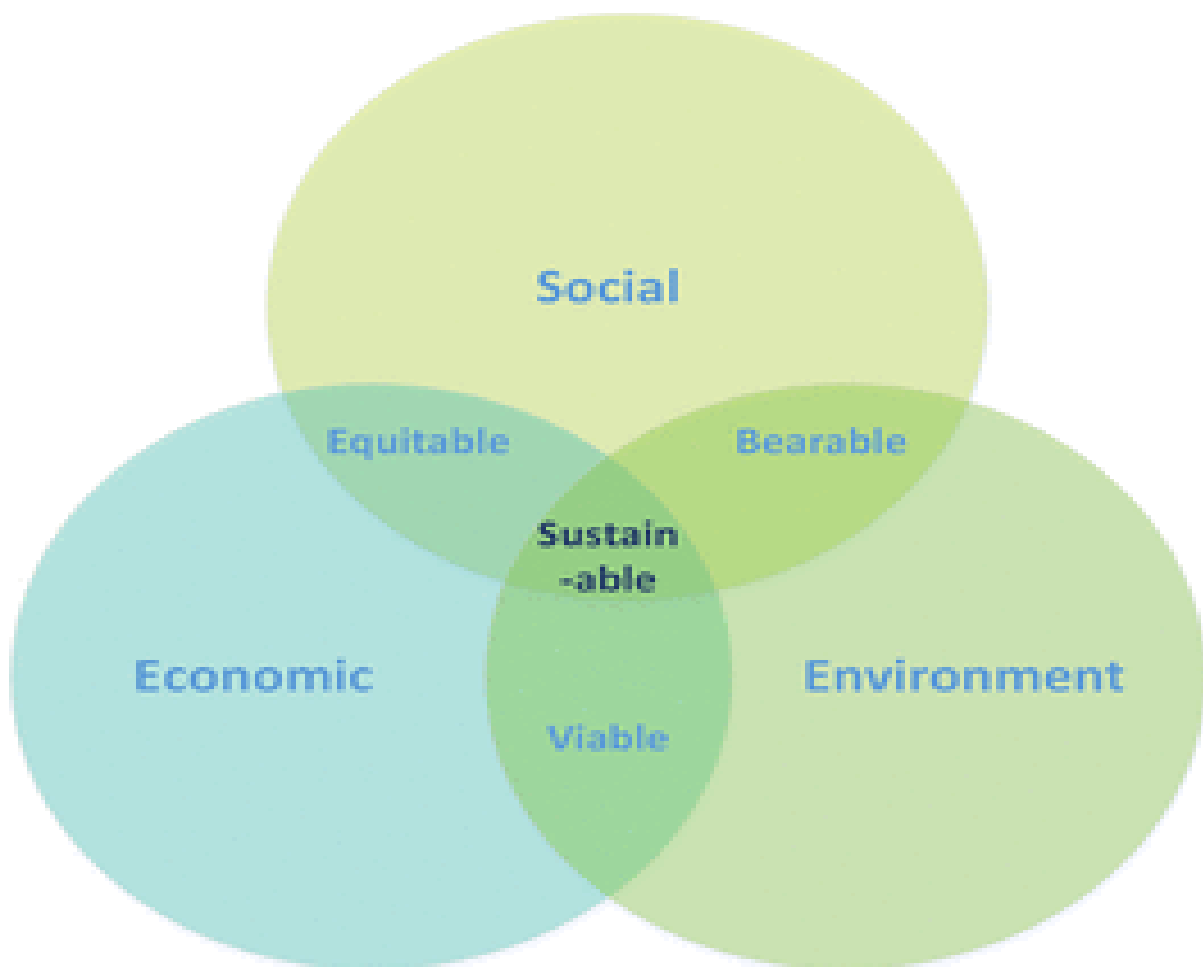
- Recycling 70% of all waste by 2025
- Reducing waste by 15% by 2025
- Reducing food waste by 33% by 2025
- Meeting 50% of energy heat demand from renewables by 2032
- Energy efficiency as a national infrastructure priority
- Reducing Scotland's greenhouse gas emissions by 66% by 2032

4.3.2 Recycling in the domestic sector has largely been driven by local authorities through kerbside collections and this will probably continue to be the case. The Co-operative's waste reduction role is therefore more likely to focus on our operations as a business and on the influence we can bring to bear on our supply chains, (e.g. contractors, office supplies, etc.)

4.4 Sustainable development

4.4.1 In 1987, the Brundtland Commission defined [Sustainable Development](#) as “*development that meets the needs of the present without compromising the ability of future generations to meet their own needs.*”

4.4.2 Definition of sustainability: balance economic, environmental and social factors in equal harmony. This is illustrated in the Venn diagram, below:



5. Priorities

5.1 Our priorities, in rank order will be:

1. Where we have a statutory or regulatory duty (e.g. [EESSH](#) / [Building Standards](#)).

2. Where we can have the biggest impact on the lives of our tenants – i.e. their quality of life / financial benefit.
3. Where action will have a lasting impact, rather than an impact that might be short-lived, reversed or require repeated investment.
4. Where early action might be more cost effective for the Co-operative in the long-term, given that standard will have to rise further.

6. Making it happen

6.1 We have grouped the activities we intend to carry out over the next three years into six categories. These are discussed below and the Action Plan at Appendix 2 of this policy identifies lead officers and timescales.

6.2 Help and Advice to Tenants

1. Provide Welfare Benefits and Debt Advice Service to tenants: This is currently provided one day a week by the Citizen Advice Bureau for our tenants. Grant funding for the Debt Advice Service, through community funds ended March 2018. From 2019 we will evaluate whether a better service could be provided by directly employing our own member of staff, possibly in collaboration with other local organisations.
2. Work with [G-Heat](#) to offer advice on fuel efficiency and fuel switching.
 - i. Refer people who are having difficulty paying their utility bills
 - ii. Refer all new tenants at sign-up
3. Invite G-Heat to attend Community events, (e.g. Gala Days)
4. Provide advice to tenant on how to use their heating and ventilation systems.
5. Consider designing, piloting and evaluating a floor covering scheme for low income families who can't fund them from other sources.

6.3 Protecting Assets

1. Meet EESSH standard. We are currently surveying properties that may not meet the standard. It is currently estimated that there are 12 properties that do not comply. A number of these relate to properties where the tenant has a preference for electric heating. We will seek to identify more energy efficient electric heating systems for those tenants. The other

properties have gas heating systems by back boilers. Those tenants have been contacted on an ongoing basis to try and encourage them to change the heating system to gas heating by combination boiler.

2. Develop a workplan to implement new EESSH 2 standard and implement as quickly as resources allow. The new standard will not be set until after the conclusion of Scottish Government consultation in 2018.
3. Carry out options appraisal when major components (e.g. heating, ventilation, windows) are due for replacement. The aim of the options appraisal would be to consider the feasibility of more sustainable forms of provision. e.g.
 - Heating system
 - Glazing
 - Ventilation
 - Insulation
 - Solar PV
4. Investigate research into improving energy efficiency, ventilation and internal air quality of the housing stock, with a particular focus on older stock. The Co-operative will consider working with Hab-Lab, a joint venture between John Gilbert Architects and MEARU.
5. Investigate SMART heating controls and, if appropriate, pilot them and evaluate effectiveness in improving energy efficiency and user satisfaction. Consider wider application if found to be beneficial. Examples of SMART controls includes Switchee, which has been designed specifically for social housing tenants and does not require Wifi.

6.4 Supply Chain

1. We will require contractors to have their own sustainability and waste reduction policies as part of the procurement process.
2. We will investigate options for choosing sustainable product when ordering office equipment / materials.

6.5 Offices and Staff

1. Consider reviewing power, heating and ventilation systems / practices. N.B. New FiT registrations due to end April 2019 should we wish to install solar PV.

2. Promote reduction, reuse and recycling of office consumables, e.g.
 - Electronic document handling
 - Printing double-sided and in B&W where possible
 - Provide facilities for recycling

6.6 Working with Others

1. We will work with other organisations where:
 - a) Joint working will be more efficient or effective
 - b) It gives us access to expertise that we don't have in-house
2. Current and potential partners include:
 - a) Cernach Housing Association
 - b) Drumcog
 - c) G-Heat
 - d) CAB
 - e) Energy Saving Trust / Home Energy Scotland

7. Monitoring, evaluation and reporting

- 7.1 Performance against the Action Plan will be monitored, and progress will be reported to the Management Board on an annual basis. If appropriate, amendments to the Action Plan will be proposed at the same time.

The policy will be reviewed in March 2023 or earlier if required by legal, regulatory or good practice requirements. The action plan will be reviewed more regularly.

8. GDPR Privacy Statement

- 8.1 The Co-operative will gather and use certain information about individuals in accordance with GDPR. Staff members have a responsibility to ensure compliance with the terms of the privacy policy and to collect, handle and store personal information in accordance with relevant legislation. The Fair Processing Notice (FPN) details how personal data is held and processed with third parties in accordance with relevant policies and procedures.

Appendix 1

Action Plan

Action	Lead Officer	Deadline
Help and Advice to Tenants		
CAB: Continue Benefits advice and debt advice service (increase when required due to Welfare Reform changes)	Depute Director	Ongoing March 2019 evaluate directly employing own staff
G-Heat: Refer all new tenants and tenants who report problems with utilities / heating systems.	Housing Management staff	Ongoing
G-Heat: Invite G-Heat to attend Community events, e.g. Gala Day. Also refer individual tenants to G-Heat and arrange a home visits were necessary	Housing Management staff	Ongoing
Asset Management		
Meet EESSH Standard before deadline	Technical Manager	31/12/2020
When new EESSH established, identify required investment and programme of works	Technical Manager	Tbc
Carry out options appraisal when major components (e.g. heating, ventilation, windows) are due for replacement	Technical Manager	Evaluate year preceding implementation
Investigate research study of thermal performance of older stock	Technical Manager	Tbc
SMART Heating Controls: Evaluate options and pilot one option (if chosen).	Technical Manager	Tbc
Supply Chain		
Contractors/ Suppliers to have their own sustainability and waste reduction policies	Technical Manager	Ongoing: Procurement process
Choosing sustainable product when ordering office equipment/materials	All staff	Ongoing
Offices		
Review power, heating and ventilation systems / practices	Technical Manager	Tbc
Promote reduction, reuse and recycling of office consumables, e.g. <ul style="list-style-type: none"> • Electronic document handling • Printing double-sided and in B&W where possible • Provide facilities for recycling 	Finance Officer/Customer Service Advisor	Ongoing

Equality Impact Assessment

Is further action required?

Yes

No

Is the action achievable?

Yes

No

Timescale for action

N/A

1. Aims of the policy

a) What is the purpose of the policy?

- Improve the quality of life of our tenants by reducing fuel poverty; helping them use energy more efficiently; and improve the environment.
- Make a contribution to mitigating the effects of Global Warming and adopting more sustainable practices to reduce our adverse impacts on the environment by using resources more efficiently and reducing waste.

b) Who is affected by the policy/who will benefit from the policy and how?

- The Co-operative's tenants and others who live in our properties
- Staff and Management Board
- Contractors, consultants and suppliers who are required to observe the policy
- Partner agencies and other organisations who work with us

c) Who is responsible for delivering the policy?

The Director on a day-to-day basis and ultimately the Management Board

d) How does the policy fit into our wider or related policy initiatives?

The policy underpins our work as a landlord and employer.

2. What do we already know about the diverse needs and/or experiences of our target audience?

Do we currently have information on:

Age	Yes	✓
Disability	Yes	✓
Marriage and Civil Partnership	Yes	✓
Pregnancy and Maternity	Yes	✓
Race	Yes	✓
Religion and Belief	Yes	✓
Gender	Yes	✓
Gender Reassignment	Yes	✓
Sexual Orientation	Yes	✓

Tenants

- 2.1 Households that might be expected to have a greater risk of fuel poverty include:
- Those with older or disabled member, who may have a higher demand for heating.
 - Those on low incomes or dependent on benefits
- 2.2 Households who have difficulty in understanding English may not be able to access advice services or written material easily.
- 2.3 **Staff and Management Board**
- 2.4 No equalities issues are identified in relation to this policy.

Contractors and consultants and suppliers

- 2.5 No equalities issues are identified in relation to this policy.

3. What does the information we have tell us about how this policy might impact positively or negatively on the different groups within the target audience?

- 3.1 We gather information on all of the nine protected characteristics. This may help us identify households who are in or at risk of fuel poverty or those who may have difficulty in accessing information and advice. Through our housing management service we identify households on low income or dependant on benefits and sign post thm to the relevant agencies along with the internal

service we provide to maximise their income.

4. Do we need to carry out a further Impact Assessment?

4.1 No. Most physical measures will benefit all households regardless of their household. Issues with regard to communication are similar to those in other areas of the Co-operative's work and the same standards should be applied.

5. How will we monitor and evaluate this policy to measure progress?

5.1 Ongoing monitoring by staff and an annual written report to the Management Board.