Environmental Management Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	July 2020
Review date:	July 2023

1	Introduction

1.1 As a responsible business, employer and provider of housing services, One Vision Housing (OVH) seeks to promote positive environmental practices in its core business activities.

1.2 The Policy sets out the provisions OVH will have in place for positive environmental actions associated with:

- Its status as an employer and the running of office facilities
- How it will encourage positive environmental actions from those that carry out work on its behalf and supply chain management
- Work it carries out on its rental property portfolio

1.3 The Policy does not cover the waste or recycling obligations for those it provides landlord services to, although, every effort will be made to promote responsible waste management and recycling opportunities for these customers and provide advice on how they can reduce energy usage.

1.4 Operation of the Policy enables OVH to meet the requirements of the Regulatory Framework for Social Housing, introduced by the Regulator for Social Housing (RSH) as follows:

- Meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes
- Registered Providers shall articulate and deliver comprehensive strategic approach to value for money including an assessment of environmental returns

1.5 In operating the Policy, OVH will ensure it meets the requirements of the relevant legislation and regulatory codes as follows:

- Environmental Protection Act 1990
- Environmental Protection (Duty of Care) Regulations 1991
- Environmental Permitting Regulations 2010
- Hazardous Waste Regulations 2005
- List of Waste Regulations 2005
- The Waste Framework Directive (WFD) 2008
- The Waste (England and Wales) Regulations (WR) 2011
- Waste Electrical and Electronic Equipment (WEEE) 2013

- Waste Transfer Regulations 2005
- Control of Substances Hazardous to Health (COSHH) 2002 as amended
- Environmental Damage Regulations 2009
- Scrap Metal Dealers Act 2013
- Control of Pollution (Oil Storage Regulations) 2001
- Energy Efficiency Regulations 2015

1.6 Access and Communication

1.6.1 OVH is committed to ensuring that the services it provides are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.

1.7 Equality, Diversity and Human Rights

1.7.1 OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Pregnancy & Maternity, Marriage and Civil Partnership, Religion and/or Belief.

1.7.2 OVH also recognises that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

1.7.3 OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make every effort to ensure staff and others with whom OVH works, will adhere to the central principles of the Human Rights Act (1998).

2 Statement of Intent

2.1 OVH will operate a comprehensive Environmental Management System (EMS) incorporating an 'aspects and impacts register' of all activities, products and services it provides. The aim of this register is to determine which of those aspects and impacts are significant and require control measures and actions to improve performance.

2.2 In operating the EMS OVH will ensure that it:

- Complies with all relevant legislation, standards and codes of practice relevant to its area of operations and strives to make efficient use of energy and materials, including substitution of renewable resources wherever possible
- Reduce waste by actively promoting the recycling of materials and the use of recycled goods and ensure that all associated residual waste materials are disposed of in a safe and responsible fashion
- Seek to reduce harmful emissions wherever possible
- Reduce energy and materials (including water use) consumption in OVH offices, and help residents in housing owned by OVH to save energy in the running of their homes
- Reduce the overall carbon footprint
- Promote environmental awareness to employees, sub-contractors and customers

2.3	OVH will ensure that its systematic efforts to improve environmental performance are externally verified and will look to maintain internationally recognised standards such as ISO 14001 Environmental Management Systems, or similar.

3 Policy

3.1 Environmental actions as an employer

3.1.1 As a responsible employer OVH will seek to minimise or eliminate the negative environmental impacts associated with the operation of office facilities.

3.1.1.1 OVH will adopt the following approach:

- Establish baseline positions for environmental aspects and impacts
- Put in place effective monitoring systems
- Periodically review findings
- Through benchmarking and industry standard comparisons, set challenging but realistic targets for improvement

3.1.1.2 As a result of this approach OVH will take action in the following areas:

3.1.2 Staff Agile working

3.1.2.1 OVH empowers its employees to carry out all or some of their work at any place (an approved worksite) and time of their choice with maximum flexibility and minimum constraints e.g. home, library etc.

3.1.2.2 Agile working by OVH employees will achieve the following:

- Reduced emissions associated with travel to work, improving carbon footprint performance
- Reduced office waste i.e. printer paper, plastics etc.
- Reduced energy consumption and water use in office accommodation

3.1.3 Reduce office energy consumption:

3.1.3.1 For its head office facilities and any other buildings it owns and manages from which it delivers housing services, OVH will seek to reduce energy consumption associated with building operations i.e. electricity or gas usage.

3.1.3.2 To achieve this aim OVH will:

- Invest in smart metering facilities to be able to determine precise usage and challenge accuracy of rates being charged. OVH will also use this information to identify areas / installations of high consumption and look over a phased programme to replace with more energy efficient systems e.g. replacing computer servers with more modern energy efficient units

- Investigate the possibility of installing voltage power optimisation technology (matching more closely voltage supply with actual requirements of electrical equipment)
- Investigate the possibilities and install wherever viable green technologies (micro - generation) to reduce energy consumption

3.1.4 **Improve recycling rates:**

3.1.4.1 OVH will set targets to reduce the amount of office waste created and improve recycling rates. It will look to achieve this by:

- Increasing the amount of documents stored in electronic form to cut down on paper usage
- Operate account managed printing facilities to identify areas of the business that produce the largest volumes and work towards reducing their printing output via communication by other means
- Employing waste carriers that will sort office waste off-site for recycling and set year-on-year targets for improvement including arrangements for confidential waste recycling and safe disposal of electrical / computer equipment in accordance with WEEE 2013 Regulations

3.1.5 **Encourage sustainable transport**

3.1.5.1 OVH will look to reduce fuel emissions by:

- Encouraging sustainable forms of transport e.g. cycling through promotion of the 'bike to work' scheme (subsidised cycle and equipment purchase), provision of safe cycle storage and shower facilities at head office location
- Encouraging use of combined visits across multiple teams for housing management

3.1.6 **Promoting positive environmental behaviours**

3.1.6.1 OVH will use its internal communication channels to promote positive environmental behaviours from its staff including home energy saving advice and ways in which they can reduce the amount of office waste created / increase recycling rates.

3.1.7 **Standardised Environmental, Social and Governance Reporting**

3.1.7.1 To drive up environmental standards in the social housing sector, OVH have agreed to be an 'early adopter' of a standardised approach being developed for recording Environmental, Social and Governance performance and good practice measures.

3.1.7.2 The aim of this approach is to demonstrate to external finance providers that are seeking ethical business investment opportunities, OVH's credentials in a measurable and comparable way.

3.2	**<u>Supply chain and contractor management</u>**
3.2.1	**Contractor selection and monitoring**
3.2.1.1	When selecting all major and regular suppliers of goods and services, including sub-contractors OVH will require companies which it chooses to work to pass 'preferred supplier' requirements.
3.2.1.2	OVH will carry out periodic checks to ensure environmental performance targets and arrangements are being adhered to and will remove contractors and suppliers where non-compliance is discovered. OVH will also require suppliers / contractors that have achieved preferred supplier status to reapply if not used in the previous 12 month period.
3.2.2	**Intra-Group arrangements**
3.2.2.1	OVH will work with other companies within the Sovini Group to monitor and improve environmental performance including measures for: • Product selection – working together to pool knowledge to select replacement components for both responsive repairs to OVH owned properties and those used in investment programmes that have improved life-cycles and require less on-going maintenance / replacement • Recycling of trade waste - setting targets that exceed industry best practice (Waste and Resources Action Programme targets) including arrangements for reducing packing and recycling of metals • Fleet management – ensuring low emission vehicles are used and reducing business mileage through the use of journey optimisation and intelligent job scheduling technologies, including use of mobile working solutions
3.3	**<u>Property management</u>**
3.3.1	**Property attributes**
3.3.1.1	OVH will meet the requirements of the Energy Efficiency Regulations 2015 by ensuring each property for rent (domestic and commercial) has an Energy Performance Certificate (EPC) rating of 'E' or above.
3.3.1.2	In compliance with the above Regulations and the 'Minimum Energy Efficiency Standard', OVH will arrange for energy performance assessments using an EPC rating on all its void properties. Where ratings require improvement, OVH will take action as appropriate, examples include: • Roof and wall insulation • Replacing old, inefficient heating with energy efficient systems • Installing double glazed windows • Installing energy efficient lighting
3.3.1.3	OVH will ensure a copy of the EPC is provided to all new tenants / leasees for properties that it rents when they first move into the property and the existing ratings will be available when properties are advertised.

3.3.1.4	In addition to the above EPC requirements, OVH will develop and maintain a 'sustainability index' of all domestic properties that it rents and will assess information in this alongside, where possible, stock condition information and prototype surveys. This approach will be used to: • Determine future investment strategies for buildings and facilities to improve environmental performance • Inform any decisions on stock rationalisation options • Identify potential for installation of renewable and low carbon energy technologies
3.3.1.5	Where possible OVH will ensure any new build properties it commissions or takes ownership of incorporate design features that reduce energy consumption or low carbon technologies for energy production.
3.3.2	**Customer information provision and sign-posting**
3.3.2.1	Through newsletters and general information produced on its website, OVH will encourage actions from its customers that have a positive environmental impact including reducing energy usage and recycling opportunities.
3.3.2.2	OVH will work in partnership with energy providers, local authorities and other agencies to provide advice and referrals where customers may be experiencing fuel poverty or to take advantage of opportunities to reduce home energy usage, e.g. through the installation of smart metering or accessing favourable tariffs.
3.3.3	**External funding**
3.3.3.1	In order to improve environmental performance and in line with value for money initiatives, OVH will seek to maximise opportunities for accessing external funding, wherever possible.
3.3.3.2	This may apply to environmental initiatives that relate to the management of its rental properties and office facilities /employer functions and include joint ventures with external partners.
4	**Implementation**
4.1	All OVH staff need to be aware of the OVH Environmental Management Policy to direct their actions and so that they may address any customer queries that may arise.
4.2	The Data and Quality Assurance Manager will have specific responsibility for ensuring all necessary certification and licenses, that support the operation of this Policy are in place and up to date which will be checked regularly through system audits.
5	**Performance**
5.1	The following performance indicators underpin the operation of this Policy will be reported to the Health and Safety, Environmental and Quality Group annual review; • Reduction in energy consumption in OVH offices

- Increase in volume of office waste recycling
- Reduction in total, annual carbon footprint (CO2) emissions in comparison with the base year's data

5.2   An assessment of the above is included in the OVH's Value For Money Statement.

5.3   The above targets will be reviewed and amended on an annual basis, based on actual performance.

6	Consultation

6.1   All OVH staff have been consulted in the development of this Policy. The Tenant Policy Review Group were also consulted on this Policy on 16/05/2017.

7	Review

7.1   The Policy will be reviewed once every three years from the date of the OVH Executive Management Team (EMT) approval or sooner if required by the introduction of new legislation, regulation or if necessitated by changes to OVH working practices / as a result of system audits.

8	Equality Impact Assessment	
8.1	Was a full Equality Impact Assessment (EIA) required?	No
8.2	When was EIA conducted and by who?	An EIA Relevance Test was conducted by the Policy Writer and the Policy and Strategy Manager on 25 October 2016 and is still relevant for this review of the Policy.
8.3	Results of EIA	The EIA Relevance Test did not identify any differential or adverse impacts for any groups with protected characteristics.

9	Scheme of Delegation	
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	EMT
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Group Director - Governance and Compliance
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Group Director - Governance and Compliance

10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
First version of the Policy	Not applicable	See section 6	Not applicable
7th June 2017	In line with review schedule	See section 6	The scope of the Policy has been changed From Sovini Group activities to the core business activities of OVH only.
14th July 2020	In line with review schedule	See section 6	• A Change at 3.1.2.2 –Removed the section-measures taken by OVH to reduce office energy consumption in offices • A Change at 3.1.2 – Added a section regarding 'Staff Agile Working' • A Change at 3.1.7 – Added a section regarding ' Environmental Social Governance'