



## **Environmental sustainability policy**

**Date Approved by Management Committee:**

29 June 2023

**Date Issued to Staff:**

30 June 2023

**Due for Review:**

June 2026



## **1. Introduction**

- 1.1 The purpose of this policy is to guide how the Association will improve the quality of life of our tenants by reducing fuel poverty; helping them use energy more efficiently.
- 1.2 This policy will also guide how the Association will improve the environment as well as 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. Policy context**

### **2.1 Fuel Poverty**

2.1.1 A household is currently defined a fuel poor if it spends more than 10% of household income on fuel. In October 2022 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

2.1.2 In 2021, the Zero Emissions Social Housing Task Force (ZEST) published a report outlining actions required to meet the Scottish Governments aim of eventually achieving net zero emissions of greenhouse gases by 2045. The report is accessible [here](#) and gives a holistic overview of the findings of the report and the key legislative implements which will help the Scottish Government deliver this aim.

2.1.3 While there are numerous relevant sections within this report, the key forthcoming action from this will be the review of the Energy Efficiency Standards for Social Housing (EESH2). This will set new standards for buildings and will likely result in the need for significant investment within the Association's stock. Until this standard is known, Associations are unable to plan what exactly this will involve, or what impact it will have on residents.

## **2.2 Climate change**

- 2.2.1 The Scottish Government has updated the [Climate Change \(Scotland\) Act 2009](#) to [new standards in 2019](#), in response to the [Paris Agreement](#). This is expected to increase the target for the reduction of carbon emissions to net zero by 2045.
- 2.2.2 The Scottish Government's [Heat in Buildings Strategy](#) indicates ambitious targets for transforming buildings in Scotland to zero carbon heating solutions. However, it has recognised that in many cases zero-carbon technologies represent higher installation and running costs which presents real incompatibility with reducing fuel poverty, particularly within the context of the current energy price crisis. Glasgow City Council are promoting the adoption of higher thermal standards in the social housing sector through a new [Glasgow Standard](#).
- 2.2.3 All of Cernach's current stock was built before the modern building standards were established and more than half dates back to the 1950s. Measures have been taken to improve the thermal performance of this older stock, for example through the installation of loft and external wall insulation.

## **3. Legislative and regulatory framework**

- 3.1 Cernach HA will comply with the law and guidance notes issued by the Scottish Housing Regulator in terms of the standard of homes.
- 3.2 This policy has been developed within a framework that ensures proper compliance with legislation, regulatory advice and good practice including:
- Housing (Scotland) Act 2001, 2010, 2014
  - Scottish Social Housing Charter
  - Human Rights Act 1998
  - Equalities Act 2010
- 3.3 The Housing (Scotland) Act places a duty on the Association to consult tenants on matters that can have a significant impact on service delivery; this is also embodied in the Association's tenancy agreement and in the Resident Engagement policy.

- 3.4 This policy has taken into account the requirements set out in the Scottish Social Housing Charter that became effective on 1 April 2012, and which was reviewed during 2016 and 2021.

**Outcome 4: Quality of Housing**

Social landlords manage their businesses so that: *tenants' homes, as a minimum, when they are allocated are always clean, tidy and in a good state of repair, meet the Scottish Housing Quality Standard (SHQS), and any other building quality standard in place throughout the tenancy; and also meet the relevant Energy Efficiency and Zero Emission Heat Standard.*

**Outcome 5: Repairs, maintenance and improvements**

Social landlords manage their businesses so that: *tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.*

**Outcome 11: Tenancy sustainment**

Social landlords ensure that: *tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations.*

## **4. Equality and human rights**

- 4.1 The Association's Equality and Human Rights policy, which was approved by the Committee in April 2021, outlines our commitment to promote a zero tolerance to unfair treatment or discrimination to any person or group of persons, particularly on the basis of any of the protected characteristics<sup>1</sup>. This includes ensuring that everyone has equal access to information and services, and, to this end, the Association will make available a copy of this document in a range of alternative formats including large print, translated into another language or by data transferred to voice.

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<sup>1</sup> The Equality Act 2010 identifies the "protected characteristics" as age, disability, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, gender reassignment and sexual orientation.

- 4.2 We are also aware of the potential for policies to inadvertently discriminate against an individual or group of individuals. To help tackle this and ensure that it does not occur, best practice suggests that organisations carry out Equality Impact Assessments to help identify any part of a policy that may be discriminatory so that this can be addressed (please see section 6 of the Equality and Human Rights policy for more information).
- 4.3 In line with section 6 of the Equality and Human Rights Policy, the Association carried out an Equality Impact Assessment on this policy and no remedial action was identified as necessary. The full assessment is appended at the end of this policy.

## **5. Risk Management**

- 5.1 The Association has considered the risks of failing to adhere to the policy. As this policy predominantly sets the tone for the Association's approach to environmental sustainability, rather than specific actions, there is relatively minimal risk attached to failure to adhere to this policy. However, some inherent risks exist in failure to ensure adequate progress towards decarbonisation. Progress against the relevant aims in this policy will therefore be monitored annually by the Management Team.

## **6. Priorities**

- 6.1 Our priorities, in rank order will be:
- Where we have a statutory or regulatory duty (e.g. EESSH/Building Standards).
  - Where we can have the biggest impact on the lives of our tenants – i.e., their quality of life / financial benefit.
  - Where action will have a lasting impact, rather than an impact that might be short-lived, reversed or require repeated investment.
  - Where early action might be more cost effective for the Association in the long-term, given that standard will have to rise further.

## **7. Measures**

### **7.1 Working with tenants**

- 7.1.1 The Association will soon implement a comprehensive tenancy sustainment policy, which will provide full details of the various ways in which we support



our tenants. A major component of this policy, and our strategy, will be related to alleviating fuel poverty.

- 7.1.2 The Association employs a full time Welfare Rights and Tenancy Sustainment Officer. While they are not able to give specific fuel advice, they will regularly refer tenants on to other agencies, such as GHeat, to offer this service.
- 7.1.3 The Association has in place its own tenancy sustainment fund, which can be used for a variety of means to assist people to remain in their tenancy, including providing floor coverings for tenants who cannot otherwise afford this.
- 7.1.4 The Association will continue to seek, apply for and distribute funding relating to fuel poverty wherever possible.
- 7.1.5 The Association will support tenant and/or owner requests for permission for installation of electronic car charging ports when made.

## **7.2 Buildings**

- 7.2.1 The Association will try to ensure all properties meet EESSH standard. There are 9 units that do not comply. A number of these relate to houses where the tenant has a preference for electric heating. We will seek to identify more energy efficient electric heating systems for those tenants.
- 7.2.2 Develop a workplan to implement new EESSH 2 standard and implement as quickly as resources allow. There is not yet a date for publication of this standard.
- 7.2.3 Ensure that when major components (e.g., heating, ventilation, windows) are due for replacement there is a scoring mechanism to take account of sustainable forms of material and/or contract waste management. The aim of the options appraisal would be to consider the feasibility of more sustainable forms of provision. For example:
  - Heating systems
  - Glazing
  - Ventilation
  - Insulation
  - Solar PV



- 7.2.4 We will investigate research into improving energy efficiency, ventilation and internal air quality of our housing stock. This includes an annual budget allocation towards the provision of ventilation for properties requiring this, in line with the Association's approach to dampness, condensation and mould.
- 7.2.5 Maintenance/Renewal life cycles adopted for dwellings and their components tend to reflect mortgage terms (30 years is the most commonly quoted figure) rather than the actual lifespan of maintained construction. Components often outlast their predicted lifespan and are needlessly replaced on manufactures recommendations or on the basis of established maintenance schedules rather than through rigorous inspections of individual items. The Association through annual stock conditions survey and regular updates to its life cycle data will ensure that significant embodied energy can be saved through accurate and evidence-based maintenance schedules, which are demand led rather than predicted and provided for.
- 7.2.6 When establishing future maintenance/planned maintenance contracts we must consider the following within the specification:
- Climate change: check if drainage is strong enough to withstand increasing storm damage and rain
  - Local sourcing: source local contractors and materials
  - Waste minimisation: ensure all contractors provide waste minimisation plans
  - Water conservation: ensure all new kitchens and bathroom fittings are water conservation products
  - Environmental products: build up database of environmental products

### **7.3 Newbuild**

- 7.3.1 While the Association does not currently have any plans for building new homes, we will retain our strategy for environmental sustainability in new build homes should this opportunity arise again in future.
- 7.3.2 Compliance with the energy sections of the current Building Standards requires a holistic appraisal of the energy strategy for a site in order to arrive at a solution which is cost effective, yet also of clear benefit to the residents of each dwelling. This will typically involve consideration of heating and ventilation systems, air tightness and the potential use of renewable technologies. Additional grant funding can be obtained by meeting a higher level of performance under Section 7, Aspect 2 (energy for space heating), with this being deemed the 'Silver' standard. Aside from these measures, a

variety of other features are incorporated to improve energy efficiency and to promote longer term sustainability, with a 60-year design lifespan:

- Maximising of opportunities for solar gain through orientation and site exposure
- High performance 'A' rated boilers to all properties
- High levels of sound insulation, both within and between dwellings
- High SAP ratings, demonstrating reductions in CO2 emissions and preventing energy losses
- Design to maximise accessibility, flexibility and adaptation
- Specification of materials with low embodied energy and toxicity, using recycled/ recyclable materials where possible
- Specification of local or Scottish products and materials where possible
- Reduce transport energy demands

7.3.3 At the time of writing this policy, the Scottish Government has announced through their Heat in Buildings strategy that all new build homes from 1 April 2024 must use zero direct emissions heating systems. "Direct emission heating system", in relation to a building, means a fixed combustion appliance installation (other than a fixed combustion appliance installation which is a source of production from which thermal energy is distributed by a heat network) the purpose of which is to produce thermal energy by which space within the building is heated or cooled, or by which hot water is made available in the building. We will therefore comply with any legal requirements enacted following the approval of this policy where required.

7.3.4 At handover of newly completed properties, we will ensure that tenants receive advice on how to make best use of heating, generation and ventilations systems at handover, (e.g., running heavy load items in daytime to make best use of solar PV).

## **7.4 Supply chain**

7.4.1 We will require contractors to have their own sustainability and waste reduction policies as part of the procurement process.

7.4.2 We will investigate options for choosing sustainable product when ordering office equipment / materials.





## **7.5 Offices and staff**

- 7.5.1 The Association will consider reviewing power, heating and ventilation systems / practices as and when the need arises and will pay particular regard to renewal of the heating system should a zero-carbon alternative be feasible.
- 7.5.2 The Association will promote reduction, reuse and recycling of office consumables. This includes moving to digital methods of communication where possible – particularly with regard to Management Committee correspondence which tends to be particularly onerous in terms of paper requirements.
- 7.5.3 The Association will source recycled materials wherever possible, particularly with regard to printer paper, and will seek to minimise the use of single use plastics.
- 7.5.4 The Association will evaluate the feasibility of an electronic car port located at the office in consultation with staff requirements.

## **8. Staff Training**

- 8.1 Cernach recognises that it is extremely important that the resourcing and training of staff is adequate to meet the needs of the business. All staff involved with maintaining homes, arranging office works, promoting tenancy sustainment and procuring office materials will be made aware of this policy.

## **9. Policy Review**

- 9.1 The Association will make the policy available on the Association website.
- 9.2 The Management Committee will review this policy every three years. This review will be brought forward if there is need to respond to new legislation and/or policy guidance.



**Cernach Housing Association**  
**Equality Impact Assessment**



Name of the <b>policy / proposal</b> to be assessed	Environmental Sustainability Policy	Is this a <b>new policy / proposal or a revision?</b>	Revision
Person(s) responsible for the assessment	Emma McShane		
1. Briefly describe the <b>aims, objectives and purpose</b> of the policy / proposal	To minimise the Association’s impact upon climate change and seek to identify new ways of decarbonising process and homes		
2. <b>Who is intended to benefit</b> from the policy / proposal? (e.g., <i>applicants, tenants, staff, contractors</i> )	Staff, Contractors, Management Committee Members, Tenants, Applicants, Factored Owners and any other stakeholders.		
3. What <b>outcomes</b> are <b>wanted</b> from this policy / proposal? (e.g. <i>the benefits to customers</i> )	A reduction in the levels of carbon emissions made by the Association		
4. Which <b>protected characteristics</b> could be <b>affected</b> by the proposal? ( <i>tick all that apply</i> )			
<input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Marriage & Civil Partnership <input type="checkbox"/> Pregnancy/Maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion or Belief <input type="checkbox"/> Gender <input type="checkbox"/> Gender Reassignment <input type="checkbox"/> Sexual Orientation			



5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.

After careful consideration, there is no known elements of this policy that would impact any of the 9 protected characteristics.

	Positive impact(s)	Negative impact(s)
<p>After careful consideration, there is no known elements of this policy that would impact any of the 9 protected characteristics.</p>		
<p>7. What <b>actions</b> are <b>required</b> to address the impacts arising from this assessment? <i>(This might include collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).</i></p>		

Signed: E McShane Job title: Corporate Services & Assurance Manager

Date the Equality Impact Assessment was completed: 21/06/2023