



Building a sustainable future:
Impact Report,
for the year ended 31 March 2022

Bromford.

Our sustainability in numbers.



175:1 homes to neighbourhood coaches

1,201 new build social housing

73 apprentices to date



30 apprentices in the pipeline

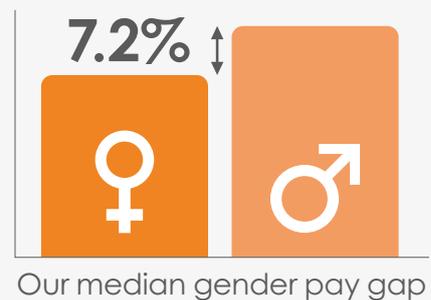


33 currently on the programme



Homelessness reduction

We let more than 18% of our homes to 'statutory homeless' households in our big 4 local authorities.



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Foreword.

Sustainability is fundamental to our social purpose at Bromford.

It is integral to our relationships with our customers and communities, the decisions we take on new and existing homes and the way we are funded.

Sustainability is also fundamental to our core purpose of providing affordable, safe and secure homes to those who cannot access the private housing market, and to helping customers feel empowered and able to thrive.

That's why it has been a priority here at Bromford for some time now – shaping the way the business operates to better protect the environment and the society around us, while ensuring that what we do today doesn't compromise where we want to get to tomorrow.

More recently, we have begun to formalise how we demonstrate this commitment. This impact report is a reflection of that – helping us tell a clearer story while providing greater transparency and accountability to our stakeholders.

Central to this process is our new Sustainability Group, set up last year and chaired by our director of strategic property planning alongside senior leaders from across the business.

Our Sustainability Group has helped to cement the pillars of our reporting: developing our Sustainable Finance Framework and driving our commitment to the Sustainability Reporting Standard for Social Housing.

We know that we need to back up what we are saying with evidence, which is why the group is demanding more of our organisation, so that the quality of our data and reporting match our ambition.

Like many others, we also know there's a long way to go on our sustainability journey. One thing is very clear, however: everything must start and end with the customer.



We believe our investment in sustainability will continue to benefit our customers. And we want our customers to come with us on the journey, particularly as the economy comes under further strain and the cost of living crisis continues.

We are continuing our efforts to build more customer confidence and to ensure our customers are heard, particularly through our locality-focused neighbourhood coaching approach.

And while we should be very proud of the things that we do well, we also need to be honest about the things we don't get right.

We have brought forward our target to have all homes at EPC C by 2028, rather than 2030, which will help to reduce the amount customers need to spend to heat their homes. But following instances of condensation, damp and mould in some of our homes, we have invested more funding and resources to resolve existing problems and pre-empt future ones.

While the customer will always come first, to be a truly sustainable business, the shared purpose and commitment around sustainability must run all the way through the organisation.

Our long-term financial plan now includes the full cost of achieving our net zero carbon target by 2050. After pioneering sustainability-linked borrowing in our sector, we've committed to all future funding being tied to our sustainable objectives.

This is our first impact report, and we are expecting to build on it in the years to come. This report will become a central channel through which we demonstrate our progress so far, and our commitments to building a more sustainable future for our people, our communities and our customers.

Robert Nettleton, chief executive

About Bromford

Since forming in 1963, Bromford has grown to become one of the largest housing associations in the country.

We now own over 45,000 homes and plan to deliver more than 12,000 new homes over the next eight years. Our colleagues build individual relationships with the more than 100,000 customers that live in our homes and use our services.

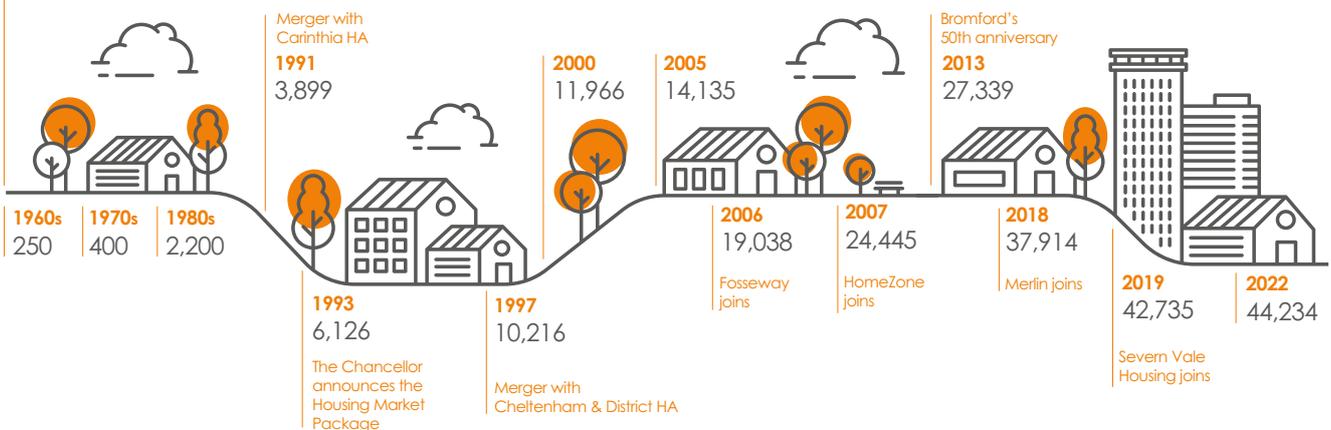
Our purpose is to invest in homes, communities and relationships across central and south-west England so people can thrive.

Sustainability is central to our purpose - and to the investments we are making in our communities. Sustainable homes are directly linked to wellbeing, they increase comfort and reduce fuel bills, and ultimately contribute to addressing climate change.

Over 50% of our customers live in just four areas – Lichfield, Tewkesbury, Cotswolds and South Gloucestershire. We seek a relationship with each of our customers that builds mutual trust and respect and helps our customers achieve more for themselves, their families and their communities. We are the sector's biggest developer of social housing, which goes to the very core of our purpose. Central to this is our role as strategic partner to Homes England, with whom we are delivering around 4,000 new homes.

Our core business includes the management and maintenance of social and affordable housing, neighbourhood coaching, development of social and affordable rented homes and shared ownership.

Our history.



Our sustainability reporting approach.

Sustainability has been central to the Bromford mission for some time - and we are delighted to now be reporting on our progress every year.

This is where our Sustainability Group is so important. By bringing together senior directors with specialists from all corners of the business,

Sustainable Finance Framework (SFF)

Our SFF cements the relationship between finance and purpose. We are a business backed by £1.7bn of private finance, with plans to raise another £1bn over the next decade – all of which will be sustainable finance.

Our framework goes beyond metrics to a commitment to doing the right thing and building a better world for the communities we serve in an accountable and transparent manner.

As such, it links directly to the UN SDGs. While we are confident we contribute to all 17 SDGs, we can meaningfully track our performance and contribution against seven of these (see right).

Sustainability linked loans (SLL)

We have secured two bank facilities totalling £125m linked to sustainability measures and have committed to all our future finance being linked to sustainability and ESG measures.

from finance and asset management to localities and investment, this group can drive the way we collect data and report our performance and progress.

Alongside the people, we have introduced the reporting mechanisms that promote transparency and accountability to our stakeholders.

These take the form of three core reporting pillars, set out below, demonstrating our sustainability priorities and our alignment to the UN's Sustainable Development Goals.

As we continue on this journey, we are determined to improve on the quality, the quantity and the accessibility of our data. We want to provide a picture of our sustainability performance throughout the financial year, made accessible through a sustainability performance dashboard. Our data will become more mature as reporting becomes embedded within the organisation.

We are proud to have been the first business to link our borrowing to targets around gender pay gap, and the first in our sector to link to a governance metric. And we are already reaping the rewards of these facilities, with savings already funding important community programmes including The Safe Partnership to support victims of domestic violence.

Sustainability Reporting Standard for Social Housing (SRS)

We are reporting against the Sustainability Reporting Standard for Social Housing (SRS), which commits us to assessing ourselves against 48 ESG measures and is itself linked to nine UN Sustainable Development Goals (UN SDGs).

We see great value in the sector standard and a collaborative approach, but will always look to go beyond these metrics to tell our own story.

Ultimately our sustainability journey is as unique as our people and tailored to meet the specific needs of the customers and communities we serve.

How our framework links to the UN SDGs



Ending poverty in all its forms everywhere

1.4: By 2030, ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic

resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance

1.5: By 2030, build the resilience of the poor and those in vulnerable situations and reduce their exposure and vulnerability to climate-related extreme events and other economic, social and environmental shocks and disasters



Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

4.4: By 2030, substantially

increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship



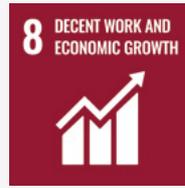
Ensure access to affordable, reliable, sustainable and modern energy for all

7.1: By 2030, ensure universal access to affordable, reliable and

modern energy services

7.2: By 2030, increase substantially the share of renewable energy in the global energy mix

7.3: By 2030, double the global rate of improvement in energy efficiency



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

8.5: By 2030, achieve full and

productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value



Reduce inequality within and among countries

10.2: By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability,

race, ethnicity, origin, religion or economic or other status

10.4: Adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality



Make cities and human settlements inclusive, safe, resilient and sustainable

11.1: By 2030, ensure access for all to adequate, safe and affordable housing and basic

services and upgrade slums.

11.7: By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities.



Ensure sustainable consumption and production patterns

12.2: By 2030, achieve the sustainable management and efficient use of natural resources

12.5: By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse

12.7: Promote public procurement practices that are sustainable, in accordance with national policies and priorities

Our 3 sustainability reporting pillars.

1

Sustainable Finance Framework

Our Sustainable Finance Framework (SFF) aligns our future financing to strategic commitments, underpinned throughout by the UN SDGs. Launched in 2021, it was the first in the sector to be accredited by S&P Global Ratings. It encompasses funding options including UK listed bonds, UK and US private placements, bank facilities (revolving and term debt). The framework is aligned to the International Capital Markets Association (ICMA) principles for: green bonds, social bonds and sustainability bond guidelines. It also satisfies Loan Market Association (LMA) principles for green loans and social loans.



2

Sustainability linked loans (SLL)

Our SLLs bridge our finance with our purpose. The revolving credit facilities see margins and fees on the loans ratchet down as long as we successfully meet pre-agreed ESG targets, in relation to increasing the energy efficiency of our existing homes and reducing our gender pay gap. Greater energy efficiency means warmer, cheaper homes for our customers, while promoting gender equality is quite simply the right thing to do. These targets also encourage us to continue to put in place the right reporting and measures to deliver on what we say we will. The savings we do generate will be re-invested into projects which support and empower our communities.



3

Sustainability Reporting Standard for Social Housing (SRS)

The SRS was launched in November 2020 as a valuable voluntary reporting framework designed to help housing providers report on their ESG performance in a transparent, consistent and comparable manner. We are publishing our SRS performance to help investors see how we compare to our peers, but we believe our approach to sustainability is as unique as the people and communities we serve, so we will always look to go beyond the sector standard. The SRS includes 12 themes and 48 criteria, and has been adopted by over 100 housing providers, banks and investors. The standard has been designed to align with both the ICMA and LMA Social and Sustainability Bond Principles and can help housing associations meet the reporting standards required by the ICMA and LMA.





OUR IMPACT:

**Sustainable
finance
framework.**

Leon Campbell
Bromf

Leon Campbell

Our Sustainable Finance Framework (SFF) reinforces our view that sustainability is a thread that runs right through our organisation, including how we source and deploy our funding.

It represents our commitment to doing the right thing and building a better world for the communities we serve, in an accountable and transparent manner. It is also a springboard for partnering with investors who share this vision to deliver meaningful change.

The framework was developed by our Sustainability Group and sets out a number of existing and new projects linked to our business strategy, along with commitments against nine focused criteria, from tackling homelessness to reducing our carbon footprint.

It commits us to raising all future funding under the sustainability banner. To put this into context, we currently have £1.7bn of private finance, with plans to raise another £1bn over the next decade.

We are proud that our framework was the first in the sector to be accredited by S&P, a leading name in the world of sustainable finance and a major credit ratings provider to numerous UK housing associations.

We are also proud to be part of a sector that has itself become a leader in sustainable finance, demonstrating its natural affiliation with sustainability and its willingness to commit to and embrace transparency in this area. Since the first ESG-linked deal was struck by a UK housing association in late 2018, we have seen almost £10bn of sustainable finance flow into the sector.

Like many of our peers, we have adopted a “use of proceeds” framework, which means the net proceeds from the issuance of green, social or sustainable funding will be exclusively used to finance or refinance green and social projects.



What makes our approach different however, is our voluntary commitment to a set of stretching and tangible social and environmental KPIs that address our housing ambitions but also extend to areas so far untouched by other frameworks, including neighbourhood coaching, homelessness reduction and increased employability and diversity.

We will be issuing our next capital markets funding through this SFF, and expect to return to the market in the next 12-18 months. However we wanted to take the opportunity to establish this framework ahead of time to demonstrate our commitment to sustainability, and the fundamental role it plays in driving all of our business activity.

We look forward to investors engaging with us in sophisticated analysis of our sustainability data, providing them with key focal points while also helping us to sharpen and improve our data collection over time.

Imran Mubeen, director of treasury

Our commitments.

Eligible criteria	Our commitments	Our performance
Neighbourhood coaching	Building individual relationships with customers so people and communities can thrive.	On track to meet 1:175 ratio of neighbourhood coaches to households (currently 1:187), demonstrating a dedicated local service to customers
Employment of graduates / apprenticeships	Being recognised as a place of work which supports our community.	1) £25,000 per month into the levy pot 2) £600,000 in total, the equivalent of nearly 200 colleagues training
Equality and Diversity	Improve our understanding of what we need to do better.	Invested in EDI and unconscious bias training and EDI in the workplace e-learn. 2022 EDI survey returned an overall inclusion rating of 78%
Homelessness reduction	Through the Homelessness Reduction Plan, investigate the root causes of homelessness.	Build more - 196 affordable homes to be converted to social rent House more - Over 18% of our homes let to 'statutory homeless' households Help more - Housing First partnership now live
Delivering affordable homes and regeneration	Ensure our customers in the lowest income group continue to have access to long-term housing. Better understand the impact we have in local areas by regenerating homes.	1,224 new homes in the year, which includes: 1) Social Rent - 444 (8 regen) 2) Affordable Rent - 350 (15 regen) 3) Shared Ownership - 392 (11 regen) 4) Outright Sale - 15 5) Supported Housing/Myplace - 23
Carbon reduction - energy efficient homes	Improve the energy efficiency of all our homes, both new and existing.	86% of homes already achieving EPC C or better. On target for 100% by 2028, two years ahead of the government deadline
Carbon reduction – electric and hybrid repairs fleet	With more than 450 diesel vehicles currently in operation, explore alternatives to reduce our annual CO2 emission.	By 2025, on target to have 70% of our fleet as either hybrid or electric vehicle
Modern Methods of Construction (MMC)	Deliver new homes in a way that not only reduces building costs, but also reduces our impact on climate change.	Committed to deliver minimum 25% MMC as part of our strategic partnership with Homes England to deliver 4,000 new homes
Carbon reduction – green office buildings	Building a sustainable approach to our working environments.	We have decreased our workspaces from 13 to six, which represents a 32,000 sq ft reduction in space. There is a further reduction of 27,000 sq ft planned. The remaining offices have been refurbished, with the first wave of energy saving initiatives such as LED lighting and PV panel installation, along with EV charging points, delivered and more to come.

CASE STUDY

Neighbourhood coaches: safeguarding customer wellbeing during lockdown



Our MyPlace schemes centre on raising aspirations for people with a learning or physical disability, or an enduring mental health diagnosis.

Lea Hall Place MyPlace in Rugeley, Staffordshire, is one of our specialist schemes designed for residents that require support and have a health and social care package in place.

Abbie Wright is one of our housing enablers at Lea Hall Place, responsible for encouraging and coaching her customers to live as independently as possible – which was a particular challenge during the global pandemic.

Abbie says: “At the beginning of lockdown, my residents were struggling to understand the [lockdown] regulations, so I worked with our care provider to produce easy-to-read documents and host video calls to help my customers understand why it was important.

“I also held socially distanced ‘workshops’ in the garden where we had discussions about the

positive things that they could do to help them cope with all of the changes.

“One of my residents, Simon*, came up with the idea of supporting the local food bank and, with some coaching, he was encouraged to let others support him with this and get involved so that they felt included.

“Simon was nervous about allowing staff into his flat for support because of social distancing so I asked him how he thought he could resolve this and what he might be able to do to ensure that he still receives the support he needs. Simon came up with the fabulous idea of marking out his flat.

“Simon is a very proactive resident at Lea Hall Place in many ways – he facilitates activities such as quizzes and picnics, has made the garden beautiful and encourages a real community spirit.

“He has also helped other residents when there has been an emergency and promotes healthy lifestyles to those who are struggling – he is a fantastic role model to others.”

*Customer’s real name has been changed



Our progress against these commitments

Neighbourhood coaching

Our neighbourhood coaches are out working in their communities every day, helping customers and communities to thrive. Each neighbourhood coach has a patch of around 175 homes which means they can really get to know our customers and the communities they live in. Our neighbourhood coaches are enablers - they focus on building on strengths to enable our customers and communities to thrive. We want to coach customers to take control of their own lives, so they can work together with others and help make the place they live somewhere great.

Customers tell us that by knowing their neighbourhood coach they are significantly more likely to get what they need from their community and do more themselves to contribute to the community, including offering support to others. Customers also tell us that they feel better able to

work towards the things they want from life and are more likely to know where to get help if they need it.

We have also established a dedicated income collection team to support neighbourhood coaches to collect rent and manage arrears at sector low levels.

Employment of graduates / apprenticeships

We want to be recognised as a business that supports our community. As members of national body the 5% Club, we have committed to increasing the number of apprentices, sponsored students, and graduates on formal programmes to at least 5% of our total workforce within five years.

The range of our commitments to our colleagues is set out in the table below.

73 Apprenticeships to date	30 Apprenticeships in the pipeline	33 Currently on programme	Route to 100 on target	£25,000 Monthly funds into levy pot
£592,642 Total levy pot – equivalent to 200 colleagues doing level 2-4 qualification every year	New early careers website	5% Members of the 5% Club	Award nomination at Bristol and Bath Awards	

Equality, diversity and inclusion (EDI)

We are committed to EDI at Bromford, but we know we have much to do. Our efforts so far have included investing in EDI and unconscious bias training. Our EDI in the workplace e-learn was new for January 2022. Our unconscious bias training creates a safe learning environment for colleagues. In addition, an EDI survey in April-May 2022 returned an overall inclusion rating of 78%.

We currently advertise on diversity job boards including:



We are level 1 Disability Confident and a Bronze Armed Forces friendly employer too.

Recruiters do not have any visibility of any candidate disabilities or convictions, unless reasonable adjustments are required for interview. Ensuring a better gender split and ethnicity range on our interview panels is something we intend to focus more on alongside ensuring the panel consists of colleagues from other teams.

We are committed to empowering our female workforce and have entered into a female career accelerator programme.





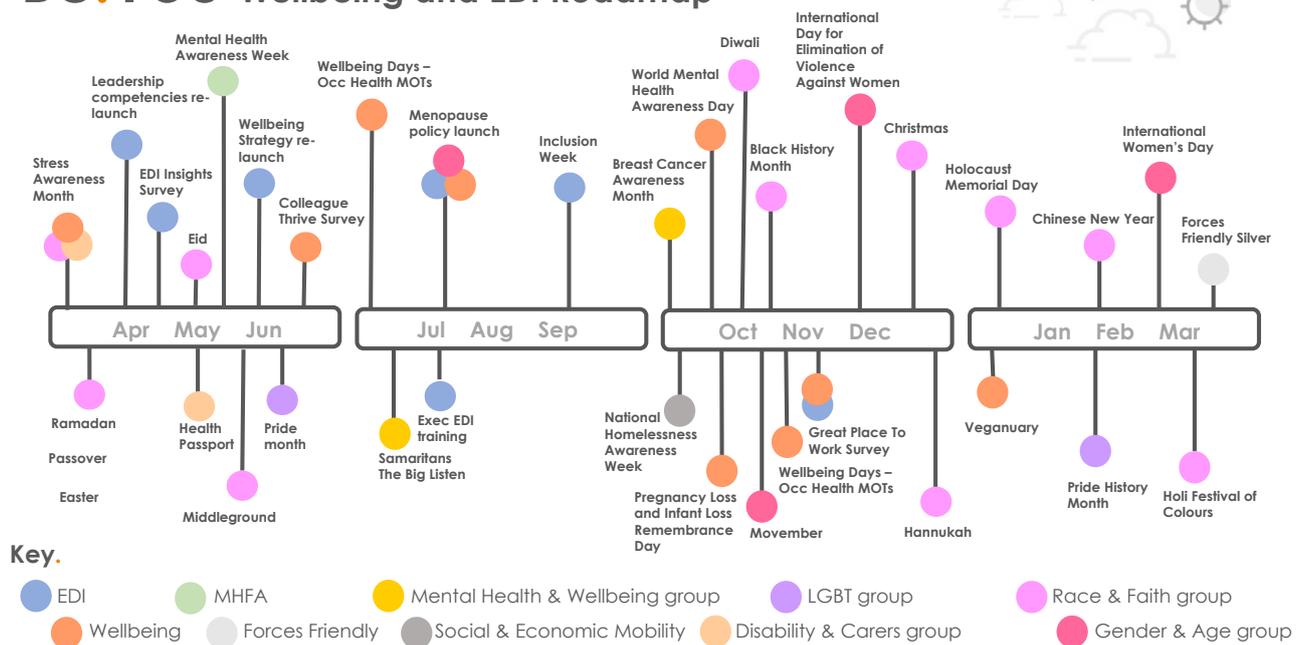
Our Be.You roadmap:

In October 2020, the executive team agreed to commission an external audit on EDI, reviewing the internal Bromford approach. Following this and feedback from over 200 colleagues and 270 customers, a roadmap of recommendations was agreed by the executive in May 2021.

This roadmap is called Be.You, and is led by an EDI and wellbeing steering group that meets each quarter. We'll also have a monthly working group aligned with our chief officers as the champions, which puts our leadership at the heart of EDI. Our CEO is a diversity champion and the other 'chiefs' are champions of different diversity strands.

We hope this will attract and retain top talent and help us better understand our customer base. It is early days and the roadmap will evolve over the next six to 12 months.

Be.You Wellbeing and EDI Roadmap



Homelessness reduction

Playing our part in reducing homelessness is one of our key strategic goals, bound to the Housing First belief that housing is a basic human right.

The Housing First philosophy is to provide a stable, independent home and intensive personalised support and case management to homeless people with multiple and complex needs. Secure housing is viewed as a stable platform from which other issues can be addressed. Housing First is a different model because it provides housing 'first', as a matter of right, rather than 'last' or as a reward.

There are three homelessness KPI's shaping the work we do in this area:

Build More: Against the backdrop of a cost of living crisis, we've pledged to build more homes for social rent and remain a leading developer of this vital tenure, especially in our big four local authorities. A social rent home typically saves a customer £1,400 a year compared with a home for affordable rent. We're investing £8.5m to convert 196 homes from affordable rent to social rent. By the end of March 2022, we'd completed 69 homes and we are on track to complete or be on site with all 196 by the end of 2023. In 2020-21 we built 377 homes for social rent - more than any other housing association. In 2021-22 we built even more - completing 444 homes of the most affordable tenure, the most of any housing association in England.

Housing More: For 2021/22 we have exceeded our target to let more than 18% of our homes to 'statutory homeless' households in our big four local authorities. This has been achieved through continued collaboration with our big four local authorities, alignment and transparency in our lettings processes, assessing each household who apply on their individual circumstances, and utilising the flexibility within our lettings policy to ensure we provide as many customers as possible with an opportunity to thrive.

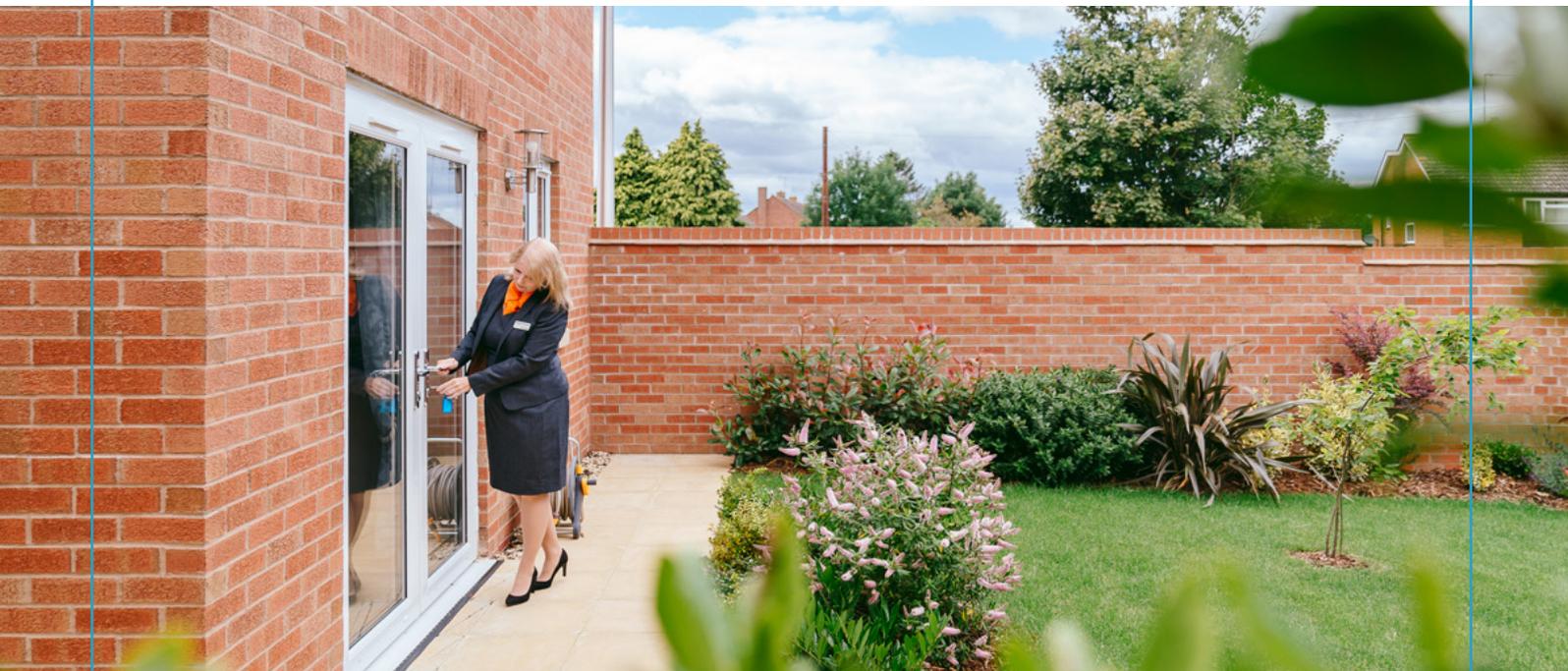
South Gloucestershire Council – 31.4%
Tewkesbury Borough Council – 29.3%
Cotswold District Council – 30.5%
Lichfield District Council – 32.4%

Help More: The Housing First partnerships will monitor the following outcomes to use as evidence for the effectiveness and viability of the projects. These outcomes will also provide the partnership with information around whether the Housing First customer has consistent and fair opportunities, access to appropriate services, and is ultimately able to thrive. The support provider and Housing First customer will aim to complete the outcome measures survey within the first two weeks of moving into the property and then every 3 months (our Localities team will also feed into the survey as appropriate).

- The location and suitability of the property
- Measuring the customer's health and wellbeing
- If the customer is healthily integrated into the community, linked in with family and friends
- Ensure the customer's income is maximised and they can afford their home, as well as access to the right employment, education, or volunteering opportunities
- Criminal activity, ASB and victimisation can greatly impact on the customer's ability to thrive

CASE STUDY

New tenancy completes turnaround for Housing First customer



Three years after losing her home and seeing her children taken into care, a Gloucestershire woman signed a five-year tenancy with Bromford.

The turnaround in her life has happened after we provided her with a place to live through our Housing First partnership with Cotswold District Council and support provider Aspire.

After losing her home in 2019, Miss S lived with friends and in temporary accommodation but together with the impact of losing her children, it took its toll on her mental health.

After starting work with Aspire in January 2021, we found her a place to live last May.

Housing First is an evidence-based approach to successfully supporting homeless people with high needs and histories of entrenched or repeat

homelessness to live in their own homes. There are no conditions around housing readiness before providing someone with a home; rather, secure housing is viewed as a stable platform from which other issues can be addressed.

Over the past year, Miss S thrived in her flat as she enjoys having her own space and managing her home.

In the past, finances have been a struggle, but she's taken ownership, has cleared her former arrears and is having open conversations around her finances.

At the same time she's been taking steps to improve her mental health, engaging with her GP, remembering to take medication and taking better care of her physical health.

Her confidence has soared over the year and has led to us offering her a five-year tenancy for her home.



Delivering affordable homes and regeneration

Our core purpose is to invest in existing and new housing, so that all our customers have a safe, secure and warm home. We are proud to be the largest builder of socially rented homes in England for two years running - delivering more than 800 between 2020 and 2022 - and have pledged to build even more homes for social rent.

In the last financial year, we delivered 1,224 new homes. Where possible we have utilised grant from our strategic partnership with Homes England (please see table below for delivery breakdown).

We are investing more than ever in our existing homes to make them more efficient. Regeneration gives us an opportunity to replace some of our older homes with brand new, energy efficient ones.

	Total	S106	Land Led	Regen
Social Rent	444	357	79	8
Affordable Rent	350	179	156	15
Shared Ownership	392	304	77	11
Outright Sale	23		23	
MyPlace	15		15	

Carbon reduction - energy efficient homes

We have already met our initial target to have 86% of our homes achieve EPC C or better by 2023 and will ensure 100% of our homes are EPC C or better by 2028 - two years earlier than the original 2030 target.

We intend to complete a pilot in each locality using information from the 'Getting to C' project or by identifying particularly hard to treat or problem properties or schemes. This will be considered for Wave 2 of the UK Government's Social Housing Decarbonisation (SHDF) grant ahead of the submission date of August 2022. If we are unable to secure grant funding, we will reforecast in early Q3 for completion by end of financial year. A retrofit project has also started in one area following a number of complaints about a particular scheme.

We are in the early stages of assessing the direction of travel for carbon reduction in our homes. To inform this, we have engaged Suss Housing, external consultants who specialise in the social housing sector, to support our understanding of the CO2 emissions of our homes.

We are working across all Locality Influence Networks (LINs) to see how we can involve customers in procurement.

We have trained eight people in level 5 retrofitting. The Retrofit Coordinator course is 100-150 study hours, with a fast-track option.



Carbon reduction - electric and hybrid repairs fleet

We're embracing alternative options to reduce the annual CO2 emissions of our fleet. At the time of reporting, we had 32 electric vans (EVs) in operation, with another 40 new EVs expected to be on the road in 2022/23.

We intend to roll out more EVs subject to improved infrastructure of charging points across the UK, along with the possible introduction of hydrogen and improved battery range.

We have 27 electric and three hybrid company cars. We have refined the selection list based on a reduced level of CO2 and added more hybrid and electric options. We plan to increase the EV and hybrid options each year, including plug-in hybrids.

Modern methods of construction

As a Homes England strategic partner, we have committed to delivering a minimum of 25% of new homes via MMC through that partnership.

We also believe we are one of the first registered providers to carry out a public sector tender process forming a direct partnership with suppliers, demonstrating our commitment to deliver MMC as part of our wider new homes delivery.

The contract was procured via the Official Journal of the European Union (OJEU), a public sector method of procuring services and contracts. The category 1 contract with MMC developers Ilke Homes and Hadley Group will deliver hundreds of new homes across the West Midlands and West of England that are cheaper to run, produce low carbon emissions and are quicker to deliver. That means good quality homes for customers, provided to EPC A standards.

CASE STUDY

Setting off on the road to electrification



Our first electric vans have taken to the roads as we begin the rollout of our electric fleet and reduce our carbon footprint.

The first phase of the electrification of our fleet saw 32 vans being used by service delivery engineers. The new Vauxhall Vivaro E 75kwh cuts CO2 emissions to zero as part of our move to become more sustainable as a business. By the end of the year, we're aiming to have rolled out up to a further 40 vans. With our fleet of 511 vans travelling an average of 6.5 million miles every year, the arrival of the electric vans will begin to reduce our vehicle carbon emissions.

Neville Meakin, associate director – commercial and logistics, said: “We’re delighted to see the first of our new electric vans arrive, as this is a significant step towards reducing our carbon emissions. The benefits of electric vehicles are

obviously clear; they’re cleaner, they’re safer and they’re quieter. But the biggest advantage is to the environment and this is absolutely the reason why we are doing this.

“We’ve taken a prudent approach to moving to an electric fleet and are doing it in phases, with an aspiration to have 90% of our fleet electric within the next five years. But the infrastructure has to catch up as well. We’re beginning to see more charge points pop up at supermarkets and motorway service stations and we expect this will continue over the next three years.”

We are also investing in the country’s EV charging network by installing charge points at employees’ homes with EO Charging, with a view to installing points at our offices in the future. All engineers driving the vans will have the zap-map app downloaded onto their devices so they can find their nearest charge point.

OUR IMPACT:

Sustainability-linked lending.



We have strong relationships with our lenders, built on a shared ambition to alleviate the country's housing crisis, deliver positive social outcomes and reduce our negative environmental impact.

Linking our lending to ESG and sustainability commitments is a logical step, and means we agree to meet a variety of targets and KPIs related to our social purpose. If these targets are met, and the lending leads to a positive ESG outcome, we will benefit from a lower interest rate and fees on the loan.

We see these agreements as the ideal way to create a broad community of interest across Bromford to shine a spotlight and create a shared focus on the things that really matter to us.

These types of loans not only hold us to account over our ESG commitments – they also save us money in the long run. And as a purpose-driven business, these savings can then be reinvested into our communities. In fact, savings on our sustainable loans are already making a difference to people's lives, providing much-needed funding and support for domestic abuse sufferers (see full case study below).

Our first ESG-linked revolving credit facility (RCF) was agreed in 2019. The 10-year, £50m loan has an interest rate linked to our ability to meet EPC C ratings across our existing homes, and will ratchet down as and when we meet our targets. We see this as a further step on our net zero carbon journey.

A subsequent £75m RCF with SMBC Bank International plc marked the first loan of its kind to be linked to the gender pay gap - and the first in our sector to be linked to governance criteria.

It commits us to meeting an agreed annual KPI to continuously improve our gender pay gap from the median group level of 7.2%. The savings made on the five-year RCF are re-invested into community projects to support customers and enable communities to thrive.

Over the life of the loans, we are expecting to return a significant six-figure amount that will be reinvested into our communities.

Bromford has already seen considerable success using these loans and will continue to utilise ESG-linked lending in the future.



Energy efficiency of our homes

Linking our lending to our energy efficiency objectives creates a community of interest that engages people around our ambitions as a sustainable business, and coalesces around our corporate strategy.

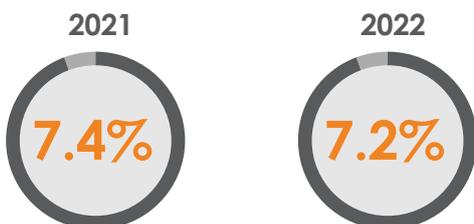
We are pleased to say that 86% of homes meet EPC C or above, but we need to go further, and faster.

That's why we have brought our target for 100% of homes to meet EPC C or above forward by two years, to 2028. This means making our homes more energy efficient, warmer and cheaper to run for our customers, sooner than originally planned.

EPC ratings also contribute to our wider net zero strategy - however they are one part of a big picture, and we have plenty to do as a business and a social landlord.

Our long-term financial plan now includes the full cost of achieving our net zero carbon target by 2050.

Our median gender pay gap



Closing the gender pay gap is not only the right thing to do - it is essential in attracting and retaining the very best talent. We need to reward colleagues in a way that is attractive, transparent, easy to understand and fair.

Our median gap is the calculation of the exact mid-point between the lowest and highest-paid man in our group versus the equivalent woman. The gender pay gap data is drawn from a specific payroll date each year, known as the 'snapshot date'. Data is reported a year in arrears in all cases.

To further empower our female colleagues, we have secured 10 places to a female career accelerator programme - a six-week online course created for women who are ready for the next step, whether at the beginning of their career or are more experienced.

CASE STUDY

How savings on our sustainable loans are supporting domestic abuse survivors



A £50m revolving credit facility with NatWest and a £75m loan with SMBC will have a lower margin rate and fees if we met our targets that relate to improving energy efficiency of our homes and reducing our gender pay gap.

We are delighted that in the first year of these loans we have met our targets helping us to reduce our gender pay gap to 7.2% while 86% of our homes now have an Energy Performance Certificate (EPC) rating of 'C' or better. We are also on track to meet these targets again in the second year.

The savings that we make from hitting these targets in the first year of these loans are being invested in a pilot scheme with The Safe Partnership that aims to reduce homelessness, domestic abuse and hate crime by providing security for vulnerable residents.

This includes features such as improved window and door locks, personal safety alarms, and

sanctuary rooms. Domestic abuse survivors will also benefit from outdoor security lighting, CCTV, fencing and other steps to keep residents safe.

Hazel O'Halloran, Bromford's homelessness lead, said over 100 people are likely to benefit from these enhanced security measures and support each year – and that the investment would ultimately prevent customers from fleeing their homes and becoming homeless.

"It's fantastic these partnerships with our major lenders enable us to invest in additional security measures which will allow dozens of our customers at risk to continue living safely in their homes," said Hazel.

Imran Mubeen, director of treasury, added: "Together with NatWest and SMBC, we remain committed to completing a virtuous sustainability circle by putting this cash back into our communities and delivering even more social value for our customers. We all have a right to live in a safe environment, and funding the Safer Partnerships project will make a real and lasting difference to some of the most vulnerable people in our society."



OUR IMPACT:

Sustainability Reporting Standard for Social Housing.

Sustainable finance can help ensure we are accountable for the commitments we make around specific sustainability and ESG targets.

But in order to have a more holistic impact, sustainability must also be embedded in our operations and our culture.

It needs to be intrinsic to our governance procedures too, which is where our Sustainability Group plays such a crucial role, reporting into our executive and non executive teams.

We see the Sustainability Reporting Standard for Social Housing (SRS) as a valuable wraparound tool that captures our broader ESG considerations, and can help to demonstrate where we perform well and where we need to do more work.

It can also help to promote collaboration across our organisation, bringing our people together and crystallise our purpose – while promoting accountability and transparency with our customers. What's more, it reflects a central tenet of the sector we work within – that we are stronger together, and that the sector as a whole can work together to promote transparency and accountability, and communicate our shared social purpose.



We have reported against all 48 of the SRS criteria in our first year (C1 to C48). In some cases, we know there is work to be done, whether that be around our data collection or driving up our performance.

We welcome that challenge and are confident we can deliver for our communities.

We also hope that our colleagues and customers welcome this step towards greater transparency and intend to engage further with them on these sustainability issues, which in so many cases affect their everyday lives.

**Laura Johnson, chair of Sustainability Group,
director of strategic property planning**

Social

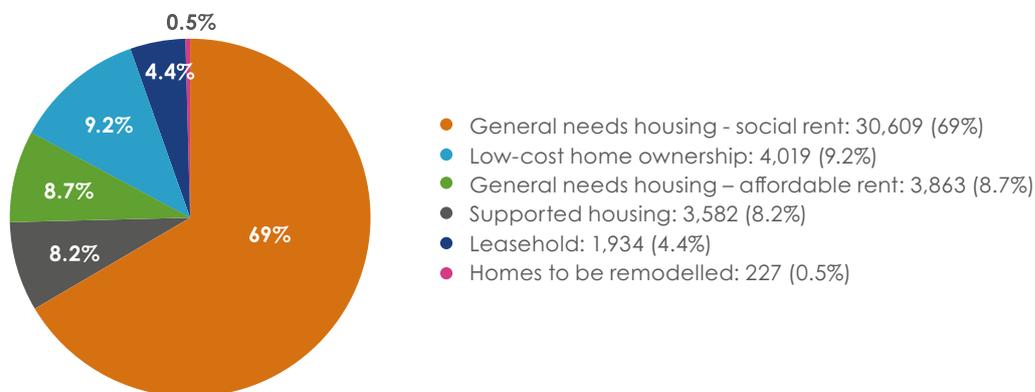
C1 For properties that are subject to the rent regulation regime, report against one or more affordability metric:

Using a sample size of over 20,000 homes across the Cotswolds, Lichfield, South Gloucestershire and Tewkesbury, our homes are on average rented at c.42% below the Local Housing Allowance (LHA).

	Bromford Rent (£)	Local Housing Allowance (£)	Difference
Cotswolds	111	185	40%
Lichfield	95	139	31%
South Gloucestershire	116	211	45%
Tewkesbury	112	181	38%
Average	114	196	42%

Note: The above table shows weekly rents.

C2 Share, and number, of existing homes (include owned and managed) completed before the last financial year:



C3 Share, and number, of new homes (include owned and managed) that were completed in the last financial year:





C4 How is the housing provider trying to reduce the effect of fuel poverty on its residents?

Our work to make more of our homes EPC C or above will increase energy efficiency and reduce the cost to our customers of running their home. We have developed a condensation, damp and mould task force, working with specialist contractors and our customers. Energy efficiency guidance and support can be accessed via our website and our neighbourhood coaches and income management advisors have in-depth knowledge of specific customer circumstances.

We have also designed a new 'cost of living' project to identify and support those customers who are at the highest risk of impact through their financial status, efficiency of their home and if they have any vulnerabilities.



C5 What percentage of rental homes have at least a three-year tenancy agreement? What percentage of homes with a



of tenancies are assured for three years or more.

C6 gas appliance have an in-date, accredited gas safety check?

100% of homes. Bromford works to a 10-month cycle with a robust access process. Performance monitoring takes place twice a week and fortnightly performance reports are presented to senior leaders with monthly reports presented to Board.

What percentage of buildings have an

C7 in-date and compliant Fire Risk Assessment?

100% of buildings. We carry out Fire Risk Assessments (FRAs) on an annual frequency. Performance is monitored on a weekly basis and performance reports are presented to senior leaders on a fortnightly basis with monthly reports presented to Board. A Fire Strategy Group also meets monthly to consider performance.



C8 What percentage of homes meet the Decent Homes Standard?

100%. We invested an additional £0.9m into home improvements across 222 homes last year as part of a drive to address cases of condensation, damp and mould.

CASE STUDY

Putting things right for our customers



We know the positive impact a warm and dry home can have for residents, which is why we are determined to improve the energy efficiency and overall quality of our homes.

We serve over 100,000 customers and work hard to do right by them. But where our services fall short of their, and our, expectations, we will act to put things right.

During an ITV investigation into issues of damp and mould in social housing across the country last year, one of our customers was featured. No family should have to live in conditions that affect their health, and we are genuinely sorry for not acting sooner.

Along with addressing that particular case, we put aside an additional £0.9m to help address cases of condensation, damp and mould more proactively with customers when issues arise in their homes.

This money has funded remedial works such as replacing bathroom and kitchen extractor fans, renewing cavity wall and loft insulation, repairing and repointing damaged brickwork, and treating effected walls and windows. We have also advised

residents, where appropriate, on how to ventilate homes properly.

Phase 1 of this investment plan has focused on 222 homes. We appointed an external RICS surveying organisation to perform surveys, and three external contractors to carry out the works. This uncovered 37 causations, including asset performance, legacy disrepairs, or incorrect approach to investment works, and has also led to more engagement between neighbourhood coaches and customers to promote preventative measures.

Customer advocacy has increased as we have 'fixed' issues and complaints have been resolved. Internally, we have also carried out Housing Health and Safety Rating System (HHSRS) damp and mould training to 175 localities' staff and created a new process for inspecting and reporting.

Next steps include piloting sensor technology that detects moisture in the home, providing data remotely and flagging to us if a home needs attention. This will be tested in 50 homes in summer 2022.

We are determined to ensure we learn from the past, and that our customers' health and wellbeing always comes first.

C9 **What arrangements are in place to enable the residents to hold management to account for provision of services?**

We know the importance of engaging with our customers and communities, from seeking simple feedback through to full co-design and policy influencing.

Our Neighbourhood Coaches provide a great platform for day-to-day customer interaction, but to ensure we have transparency and governance, our Local Influencing Networks (LIN) and Customer and Community Influencing Network (CCIN) are key.

Our LINs are formed by customers from communities in each of our four localities, and hold Bromford to account at a local level. The CCIN, which is composed of representatives from each of the LINs, is a central group that has a direct link to senior leaders and is chaired by a dedicated board member.

In the coming year, work will be undertaken to continue developing LIN and CCIN approaches to further include customers in decision-making and holding Bromford to account. We are working with the Tenant Participation Advisory Service (TPAS) to provide an external and impartial lens to our approach, supporting us to further strengthen engagement.

We are also adopting the Tenant Satisfaction Measures (TSM's) expected to be formally agreed by the regulator in Summer 2022 and implemented across providers in April 2023.

C10 **How does the housing provider measure Resident Satisfaction and how has Resident Satisfaction changed over the last three years?**

Resident satisfaction and advocacy at Bromford is driven by intelligence and insight directly from customers.

We measure transactional interactions across various services from repairs to anti-social behaviour (ASB) and contact centres.

Customers are contacted by phone or have the opportunity to interact through a digital channel and tell us how we have done. This insight is analysed to understand where we do things well and where we need to improve and how. We are preparing to transition from a variety of internal satisfaction measures to the regulatory prescribed TSMs. We benchmark via Housemark and the Institute of Customer Service (ICS).

C11 **In the last 12 months, how many complaints have been upheld by the Ombudsman? How have these complaints (or others) resulted in change of practice within the housing provider?**

- Six findings of no maladministration; 2 fell outside of Housing Ombudsman jurisdiction
- Six findings of service failure
- One finding of maladministration.

The finding of maladministration related to a request for compensation due to delays in a right to buy application under a preserved right to buy. As recommended, we have completed an audit of our homes to identify any properties where there is a preserved right to buy, and updated guidance for our existing teams.

Service failure findings: these included customer dissatisfaction with our handling of a report of anti-social behaviour (ASB), whether a third bedroom could be classed as a bedroom, a report of damp and mould, and an historic complaint which was not escalated effectively.

During the last year, our Customer Solutions Team ensured we handle complaints fully in line with our policies and that where we recognise service failure, we provide an appropriate resolution that reflects the upset and inconvenience caused to the customer.



C12 **What support services does the housing provider offer to its residents. How successful are these services in improving outcomes?**

We offer a number of services to our customers to help them thrive in their homes. Our neighbourhood coaches and income management advisors focuses on each customer's individual circumstances, maximising benefits and income, tackling and reducing debt and budgeting skills. Our 'money matters' website provides a growing range of helpful information on keeping costs down in the home. All of that is about improving outcomes for customers, including helping them out of arrears.

The outcomes from our approach are measured across various forums and metrics to ensure a consistent and sharp focus on understanding and improving performance.

Our Qualtrics platform is the key indicator for the performance of teams and processes through direct interaction with customers around their experience and effectiveness of Bromford interactions.

The Qualtrics dashboard measures a number of outcomes spanning how we listen and act, how easy we are to engage with through to repairs and customer contact.

Governance of performance outcomes flows from local team approaches through to a more formal directorate level 'Monthly Business Review' through to Executive and Board meetings.

A number of outcomes are improving for customers based upon feedback and internal activity to understand poor performance. Key areas where outcomes have improved include Customer Advocacy, Contact Centre accessibility and wait times and a reduction in customer complaints.

C13 **Provide examples or case studies of where the housing provider has been engaged in or placeshaping activities.**

We pride ourselves on working at the heart of our communities. Please see the next two pages for just some examples of our contribution to placemaking within our communities.

CASE STUDY

Refreshing a valued community hub



Brockworth Link is a charity in Gloucester that runs a community hub serving a large number of Bromford customers, from young parents on low incomes to older people who are isolated.

The hub was formed when Brockworth Library was transferred to the charity by Gloucestershire County Council in 2012, preventing its closure and preserving the facilities for the community. While the council owns the building, Brockworth Link pays a peppercorn rent.

The library is a success story – it has become a community hub, offering a friendly and safe place for meetings and socialising, and providing activities for all ages.

But with only a small amount of funding from the council, and the charity bearing all operational costs, the property was in need of a complete refresh at a cost of £166,000.

Our grants and social value officer helped the charity identify and apply for grants to cover the costs, and supported with project management and governance requirements.

Brockworth Link secured a contribution of £120,000 from section 106 funding from the Perrybrook Housing Development in Brockworth, some of which is owned by Bromford, alongside a grant from Enover Community Trust.

*generic Bromford image has been used

CASE STUDY

Bringing a park and play area back to life



We have a significant number of residents in the Priors Park area in Tewkesbury, Gloucestershire, where an old playpark had fallen into disrepair.

Working with Heart of Priors Park Community Interest Company (HOPPs), who consulted with the community about what they would like to see in the park, we helped deliver a project for grants, funding and project management support.

This included our grants and social value officer suggesting an approach to Tewkesbury Town Council to request it maintains the equipment, provides the relevant insurance and deals with the ongoing health and safety inspections to ensure the area remained safe.

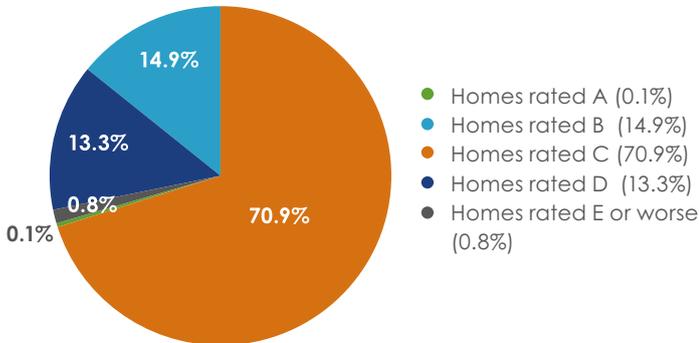
Funding was obtained through Barnwood Trust for the specialist equipment along with the council, and we applied to the Government Pocket Park Grant funding for the balance.

A total of £80,000 was raised for the redevelopment, to refresh the area – from fencing and gates, to picnic benches, new play equipment and bike racks, and wheelchair accessible tables.

*generic Bromford image has been used

Environmental

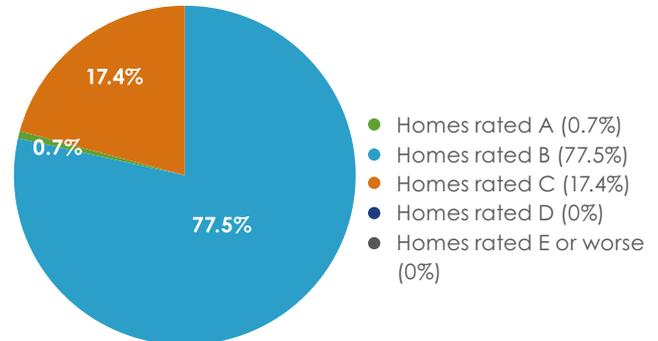
C14 Distribution of EPC ratings of existing homes (those completed before the last financial year)



As well as internal focus across Bromford, we engage with sector benchmarking organisation HouseMark to understand the performance of the sector and key forecasting. An out-of-sector view is also provided by the Institute of Customer Service (ICS).

No rating – 0.02%. We have an EPC rating for all our homes, except for those that are excluded, such as some of our commercial properties and the shared rooms. Shared rooms do have an overall EPC rating for the block, which is recorded in our data set at ‘parent’ level.

C15 Distribution of EPC ratings of new homes (those completed in the last financial year).



No rating – 4.38%. We have an EPC rating for all our homes, except for those that are excluded, such as some of our commercial properties and the shared rooms. Shared rooms do have an overall EPC rating for the block, which is recorded in our data set at ‘parent’ level.

C16 Scope 1, Scope 2 and Scope 3 greenhouse gas emissions

We are in the early stages of assessing the direction of travel for carbon reduction in our homes. We have engaged Suss Housing, external consultants who specialise in the social housing sector, to support our understanding of the CO₂ emissions of our homes. We have already met our initial target to have 86% of our homes achieve EPC C or better by 2023 and, whilst the target remains for 100% of our homes to be EPC C or better by 2030, we intend to do this by 2028.

We have worked in collaboration with Suss Housing to establish our baseline CO₂ emissions across Scopes 1, 2 and 3 and set these out below. These figures remain high level and reflect our projections based on our current understanding of the requirements. We will commission further, more detailed analysis to arrive at more precise figures, itemised under each scope, to reflect further developments as they emerge over the coming year.

Scope 1	4,989.45 tonnes CO ₂ e
Scope 2	2,148.39 tonnes CO ₂ e
Scope 3	83,697.09 tonnes CO ₂ e
Total	90,834.93 tonnes CO₂e

C17 What energy efficiency actions has the housing provider undertaken in the last 12 months?

Type	No. of homes
Air Source Heat Pump Installation	106
External Wall Insulation	335
Internal Wall Insulation	0
Cavity Insulation	562
Loft Insulation	561
Windows	721
Doors	1,175

Total annual CO2 savings of c.1.5m kg and total annual CO2 savings over 35m kg

C18 How is the housing provider mitigating the following climate risks: increased flood risk; increased risk of homes overheating?

We conduct the standard flood risk assessment undertaken by an external consultant. When seeking permission to build new homes, this is a planning requirement and is needed to validate the planning application. The ground floor level of our houses is always set above what the peak flood level of an area is. We aim to not develop in any flood zones. We allow for permeable paving in parking areas and will install these where necessary. All of our storm water goes through a sustainable system and we design controlled water flow rates to hold and discharge the flood water. The water flow rates also allow for a 40% climate change impact. We adopt best practice principles in New Homes on water saving devices.

In order to limit solar gain (the temperature increase in a space or structure due to heat from the sun) the following measures would be considered:

- Limiting excessive glazing to whole facades and single rooms
- Maximising shading from adjacent buildings/ landscape through layout design.
- Specifying reduced 'g-value' of glazing (g-value is a measure of how much solar heat (infrared radiation) is allowed in through a particular part of a building. A low g-value indicates that a window lets through a low percentage of the solar heat).
- Fixed external shading devices, shutters, external blinds, overhangs, awning.

In order to quickly remove excess heat from the indoor environment, we would consider including more windows that can be opened, ventilation louvres and mechanical ventilation systems. Passive mitigation measures will be favoured over mechanical measures for the benefit of the customers in terms of energy usage and maintenance liabilities. We will be reviewing our existing stock and establishing a strategy to address the risk of over-heating.

C19 Does the housing provider give residents information about correct ventilation, heating, recycling etc. Please describe how this is done.

We are currently researching a programme of sensors that detect moisture in the home, providing data remotely and flagging to us if a home needs attention. We will be piloting this approach in 200 homes in summer 2022.

Our condensation, damp and mould (CDM) experts and surveyors give advice and guidance, our task force offers support from an external specialist and our neighbourhood coaches are also trained to provide guidance. Where we have completed a project of works we provide information to assist customers. Our customer contact centre is also a key function for ensuring that we capture customer issues and either resolve them/signpost directly at the point of contact.

C20 How is the housing provider increasing Green Space and promoting Biodiversity on or near homes?

Biodiversity and green spaces are a crucial focus for us and we are currently devising a dedicated strategy in this area.

In the meantime, we are conducting a baseline status assessment across all of our schemes. We have also secured biodiversity credits at our Pearl Lane site.

Examples of how we are preserving natural ecology at our development sites include:

- **Grange Road** – Swift boxes and bat boxes.
- **Conningsby Drive** - Wildlife corridor, hedgehog runs, deer access points.
- **Roman Road** – Install new badger sett and relocation tracks.



- **Audley Avenue** – Bat boxes.
- **Bouncers Lane** – Badger relocation into an off-site setting.
- **Grange Park** – Bird boxes, swallow boxes, hedgehog runs, bat boxes.
- **Hereford Road** – Hedgehog runs, bird boxes.
- **Offenham Road** – Bird boxes and bat boxes on the tree line, hedgehog runs.
- **Racks Lane** – Bird boxes.

C21 Does the housing provider have a strategy to actively manage and reduce all pollutants? If so, how does the housing provider target and measure performance?

We do manage some pollutants (diesel, paint), but do not have a full strategy developed as of yet. Examples of management include:

- Diesel/fuel spills on construction sites are mitigated with triple-walled tanks and bunded areas to eliminate run off. Spill kits are also held on the tanks.
- Waste streams are semi controlled, plasterboard and timber are recycled separately, metal is also either recycled or repatriated where possible.
- We are in partnership with Novus and Dulux and any waste paint from our new build sites and our cyclical painting programme is sent to paint360.co.uk to be recycled and all empty tins are sent back to Dulux to be recycled.

C22 Does the housing provider have a strategy to use or increase the use of responsibly sourced materials for all building works? If so, how does the housing provider target and measure performance?

We are currently in the planning phase of developing a strategy which will incorporate responsibly sourced materials for our building works.

C23 Does the housing provider have a strategy for waste management incorporating building materials? If so, how does the housing provider target and measure performance?

We currently have some sites with separate skips for timber, mixed waste, inert (brick/rubble/crushed stone) and plasterboard. Every site has a minimum of two skips, mixed and plasterboard. The mixed is separated at the recycling centre and where possible a report is sent back to us, while plasterboard is recycled and reused. However not every supplier can offer this reporting service.

We also want one waste management company to manage the process as a single point of contact, with a monthly report broken down by site to identify the amounts removed and reused.

C24 Does the housing provider have a strategy for good water management? If so, how does the housing provider target and measure performance?

We are currently finalising a water management strategy and expect to have this live by our next reporting cycle.

Governance

Criteria #	Criteria	Response
C25	Is the housing provider registered with a regulator of social housing?	Yes
C26	What is the most recent viability and governance regulatory grading?	G1 / V1

C27 Which Code of Governance does the housing provider follow, if any?

The Regulator of Social Housing requires that each RP choose a Code of Governance. The RPs in the Bromford Housing Group have all adopted the UK Corporate Governance Code 2018. This reflects the Group's more commercial approach.

Criteria #	Criteria	Response
C28	Is the housing provider Not-For-Profit? If not, who is the largest shareholder, what is their % of economic ownership and what % of voting rights do they control?	Yes, all non-profit

C29 Explain how the housing provider's board manages organisational risks?

Our board has defined the risk appetite statements and metrics which are central to the core elements of our strategy. Across five key enterprise risk types they set out the type and amount of risk we are prepared to accept as we deliver our strategy, plans, and run our day-to-day operations. These are integral to our corporate decision making.

The board review the principal risks, appetite and tolerances annually and the last review was in November 2021. The risks and associated indicators are monitored monthly by the board. Business risks are monitored for emerging threats and operational trends, with escalation through executive forums, Audit and Risk Committee and then to board.

C30 Has the housing provider been subject to any adverse regulatory findings in the last 12 months (e.g. data protection breaches, bribery, money laundering, HSE breaches or notices) - that resulted in enforcement or other equivalent action?

There has been no enforcement action from the Regulator of Social Housing, Information Commissioner's Office, Health and Safety Executive or in areas of bribery and anti-money laundering.

C31 What are the demographics of the board? And how does this compare to the demographics of the housing providers residents?

Board demographics:

Non executive directors: seven
Executive directors: two
Gender: seven male two female
Ethnicity: nine white British
Average Age: 58
Disabilities: none

Customer demographics:

52% of residents are women
12% of residents have a disability
8% of residents are from ethnic minority groups
Average age of residents is 41

C32 What % of the board and management team have turned over in the last two years?

Since 1 May 2020 and in accordance with our Board Succession Plan the group board has reduced from 10 to nine members - or from eight Non Executive Directors (NEDs) and two Executive Directors to seven NEDs and two Executive Directors. Of the previous 10 members on the board at 1 April 2020 there now remains four NEDs and one Executive Director. Five new NEDs and one new Executive Director have been appointed. One previous NED post has not been filled. This represents a turnover of 45%.

Executive management team

The Chief Executive has strengthened and restructured his management team. Of a leadership team of seven people, three have joined since 1 May 2020. This represents a turnover of 43%.

C33 Is there a maximum tenure for a board member? If so, what is it?

Yes **9** years

C34 What % of the board are non-executive directors?



C35 Number of board members on the Audit Committee with recent and relevant financial experience

The Audit and Risk Committee comprises three non-executive board members.

The chair, Charles Hutton-Potts, is a Fellow of the Institute of Chartered Accountants in England and Wales who spent 21 years as an audit partner at a large accountancy firm before retiring in 2018. Charles is now active as a non-executive director and business consultant.

C36 Are there any current executives on the Remuneration Committee?

Bromford operates a combined Remuneration and Nominations Committee. The Committee members are two independent non-executive directors and, because of the wider remit of the Committee, which includes nominations as well as remuneration, the chief executive is also a member.

Interests of those present are managed carefully and the chief executive does not take part in any decision making that concerns his own role or own remuneration

Rationale for the joint committee is that executive pay and bonus is not the same as those who are formally governed by the UK Code and the remit of the committee is broader than the most senior executive. Executive pay is very much aligned to that of colleagues and is benchmarked both in and out of sector.

C37 Has a succession plan been provided to the board in the last 12 months?

The external board effectiveness report was considered by the Board in March 2021. This included a Succession Plan that would see the size of the board reduce in November 2021.

Criteria #	Criteria	Response
C38	For how many years has the housing provider's current external audit partner been responsible for auditing the accounts?	Beever and Struthers were appointed as External Auditors in November 2020.
C39	When was the last independently-run, board-effectiveness review?	Feb-21
C40	Are the roles of the chair of the board and CEO held by two different people?	Yes, the chair and CEO roles are held by two different people.

C41 How does the housing provider handle conflicts of interest at the board?

The Board has adopted a Group Conflicts Policy which sets out details of what might constitute a conflict and how this should be managed.

Each Board member makes an annual declaration of interest. This is presented to the Audit and Risk Committee each year as part of our end of year attestations. Board members make declarations of interest as they arise in meetings. Conflicts between entities are also managed through the Group Conflicts Policy.

Criteria #	Criteria	Response													
C42	Does the housing provider pay the Real Living Wage?	Yes we pay the Real Living Wage													
C43	What is the median gender pay gap?	<table border="1"> <thead> <tr> <th></th> <th>Mean</th> <th>Gap</th> <th>Median</th> <th>Gap</th> </tr> </thead> <tbody> <tr> <td>Men</td> <td>£17.19</td> <td rowspan="2">6.2%</td> <td>£14.76</td> <td rowspan="2">7.2%</td> </tr> <tr> <td>Women</td> <td>£16.13</td> <td>£13.71</td> </tr> </tbody> </table>		Mean	Gap	Median	Gap	Men	£17.19	6.2%	£14.76	7.2%	Women	£16.13	£13.71
	Mean	Gap	Median	Gap											
Men	£17.19	6.2%	£14.76	7.2%											
Women	£16.13		£13.71												
C44	What is the CEO: median-worker pay ratio?	7.9													

C45 **How does the housing provider support the physical and mental health of their staff?**

The physical and mental wellbeing of our colleagues is a key priority at Bromford. Our chief financial officer is the group's mental health champion and our wellbeing strategy aims to go beyond the foundational level of wellbeing initiatives. We seek to embed a preventative and holistic approach to colleague wellbeing. We want all our colleagues to have a great place to work, with a good work life balance, a sense of fulfilment, job satisfaction, financial security and psychological safety. Our approach to wellbeing is intrinsically linked to our wider employee engagement work, where everything we do is aimed at making sure all colleagues feel that they Belong at Bromford.

Our plans:

1. We will be recruiting more Mental Health First Aiders and supporting them to develop their skills and champion the positive impact that early intervention and signposting can have.
2. We believe in promoting an open culture around mental health. It's okay to not be okay. We encourage colleagues to share their personal stories and experiences to help break down barriers and taboos.
3. We want to develop mental health awareness amongst colleagues, so we will be looking at improving our training for both colleagues and leaders
4. We will ensure all colleagues have regular time with their leader face to face to talk about work, development, health and wellbeing, ensuring colleagues maintain a healthy worklife balance
5. We will increase transparency through better internal and external reporting of absence, specifically where this is related to mental health.

We have an occupational health advisor who runs MOT health check ups at our offices, where colleagues can have their blood pressure, cholesterol and BMI assessed. The advisor also offers support and guidance on issues such as stopping smoking, dealing with stress, healthy eating and staying active.

Our flexible benefits package gives all colleagues a £500 cash flex allowance to spend on a range of lifestyle, health and wellbeing benefits, including BUPA and a cycle to work scheme.

We are committed to ensuring that we keep colleagues and customers safe from harm. We have toolkits and offer support and advice on domestic abuse and safeguarding and also have domestic abuse champions.

We have a Wellbeing App – My Healthy Advantage, available to all, as well as the Health Assured Colleague Assistance Programme which is a 24/7 confidential support service for all colleagues and their immediate family.

C46 **What is the average number of sick days (both long and short term) taken per employee?**

10 days



C47 **How is Social Value creation considered when procuring goods and services?**

For supply chains with developed social value procedures, where we either have procurement leverage or third-party framework support, we develop social value initiatives to specifically meet our customer's needs.

We have accrued £109k into the Social Value Fund through our contract with Travis Perkins. This will be put to use in 2022/23. We also actively support charities with their s106 social value projects obtained indirectly via the housing supply chain grant funding initiatives.

For supply chains with less developed social value creation, we look to develop relationships with the lower tiers of the supply chain, where we know social value activities have matured.

During this financial year we are reviewing the potential of the Social Value Portal, to extract wider social value benefit by working indirectly with over 100 public sector procurers across the UK. The data and measurement activity in this portal is based on the National Social Value Measurement Framework (National TOMs), which is a proven and robust measurement framework widely adopted by local government, central government, and the private sector.

C48 **How is Environmental impact considered when procuring goods and services?**

For strategic and critical procurement activities, Bromford pre-selects suppliers and contractors based on a self-certification basis. This ensures that the potential supplier complies with environmental legislation and that there have been no prosecutions of, or notices served on, the potential supplier for breaches of environmental laws or that, where there have been, the supplier can confirm adequate steps have been taken to prevent a recurrence, in their proposal documents.

Looking forward.

As we've set out in this report, sustainability is inextricably linked to our mission of empowering our customers and building thriving communities.

It is also central to our relationship with our funders and investors, in meeting their growing needs and expectations as sustainability activity and data matures, and providing them with the information they require to robustly assess our progress, business performance and risk management.

We are proud of our long-standing commitment to sustainability here at Bromford, and pleased to be sharing our story in a more structured and transparent way.

Our sustainability reporting is already putting a sharper focus on where we can do better for our customers. But we also know we're at an early stage of this reporting process, and there is more we can do to support greater openness and accountability.

We are committed to improving and enhancing the way we collate, carry and use data – this is central to our ability to manage, monitor and communicate our performance as a business, and to promoting that accountability to our stakeholders.

We also know there is work to do to involve and engage our customers on our sustainability reporting. Our reporting needs to resonate with their expectations and tell the story of how our work is delivering positive impact and outcomes for the people and communities we serve.

As such, much of our focus in the year ahead will be to improve our data and reporting processes, and the way we engage our customers, funders, colleagues and partners on the sustainability agenda. Our Sustainability Group will be leading the charge in this area, and we will continue to evolve and improve our reporting against our sustainability pillars, including the commitments set out in our sustainable finance framework.

We look forward to sharing more of our impact story next year. In the meantime, we would very much welcome feedback on the contents of this report and how we can better engage our stakeholders and customers in our sustainability reporting process.

If you would like further information or to feed back on this report, please contact:

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