



# Building a sustainable future:

## Impact Report

For the year ended 31 March 2024

**Bromford.**

# A snapshot of our business

1,991

Colleagues



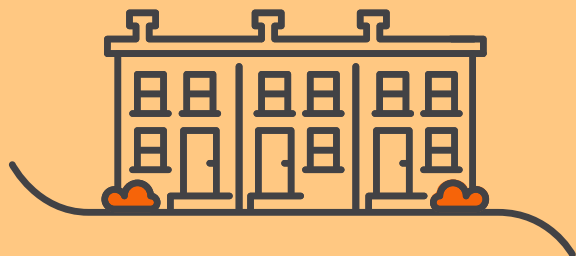
G1/V1

Regulatory ratings



1,191

New affordable homes  
developed



47,304

Homes owned  
and/or managed



1 12,000+

Customers



# Sustainability golden metrics

Sustainability Linked Loans:



## 89%

Homes at EPC C or above



## 30.42kg/m<sup>2</sup>

Scope 1, 2 and 3 emissions



[Contents](#)  

## 55%

Market-social rent differential



## 551

New social rent homes



## 91%

Customer advocacy



## 10,285

Average live repairs



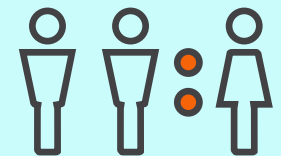
## 25

Customers coached into employment or training



## 9:3

Board and executive male:female ratio



## 3.8%

Gender pay gap

## 3.9%

Ethnicity pay gap



## 8.7

Colleague sick days



## 99.98%

Decent Homes Standard



## 100%

Gas and fire safety



## 20

Complaints upheld by Ombudsman

## 0

Adverse regulatory findings

# Contents

Foreword	05
About us	06
Our strategic objectives	07
Our sustainability reporting approach	08
Our three sustainability reporting pillars	10
Sustainable finance framework	11
Sustainability linked loans	18
Sustainability Reporting Standard for social housing	20
Looking forward	47





**Bromford has been providing affordable homes to our customers for more than 60 years, with our purpose rooted in sustainable principles. We're now one of the UK's largest housing associations, owning and managing more than 47,000 homes and with ambitions to build 11,000 more by 2032. Going forward we know we have a vital role to play in building a sustainable future where everyone has a safe, secure and affordable home.**

There is a widespread housing crisis across the country and social housing is a vital public resource that has become scarcer over the last decade. Against a backdrop of many organisations significantly reducing their house building, over the past year we've completed 1,191 new affordable homes, including 551 for the most affordable tenure of social rent. Our focus on investing in both new and existing homes has not wavered.

We understand that sustainability is most powerful when it enhances the lives of our customers and colleagues. In 2024, we continued our work on improving the energy efficiency of our existing homes, with 89% now rated EPC C or above. We've also invested in regenerating older properties, completing 52 new homes

on previously demolished sites and our efforts in this area are just one aspect of our broader commitment to decarbonisation and ensuring our homes are fit for the future.

Our innovative approach to sustainability-linked finance continues to yield positive results, helping us align our financial strategies with our commitment to sustainability. This year we invited one of our customers to speak at a leading housing finance conference, showcasing the importance of creating an open dialogue between customers and external investors. Building this connection has deepened the understanding of how our external investors support our purpose to enable our customers to thrive.

We have now completed our first year of our corporate strategy for 2023 to 2027 which is centred around place, scale and impact. We are expanding our place-based approach to better understand the broader environment in which our customers live, ensuring that our investments in homes and communities enable people to thrive socially and economically. We are also scaling up our new homes programme, aiming to deliver even more affordable homes in the coming years.

Our journey towards becoming a more sustainable organisation is ongoing and we are committed to transparency and continuous improvement. We will keep refining our sustainability metrics to reflect the evolving landscape and ensure our actions deliver real, sustainable outcomes for our customers, colleagues, investors and wider stakeholders.

We are proud of the progress we have made. It is testament to the hard work and dedication of our colleagues, whose commitment to sustainability and a shared vision for the future has been instrumental in driving our achievements. Their efforts, their commitment to our DNA, aligned with our purpose of creating a sustainable future, have made it possible for us to make a meaningful impact. But we do recognise there is still much work to be done. As we move forward, we will continue to listen to our customers, invest in our homes and communities and strive to make Bromford a place where everyone can thrive.

---

**Robert Nettleton**  
Chief Executive

# About us

Since forming in 1963, Bromford has grown to become one of the largest housing associations in the country. We now own and manage 47,304 homes and plan to deliver more than 11,000 new homes by 2032. Our colleagues build individual relationships with more than 112,000 customers that live in our homes and use our services.

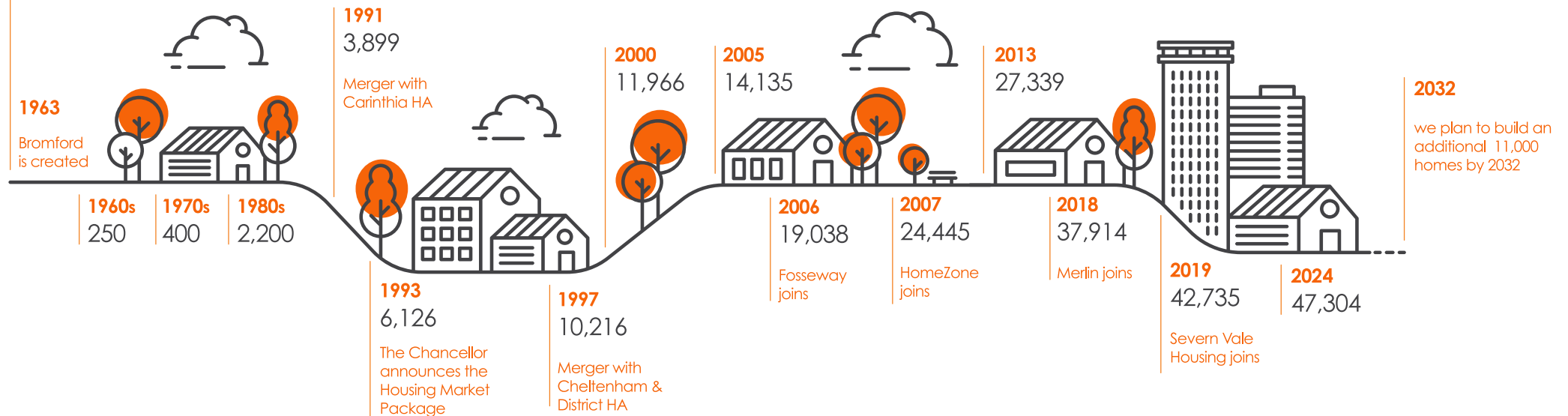
Over 50% of our customers live in just four areas, Lichfield, Tewkesbury, Cotswolds and South Gloucestershire, all of which feature in this report in relation to our social and environment impact.

Our purpose is to invest in homes and relationships so people can thrive. Sustainability has always been fundamental to our mission and continues to underpin everything we do. It runs to our core purpose and is the foundation upon which our 2023 to 2027 corporate strategy is built.

We believe that everyone should have a home that is safe, secure, warm and affordable and last year, once again we built more homes for social rent than any other housing association in the country.

With our strategic shift to scale, place and influence, we have the aspiration to be the number one developer of affordable homes in Gloucestershire and throughout the wider M5 corridor. We will continue to be a major developer of new homes across a wider area too including the West Midlands and West of England Combined Authority regions.

## Our history.



# Our strategic objectives

We launched our new strategy in April 2023 which sets our course not just for four years, but for many years to come. We have eight objectives for the end of 2027, which will turn our purpose into action over the life of this strategy and each have targets to enable customers, colleagues and stakeholders to not only hold us to account, but to enable all to have clarity of the scale of our ambition. They demonstrate how we will invest in homes and relationships so people can thrive.

Place-based working

Relationships that support customer aspiration

Move to proactive maintenance

Agile working to solve problems

Our move to scale

Closing the home standard gap

Place-based pipeline of talent

Known as a leader and influencer


We have three overarching frameworks which guide all our strategic decisions over the life of our strategy. These are customer, financial and sustainability. The golden rule and the aspiration act as our tramlines for each metric for the life of this strategy.

Sustainability framework				
Rule	Description	Current	Golden Rule	Aspiration
1E	Carbon reduction: total scope 1,2,3 CO2 emissions (tonnes per home)	3.3	4.00	3.00
2S	Housing the homeless: proportion of our rented homes let to the homeless	29%	15%	30%
3G	Regulatory rating on governance	G1	G1	G1


Alongside our new strategic objectives, we have also established a set of guiding principles, which include:




**Build relationships**




**Think community**



**Data driven**




**One Bromford**




**Places, not projects**



**Invest for impact**



**Develop trust**



**Seamless service**

# Our sustainability reporting approach

A golden thread runs through all our sustainability reporting, linking our corporate strategy, our business plan, our Sustainable Finance Framework and this report.

## Our sustainability golden thread

Our sustainability ambitions continue to be set and led through all elements of our corporate strategy 2023 to 2027.

Our internal sustainability framework sits alongside our customer and financial frameworks, all with their own golden rules and aspirations and drives our ESG aspirations in the work delivered by our colleagues every day, with performance overseen by our Sustainability Group, Investment Forum, executive and board.

Our sustainability commitments are also reflected in the investment decisions which underpin our business plan where we ensure that we are allocating the resources that we need to deliver our ambitions now and into the future.

This golden thread continues in our 2023 Sustainable Finance Framework which makes a firm commitment to setting targets and measuring outcomes against our ESG projects in line with our corporate strategy.

This impact report completes that golden thread, setting out our annual performance in the 2023 to 2024 financial year against our commitments to our customers and colleagues, investors development partners and other key stakeholders.

This golden thread enables us to continue issuing new sustainable linked finance which focuses on the KPIs and projects we know truly make a difference to our customers as well as the homes and communities in which they live in order that they can thrive.

Our three core reporting pillars, which are set out below, remain at the heart of our approach, demonstrating our sustainability reporting and our alignment to the UN's Sustainable Development Goals. These include:

- our Sustainable Finance Framework (Framework)
- our Sustainability-linked loans (SLLs)
- the Sustainability Reporting Standard for Social Housing (SRS)

Our commitment to addressing social equality and climate change to the best of our ability is aligned to making as much of a contribution to the UN's Sustainable Development Goals as possible. We have mapped this contribution to the following seven SDGs.





## Changes to the Sustainability Reporting Standard

We are an adopter of the SRS and acknowledge the key role it plays in social housing, striving to embed a common standard. By bringing together housing associations, funders, investors and other important stakeholders, the SRS has already provided a common language to facilitate a sincere and collaborative commitment to sustainability reporting in our sector. Importantly, it has already provided a reference point to highlight key areas of success and areas for future development.

Our answers in this impact report talk to the second iteration of the standard, SRS2.0. We see the value in the amended questions with a broader scope for disclosure of performance.

## Our sustainability golden metrics

To complement the adoption of the full SRS as an important aspect of our disclosure and reporting, we have produced a core set of golden metrics which allow all stakeholders to understand our journey and the progress we are making. We were the first housing association to openly publish these golden metrics as a measure of our sustainability performance in our year end trading update 31 March 2023 and this is replicated in our six-monthly trading updates. Importantly, the selection of these metrics is led by us in discussion with our customers and colleagues in order to drive the activities that deliver truly sustainable outcomes and we will continue to work with our customers, colleagues, investors and other stakeholders to further develop our sustainability golden metrics over time.

## Looking forward: the development of a unified reporting standard

Over time we have seen sustainability reporting continue to increase and move at pace, resulting in different reporting authorities and investors asking for an increasing amount of data, disclosure and assurance. With the obvious burden on our resources, this carries the risk that we become focused on reporting rather than delivering outcomes. It also presents a risk of reporting being authority-led rather than based on customer outcomes. We would therefore welcome reporting authorities to unify behind a single reporting standard and for housing associations to drive that standard.



# Our three sustainability reporting pillars

1



## Sustainable Finance Framework

Our Framework is an essential component of our sustainability story and wider corporate strategy, cementing the relationship between finance and purpose and enabling all future funding to have a sustainability focus. It has been updated this year to align our future financing to strategic commitments of place, scale and impact. First launched in 2021, the Framework maps our contribution to the UN SDGs (Sustainable Development Goals) and details and tracks our progress against a set of eligible social and green projects.

The Framework was updated in May 2023 and the third edition is to be published in October 2024 to keep in line with latest market principles. 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

We believe that SLLs are more than just about discounts or margin savings. When they work effectively, they create a new awareness and discussion throughout our organisation and with our partners, to drive new outcomes on important pillars of sustainability. Our existing revolving credit facilities see margins and fees on the loans ratchet down as we successfully meet pre-agreed ESG targets. We are passionate about delivering against all aspects of ESG and have developed a series of sustainability-linked loans across the themes of energy efficiency, gender pay gap, colleague sick days and customer employment.

3



## Sustainability Reporting Standard for Social Housing

We are proud to be an adopter of the SRS, which aims to provide a transparent, consistent and comparable approach to ESG reporting across UK social housing. This year we will be reporting on the latest version 2.0, which reflects changes to the housing environment and wider ESG reporting landscape.

The SRS covers 12 themes and 46 criteria and has been adopted by over 150 housing providers, banks and investors. The SRS has been designed to align with both the ICMA and LMA Social and Sustainability Bond Principles. We 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.

Our impact

# Sustainable finance framework



**Our Framework captures our commitments across six eligible categories, from new affordable homes and EDI, through to green buildings and clean transport. Our key progress against our commitments is set out below.**

**1 Affordable housing**

**Delivering affordable homes and regeneration**

We had a strong year of building new homes, including 551 new social rent homes, representing 46% of our 1,191 new homes delivered. Once again this made us the biggest developer of social rent homes in the country.

Building social rent homes remains a key focus for us alongside the delivery of homes for affordable rent and shared ownership which also offer affordable housing for customers who cannot access the private rent or sale market.

Over the life of our new strategy, the delivery of new social rent properties will continue to represent around 50% of new homes we build and we will do this through a mixture of S106 and land-led development schemes, with a slightly higher weighting of properties via our land-led sites.



**2 Employment generation alleviating unemployment**

**Employment of apprenticeships and graduates**

Our apprenticeship and graduate programme continues to be successful, with 74 colleagues on the programme for the financial year ending March 2024. This takes the total number of apprentices and graduates who have trained through the programme since its inception to 151 as at March 2024. We have an established apprenticeship offering which provides excellent opportunities to give people a solid grounding in their chosen career; allowing them to develop new skills alongside our existing colleagues, gain accredited qualifications, whilst making a real contribution to meeting our strategic goals.

As a member of the national body the 5% club, we are committed to increasing this number even further and aspire to achieve 5% of our colleagues in earn and learn positions as we seek to make esteemed workplace learning a more accessible opportunity. In November 2023 we were delighted to be awarded the Silver award demonstrating our progress to this commitment. Our 2023-24 graduate programme took on a further three graduate colleagues across the business, who began working for us in the autumn, with our next intake of graduates and apprentices due to join us in autumn 2025.

**Coaching customers into employment**

Employment generation does not stop with colleagues and we are committed to coaching customers into employment. Our 2023 sustainability linked loan with ABN Amro is formally linked to getting more of our customers into employment and training. Over the past year we have coached 17\* customers into employment.

\*This was originally reported as 25 in our year end trading update and subsequently revised after review from our external auditors.

### 3 Socioeconomic advancements and empowerment

To continue to succeed we need to ensure that our customers and colleagues are given the opportunities and tools to thrive.

#### Equality, diversity and inclusion

We're determined to do this in a way that is inclusive and celebrates equality and diversity as we know this makes us stronger and more effective in achieving our purpose.

We have a number of colleague champion groups, each supporting a strand of EDI, meeting regularly and offering a community and space for colleagues to come together, connect and help raise awareness across the organisation. These groups include Race and Faith, LGBTQIA+, Disability and Carers, Age and Gender, Mental Health and Wellbeing and Menopause. Each group contributes to our annual Be You roadmap, which highlights events, activities or projects across the year to celebrate and raise awareness across a broad spectrum of EDI.

Over the past year we introduced new menopause training for all colleagues and again ran our female accelerator program. This is designed to offer learning and development opportunities for females across the business and to empower them to reach their full potential and was nominated for a Housing Heroes/Women in Housing award. We also achieved Disability Confident level 2 and were also working towards achieving menopause friendly accreditation in 2024, which we achieved in August 2024.



#### Neighbourhood coaching

Our neighbourhood coach operating model helps us to understand our customers and communities' needs by providing us with a unique angle to engage with our customers through a personalised relationship.

This enriches our understanding of different customer needs and by restricting each neighbourhood coach's patch size to 250 families it gives all coaches the opportunity to build relationships with all our customers. Our neighbourhood coaches have an annual customer conversation with each of their customers, to better understand their needs and aspirations whilst gathering rich insight and data that will enable us further improve services to customers.

Our Customer and Community Influencing Networks (CCIN) and Local Influencing Networks (LIN) enable us to work with customer groups which are diverse and facilitate focussed discussions relating to our homes and communities. Our involved customers help us to codesign how we move forward and also hold us to account to deliver on our promises. We survey thousands of customers a year and this enables us to capture qualitative feedback which also helps us to design how we engage with our customers and service them. Our customer advocacy scores continue to rise year on year and this year was 91%.



## 4 Green buildings

### Carbon reduction: energy efficient new and existing homes

Our progress on our carbon reduction journey remains strong and 89% of our existing homes are EPC C and above and we remain on track to achieve close to 100% by 2028. This will reduce how much CO2 our homes emit with the added benefit of reducing the amount of energy customers need to keep their homes warm and hopefully lowering their bills and minimising the risk of them entering fuel poverty. We have a robust retrofit plan to improve the thermal performance for our remaining properties over the next four years.

Of our new homes acquired and built over the past 12 months, 81% of properties had an energy efficiency of EPC A or B with 19% EPC C.

### Modern Methods of Construction (MMC)

MMC continues to be an important part of our broader new homes' ambitions. The implementation of our MMC framework in June 2022 has led to product development of steel frame Cat 1 and 2 systems using our own house types. The Timber Frame Cat 2 development space has progressed rapidly over the last year, with panelised Cat 2 systems being routinely available combining the speed, quality and carbon reduction benefits of wider MMC delivery with the cost effectiveness of timber frame. This will enable us to deliver against our strategic partnership with Homes England for up to 400 category 1 and 2 MMC homes started onsite by 2026.

**81%**

new homes are EPC A or B

**400**

MMC homes started on site by 2026

## 5 Clean transport

### Carbon reduction: commercial and company car fleet

We want to significantly reduce our carbon footprint when considering our commercial and company car fleet.

At present, our fleet comprises of more than 600 vehicles and, over the next two years, we will fast track the transition to greener alternatives.

- we have 509 vehicles in our commercial fleet, of which 14% (72) are electric or hybrid
- our company car fleet totals 100 vehicles, of which 39% (39) are electric or hybrid

We have not ordered a single standalone internal combustion engine company car for over two years and our strategy is to replace all remaining non-electric vehicles with greener alternatives over the next four years.

To reduce the carbon footprint of our company vehicle fleet and colleague vehicles, we have installed 30 electric vehicle charging points at our offices. This initiative promotes cleaner transport alternatives as we encourage our colleagues to consider electric vehicle use.



**14%**

of fleet are electric or hybrid

**39%**

company cars are electric or hybrid

**6 Energy efficiency**

**Carbon reduction: green offices**

We have made a number of improvements to our offices to make them greener. This has included improving the controls and automation of our heating, ventilation and cooling systems at our workspaces and installing remote systems to enhance our monitoring and control. We have monitored the building management data and reduced operating hours by 14%, therefore reducing HVAC-related energy consumption. Installing solar photovoltaic systems to some of our workspaces has increased the proportion of energy provided from renewable sources and reduced our overall grid dependency. We are exploring fitting panels to all of our premises to further reduce our use of non-renewable energy. We're also reviewing the latest developments in energy battery storage technologies to further support renewable energy integration and carbon footprint reduction.

We have expanded our LED lighting installation programme in our offices and have replaced outdated energy intensive fluorescent lighting systems with low energy lighting which is 80% more energy efficient.

We also introduced improved vending services in May 2023 to help reduce our business waste. As part of this initiative, we have removed all single-use plastic cups and encouraged the use of our reusable and eco-friendly Bromford cups.

14%

reduction in operating hours

80%

more energy efficient lighting



Case study

# Making our homes more energy efficient

We're committed to ensuring all of our homes are energy efficient and as warm and affordable as possible for our customers to live in.

Over the past year we have handed over the keys to customers of some of the most energy efficient homes we have ever built. But at the same time as building new homes with high EPC ratings, we have also been continuing to improve the energy efficiency of some of our older properties. Among the worst rated properties we own are our pre-cast reinforced concrete (PRC) homes.

These homes were built using non-traditional construction methods in the post-war period as a quick solution to the housing shortage at the time. There were several different types of PRC homes but over time they have all become notorious for suffering from poor insulation and allowing heat to easily escape, making them expensive to keep warm. We own 1,200 of these properties in South Gloucestershire and over the past ten years have

had an improvement programme in place to make them warmer, cheaper to heat and improve their external appearance.

At the start of 2024 we began work on the final few blocks of flats, which will bring the long-running programme to a successful conclusion. A total of 790 have had external wall insulation fitted to them, transforming their thermal efficiency and increasing energy performance ratings to a C. With homes becoming more energy efficient, customers have had to use far less energy to keep them warm. Customers in some of these homes are now using two thirds of the energy they were previously, potentially reducing their bills. In addition to fitting external wall insulation, we've also fitted new windows, doors and roofs, loft insulation, fascias and soffits. Homes have been redecorated externally, while footpaths, gates and fences have been repaired or replaced.

Investment Delivery Manager Fay Gorick said: "This has been a long-

running programme and we're incredibly proud of the improvements we have made to people's homes through this project over the years. Making these homes more energy efficient has improved the homes and lives of our customers; the new insulation means homes stay warmer for longer, which means customers are potentially using less energy than they did before and potentially seeing savings on their energy bills."

Ms Manca a customer who recently had work completed to their home said: "It's very good and a lot warmer

than before, before it was really drafty, I do feel the benefit and I don't have the heating on as much as I used to."

Completing the work on these properties has helped to increase the total number of Bromford homes with an EPC rating of C or above to 89% and we are committed to bringing all homes up to this level by 2028.





Case study

# Largest land deal for more than 200 homes secured

Our ambitions to be the largest developer of affordable housing in Gloucestershire was boosted in January 2024 after we finalised a multi-million pound land purchase that will pave the way for a development of more than 200 new homes.

The deal to buy the 19.5-acre site in Matson close to the M5 motorway, is our biggest purchase to date. The site already has outline permission for 217 homes, which was granted by Gloucester City Council in April 2021. Our plans are to create a mixed tenure development comprising around 50% rental homes plus homes for part-rent part-buy shared ownership and for outright sale.

Operations director Robin Smith said: “We’re thrilled to have secured this land which will provide homes to hundreds of families. It’s our largest land purchase deal to date and demonstrates our growing ambitions to invest in more large-scale projects which allow us to make a bigger impact in the community. Over the months ahead we’ll be focused on

drawing up plans to create a vibrant community of modern, energy efficient homes where our customers can thrive. Subject to planning permission, our in-house construction team will lead on the development of the site. This is a great start to the new year and we are also progressing further deals to secure even more land so we can continue to provide much-needed affordable housing across the region.”

Over the years ahead we have an ambition to reduce our reliance on section 106 agreements and to lead on more of our own developments. Securing this land at Matson, on the outskirts of Gloucester, fits directly into this strategy.

The land is less than a mile from our previous biggest land purchase at Snow Capel where we have begun

developing 180 new homes. Over the past year our in-house construction team has also started work on other iconic sites including a 100-home development in Winchcombe in Gloucestershire.



Our impact

# Sustainability linked loans



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

We started linking our finance to sustainable measures in 2020, pioneering the first loans in the sector linked to energy efficiency and governance and since then we have developed our focus across all pillars of ESG. We now have a number of KPIs which are customer focused, ranging from building more social rent homes to customer advocacy and the responsiveness of our repairs service. We now have six RCFs totalling £427m that are sustainability linked and are committed to all our future finance being linked to sustainability and ESG measures.

This year we linked three revolving credit facilities to CO2 intensity targets, measured on a metre squared basis rather than a per home basis which provides a consistent measure across all stock types, irrespective of the asset type and its size.

As our KPIs become more data led, the inevitable increasing amount of supporting data required also increases the level of disclosure and assurance required. This level of reporting and assurance comes with a heavy resource demand and we encourage the sector to lead the unification and simplification of this process for housing associations.

 **ABN·AMRO**

**£100m**

A five-year revolving credit facility, linked to reducing our colleague sick days and coaching more of our customers into employment.

 **BARCLAYS**

**£52m**

A five-year revolving credit facility, linked to our ability to meet targets related to Scope 1, 2 and 3 carbon emissions per metre square floorspace and our customer advocacy score. The first test date for the targets will be 31 March 2025.

 **HSBC**

**£75m**

A five-year revolving credit facility, linked to our ability to meet targets related to Scope 1, 2 and 3 carbon emissions and our average number of live repairs. The first test date for the targets will be 31 March 2025.

**LLOYDS BANK** 

**£75m**

A five-year revolving credit facility, linked to our ability to meet targets related to Scope 1, 2 and 3 carbon emissions and the number of new homes we build for social rent. The first test date for the targets will be 31 March 2025.

 **NatWest**

**£50m**

A 10-year revolving credit facility, which up to 31 March 2024 was linked to EPC C ratings of our existing homes. We improved 1,956 homes to EPC C and above from 1 April 2020, against a target of 1,500. The facility will then be linked to targets related to Scope 1, 2 and 3 carbon emissions and new homes built for social rent. The first test date will be 31 March 2025.

 **SMBC**

**£75m**

A five-year revolving credit facility, which 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 metrics.

Our impact

# Sustainability reporting standard for social housing

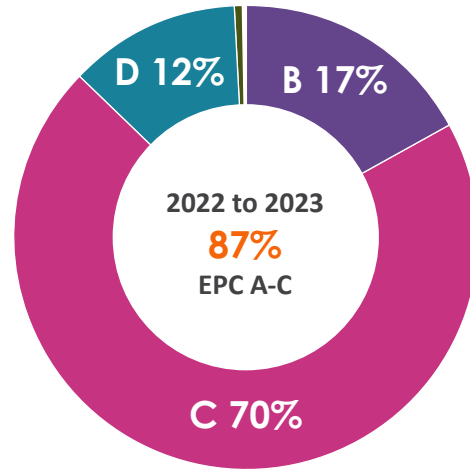
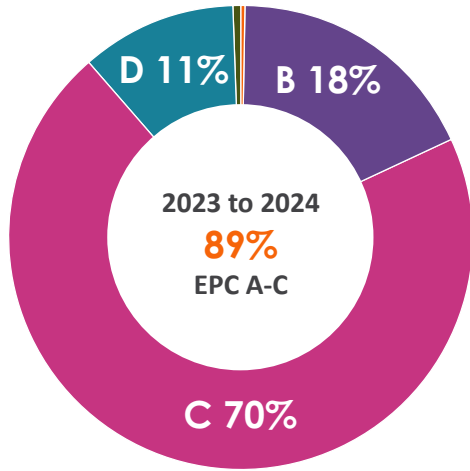


C1

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

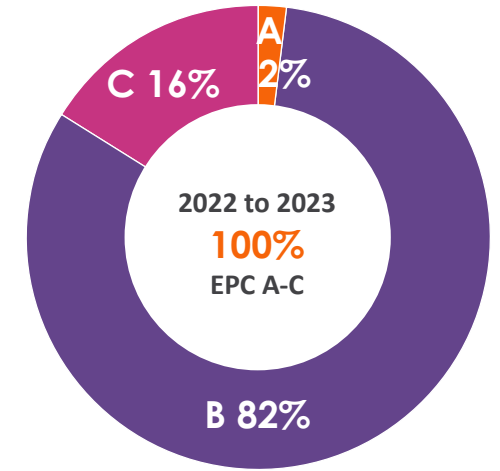
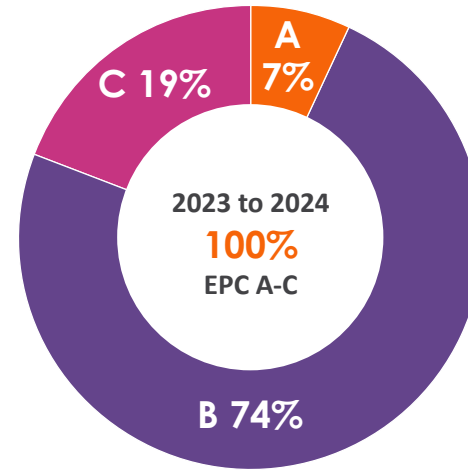
The average SAP rating of our homes as at end financial year 2023 to 2024 is

**74.29**



C2

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



■ EPC A  
 ■ EPC B  
 ■ EPC C  
 ■ EPC D  
 ■ EPC E or worse



Case study

# Customers move into our most energy efficient MMC homes

In March 2024 we started welcoming customers into their new homes at our Stockwells development of factory built affordable homes in Moreton-in-Marsh.

The 28 new homes were built in modules off-site before being transported to the Cotswold village and craned into place and are the most energy efficient homes we have ever built. All the homes are carbon zero and boast EPC-A energy ratings thanks to the solar panels, batteries and air source heat pumps installed in every home. The energy efficiency features have been part-funded by Cotswold District Council, which provided £550,000 towards the project, to make them some of the most energy efficient homes ever built in the district.

Regeneration project manager Millie Nicholls said: "We're incredibly proud of the new homes we have built at Stockwells, which utilise some of the latest technology to keep them warmer for longer while also reducing our customer's energy bills, making

them the most energy efficient homes we have ever built."

The 28 new homes have replaced 24 older properties that used to be on the site. The previous properties were built in the post-war period as a quick solution to the housing shortage at the time, but their condition had deteriorated over decades since their construction. Work started on site to demolish the properties in June 2022, before the new homes were craned into place in spring 2023.

Councillor Juliet Layton, Cabinet Member for Planning and Regulatory Services, said: "We are thrilled to celebrate the official opening of the Stockwells affordable housing site in Moreton-in-Marsh. This development not only addresses the pressing need for affordable housing in our district but also enriches the fabric of our communities. Providing sustainable

and affordable homes for our residents is a top priority and Stockwells represents a significant step forward in achieving this goal. I would like to thank our partners Bromford for their hard work."

Councillor Joe Harris, Leader of Cotswold District Council, added: "It was quite something to see these homes delivered to the site on lorries and impressive how quickly they went up. The energy efficiency of the

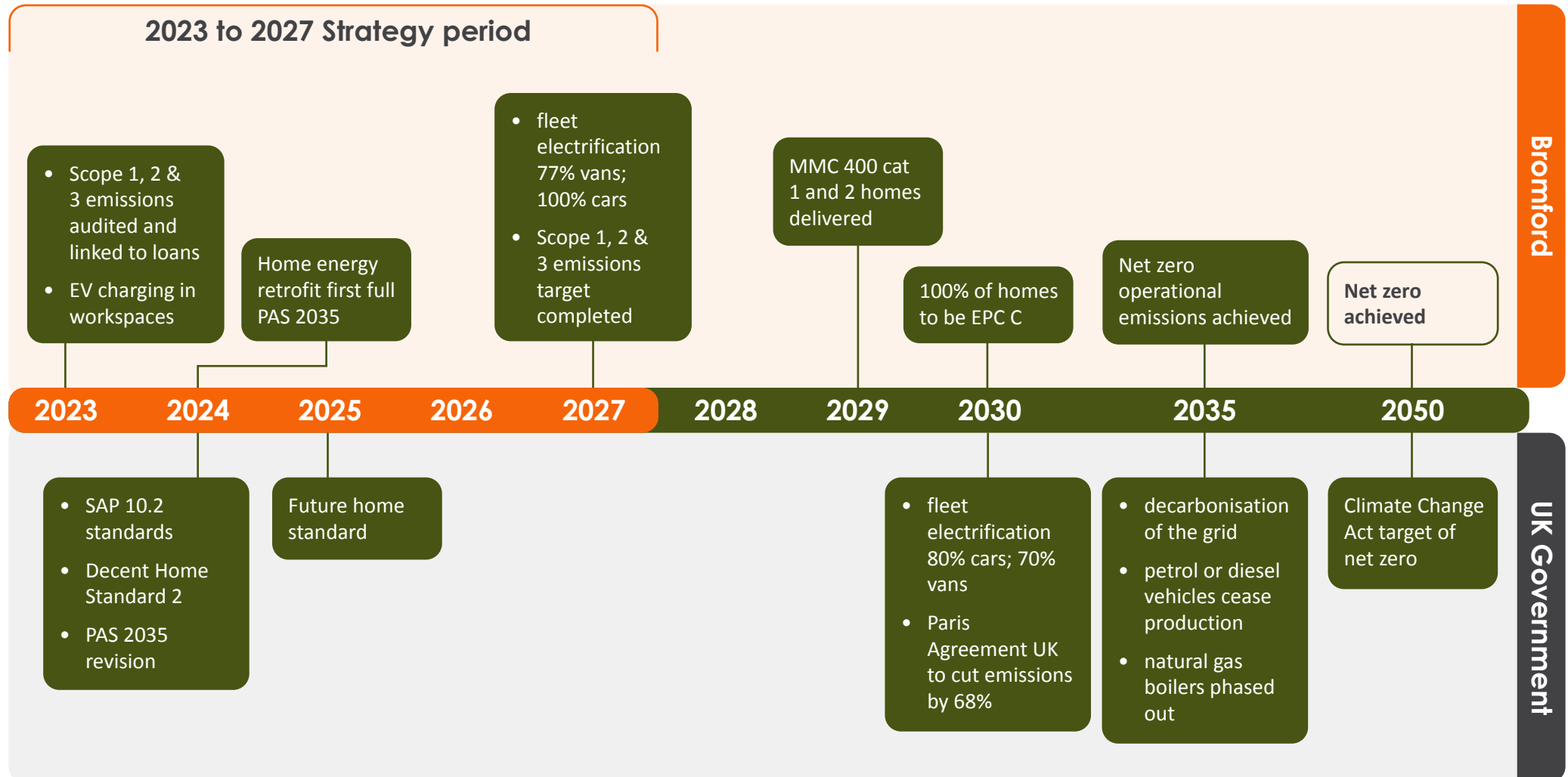
properties at Stockwells will help to reduce carbon emissions and lower utility costs for residents. We believe that by incorporating renewable energy sources and innovative technologies, we can not only combat climate change but also improve the quality of life for our residents."



C3

## Does the housing provider have a net zero target and strategy?

We have a clear delivery plan for the next four years relating to reducing the carbon output of our homes and making them warmer, more energy efficient and cheaper for our customers to heat. This target is linked to four sustainability linked loans to further drive our performance. We are on track to make close to all our homes EPC C by 2028 and alongside our delivery we are also testing and trialling future initiatives to set out a measurable pathway to net zero by 2050 and have allocated £633m in our business plan to achieve this. We also have clear plans for the decarbonisation of our fleet and operations.



C4

## What retrofit activities has the housing provider undertaken in the last 12 months in relation to its housing stock?

We successfully submitted a bid for the Social Housing Decarbonisation Fund (SHDF) Wave 2.1. This initiative aims to enhance the energy efficiency and reduce the carbon footprint of our properties and we chose 250 of our poorest-performing for inclusion in the bid. The table below notes initiatives for the year 2023 to 2024 that have been undertaken but have not yet been fully registered with Trustmark for completion (and therefore not included in Table 2).

Table 1:

SHDF Wave 2.1 Phase 1 Type	Number of homes 2023 to 2024
Solar PV installs	49
Cavity wall insulation	5
Loft insulation	53
Retrofit assessments	223



The following table highlights the retrofit activities undertaken in our homes in 2023 to 2024:

Table 2:

Type	Number of homes 2023 to 2024
Air source heat pump installation	95
External/internal wall insulation	190
Cavity wall insulation	318
Loft insulation	342
Windows	829
Doors	742

In 2023 to 2024, we demonstrated our commitment to energy efficiency by investing in the upskilling of our Home Investment colleagues. This initiative included the following achievements:

- two surveyors obtained a Level 3 qualification in Domestic Energy
- four colleagues earned a Level 3 Award in Energy Efficiency for Older and Traditional Buildings - assessment through Elmhurst
- seven colleagues attained a Level 5 Diploma in Retrofit Coordination & Risk Assessment through the Retrofit Academy

These qualifications ensure that we are not only aligned with current industry standards but are also equipped to assess our housing stock using a comprehensive, whole house, fabric-first approach to retrofitting. This approach ensures that any recommended energy efficiency measures are installed in the correct sequence and are future-proofed to mitigate against unintended consequences such as damp and mould. Our aim is to prioritise the suitability of measures while considering the original construction of homes, with the ultimate goals of improving energy efficiency, reducing the homes carbon footprint and lowering customers' energy bills.



Case study

# Retrofit project improves energy efficiency of homes and cuts customers' bills

Customers living in a Gloucestershire street are saving up to £200 a month after the completion of a retrofit project.

The nine one-bedroom bungalows and six three-bedroom houses in St Andrews, Ashleworth, all had an E energy efficiency rating making it difficult for customers to keep them warm. In fact customers had been contacting us to complain about how cold their homes were and how expensive they were to heat. The properties all had electric storage heaters and electric water heaters for their hot water.

We put a plan of works together and invited customers to a coffee morning at a local café so we could talk them through our proposals. The café would become a regular venue for site meetings throughout the duration of the project.

Work started in June 2023 and saw new external wall insulation fitted to all 15 homes, finished with new render and brick slips. The nine bungalows

all had air source heat pumps fitted, while the six houses had air source heat pumps and solar panels installed thanks to an £85,000 ECO 4 grant. In addition, we also carried out improvements to the ventilation in the homes, added new canopies and external lighting to ensure the project met the requirements of the new PAS 2035 retrofit standard. The first phase of work to the houses was completed in September 2023, with work to the bungalows completed in March 2024.

We are now monitoring the homes to ensure the work we've carried out is providing the expected improvements to both customers and the homes themselves. Initial feedback from customers is that they are using less

energy and saving up to £200 a month. The houses that had the solar panels fitted have seen their energy efficiency rating rise from an E to a B. Most importantly customers are reporting that their new heating systems are providing a huge improvement in the warmth of their homes.



C5

### Scope 1, Scope 2 and Scope 3 greenhouse gas emissions in total and on a per home basis

We have a clear delivery plan for the next four years relating to reducing the carbon output of our homes and making them warmer, more energy efficient and cheaper for our customers to heat. This target is linked to four sustainability linked loans to further drive our performance. We are on track to make all our properties EPC C by 2028 and alongside our delivery we are also testing and trialling future initiatives to set out a measurable pathway to net zero by 2050 with £633m allocated within our business plan to achieve this. We also have clear plans for the decarbonisation of our fleet and operations.

Type	2023 to 2024
Scope 1	5,644 tonnes CO2e
Scope 2	1,759 tonnes CO2e
Scope 3	83,098 tonnes CO2e
<b>Total</b>	<b>90,502 tonnes CO2e</b>

This equates to 2.29 tonnes of carbon dioxide per home\* we own and an intensity of 30.42 kgCO2/m2. We have moved beyond just reporting on a per home basis to a carbon intensity basis, by calculating the kg CO2/ m2 of our homes. This measure removes any element of size disparity across our stock by treating flats, bungalows and different house types all equally, but instead moves us to a much clearer indicator of carbon emissions across all our stock equally. We believe this is a more transparent way of reporting carbon emissions for housing stock.

There is still much work to do to standardise Scope 3 reporting across the sector. We are not currently including supply chain emissions or embodied carbon in our reporting.

\*homes that we have decent homes responsibility for

C6

### How has the housing provider mapped and assessed the climate risks to its homes and supply chain, such as increased flood, drought and overheating risks?

We commissioned a desktop study into the risk of overheating, using risk factors overlaid with property information. This showed 2,504 of our homes are in the medium to high risk category (3-6 risk factors) the remainder classified as low risk (1-2 risk factors). The properties with the highest risk were already earmarked for disposal, as they scored poorly on several key criteria.

As this was a desktop study, we are still in the process of validating the data by asking open questions about thermal comfort to those customers living in those homes that have been identified as at risk during our annual customer surveys. Customers with known vulnerabilities are being prioritised and outcomes are being followed up by our customer experience colleagues.

We are in the process of plotting all our homes against the Environment Agency flood maps and will be working through mitigation measures with customers when this is complete.



Case study

# Supporting nature for the benefit of all

Development and nature are often in conflict, but we do try to limit our impact and make good where we can, understanding the value of natural capital to society and the economy.

In 2023 the Government published guidance to developers in a document called Enabling a Natural Capital Approach, which states:

“Natural capital forms part of our natural wealth, alongside traditional assets such as infrastructure, skills, buildings and technology. This framing helps us to account for its contribution to the economy and the range of social and economic benefits and opportunities that come from investment in those assets. Pressures on nature result in costs to the economy.”

We’ve been taking this guidance into account across our sites, like at Village Road in Cheltenham. Our in-house construction team started work on this development of 71 homes in autumn 2023. The four-acre site is the former home of an equipment factory which

had been empty since the site closed in 2020. During that time, wildlife had started to return to the site and we are keen to encourage them to stay once our development is completed.

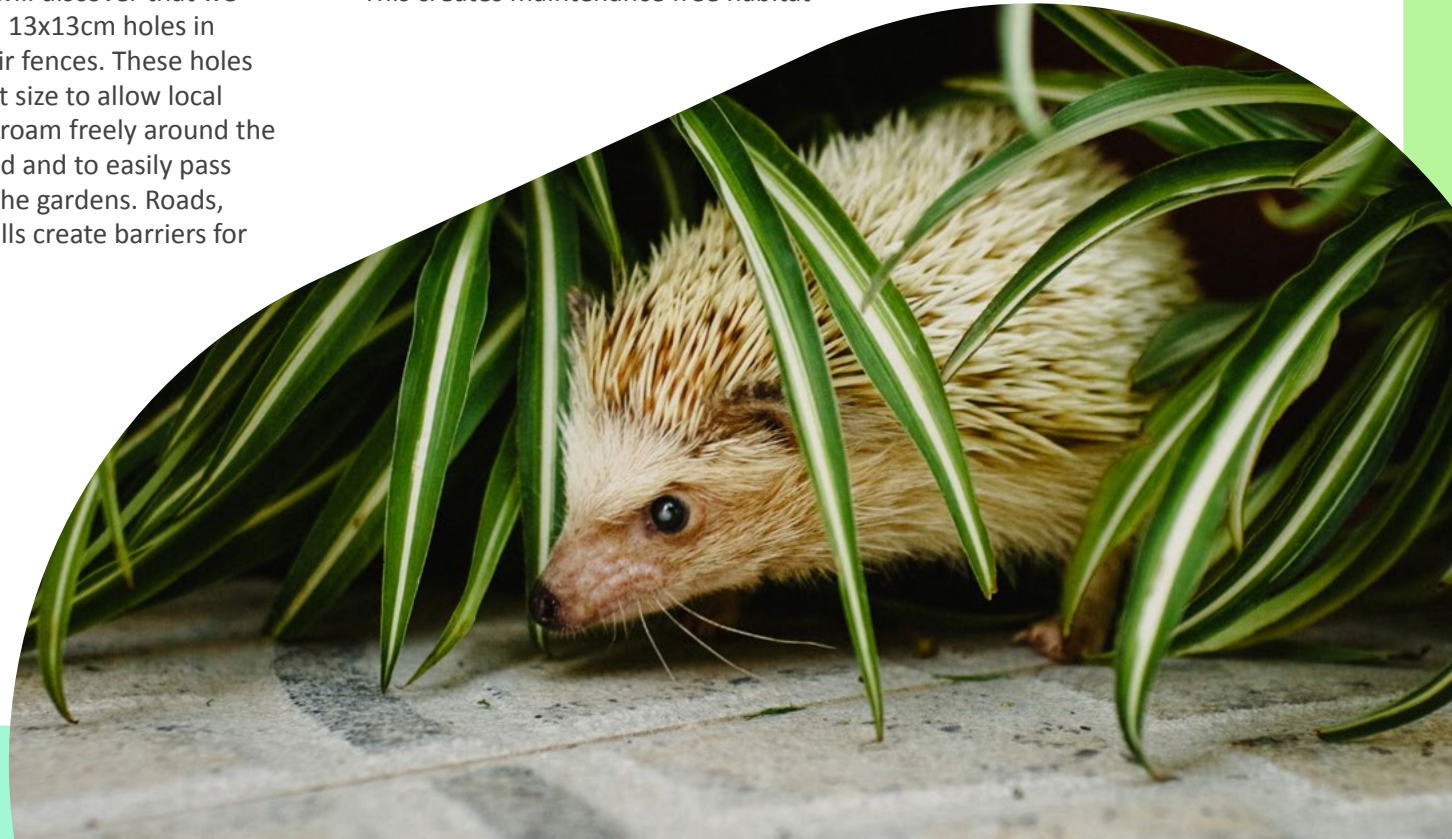
The first homes on the site are due to be handed over to new customers in autumn 2024 and when customers move in they will discover that we have cut small 13x13cm holes in bottom of their fences. These holes are the perfect size to allow local hedgehogs to roam freely around the neighbourhood and to easily pass in and out of the gardens. Roads, fences and walls create barriers for

hedgehogs so creating these holes will make it easier for them to access vital networks of food and shelter across the site and the neighbouring area.

We have also been building our homes with both bird and bee brick houses as well as bat boxes designed to fit in wall cavities and match brick dimensions. This creates maintenance free habitat

for wildlife whilst also not causing any disturbance to occupants in their homes.

We are also adding sparrow terraces and swift boxes to our homes, out of reach of predators and away from suntraps, to allow local birds to nest without disturbance.



C7

**Does the housing provider have a strategy to enhance green space and promote biodiversity on or near homes?**

We have undertaken a full review of our landscaping provision during 2023 to 2024 through the lens required for the consumer standards. Looking forward to the year ahead we have allocated funds to specifically enhance the green spaces around a number of our neighbourhoods. We will measure the impact of this work against our Home Standard for improvements in customer satisfaction, wellbeing and pride in their homes.

We have carried out all the necessary ecological surveys and will build in eco-friendly management systems to complement the wildlife at our construction sites at Douglas House, Delavale Road and Rawnsley Road. Our in-house construction team started construction work on all these sites during the past year.

At Douglas House we cleared up an area of the adjacent school field when we put through the storm drainage outfall. There was an old septic tank on site which had been servicing some off-site homes. This had overflowed and polluted part of the school field. We removed the polluted soils and re-seeded the area, thus recovering the useable green space for the school. The site was a brownfield site, where we've demolished the old industrial buildings. The landscaping we're putting back in includes hedging and trees along with the normal amenity spaces for the plots and have left the existing small areas of public open space. We are also using rain gardens for some of the homes we are constructing.

Biodiversity is a regular topic at our Sustainability Task Force group and we are committed to providing the necessary biodiversity requirements, including working with our S106 partners to understand their approach to biodiversity net gain (BNG) as we recognise the importance of our impact on the environment and place to our customers.

At our Pearl Lane Pilot BNG site, we have an outline design that has been worked up with partners at Natural Networks and Worcestershire Wildlife Trust. Ultimately, the aim of this project is to open a culvert, alleviate flooding issues and enhance biodiversity, while creating an inviting open space of 0.94 hectares for the public to enjoy. Our funding application has been submitted to Natural Networks and Worcestershire County Council and the local authorities have also pledged to provide some funding.

C8

**Does the housing provider have a strategy to identify, manage and reduce pollutants that could cause material harm?**

We have a plan to manage diesel and paint pollutants. We ensure diesel and fuel spills on construction sites are mitigated by having triple-walled tanks and bunded areas to eliminate run off.

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, while all empty tins are sent back to Dulux to be recycled.

Our stock condition surveyors are now identifying lead water supply pipework when they are visiting our homes to enrich our data with a view to creating a forward programme for replacement with our contracted partner.

C9

**Does the housing provider have a strategy to use or increase the use of responsibly sourced materials for all building and repairs works?**

Our construction team is working towards a strategy to increase the use of responsibly sourced materials for all building works in line with current building regulations.

We try to engage and collaborate with suppliers who prioritise sustainability and ethical sourcing, whether this is done by how the material is manufactured or by how far it travels to get to site.

Performance is measured through tracking the percentage of responsibly sourced materials used in each project and monitoring adherence to sustainability standards.

We ask our service delivery suppliers how they resource materials as part of our procurement process and consider their response to this as part of the tender process.

**C10**

**Does the housing provider have a strategy for waste management incorporating building materials?**

We have been developing our waste management strategy over the past year with the aim of significantly reducing the waste that currently goes to landfill with a target of zero. We are entering into a new contract with SUEZ for part of our operations who manage waste in a sustainable manner that ensures nothing goes to landfill. This means we can reduce the number of independent suppliers we use which will help us to better understand the data around the waste that we are producing and how we can reduce it. A working group of colleagues from across the business meets regularly to discuss waste management and how we can create synergies. Our new build schemes have a minimum of two skips on every site for mixed and plasterboard waste. The mixed is separated at the recycling centre and a report is returned to us while the plasterboard is recycled and reused.

**C11**

**Does the housing provider have a strategy for water management?**

We use water saving devices as part of our standard specifications, to include taps, showers and toilet flushes and are working to streamline our water saving activities across all our operations to ensure a consistent approach.

We own and manage 40 sewage treatment plants and have an active service and maintenance regime in place for these plants. This year we contracted with Severn Trent Services to closely monitor and proactively maintain our sewage treatment plants and provide an emergency response to any reported leaks to Bromford-owned communal water supply pipework. We are also working with Severn Trent Services to identify and replace existing lead water supply pipework in all our homes.

**C12**

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

	Bromford weekly rent (£)		Local housing allowance weekly (£)		Difference		Private rental sector weekly (£)	Difference
	2023/24	2022/23	2023/24	2022/23	2023/24	2022/23	2023/24	2023/24
Cotswolds	121	111	167	145	27%	23%	234	48%
Lichfield	104	97	129	129	19%	24%	192	46%
South Gloucestershire	110	102	188	192	41%	47%	252	56%
Tewkesbury	109	103	158	169	31%	39%	189	42%
<b>Big four area average</b>	<b>111</b>	<b>103</b>	<b>160</b>	<b>159</b>	<b>30%</b>	<b>35%</b>	<b>217</b>	<b>48%</b>

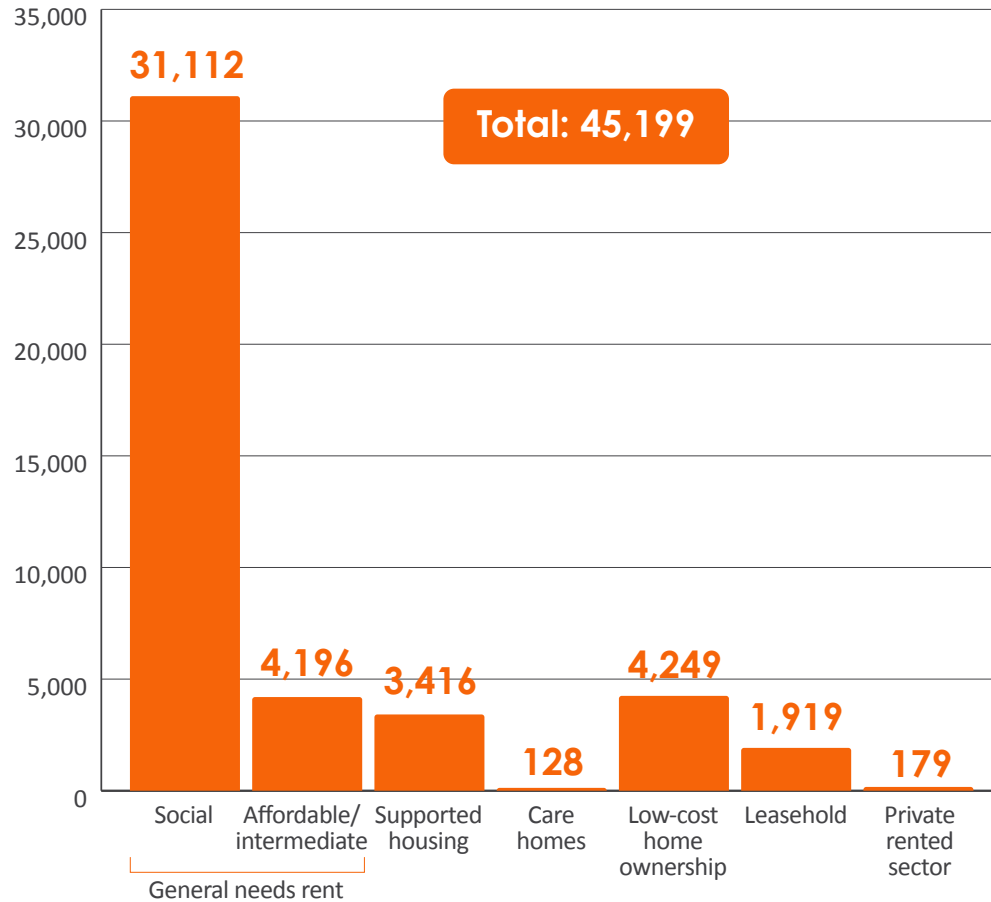
The Cotswolds, Lichfield, South Gloucestershire and Tewkesbury local authority areas are our big four councils which represent more than 50% of our total housing stock.

**C13**

**Share and number, of existing homes (owned and/or managed) completed before the last financial year**

Allocated to:

- general needs (social rent)
- intermediate rent
- affordable rent
- supported housing
- housing for older people
- low-cost home ownership
- care homes
- private rented sector
- other

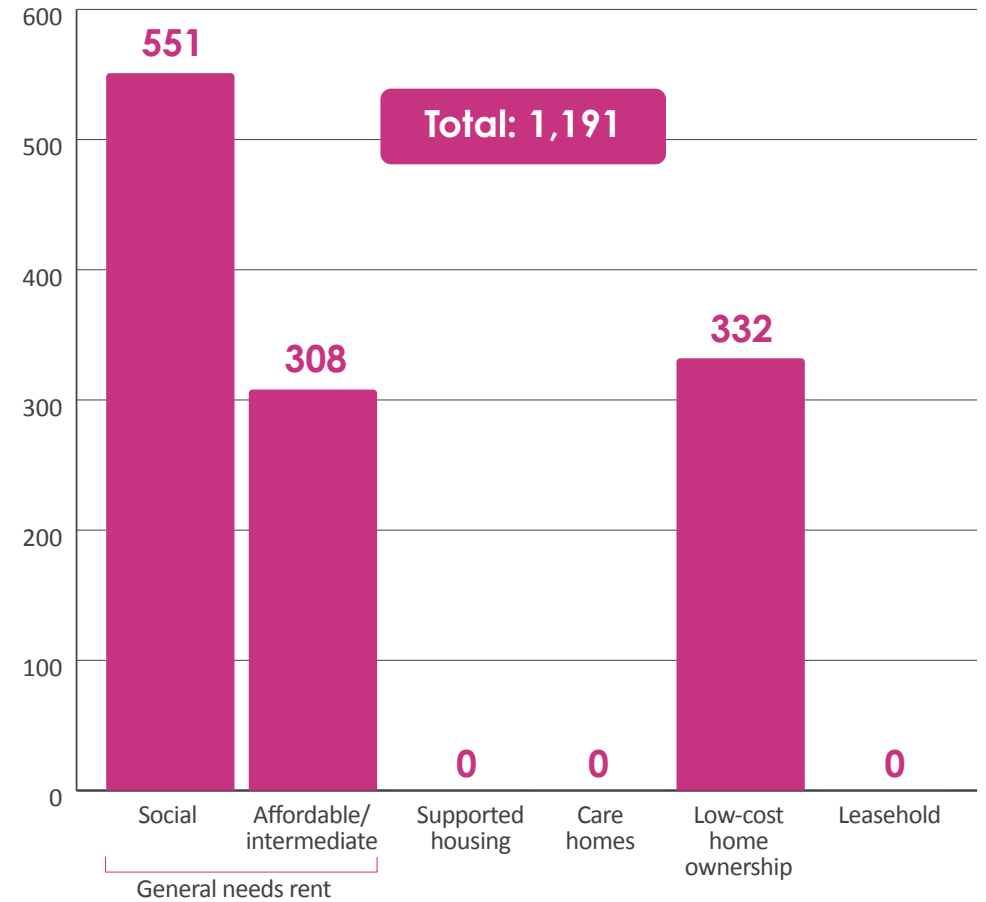


**C14**

**Share and number, of new homes (owned and/or managed) that were completed in the last financial year**

Allocated to:

- general needs (social rent)
- intermediate rent
- affordable rent
- supported housing
- housing for older people
- low-cost home ownership
- care homes
- private rented sector
- other



Case study

# Tailored support helps customer avoid homelessness

Tackling homelessness isn't just about providing new homes for homeless families, it's about ensuring our existing customers don't end up losing their homes as well.

One of our customers in South Gloucestershire had refused to engage with any Bromford colleagues for more than six months, until finally in August 2023 they agreed to speak to their neighbourhood coach. It quickly transpired the customer was facing some issues. Although they were in work, they had suffered a lot of bereavement within their family. Their sons had moved out which had left the customer subject to the bedroom tax, which had contributed to her rent arrears climbing to £4,500, which was taking its toll on her physical and mental health.

After speaking to the customer, our neighbourhood coach completed a social care referral for her as well as a referral into the Gold Fund at South Gloucestershire Council to ask it to consider paying off a large sum of rent arrears, that would allow the customer

to apply for properties that met her needs and would avoid her being affected by the bedroom tax.

The customer was supported to complete their application on the council's choice-based lettings system, their PIP application and a limited capability assessment for their Universal Credit account. They also completed a debt relief order to help support them with their other debts.

Just a few weeks after completing their choice-based lettings application, they were successful in securing another Bromford property, a one-bedroom detached bungalow not far from their previous home. They moved into their new home in autumn 2023 and are now completely settled in.

Their Gold Fund application was successful and paid off £4,500 of their arrears, while their income was maximised through their successful PIP application. They are now fully engaging with Bromford and other services who have worked together to secure the best possible outcome for the customer.

Shortly after moving into their new home, the customer messaged their neighbourhood coach to say: "I just wanted to say thank you for being amazing. You have no idea how much you have changed my life. You have gone above and beyond to help me and I can't thank you enough."



C15

### How is the housing provider trying to reduce the effect of high energy costs on its residents?

Our cost of living working group continues to support customers who are struggling with rising prices for food, fuel and utilities. The group includes a range of colleagues from across the business and is chaired by our head of homelessness and community investment. It reports into our Customer Forum and Sustainability Group and has visibility at executive level.

Neighbourhood coaches discuss the impact of cost of living with our customers in their annual customer conversations, of which we recorded 36,620 between 1 April 2023 and 31 March 2024. As a result, we have provided customers with food bank vouchers, referred them to speak to our income management advisors and provided referrals to various external partners for Household Support Funds, Warmer Discount Schemes and other resources.

We have partnered with HACT to enable eligible customers in fuel poverty to gain access to their Fuel Fund, which has been a huge success.

	Households	Number of vouchers	Value given to customer
Gloucestershire	11	20	£980
West of England	19	98	£4,802
Central	26	128	£6,272
Staffordshire and the Marches	23	106	£5,194
<b>Total</b>	<b>79</b>	<b>352</b>	<b>£17,248</b>

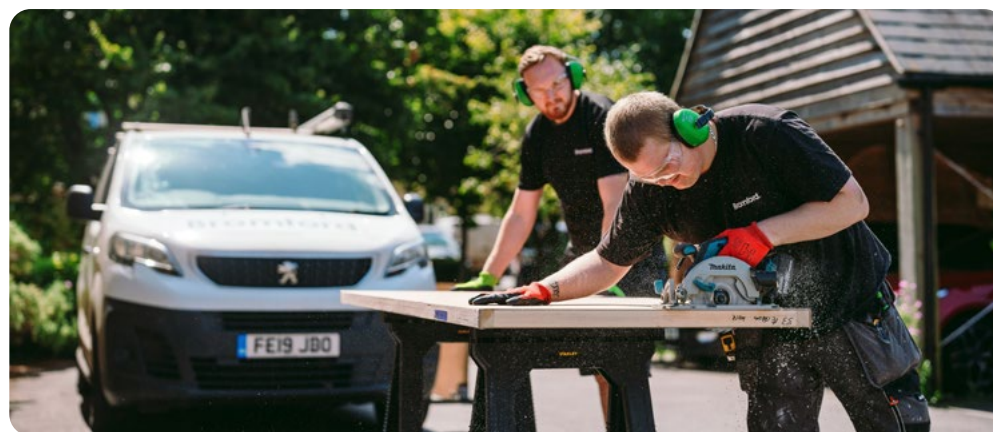
We are now retaining more than 70% of carpets and flooring in our existing homes when they become vacant so that incoming customers can benefit from them. Through a pilot with Uplyfted we have also carpeted a further 65 homes using recycled carpet tiles. In addition, we have accelerated our programme of installing showers in homes which do not currently have them and are supporting customers to reduce their fuel bills.

We have also had a big focus this year on our hard-to-treat properties and are forming a plan to make them more energy efficient, warmer and cheaper for our customers to heat. We have already undertaken a lot of work in this area as demonstrated by our EPC C figures and will be executing this plan over the period of the Bromford Strategy to 2028.

C16

### How does the housing provider provide security of tenure for residents?

Customers moving to a Bromford home will either be offered a starter to assured tenancy, which will be converted to a lifetime tenancy upon satisfactory completion of the first 12 months of tenancy, or an assured tenancy. Assured tenancies offer a lifetime tenure to our customers enabling our customers to thrive in their home, for their lifetime should they wish to. Bromford no longer offer fixed-term tenancies which offer less security than assured tenancies.



C17

### Describe the condition of the housing provider's portfolio

100%

Of homes for which all required gas safety checks have been carried out.

100%

Of homes for which all required fire risk assessments have been carried out.

100%

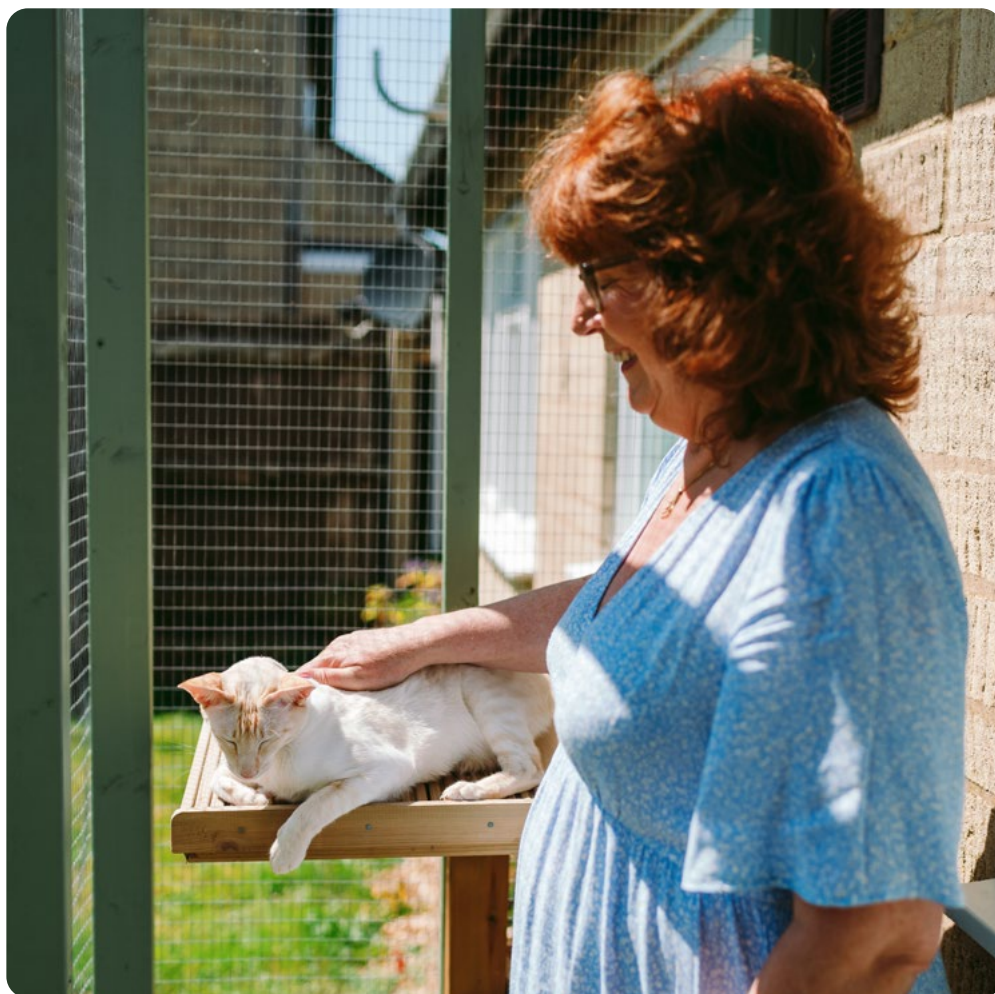
Of homes for which all required electrical safety checks have been carried out.



**C18**

**What percentage of homes meet the national housing quality standard?**

**99.98%** of our homes meet the Decent Homes Standard. There were six active HHSRS failures as at end of the 2023 to 2024 year. These were three cases of crowding and space (HHSRS Hazard 11), two cases of damp and mould (HHSRS Hazard 1) and one personal hygiene, sanitation and drainage (HHSRS Hazard 17). All of these cases have since been worked through and resolved.



**C19**

**How do you manage and mitigate the risk of damp and mould for your residents?**

Issues of condensation, damp and mould (CDM) are a priority at Bromford and established a dedicated CDM team in 2022 to focus specifically on CDM and disrepair. This team not only ensures that cases are effectively triaged, with clear resolutions put in place, but also take learnings from the data and insight that we receive from each case.

In early 2023, we installed 50 environmental sensors into our homes as a trial which has provided some good learning for us to reflect on. The majority of customers welcomed the deployment of the sensors into their homes and proactively worked with us where we continued to provide feedback when and where necessary. The data collected has enabled neighbourhood coaches to engage more effectively with customers, providing tailored advice on areas such as ventilating rooms, negating poor air quality and high humidity. Our neighbourhood coaches discuss ventilation and heating issues during each customer’s annual review and feedback any concerns into the business.

Where relevant these interactions have led to improvements in both customers health and the avoidance of high humidity in homes which is often a cause of mould. The sensor dashboard management continues to be monitored and enables the flexibility to deploy sensors where we encounter any new complex cases.

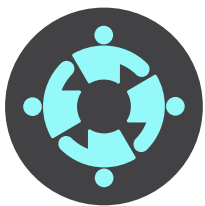
We provide general information to our customers on our website regarding heating their home efficiently. We also sent out a condensation, damp and mould information leaflet to customers in late spring 2023.

## What are the results of the housing provider's most recent tenant satisfaction survey?

Customer satisfaction and advocacy at Bromford continues to be measured through our feedback programme via nine transactional surveys (after an event or experience) asking about repairs, complaints, anti-social behaviour, neighbourhood coaching and more. Survey results are analysed every month to help us understand where we do things well and where we need to improve. In September, we successfully launched our close the loop process – meaning any time a customer is dissatisfied with our services or tells us there are unresolved issues, a dedicated colleague contacts them to resolve things. Through our close the loop reporting, we’re able to track the root cause reasons for dissatisfaction and this supports our work on improving services for customers.

Our customer advocacy at 31 March 2024 was 91%, which is an increase of 8% from the prior year. In addition to the feedback we collect from customers, we continue to use our management information to support an evidence-based approach to insight – sourcing data from customer services, complaints and repairs as well as other channels to give a broad and transparent view of the voice of the customer which is shared through our regular report. Benchmarking of our performance is completed with HouseMark monthly.

The launch of our new Bromford Strategy in April 2023 gave clarity to our purpose – we invest in homes and relationships so people can thrive. As part of this, it was important for us to understand what we mean by thrive and be able to define this with a set of key metrics that focus not just on the individual customer, but overarch everything we’re trying to achieve. In doing this, we developed our new customer thrive index, which focuses on four key themes:



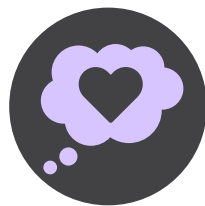
Place shaping and having positive impact on communities



A home to feel proud of and meets customers’ needs



Customers having financial wellbeing



Customers having positive mental wellbeing

Insight for our customer thrive index is captured through our annual perception survey via telephone conversations and asks customers how they feel about their home, the place where they live and their community, as well as their mental, financial and overall wellbeing. The survey seeks to draw out both quantitative and qualitative insight through deeper conversations which we then analyse to help us better understand how our customers are feeling overall, rather than just how they feel about us as a landlord. We correlate this information with the rich conversations that our neighbourhood coaches are having with our customers every day to draw themes for areas of focus and improvement.

Our customer thrive index is an enabler for our strategic initiative of place-based working. As part of our discovery work for this, we have utilised spatial mapping and open-source data such as the co-op wellbeing index, to better understand community wellbeing and customer satisfaction across our places. The insight we’re learning from the discovery phase will inform our future work on place.

In April 2023 we started collecting data for the new TSMs. We have taken a census approach to this survey and through our annual customer review conversations, over 10,800 customers have taken part and given their views.

Positively, 85% of customers said they were satisfied with the overall services we provided to them (rental customers: 85%, home ownership customers: 74%). This performance places us in upper quartile when compared to sector benchmarking provided by HouseMark.



When reviewing our performance more closely, customers scored positively for satisfaction that their home is safe (91%), this is noted from HouseMark as one of the highest scorings TSMs and insight analysis shows a clear relationship between a perception of safety and decent homes compliance with overall satisfaction. Our constant focus on ensuring all our homes are safe and compliant saw us achieve 100% compliance for all building safety TSMs. This strong performance has placed us among the top performers in the sector, achieving top deciles.

Our other high performing areas relate to customers agreeing we treat them fairly and with respect (91%) but whilst our score is positive, themes from comments suggest we can do more to improve our communication as well as how we treat customers as individuals, with an emphasis on tailoring our services and approach to better understand and meet customers' individual needs. This will be an area of focus for us in the coming months.

Our neighbourhood management TSMs including satisfaction with ASB handling (70%) and making positive contributions to neighbourhoods (75%) also achieved upper quartile performance and with our strong customer relationships and neighbourhood coaching approach this can be attributed to us achieving higher levels of overall satisfaction. HouseMark notes the sector has seen a reduction in the number of ASB cases opened averaging 38.6 per 1,000 homes, with Bromford recording 24.6 cases per 1,000 homes.

76% of customers told us they were satisfied with the cleanliness and maintenance of communal areas. This will become an area of regulatory focus with new consumer standards' specific expectations for communal areas and shared spaces and our comment themes suggest we have work to do in this area to improve – more specifically focusing on cleaning and landscaping as the key areas of dissatisfaction. These themes are more prevalent for our home ownership customers with satisfaction levels reducing to 67%. In response to this feedback, we are making investments in our landscaping service, with more colleagues delivering services and new machinery to improve the quality of work.

**85%**

satisfaction with overall services

**91%**

said their home is safe

**100%**

compliance for building safety

**91%**

said we treat them fairly and with respect

**70%**

satisfaction with ASB handling



C21

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

Our neighbourhood coaches continue to engage with customers every day and build strong relationships based on trust with open and honest conversations happening at each interaction. This year we have strengthened our annual customer review approach and included the regulated tenant satisfaction measures (TSM) collection as part of these conversations, giving thousands of customers the opportunity to have their voices heard. By the end of March 2024 we had spoken to 36,620 customers on an individual basis about our services, their home and where they live with more than 10,800 customers actively taking part in our TSM survey.

As part of these annual conversations we invite every household to have a conversation with one of our colleagues so we can understand their aspirations and hopes for the future as well as their experience and views on our services. In the past year, we've launched our new customer engagement and empowerment plan which seeks to put customers at the heart of what we do. We wanted to empower and enable customers to get involved in an easy way that suits them. We've committed to being inclusive and removing any barriers to customers getting involved and being able to hold us to account and we've been working to grow our network of customers to provide us with an honest view of their world and tell us about what's important to them, to help us shape improvements.

All our combined insight is brought together in our quarterly Voice of the Customer Report which seeks to understand information from a broad range of channels such as customer feedback, complaints, customer services and social media to name a few. Leaders from across the business, our customer and communities influence network (CCIN) and locality influence networks (LINs) use the report to identify what is of most value to customers and this enables us to draw conclusions about where our resources and service reviews should be prioritised.

We've enhanced the work of our customer-led CCIN who use insight from our Voice of the Customer Report to identify areas for further scrutiny and recommend appropriate engagement activities. CCIN is an independent, positive, constructive and purposeful group that has a clear route to our boardroom as part of our governance framework. Our CCIN continues to have access to independent training and support from organisations such as the tenant participatory advisory service (TPAS).

Going forwards we plan to tailor our engagement opportunities to what is important to each community and we'll be using our LINs to consult with customers at a local level to inform our approach. More recently, we have worked collaboratively with some of our involved customers to introduce them to our external investors and credit rating agencies and as a result, we have successfully linked our customer satisfaction measure, known as customer advocacy to one of our sustainability linked loans. Our customer advocacy measure is tracked through our Qualtrics system with performance, insight and customer outcomes reported monthly. Lastly, our neighbourhoods and community teams continue to build local relationships with stakeholders, partnership organisations as well as MPs and councillors to address any issues and collaborate locally.

Our shared ownership and leasehold customers have access to our Virtual Homeowners' Panel which covers topics based on customer insight highlighting areas that need to be reviewed and improved.



**C22**

**In the last 12 months, in how many complaints has the national Ombudsman determined that maladministration took place?**

During the 12 months to March 2024 we received four findings of maladministrations and five of severe maladministrations. Our compliance with the complaint handling code has continued to be scrutinised and our adherence to the timescales laid out by the Ombudsman have been an additional area of scrutiny.

In the last 12 months the main area of complaints have continued to be around our ability to respond in a timely way when our customers raise concerns about our service delivery for repairs and condensation, damp and mould (CDM) issues. Due to the continued media pressure around CDM we experienced a significant increase in referrals to our specialist team which at times has challenged our capacity to respond. We have a comprehensive plan and new policy going through our governance processes to ensure there is a sustainable approach to this significant area of the business for the future. These plans have been shared with the Housing Ombudsman.

The five severe maladministration judgements from the Ombudsman have highlighted some key areas for improvement across Bromford. These key areas are all logged as part of a continuous improvement plan and reported through our Customer Forum for accountability and governance purposes. These are:

- 1** An increased awareness and empathy for our customers’ individual needs and vulnerabilities and our ability to demonstrate how we have taken these into account when we are working with our customers to ensure they receive the best service possible from us.

---

- 2** Our depth and breadth of record keeping requires further enhancement and is a key learning point shared with our new systems upgrade.

---

- 3** We need to utilise more of the technology available to ensure we are working with our customers more effectively.

---

- 4** Our CDM processes and activity has taken the lessons learnt and adapted the newly emerging service standards, process and policy to reflect the Housing Ombudsman’s guidance.

**C23**

**What are the key support services that the housing provider offers to its residents?**

Our neighbourhood coaching model supports our customers to thrive and fulfil their aspirations. We are committed to having small patches of between 200 and 250 homes to ensure customers can build a great relationship with their coach. Our neighbourhood coaches focus on what people can do, what they can bring to their community and how they can make the most of their talents. Being at the heart of the community, neighbourhood coaches connect customers with local services, community groups, local clubs, voluntary organisations and each other to help build thriving neighbourhoods and resilient individuals. Our approach isn't about doing things for people, it's about empowering them to get what they want out of life. We support customers to manage their tenancy and ensure all our customers will have an annual customer conversation with their neighbourhood coach, which is tailored to segments of our customer base and is carried out in our customers homes and covers many areas of support from tenancy related matters through to safety, which allows time to work through any challenges and unlock their potential. Additionally our income management advisors also conduct home visits to support any of our customers who are in arrears. The advisors provide support about benefits available and signpost customers to external agencies. We have a dedicated income telephone line and email address and a strong external network that we can call on for assistance.

Whilst the core part of our neighbourhood coaching approach is about local, face to face relationships with our customers, we continue to embrace a wider channel offer. During the 2023 to 2024 financial year we worked with Alertacall to upgrade the Housing Proactive service for existing customers and install c.1,500 digital devices for new customers. We recognise that digital engagement and communication is imperative for many of our customers and the Ok Each Day service offers a daily check in for those who may have additional needs or vulnerability. Just under 3,000 of our customers now use the Housing Proactive service.

**C24**

**Describe the housing provider's community investment activities and how the housing provider is contributing to positive neighbourhood outcomes for the communities in which its homes are located.**

We are continuing our journey to a focus on the wider place our customers live in and what impact we can have to enable the area and our customers to thrive. We are working to define the areas where we will pilot our new approach to place-based working with a view of the pilots going live in summer and autumn 2024. These pilots will help shape where we are designing services we deliver with very local engagement from customers, colleagues and stakeholders. In tandem we are also building deeper, leading and influencing relationships to ensure these local plans get the voice they need to be deliverable.

This will allow us to understand employment trends, educational performance and health provision in the places we invest and the impact they have on those communities.

An example of how this approach can deliver change is the investment in an extension to an existing community that we will be delivering. The people living in the new homes will be knitting into the infrastructure and existing communities that are already established. Our customers will call this place home for generations and as such our focus for place design moves beyond the creation of new homes, to the creation of a thriving integrated community for decades. The ability of the place to thrive for generations depends on how the stakeholders lead, influence and improve the social infrastructure.

With this approach the social value we can help create goes far beyond the jobs and economic group new homes can deliver. When we apply this approach at scale the effect is amplified bringing our significant resources together to help current and future customers and colleagues thrive.

**C25**

**Is the housing provider registered with the national regulator of social housing?**

Yes.

**C26**

**What is the housing provider's most recent regulatory grading/status?**

G1/V1.

**C27**

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

The registered providers in the Bromford Housing Group have all adopted the UK Corporate Governance Code 2018.

**C28**

**Is the housing provider a Not-For-Profit?**

Yes.

Case study

# Mental health training empowers colleagues to support customers

The cost of living crisis isn't just putting a strain on household wallets, it's having a serious impact on people's wellbeing and mental health and in some instances resulting in self-harm.

Over the past year colleagues have reported increased concerns about the mental health of our customers. Last summer we ran a session giving colleagues a safe space to talk about issues their customers were experiencing, the impact it was having on themselves and how we could provide more support.

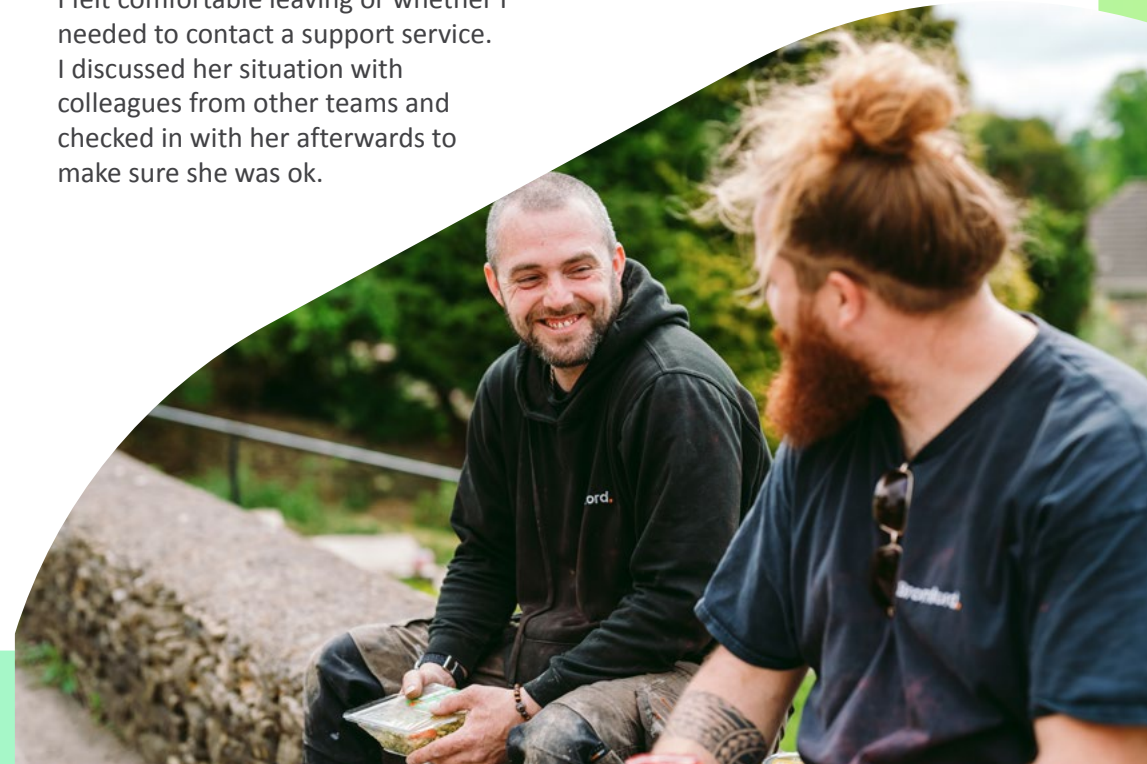
Thanks to savings made through our sustainability linked loans, we brought in Grassroots Suicide Prevention, a nationwide organisation which empowers people to save lives through education, to run training sessions with colleagues. We ran different sessions for colleagues who have an ongoing relationship with our customers, such as our neighbourhood coaches and those who don't have that relationship but do visit customers' homes.

The session for neighbourhood coaches provided them with an interactive and emotionally engaging experience that encouraged them to empathise with a person having thoughts of suicide. The other course gave learners the skills needed to identify someone who may be thinking about suicide through tutor-led role-play, group work and audio-visual presentations.

HR business partner Tuesday Wilmott said: "This training has given colleagues the skills and confidence to spot signs when a customer may be in distress or struggling with their mental health and to signpost them to the most appropriate support. We've asked everyone who attended to share the knowledge and experience they gained from these sessions with their colleagues so that we can help support as many customers as possible who may be struggling with their mental health."

Kay Ross, income management advisor said: "I've previously had contact with a customer who was talking about killing herself during a phone call and subsequent visit. While I was visiting the customer I managed to speak to her neighbourhood coach, who was very supportive and gave me advice, including asking the customer whether they had a plan. I felt the need to stay and talk with her and had to decide if I felt comfortable leaving or whether I needed to contact a support service. I discussed her situation with colleagues from other teams and checked in with her afterwards to make sure she was ok."

"When people talk about not wanting to go on you have to treat it seriously and have to use your knowledge and experience to support them, which is why training like this course is so important. It allowed me to revisit that scenario and assess my actions which reassured me that the steps I took were the right ones and that I would know what to do if faced with a similar situation in the future."



**C29**

**Explain how the housing provider’s board manages ESG risks**

We have a risk management process in place through which our principal risks and related controls including ESG are identified, assessed and managed. Our board has overall responsibility for setting our risk appetite and ensuring there is an effective risk management process in place. Applying the principles of risk management effectively allows us to create value by enabling us to take informed decisions whilst protecting value by reducing the uncertainty of achieving our strategy.

We think of risk as those things that could prevent us from achieving our strategic goals. Our approach to risk management is designed to enable the business to deliver our strategic goals while managing the inherent uncertainty that can manifest itself as both opportunities and threats to those outcomes. The board defines clear statements and tolerances that set out the type and amount of risk we are prepared to take as we deliver our strategy. Regular reporting to our board highlights any movement in the assessment of key risks.

We manage our ESG risks through governance oversight at our monthly sustainability group meeting which is supported by a working task force group which brings together a collaborative cohort of employees from across the business to drive innovation and change and discuss the ESG challenges faced. Our sustainability group feeds into our Investment Forum and escalation is upwards into our executive team and Board. The chief finance officer is the accountable chief officer for ESG and we have a dedicated ESG director, the director of strategic property planning, supported by a sustainability team to help manage ESG risks.

**C30**

**Has the housing provider been subject to any adverse regulatory findings in the last 12 months**

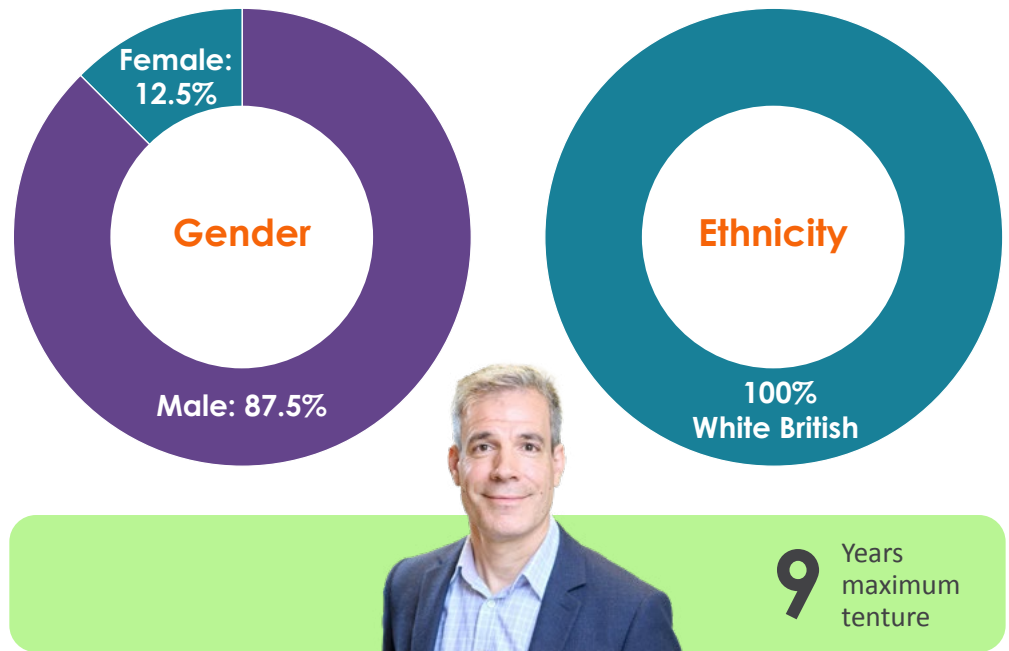
No, there has been no enforcement action from the Regulator of Social Housing, Information Commissioner’s Office, Health and Safety Executive or in areas of bribery and anti-money laundering.

**C31**

**How does the housing provider ensure it gets input from a diverse range of people, into the governance processes?**

Each month the executive and board receive details of the feedback from customers over the past month. In addition they also receive the detailed complaints report which sets out, alongside details of the number of complaints received, the themes that are emerging and the learning points. The Chair of the CCIN, Dame Sandra Horley, is a non-executive director and also provides an update on the discussions and issues raised at CCIN meetings. This information informs decision making about current operational issues and strategy.

The non-executive directors recruitment and succession planning framework sets out the board’s commitment to creating a board with as diverse a membership as possible alongside the collective skills, knowledge and experience necessary to govern effectively. The Equality Diversity and Inclusion Policy and Recruitment Policy set the framework for ensuring that Bromford has a fair and equitable recruitment and selection process and creates a diverse workforce reflective of our customers and the communities we serve.





**C32**

### What % of the housing provider's board and senior management team have turned over in the last two years?

There have been no changes to the board in 2023 to 2024 (0% turnover). During 2022 to 2023 two board members resigned and one board member was appointed. The number of board members also reduced from nine to eight, representing a turnover of 23.5%.

During 2023 to 2024 one member of the executive left and one executive member was appointed representing a turnover of 14%. In 2022 to 2023 one member of the executive team left and one member was appointed, representing a turnover of 14%.

**C33**

### Number of board members on the housing provider's audit committee with recent and relevant financial experience.

Our Audit and Risk Committee comprises two NED's. 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.

**C34**

### What % of the housing provider's board are non-executive directors?

There are currently eight members of the board; six non-executive directors and two executive members. The proportion of non-executive directors is 75%.

**C35**

### Has a succession plan been provided to the housing provider's board in the last 12 months?

It was agreed in 2023 to 2024 that the update to the current succession plan take place after the external board effectiveness review. This work is ongoing.

**C36**

### For how many years has the housing provider's current external audit partner been responsible for auditing the accounts?

Four years. An assessment of external audit is undertaken each year and re-appointment approved by the Audit and Risk Committee.

**C37**

### When was the last independently-run, board-effectiveness review?

The last external board effectiveness review was undertaken by Campbell Tickell during 2023 to 2024.

**C38**

### 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 year every board member is required to complete a declaration of interest and each year the board receives an annual report of those non-executive director conflicts of interest.

**Designated conflict management role** – two NEDs who are appointed to represent each of Bromford Housing Group, Bromford Housing Association and Merlin Housing Society if there is a potential conflict situation arising between our charitable Registered Provider (RP) group members.

**Independent board member role** – deals with any conflict situations involving Bromford Home Ownership and any of the charity RP group members.

**Board member retirement** – deals with the most extreme instances of board member conflict between any group members.

C39

Does the housing provider pay the Real Living Wage?

Yes.

C40

What is the housing provider's median gender pay gap?



	Median April 2023	Median April 2022
Female (hourly rate)	£15.29	£14.40
Male (hourly rate)	£15.88	£15.39
<b>Difference</b>	<b>3.8%</b>	<b>6.5%</b>

C41

What is the housing provider's CEO:median-worker pay ratio?



2023 to 2024

2022 to 2023

C42

How is the housing provider ensuring equality, diversity and inclusion (EDI) is promoted across its staff?

Our approach to promoting equality, diversity and inclusion is underpinned by our Be You DNA and one of our core competencies. These recognise the value that different perspectives bring to the business, encouraging colleagues to seek out diversity and different ways of thinking, embracing differences, celebrate success and being respectful of others and taking accountability for inclusion. These are discussed in one-to-ones and each colleague’s performance is assessed and rated against these every year as part of their annual performance review.

We have a number of colleague champion groups, each supporting a strand of EDI and sponsored by one of the chief officers, meeting regularly and offering a community and space for colleagues to come together, connect and help raise awareness across the organisation. These groups include Race and Faith, LGBTQIA+, Disability and Carers, Age and Gender, Mental Health and Wellbeing and Menopause. Each group contributes to our annual Be You roadmap, which highlights events, activities or projects across the year to celebrate and raise awareness across a broad spectrum of EDI. Over the past year this included events to celebrate Black History Month, Carers Week and International Women’s Day. Every year we also celebrate national inclusion week with a range of speakers and events across the week promoting, raising awareness and offering EDI learning opportunities.

All colleagues are required to undertake our EDI e-learning course every two years and leaders undertake unconscious bias training. Over the past year we introduced a new menopause training for all colleagues and again ran our female accelerator program. This is designed to offer learning and development opportunities for females across the business and to empower them to reach their full potential and was nominated for a Housing Heroes/Women in Housing award. We also achieved Disability Confident level 2 and were also working towards achieving menopause friendly accreditation in 2024, which we achieved in August 2024.

Case study

# Creating a menopause friendly workplace

A quarter of working women are of menopausal age but it's often not a subject that's talked about or supported by workplace policies or training.

To be a truly sustainable employer we knew we needed to change that and create an environment where colleagues feel confident to talk about the menopause and how it might be affecting them, directly or indirectly. So we have committed to becoming a Menopause Friendly Employer, as part of our work to create an environment where colleagues can thrive.

We now have a dedicated group of 21 menopause champions. These champions are trained to provide non-judgmental support, a listening ear and signposting for any menopause related questions.

Jonathan Cooper, strategic property planning manager, is the only male colleague on the group and said: "Like the majority of men I had absolutely no idea what the menopause was and how it affects women. Obviously

I had heard that once women get to a certain age they can have hot flushes and mood changes but I didn't know much more than this. I definitely didn't know there is a thing called perimenopause which can affect women much younger - even in their 30s.

"So being a manager of women in their 30's and my wife just turned 40, I thought I better do some learning- just so I knew what the impact would be on me and how I can support others.

"I'm proud to be a menopause champion and work with some awesome and brave colleagues in the group. I know that the majority of women may want to speak to another

female; however being a menopause champion is about being open to have these conversations, having the knowledge to support and make adjustments should I need to and help dispel the myth that menopause only affects women; I would like to think that any men that have a wife, partner, mother, sister or friend that need some support or signposting to where further help can be gained they would come to me.

"Menopause in the past has been a bit of a taboo subject- but the group is here to change attitudes and provide support to anyone who wants it. No one should suffer alone."



**C43**

## How does the housing provider support the physical and mental health of its staff?

Our approach to supporting physical and mental health is underpinned by our wellbeing framework and plan, which sets out our commitment to promoting good physical and mental health so we can create an environment where colleagues can thrive.

Colleagues are supported through various initiatives including access to Occupational Health, as well as free annual health checks including BMI, cholesterol and blood pressure checks during which colleagues can also get advice and support on a range of health issues. We also offer an on-site monthly physio, where colleagues can book a free 45-minute appointment with a trained physiotherapist which has helped support a reduction in absence related to musculoskeletal health issues.

<b>Annual health checks</b>	<b>On-site physio</b>	<b>Coffee cards</b>
<b>Free office breakfast</b>	<b>Advice and counselling</b>	<b>24/7 GP service</b>
<b>50+ mental health first aiders</b>	<b>21+ menopause champions</b>	<b>£500 flexible allowance</b>

We provide a selection of fruit and healthy breakfast options across our four main offices and provide field-based colleagues with a coffee card which is topped up monthly to purchase food and drink while they are out in our communities. Alongside our employee assistance programme (EAP), which offers confidential advice and counselling, colleagues have access to Yu Dr providing access to GP services 24/7, which also covers colleagues’ immediate family members which can be a great help when people need it most. We have recently introduced two new services as part of our EAP including bereavement and probate support.

Our cohort of more than 50 Mental Health First Aiders are on hand to provide support across the organisation. We are also in the process of bringing this training in-house so we can continue to train more colleagues and tailor to our needs. We have a dedicated wellbeing and menopause page on our intranet and our menopause guidance is supported by over 21 menopause champions who actively engage with colleagues, running bi-monthly coffee catch ups providing a safe space for colleagues to come together and offer support and advice. We have been working towards accreditation as a recognised menopause friendly employer.

We also provide colleagues with an annual £500 flexible allowance to spend on a variety of benefits to suit their needs, including discounted gym membership, health cash plans, screening and dental cover. Colleagues and leaders are supported by various tools including menopause, fertility, pregnancy loss and trauma support guidance alongside individual stress risk assessments, team stress surveys to identify root causes which has been successfully used to help reduce stress in teams identified through our engagement survey responses. Our health and wellbeing passport is used by colleagues to identify and record individual health needs and support or reasonable adjustments that are in place to enable them to thrive. We promote health awareness amongst colleagues and provide a wealth of training. We provide a wealth of training to colleagues and leaders covering topics including wellbeing and mental health, health and safety, resilience, safeguarding and domestic abuse.

C44

### How does the housing provider support the professional development of its staff?

We actively support the professional development of our colleagues through a comprehensive approach that includes career pathways, apprenticeship programs and internal learning and development initiatives. Recognising the importance of continuous growth, we invest in colleague development as a key component of our workforce strategy. We offer various opportunities for colleagues to enhance their skills and advance their careers within the organisation. This includes structured career pathways that help employees identify and pursue their professional goals. The apprenticeship programs provide valuable hands-on experience and training, ensuring that staff are well-equipped with the necessary skills for their roles.

In addition to these initiatives, we place a strong emphasis on internal learning and development, offering a range of resources and programs designed to foster both personal and professional growth. The organisation recognises the growing importance of professional development in the social housing sector, particularly in areas such as Chartered Institute of Housing (CIH) qualifications, green skills and leadership development.

By investing in these areas, we not only support the current needs of our colleagues but also prepare them for future challenges and opportunities within the sector. This commitment to professional development helps ensure that our workforce remains skilled, motivated and ready to meet the evolving demands of the social housing industry.



C45

### How is social value creation considered when procuring goods and services?

Our procurement activity is designed to support the provision of social value and we continue to engage with our suppliers to enhance the social value from our activities. Where we have used supply frameworks for procurement, these all have specific social value requirements embedded, commensurate with the type of supply. Similarly, we continue to benefit from our arrangement with Travis Perkins, our main repairs materials and parts supplier which provided £90k of spend for our communities in 2023 to 2024. We are adapting our approach to be consistent with legal requirements from the Procurement Act 2023, due to come into force in early 2025, that mandate social value requirements for certain contracts. In addition, we are currently drafting our social value policy which will also help shape the requirements that we build into procurement policies and procedures.

C46

### How is sustainability considered when procuring goods and services?

For strategic and critical procurement activities, we pre-select suppliers and contractors based on a self-certification basis. This aims to ensure 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. It also aims to ensure that where there has been an incident, the supplier can confirm adequate steps have been taken to prevent a recurrence in their proposal documents. We continue to develop our environmental and sustainability policies, particularly around waste management, the requirements for which are reflected in our existing procurement frameworks. The Procurement Act 2023 emphasises the use of local suppliers to reduce carbon footprint and to minimise travel and we are adapting our procurement approach to be consistent with the forthcoming legal requirements.

Case study

# Empowering communities through the South Cerney Men's Shed

Loneliness can be a silent struggle. Recognising the need to combat this issue and provide a space for connection can change lives. One example of our commitment to thriving communities is the South Cerney Men's Shed, a new community resource that is making a significant difference in the lives of local men.

The South Cerney Men's Shed opened its doors in spring 2023, offering a safe and welcoming environment where men can come together, engage in meaningful activities, learn practical skills and forge friendships. The Men's Shed was instigated by Neighbourhood Coach Nikki Mann, who noticed the lack of specific groups aimed at men in the village, after her own father became ill. She learned about the national network and worked with partners The Churn Project to secure funding to set up the group, with Bromford donating the land for the project and providing crucial technical expertise.

The South Cerney Men's Shed has continued to thrive in the months since it opened, it not only enhances the lives of its participants but also fosters a sense of belonging and community pride. The group has got involved in community projects and, just as importantly, new friendship have been forged among its members, who regularly meet up outside of sessions at the shed. Through collective efforts, Bromford, The Churn Project and generous supporters have made South Cerney a place where men can combat loneliness, learn practical skills and make a lasting difference in their neighbourhood.

Graham Harris, from the Churn Project said: "It's been great to see people using it over the past couple of months. They meet up once a week and have been getting involved in some community projects, like making some planters for the local school. It's going to benefit so many people and help them feel a bigger part of the community in South Cerney."



# Looking forward

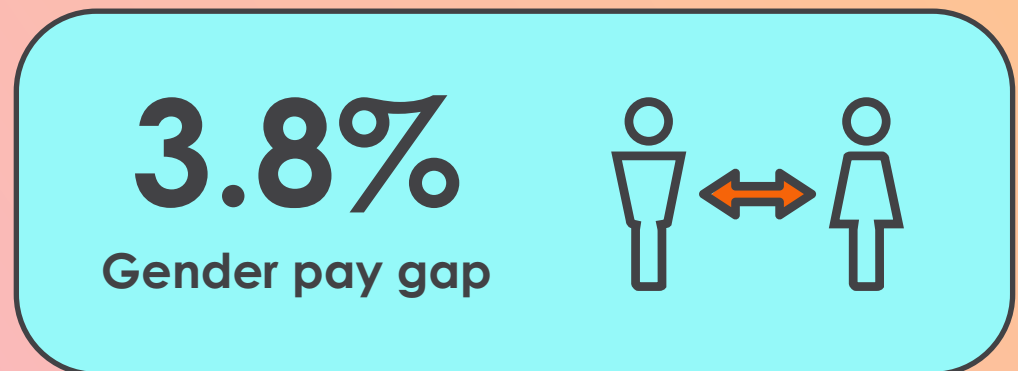
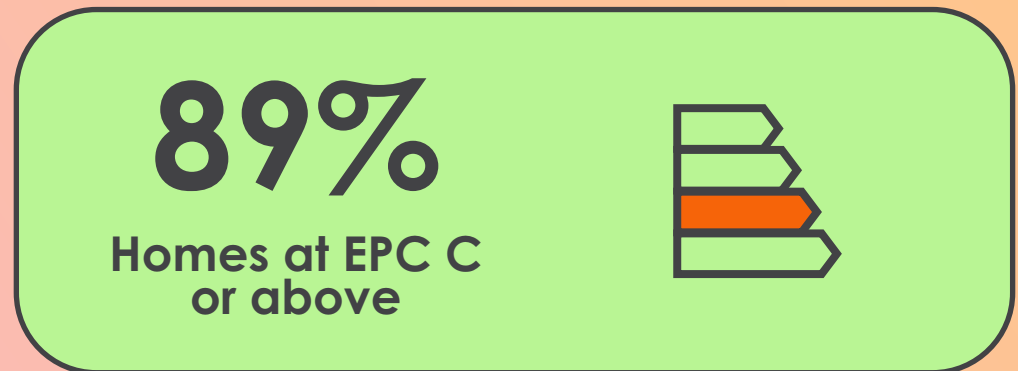
We are pleased to publish this third edition of our Building a Sustainable Future Impact Report and are proud of the steps that we have continued to take in our sustainability journey. Our sustainability ambitions are now firmly established across our golden thread, with the key drivers of ESG outcomes underpinning our corporate strategy, driving investment decisions in our business, as well as being reflected in our Sustainable Finance Framework.

We have made tangible progress against our goals again this year; we provided 1,191 new affordable homes, 551 of which were at social rent tenure; we have increased the energy efficiency of our homes, with 89% of homes now at EPC C or above; and we have driven down our gender pay gap to 3.8%. We have also strived to further improve the quality and robustness of our data that underpins these ambitions.

We have stayed true to the commitment we made to reporting our sustainability performance more regularly and continue to publish our sustainability golden metrics in our biannual market updates, which we believe gives all of our stakeholders a clear picture of our priorities and progress.

We continue to engage our customers and colleagues with our sustainability agenda, keeping them informed of our progress and challenges, listening to what they have to say and taking action to meet their needs and priorities. We will also stay close with our funders, investors and other key stakeholders and invite their examination and challenge on this report and our wider work as we share our sustainability journey with them.

As we move forward with our strategic ambitions relating to place and scale there is a lot to be excited about, building sustainable futures for our customers, enabling them to thrive.



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

**Matthew Rose**

**Director of Treasury**

**[matthew.rose@bromford.co.uk](mailto:matthew.rose@bromford.co.uk)**

**Laura Johnson**

**Director of Strategic Property Planning**

**[laura.johnson@bromford.co.uk](mailto:laura.johnson@bromford.co.uk)**

**Bromford.**