SUSTAINABILITY REPORTING STANDARD 2025

Welcome Message

Martyn Gimber
CEO of North Devon Homes

At North Devon Homes, sustainability is not just a commitment, it's a responsibility we embrace wholeheartedly as a community-focused housing provider.

Our 2025 Sustainability Reporting Standard reflects the next step in our journey to embed environmental, social, and governance principles into everything we do.

This report sets out how we measure, report, and improve our impact - from reducing carbon emissions and enhancing energy efficiency in our homes, to supporting biodiversity and promoting social value across our neighbourhoods. It also ensures transparency and accountability, helping our customers, partners, and stakeholders understand the progress we're making and the challenges we face.

As we look ahead, we remain focused on building a greener, fairer future for North Devon. I'm proud of the strides we've made and even more excited about what lies ahead as we continue to innovate, collaborate, and lead by example.

Sustainability *for* Housing

The Sustainability Reporting Standard for Social Housing (SRS) was launched in November 2020.

The SRS is a voluntary reporting framework, covering 48 criteria across ESG considerations such as affordability, carbon emission and energy efficiency, safety, equality, diversity and inclusion and resident voice.

It was set up in response to concerns that ESG investment in social housing was being inhibited by the absence of a common reporting standard. The belief is that the more widely the standard is adopted the stronger the sector's voice will be, thereby attracting greater investment.

As with many other sectors across the economy, there had been a multitude of ESG reporting frameworks, resulting in reporting that lacked transparency and was prone to inconsistency. Often housing associations would be asked to complete ESG questionnaires which asked different questions, many of which were not relevant to housing.

Today, more than 120 organisations have signed up to SRS as either SRS adopters or endorsers. Of these, 35 are lenders or investors with the others being housing providers. This includes housing providers managing more than 1.5 million homes and funders supplying the vast majority of the sector's £100bn of private finance have already risen to the standard.

While the sector has made a great start in adopting ESG reporting, which some believe could become mandatory in the future, Sustainability for Housing believes widespread adoption of the SRS will accelerate this progress.

It will enable housing providers to report on their ESG performance in a transparent, consistent and comparable way. This is making it easier for lenders and investors to assess the ESG performance of housing providers, identify ESG risks and pursue opportunities to create positive social and environmental outcomes.

Environmental

T1 Climate Change

C1	Distribution of EPC ratings of existing homes (those completed before the last financial year).

A rated = 0.9%
B rated = 11.9%
C rated = 70.9%
D rated = 14.4%
E or worse rated = 2.0%
Homes without an EPC rating = 0%

C2	Distribution of EPC ratings of new homes (those completed in the last financial year).

B Rated 58.8%
C Rated 41.2%
Homes without an EPC rating = 0%

C3	Does the housing provider have a Net Zero target and strategy? If so, what is it and when does the housing provider intend to be Net Zero by?

We are currently working on our full Environmental Strategy which includes setting out our net zero strategy.

Our Asset Management team are working towards a long term plan for retrofit; to be progressed when we have achieved our plan for all properties to be at SAP band C by 2030.

Environmental

T1 Climate Change

C4	What retrofit activities has the housing provider undertaken in the last 12 months in relation to its housing stock? How do these activities align with, and contribute towards, performance against the housing provider's Net Zero strategy and target?

NDH continues to update SAP scores for properties when improvement works are completed that will affect the energy rating. Our asset management strategy sets out our plan for achieving SAP band C for all of our properties by 2030 and this is provided for in our business plan. We have accessed Government funding through SHDF wave 1 and wave 2.1 for a total of 168 properties; this has improved the EPC ratings for these properties to band C or above. We also received funding via Energy Redress for retrofit to a further 18 properties. As a result we have retrofitted 48 homes under SHDF Wave 1, 59 homes under SHDF wave 2.1 and a further 61 completed in 24/25 and 18 homes under the Energy Redress project. We have plans to improve a further c180 properties between 2025 and 2028 with additional SHDF Wave 3 or alternative eco funding.

C5	Scope 1, Scope 2 and Scope 3 Green House Gas emissions per home. If unable to report emissions data, please state when the housing provider is expected to be able to do so.

We are currently unable to report on this metric but are reviewing how we may do this in the future as we develop our Environmental Strategy.

Environmental

T1 Climate Change

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? How is the housing provider mitigating these risks?

NDH has mapped the flood risk for all of its homes and this is captured in our asset components in our CX housing system
We will be working with our involved customers to consider the advice and guidance that we can send to our customers depending on the flood risk of the home in which they live.
We are also looking at our emergency response for areas where there is a high risk of flooding and whether there are temporary or long terms actions that we can take to mitigate.

C7	Does the housing provider have a strategy to enhance green space and promote biodiversity on or near homes? If yes, please describe with reference to targets in this area. If no, are you planning on producing one in the next 12 months?

Whilst the current NDH Development Strategy does not currently specifically promote Biodiversity Net Gain or any specific target, it does link to the NDH Environmental Strategy (currently being updated), and aims to improve the quality of the local environment. This is largely due to the fact that new sites delivered have been outside of the scope of the standard, with small sites completed to date having gained planning prior to the April 2024 statutory target.

Environmental

T2 Ecology

C7	Continued....

Other new build units acquired have been from private developers under Section 106 planning obligations, so NDH have not been involved in the site master planning or unit design.

However, the NDH Development Strategy does reference alignment to the NDH Environmental Strategy, and the Development Strategy for future land led schemes; their design will reflect the statutory requirement to meet 10% Biodiversity Net Gain and offset any negative impact in the design and delivery of our development schemes. Where we are acquiring new build units from a developer, due diligence will be carried out to ensure that a developer is meeting its obligations in respect of Biodiversity Net Gain. We are currently engaged in developments where there is a BNG target, and developers will be regularly reviewed on their compliance with these obligations as part of site meetings and unit completions.

Environmental

T2 Ecology

C7

Continued....

Any development currently undertaken will be designed in liaison with architects and an ecologist will be appointed to complete Ecological Impact Assessments, with mitigations incorporated into the design of any scheme. This will include species translocations, public open space improvements and contributions, and where applicable amendments to design such as wildlife corridors, protected hedgerows and diffused or recessed lighting. NDH will monitor compliance on completed developments and how our residents are currently occupying such property, and will consider compliance with environmental planning conditions when dealing with permission requests, and any planned works.

Environmental

T2 Ecology

C8	Does the housing provider have a strategy to identify, manage and reduce pollutants that could cause material harm? If so, how does the housing provider target and measure performance?

We have a waste management policy in place. We have surveyed our homes in relation to asbestos and proactively remove floor tiles containing asbestos and any items that are medium or high risk whilst the property is void. This is managed in accordance to the hazardous waste regulations.

We are also working with South West Water who have identified properties with lead supply pipes and working to replace these. We are reducing the amount of oil and solid fuelled boilers within our stock as part of our energy improvement plans

C9	Does the housing provider have a strategy to use or increase the use of responsibly sourced materials for all building and repairs works? If so, how does the housing provider target and measure performance?

We look to use frameworks that indicate that consideration has been given to sustainable materials. We do not currently have a specific strategy in place but this will be considered as part of the udpate to the overall Environmental Strategy.

Environmental

T3 Resource Management

C10	Does the housing provider have a strategy for waste management incorporating building materials? If so, how does the housing provider target and measure performance?

We have a waste management policy in place. Performance targets in respect of waste management are still being considered.

C11	Does the housing provider have a strategy for water management? If so, how does the housing provider target and measure performance?

We do not have a separate strategy for water management. This will be considered as we update the Environmental Strategy.

Social

T4 Affordability and Security

C12	For properties that are subject to the rent regulation regime, report against one or more Affordability Metric: 1) Rent compared to median private rental sector (PRS) rent across the relevant Local Authority 2) Rent compared to the relevant Local Housing Allowance (LHA)

% of LHA rent = 73.2%

C13	Share, and number, of existing homes (owned and/or managed) completed before the last financial year allocated to:

- General needs (social rent) 2290 (66.3%) - includes 16 managed properties
- Intermediate Rent 18 (0.5%)
- Affordable Rent 456 (13.2%) (General needs + Housing for older people affordable rent)
- Supported Housing 0 (0%)
- Housing for Older People 510 (14.8%)
- Low-cost home ownership 84 (2.4%)
- Care Homes 0 (0%)
- Private Rented Sector 8 (0.2%) Market Rented
- Other 90 (2.6%) Leasehold

Social

T4 Affordability and Security

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) - Acquisitions 17 = 81% Disposals 8 = 38.1% 7 sales to open market, 1 RTB
- Affordable Rent Disposals 4 = 19% 3 sales to open market, 1 RTB
- Low-cost home ownership - Aquisitions 4 = 19%

C15

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

Our Energy and Wellbeing service has been an important part of our cost of living and hardship response. We issued winter fuel vouchers to customers who identified as experiencing significant hardship and otherwise may not have been able to heat their home during the coldest months. Cases often cover a number of issues. Many customers find dealing with utility suppliers really difficult, especially when challenging decisions. Most cases can be resolved directly with the supplier but we have supported many customers to take their case through to the Energy Ombudsman service.

Social

T5 Building Safety and Quality

C16	How does the housing provider provide security of tenure for residents?

North Devon Homes offer all new customers starter tenancies which, after 12 months, converts to an assured tenancy.

C17	Describe the condition of the housing provider's portfolio, with reference to:

- % of homes for which all required gas safety checks have been carried out 99.9%
- % 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 95.5%
- % of homes for which all required asbestos management surveys or re-inspections have been carried out 100%
- % of homes for which all required legionella risk assessments have been carried out 100%
- % of homes for which all required communal passenger lift safety checks have been carried out 100%
- (from published TSMs and KPIs 2024/25)

Social

T5 Building Safety and Quality

C18

What % of homes meet the national housing quality standard? Of those which fail, what is the housing provider doing to address these failings

97.9 % of homes meet the national housing quality standard
2.1% non-decent homes failing due to radon levels. All impacted properties have had radon reducing equipment installed, but at year end, NDH were awaiting re-test results to confirm the impact of remedial measures taken. (from published TSMs 2024/25)

C19

C19 How do you manage and mitigate the risk of damp and mould for your residents?

North Devon Homes has a damp, mould and condensation policy which is underpinned by a procedure. Our policy and procedure has been developed in conjunction with our customers and has recently been audited by an external provider and our involved customer scrutiny group.

We have developed a customer friendly leaflet to provide advice and guidance for customers in managing condensation. We have also increased resources in our surveying team to ensure that we have the resources to attend every report of damp, mould and condensation.

We identify properties with category 1 and 2 hazards from either surveyor visits, stock condition surveying or specialist monitoring such as radon monitoring. These are monitored either through our asset database or our repairs and tenancy database.

Social

T6 Tenant Voice

C20 What are the results of the housing provider's most recent tenant satisfaction survey?
How has the housing provider acted on these results?

- Date of survey = July – December 2024
- % of residents who responded = (597 / 3,262) * 100 = 18%
- Sampling method = census

England's TSM TP01 - "Taking everything into account, how satisfied or dissatisfied are you with the service provided by your landlord?"
NDH 2024/25 Result: 73.5%

Full details of NDH's results can be found on our website:
https://www.ndh-ltd.co.uk/TSM2425

Examples of actions taken:

- Asset Management SMS Project - proactive communication on repairs management - all H2H appointments now confirmed by text, where customer has given mobile as prime contact. Missed appointments down from 25% to 3%.
- Customer Involvement Strategy, renewed to create a permanent link between customer involvement work and TSM responses; this resulted in customer information videos, driven by input of involved customers.
- Expanded estate clear up/consultation events, to combine with estates teams to create a visible presence in less visited neighbourhoods in more rural areas - programme developed and enacted Autumn 2024.

Social
T6 Tenant Voice

C21 What arrangements are in place to enable residents to hold management to account for the provision of services?

NDH have customer groups which all policies and customer correspondence are reviewed/co-designed with customers. In addition we have a scrutiny group which set a yearly planner to carry out deep dives into areas within the business. A core part of our governance is our Customer Board Partnership who meet every 8 weeks to review performance and our Customer complaints review group meet quarterly to review the complaints received during that quarter and track the learning for the business. In addition we carry out customer satisfaction surveys on Customer Care, response and planned repairs and complaints handling.

C22 In the last 12 months, in how many complaints has the national Ombudsman determined that maladministration took place?

We have had no Housing Ombudsman determinations of maladministration in the last year.

Social

T7 Resident Support

C23 What are the key support services that the housing provider offers to its residents?

The Money Matters service supports customers to identify benefits that they may be entitled to, make and manage those claims and ensure that outcomes are in line with regulations. The team are a trusted source of advice and information for colleagues and the Community.

The Specialist Support Team: We continued to see an increase in the number of complex and challenging cases presenting to NDH as the services provided by the statutory authorities' retreated further. We knew that we needed to develop and focus our service offer and how we work, to provide support to respond to these developing demands and if we didn't, we would not meet the needs of customers and our services would become increasingly reactive and offer poor value for money. We also knew from our discussions with our colleagues that we wanted to introduce changes to allow us to better respond to this to help us provide more specialist and intensive support where needed. We re-designed our existing services and team structures to enable us to make internal referrals, better respond to need and to provide the best service offer we can. By making these changes we created a specialist support offer which is available to those customers and families most in need across all of our communities.

Social

T7 Resident Support

C23 Continued....

Independent Living Service: Our Independent living team work to support our older customers remain in their home and are based within our communities.

Our hardship fund provides direct support for those struggling with the cost of living, experiencing a temporary crisis or change of circumstances.

We have agreed to trial a new service provided by the social enterprise Pocket Power. This is a telephone service which saves people money on their household bills and connects them to financial support that they may not be aware of. Each household saves an average of £250 a year. They cover all bills in one 30 minute phone call and complete applications and switches on behalf of customers. We will initially offer to support 30 households to find ways to reduce their bills and put money back in their pockets. This has the potential to multiply the return for customers from a modest spend from our hardship fund.

Social
T7 Resident Support

C23 Continued....

Home Movers Fund – the Home Movers Fund element of our hardship provision has supported 44 new customers this year with costs associated with moving and setting up a new home. As part of the housing application process the Income Officers review the pre-tenancy interview and identify any potential benefit issues, discuss affordability, ways to pay the rent, the tenancy terms and conditions that relate to rent payments, the rent in advance and the various services offered by the Income Team. The Income Officer looks out for customers who are likely to find it difficult to cover the cost of basic essentials such as carpets, curtains, furniture and white goods. Often this will be households who have been homeless and in temporary accommodation.

Social

T8 Placemaking

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

NDH has always taken a proactive approach to neighbourhood consultation, involving affected residents and its involved customers in the planning phases of its development projects. The development pipeline has not had any schemes at this stage in the 2024-25 Financial Year as schemes have been either existing or led by private developers. Our work on schemes currently in progress has contributed to improvements in the estates we own and manage, or intend to acquire with private developers. We have worked with developers, contractors and our partners in communicating with stakeholders and the wider public on the development pipeline work in progress. Notable cases are cited below:

Taw Wharf: Work has now commenced on the Phase 5 (final phase), which will complete the most significant brownfield regeneration in the town in decades. The overall site has involved clearing old derelict factory units, creating a sustainable mixed tenure community, with commercial and retail units, allowing gift aid receipts back to NDH which contribute to affordable housing delivery.

Social

T8 Placemaking

C24 Continued...

The final phase also brings 14 further affordable homes to the local area.

The Shields, Ilfracombe: Working in partnership with developer Elan Homes, on a long term distressed asset. The scheme will deliver the first affordable new build homes in the town for 19 years.
Buckland Brewer: Working with Allison Homes, we have completed development as a new affordable housing partner in a new LA area for development for NDH, Torridge District.

North Lane, Bickington: Received approval to enter into new partnership with Mazzard Investments, again supporting local businesses and working actively on the design and specification of the units, to ensure their delivery.

Buckleigh Road, Westward Ho!: Working with long term partners Chichester Developments, completed the first phase of the development, which delivers a total of 12 social rented homes, and including EV charging for all plots.

Social

T8 Placemaking

C24 Continued...

In collaboration with the developer the common landscape areas are retained by the Management Company to ensure that the area is maintained consistently and in a "tenure blind" way.

- Our more significant developments have been undertaken with extensive community and stakeholder consultation to ensure that opportunities are identified and realised wherever possible. This means that capital investment is driven with placeshaping at its core;
- We support and champion the principle of creating communities where people want to live, our most significant current development brings market homes, shared ownership homes and affordable homes together in a single community;
- We have a specialist support and an Independent Living Team who support our customers in living and contributing to balanced and active communities in a more sustainable way. This increases the diversity within our communities in a way that would not otherwise be as apparent;
- We have a formal partnership with the Local Authority which recognises the contribution we can make to supporting the wider aims of the Local and Strategic Housing Authority;

Social

T8 Placemaking

C24 Continued...

- We invest and support at a Senior Level in local place-based partnerships including Northern Devon Futures and One Northern Devon, to use our skills, resources, knowledge and influence to improve outcomes across North and Northern Devon. This includes chairing and leading the Housing and Infrastructure group.
- At a more localised level we were a founding (and remain an active) member of the One Ilfracombe project upon which the above model was based which brought partners together to engage differently with one of the areas of highest deprivation in our operating area.

Governance

T9 Structure and Governance

C25

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

Yes (Reg Code: LH4249)

C26

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

G1 , V2 and C1 as of 31st March 2025

C27

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

NHF Code of Governance (2020)

C28

Is the housing provider a Not-For-Profit?
If not, who is the largest shareholder, what is their % of economic ownership and what % of voting rights do they control?

Yes, NDH is a registered Charity (Registered Charity No. 1164142)

Governance

T9 Structure and Governance

C29	Explain how the housing provider's board manages ESG risks. Are ESG risks incorporated into the housing provider's risk register?

ESG Risks are incorporated the on Risk Register, and managed in line with the North Devon Homes Risk Strategy. Risk updates to Group Audit & Risk Committee as well as Board, and there is an annual Risk Workshop.

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

No

Social

T10 Board and Trustees

C31

How does the housing provider ensure it gets input from a diverse range of people, into the governance processes? Does the housing provider consider resident voice at the board and senior management level? Does the housing provider have policies that incorporate Equality, Diversity and Inclusion (EDI) into the recruitment and selection of board members and senior management?

Our board is made up in the following way:
(1) 30% female
(2) 70% male
(3) 0% residents
(4) 0% disability
(5) Ave age - 60.1 years
(6) Ave tenure - 3.8 years

The Chairs of the Customer Board Partnership (CBP) and Scrutiny Panel form part of the interview panel for new Board Members, ensuring that the customer voice is represented from the very outset of a Board Members engagement with North Devon Homes.

Board members attend The Customer Board Partnership meetings, observing and listening to customer views and concerns, and in turn the Chair of CBP attends every board meeting.

The Board Member Recruitment Policy fully incorporates our EDI agenda, as does every policy.

Social

T10 Board and Trustees

C32	What % of the housing provider's Board have turned over in the last two years? What % of the housing provider's Senior Management Team have turned over in the last two years?

50% - we had 5 x new board members in last 2 years.
0% - SMT turnover (executive team)

C33	Number of board members on the housing provider's Audit Committee with recent and relevant financial experience.

At 31st March 2025, of the six members of the Audit & Risk Committee, two had relevant and recent financial experience.

C34	What % of the housing provider's board are non-executive directors?

100%

C35	Has a succession plan been provided to the housing provider's board in the last 12 months?

Yes

Governance

T10 Board and Trustees

C36

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

Two

C37

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

The last independent effectiveness review was in October 2016. Our inspection in May 2024, resulting in a C1, G1 recommended a new review hence, we have commissioned an external governance effectiveness review to take place 25/26.

C38

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

Conflicts of interest declared and updated at the start of every meeting. Any issues dealt with in line with Group probity, hospitality gifts and interests policy.

Governance

T11 Staff Wellbeing

C39	Does the housing provider pay the Real Living Wage?

No

C40	What is the housing provider's median gender pay gap?

8.8% (calculated annually based on 5 April 2025 salaries)

C41	What is the housing provider's CEO:median-worker pay ratio?

1:4

(rounded down from 4.40)

Governance

T11 Staff Wellbeing

C42

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

- EDI related training throughout year
- Mandatory EDI e-learning course. To be completed within first 6 months for all new starters and every 3 years thereafter for all staff.
- Neurodiversity Employee Resource Group
- EDI Champions - Board & Staff
- Preventing Sexual Harassment in the workplace & Supporting Neurodiversity in the Workplace workshops provided for managers
- Disability Confident Employer
- EDI Strategy (+ links to HR Strategy)

C43

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

- Mental Health First Aiders - 8 across the business
- Wellbeing Team (remit: health & wellbeing iniatives & support)
- Health & Wellbeing Hub (intranet)
- Annual Health Fair (an event providing all staff access to a choice of health & wellbeing activities)
- Weekly / Monthly wellbeing activities - singing, yoga, pilates
- Dedicated on-site wellbeing nature walk
- Occupational Health Advice and Support
- Annual Health Surveillance for Operatives
- Cash Plan
- Employee Assistance Programme
- Neurodiversity Employee Resource Group

Governance

T11 Staff Wellbeing

C44 How does the housing provider support the professional development of its staff? What % of employees have received qualification that are relevant for their professional development, within the last year?
- Split result by demographic.

Percentage of employees receiving relevant qualification:

- 4 x staff
- 1 x female - 45-49
- 3 x male - 1 x 20-24 / 2 x 50-54
- 2 x Apprentices
- 1 x female - 18-20
- 1 x male - 16-17
- TOTAL = 3.6%

Government delays on finalising the professional qualification requirements for social housing has delayed the roll out of the internal NDH standard. The Remuneration and People Committee is kept up to date at each meeting.

Governance

T12 Supply Chain

C45 How is social value creation considered when procuring goods and services? What measures are in place to monitor the delivery of this Social Value?

We work closely with Advantage South West who lead on the majority of our procurement frameworks and use other providers such as procurement for housing. These frameworks are delivered with social value built in. Social value is also integrated within our Value for Money Strategy.

C46 How is sustainability considered when procuring goods and services? What measures are in place to monitor the sustainability of your supply chain when procuring goods and services?

We work closely with Advantage South West who lead on the majority of our procurement frameworks and use other providers such as procurement for housing. These frameworks are delivered with social value built in. Social value is also integrated within our Value for Money Strategy.

Supply chain risks are monitored by the Group Audit and Risk Committee as part of their regular review of the risk register, and our Strategic Perfomrance Group (made up of the Executive Team and some Heads of Service) also review key risks every 4-6 weeks. Sustainability links to the supply chain are being reviewed as part of the Environmental Strategy Update.

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