Updating the Guidance on the Sustainability Reporting Standard for Social Housing (SRS)

Sustainability *for* Housing

We've recently updated the guidance for the Sustainability Reporting Standard for Social Housing (SRS), providing clearer direction on how to report against the existing criteria. While the criteria themselves remain unchanged, this new guidance aims to remove ambiguity, improve consistency, and support more robust ESG reporting across the sector. Here's why we've done it, how we approached the update, and what comes next.

1. Why we did it

The core motivation behind updating the guidance was to improve clarity. Since launching the Standard, we've received valuable feedback—often directly from adopters—highlighting areas of uncertainty around how to interpret and report against specific criteria. We've listened to these questions, and the new guidance reflects what we've learned.

By eliminating ambiguity, we hope to make reporting expectations much clearer, which in turn will lead to more consistent and comparable responses. This benefits not only the reporting organisations but also the investors, stakeholders, and partners who rely on the data to make informed decisions.

We also recognised the need to make more of the criteria assurable. While third-party assurance isn't a requirement—and is rarely expected in SRS reports—we know that scrutiny of ESG reporting is increasing. By clarifying what is expected, we're ensuring that the SRS remains robust, credible, and aligned with broader market expectations. We want it to be a Standard that can stand up to scrutiny, should adopters choose to seek external assurance.

Importantly, while the guidance has changed, the criteria themselves have not. The reporting expectations remain fundamentally the same, and this is still version 2.0 of the SRS. However, the historical guidance has now been removed and is only available in a separate, standalone document to ensure there's no confusion.

2. How we did it

This updated guidance is the result of ongoing collaboration. In addition to regular feedback from adopters, we've worked closely with the ESG Working Group—a collective of ESG and sustainability leads from around 20 large housing associations—who provided practical insights into what works and where more clarity was needed.

We also engaged with several sector stakeholders to ensure the updated guidance aligns with broader best practices in sustainability reporting. These include the Housing Provider Biodiversity Lead Network, the Future Homes Hub, and SHIFT, among others. Their input has helped ensure that the SRS guidance is consistent with emerging priorities such as biodiversity, energy efficiency, and environmental resilience.

3. What next?

This updated guidance is intended to support reports due by October 2025. We encourage all adopters to familiarise themselves with the changes and apply them in their upcoming reporting cycles.

Looking ahead, Sustainability for Housing (SfH) plans to review the criteria again in late 2025. This will involve consultation with the Adopter community, with the aim of publishing version 2.1 in spring 2026. That review is expected to result in more incremental changes, building on the clarity and consistency achieved in this latest update.

As always, we welcome your feedback and thank you for your continued commitment to improving sustainability across the social housing sector.

Guidance for Version 2.0 – Spring 2025

Criteria 1 & 2:

Distribution of EPC ratings of new (C2) and existing homes (C1).

Enhanced reporting option:
Average SAP rating of new (C2) and existing homes (C1).
Energy use intensity of new (C2) and existing homes (C1).

Guidance

Disclosures should include the number and percentage of existing homes by their Energy Performance Certificate (EPC) rating and should reflect the housing provider's stock at a point in time (i.e. the portfolio as at financial year end).

Only homes where the housing provider has responsibility for, and control over, the energy efficiency standards of the homes should be counted. This includes homes that are owned by the housing provider, and could include managed stock or shared ownership homes, where appropriate. Homes built for sale as well as non-residential units should not be included in this breakdown.

'Existing' homes are those that reached practical completion before the start of the last financial year (i.e. before 1st April). If stock has been transferred or acquired within the reporting period, but which completed construction before the last financial year, it is still to be included in Criterion 1. It is the date of construction - not the date that the home entered the housing provider's portfolio - which is being considered here.

'New' homes are new build homes. That is, homes that reached practical completion within the last financial year (i.e. after 31st March). This does not include homes in the pipeline, under construction or reached partial completion.

Where homes do not have an in-date EPC, it is acceptable to use modelled or assumed EPC data, however this should be clearly disclosed (i.e. '% of homes without an EPC rating / with EPC ratings that have been modelled rather than extracted from an in-date certificate).

For enhanced reporting:

Disclosure should include the average SAP (Standard Assessment Procedure) rating of existing homes (i.e. those that reached practical completion before the last financial year) and new homes (i.e. those that reached practical completion within the last financial year).

The SAP methodology underpins EPCs.
More details can be found here: https://www.gov.uk/guidance/standard-assessment-procedure.
For England and Wales, see technical SAP guidance here: https://bregroup.com/sap/sap10/
For Scotland, see technical SAP guidance here: https://bregroup.com/sap/standard-assessment-procedure-sap-2012

The average SAP rating of existing homes should be calculated by combining the SAP scores of the housing provider's existing homes, and dividing that score by the total number of existing homes. Similarly, the average SAP rating of new homes should be calculated by combining the SAP scores of the housing provider's new homes, and dividing that score by the total number of new homes.

Disclosure should include the energy use intensity (EUI) of existing and new homes. The EUI provides a standardised way of comparing the energy efficiency of buildings of different sizes and types. By comparing the EUI of different buildings, it is possible to identify opportunities for energy savings and prioritise energy efficiency improvements.

The EUI is calculated by dividing the total energy consumption of a home by its total floor area and should be expressed in units of energy per square meter per year (kwh/m2/yr). Only energy usage where the housing provider has control and influence should be included (i.e. primary energy) and therefore should exclude unregulated energy usage (i.e. related to appliances etc.). This information can be extracted from EPCs. Where this information is not available (i.e. the home does not have an in-date EPC), modelled or assumed EPC information can be used, but this should be clearly disclosed.

Where the floor area of the portfolio is unknown, housing providers can respond with the EUI based on total energy consumption per £revenue. This should be in units of energy per £ revenue per year.

As with the EPC breakdown, only homes where the housing provider has responsibility for, and control over, the energy efficiency standards of the homes should be included in both enhanced reporting calculations. This includes homes that are owned by the housing provider, and could include managed stock or shared ownership homes, where appropriate.

Criterion 3:

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?

Enhanced reporting option:
Is the net zero commitment SBTi aligned?
Does the provider have a costed transition plan?

Guidance

Net zero refers to the state where the amount of greenhouse gases emitted into the atmosphere by the housing provider (including its offices, fleet, developments and properties) is balanced by the amount removed or offset. A net zero strategy outlines the plan or approach adopted by the housing provider to reach net zero emissions and should cover all greenhouse gas emissions (i.e. scope 1, 2 and 3 emissions).

The strategy will likely involve the housing provider undertaking a variety of activities, such as improving the energy efficiency of existing buildings, increasing the use of renewable energy sources, and incorporating low-carbon materials and techniques into construction. This strategy should have set targets regarding emission reductions over time.

The housing provider should disclose whether they have a strategy (yes/no), a description of key activities and plans within the strategy, and the date the organisation expects to achieve net zero (date). This could include separate net zero targets for Scope 1 & 2, and Scope 3. If the strategy is being developed but not yet complete, this can still be commented on and its status clearly disclosed.

For enhanced reporting:

The disclosure should state whether the housing provider's net zero commitment is SBTi-aligned (yes/no). The Science Based Targets initiative (SBTi) is a corporate climate action organisation that enables companies and financial institutions worldwide to play their part in combating the climate crisis. More information can be found here: https://sciencebasedtargets.org/.

The disclosure should state whether the housing provider has a costed transition plan (yes/on). This is a detailed roadmap that outlines the steps, investments, risk, and financial considerations necessary for the housing provider to achieve its net zero emissions. For more information, please see the Transition Plan Taskforce overseen by the IFRS Foundation, available here: https://transitiontaskforce.net/. If the transition plan is being developed but not yet complete, this can still be commented on and its status clearly disclosed.

Criterion 4:

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?

Enhanced reporting option:
Number of homes that have been retrofitted in the last financial year (and these homes as a percentage of the total homes the housing providers is aiming to retrofit).

Guidance

Retrofit activities refer to the process of upgrading, modifying, or enhancing existing buildings, infrastructure, systems, or equipment to improve their performance, efficiency, and environmental sustainability.

Responses may include:

- A description of the housing provider's stock with reference to EPC and SAP scores and related portfolio targets.
- A description of the housing provider's stock by heating source.
- The number of homes that were brought to (or closer to) EPC C within the reporting period.
- The EPC or SAP uplift experienced by homes within the reporting period.
- How representative the number of homes that received significant retrofit activities are as a proportion of the total number of homes that require retrofit works by 2030 (i.e. to be EPC C) and by 2050 (i.e. to be net zero).
- Plans and targets to retrofit under-performing homes going forward (e.g. % homes per year etc.), and how the housing provider plans to tackle more challenging properties.
- The cost of retrofit activities undertaken within the last financial year, and the source of funding.

For enhanced reporting:

Disclosure should include the total number of homes that been 'retrofitted' within the last financial year. These are homes that;

- Have received energy efficiency improvement works and now classify as EPC C (or higher).
- Do not require any further energy efficiency improvements and are aligned to the housing provider's net zero commitments.

The number of homes that have been retrofitted to EPC C, and the number of homes that do not require any further energy improvement works (i.e. net zero) should be reported separately if different.

These figures should then be reported as a percentage of the total number of homes that the housing provider needs or aims to retrofit by its EPC C (near-term target) and net zero (long-term target) (%).

Criterion 5:

Scope 1, 2 and 3 GHG emissions.
Scope 1, 2 and 3 GHG emissions per home

Enhanced reporting option:
Does the housing provider qualify for SECR reporting?
SECR Intensity Ratio for Total Emissions (Scope 1-2).

Guidance

Reporting GHG emissions is challenging for several reasons, such as difficulties with data collection, complexities in calculations, and varying levels of control that companies have over these emissions. Scope 3 reporting in particular is challenging as it relies heavily on supplier data, which often varies in quality and availability. Technological limitations, such as underdeveloped data management tools and limited verification methods, further complicate standardisation.

Organisations like the Greenhouse Gas Protocol, the Carbon Disclosure Project (CDP), and the Science-Based Targets initiative (SBTi) provide frameworks and guidelines for GHG emission reporting, but they vary in approach, scope, and detail. While they offer high-level guidance, they leave room for interpretation, meaning companies often have to adapt or even create their own methodologies. Many organisations find that they rely on external advisors and consultants to stay up to date with GHG emission reporting. Changing regulatory standards across countries and sectors, and the ongoing negotiation and refinement around good practice data collection, calculation and reporting processes, means that organisations must continually adjust their processes, systems and methodologies, which can make baselining and benchmarking challenging.

Until universal standards evolve, companies must piece together different frameworks to build transparent GHG reporting practices. It is therefore vital that all housing providers reporting against Criterion 5 do so as consistently and transparently as possible.

The Greenhouse Gas (GHG) Protocol is a widely used international framework for measuring and managing greenhouse gas emissions (https://ghgprotocol.org/). The GHG Protocol specifies the Scope 1, 2 and 3 emissions types;
Scope 1: Direct GHG emissions from sources that are owned or controlled by the housing provider.
Scope 2: Indirect GHG emission from the generation of purchased electricity, steam, heating and cooling consumed by the housing provider.
Scope 3: Indirect GHG emissions that occur in the value chain of the housing provider, including both upstream and downstream emissions.

Landlords should report on "regulated" emissions from their homes – regulated are those that arise due to the (in)efficiency of the home fabric and the heating system which the landlord has control. They are different to the "unregulated emissions" which are due to plug in appliances (usage from TVs, fridges, etc.) which are more in the control of residents. As there is very limited influence landlords can have over unregulated emissions these are not typically include in Scope 3 emissions.

Please report total Scope 1 and total Scope 2 emissions separately. This should be tonnes of CO2 emissions.

For Scope 3 emissions, housing providers should divide up emissions into the 15 distinct categories as specified by the GHG Protocol. These 15 categories cover a comprehensive view of an organisation's value chain emissions, making it easier for organisations to identify and prioritise areas for reduction. Further information on the categories is accessible here: https://ghgprotocol.org/scope-3-calculation-guidance-2 – and are:

Category 1 – Purchased goods and services
Category 2 – Capital goods
Category 3 – Fuel- and energy-related activities
Category 4 – Upstream transportation and distribution

Category 5 – Waste generated in operations
Category 6 – Business travel
Category 7 – Employee commuting
Category 8 – Upstream leased assets
Category 9 – Downstream transportation and distribution
Category 10 – Processing of sold products
Category 11 – Use of sold products
Category 12 – End-of-life treatment of sold products
Category 13 – Downstream leased assets
Category 14 – Franchises
Category 15 – Investments

The materiality of each of the 15 categories can vary significantly for housing providers, depending on their operational focus, the nature of their activities, and the specific contexts in which they operate. Likely 'Purchased Goods and Services', 'Capital Goods' and 'Use of Sold Products' will be the most material, although this may not necessarily be the case. **Not every category will be material for a housing provider**.

Similarly, the accuracy, confidence, and reliability of data collection and calculations can vary significantly across the 15 categories. Reporting against the 15 categories (or those that are material) instead of providing a single aggregate figure (i.e. total Scope 3 emissions) is hoped to enhance both transparency and flexibility for organisations and provide greater insight into where and how GHG emissions are changing over time. This also enables housing providers to disclose their confidence - in terms of accuracy, reliability and completeness of data collection, calculation and reporting - per material category, rather than for Scope 3 emissions as a whole.

Where housing providers have used modelled data, or where data collection, calculation and reporting practices have changed over time so that year-on-year comparison is no longer accurate, housing providers should disclose this (or direct the reader to where this information is otherwise disclosed).

The GHG Protocol along with other GHG emission reporting frameworks recommend using intensity ratios (e.g., emissions per unit of output or revenue) to help contextualise emissions data, making it easier to track performance over time and compare with industry benchmarks. Total emissions per home can be calculated by dividing the housing provider's total Scope 1, 2 and 3 GHG emissions by the housing provider's total number of homes.

The total number of homes should include both existing and new homes. Only homes where the housing provider has responsibility for, and control over, the energy efficiency standards of the homes should be counted. This includes homes that are owned by the housing provider, and could include managed stock or shared ownership homes, where appropriate. Homes built for sale as well as non-residential units should not be included in this breakdown. The total number of homes reported here should, therefore, equal the sum of those reported in Criterion 1 and Criterion 2 combined.

If unable to report emissions data, please state when the housing provider is expected to be able to do so.

For enhanced reporting:

Introduced in 2019, the Streamlined Energy and Carbon Reporting (SECR) is a regulatory framework in the UK designed to improve the transparency of energy and carbon emissions reporting among large businesses and certain public sector organisations. More information can be found here: Environmental reporting guidelines: including Streamlined Energy and Carbon Reporting requirements - GOV.UK

Disclosures should include whether the housing provider qualifies for SECR reporting (Yes/No). Housing providers qualify for SECR reporting if it is a large company that meets two or more of the following:

- Turnover (or gross income) of £36m or more;
- Balance sheet assets of £18m or more; or
- 250 employees or more

For organisations that do qualify for SECR reporting, please disclose the SECR Intensity Ratio for total emissions (kgC02e/m^2). Please note that, counter to the GHG Protocol, SECR does not mandate Scope 3 reporting, and therefore the intensity ratio includes only Scope 1 and 2 GHG emissions divided by the total floor area of the housing provider's homes.

Criterion 6:

Does housing provider have a climate change adaptation policy and/or strategy that maps and assesses 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?

Guidance

Climate risks refer to the potential negative effects that climate change can have on human and natural systems, as defined by the Intergovernmental Panel on Climate Change (IPCC). For more information please visit: https://www.ipcc.ch/.

This concept encompasses a variety of factors including exposure, vulnerability, and the severity of climate-related hazards, and can cover physical risks, transition risks, reputation risks, socioeconomic risks, and liability risks.

This criterion should provide an indication of the resilience of the housing provider's homes, and operations more broadly, in the face of increasing climate-related risks. Disclosures should include a description of the process by which climate risks are identified, assessed and mitigated. This should include reference to flood, drought and overheating risks as they relate to homes and supply chains. Housing providers should disclose the framework or approach used, such as the IPCC Risk Framework or ISO 14090:2019, and should refer to the frequency and mechanisms through which this assessment is conducted.

Disclosures should include information on the Board's oversight on climate risk assessments and the adherence to mitigation plans. This includes reference to the individuals or positions responsible for monitoring compliance, as well as the mechanisms through which climate risks are reviewed at the Board level.

Criterion 7:

Does the housing provider have a strategy to enhance green space and promote biodiversity on or near homes? If yes, please describe.

Enhanced reporting option:
Biodiversity Net Gain (BNG) of new homes (those completed in the last financial year).
What is the housing provider's Biodiversity Net Gain target for new and existing homes? Does this exceed minimum requirements?

Guidance

Biodiversity is the number and variety of living things (such as plants, animals, and fungi) that live in a particular area. Nature recovery involves protecting and enhancing biodiversity across various landscapes. A housing provider's biodiversity strategy should set out how the provider will measurably increase biodiversity on its land; to maximise the services we get from nature. This should involve an assessment of the habitats that are found on the providers land, and the priorities for protecting and improving natural habitats, and the impacts the activities of the provider will have on local biodiversity. The strategy should set out actions for improving biodiversity based on that information. This could include creating wildflower meadows on grassland, planting hedges and woodland, and installing bird boxes, bat boxes and insect hotels. It could also include any public engagement and promotion of biodiversity. The housing provider's disclosure can describe any KPIs or targets included within the strategy and an update on progress against these, if appropriate.

For enhanced reporting:

Biodiversity Net Gain (BNG) is an approach to development that makes sure that habitats for wildlife are left in a measurably better state than they were before the development. BNG is calculated using the statutory biodiversity metric tool (and supplementary guides), available here: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

Disclose the Biodiversity Net Gain (BNG) of new build homes (i.e. those completed in the last financial year). This should be a weighted average according to the number of new build homes.

Worked example:
Aiming to calculate the weighted average BNG for three new housing developments completed in the last financial year. Each development has a different number of homes and a different BNG percentage.
Development A: 100 homes with a BNG of 12%
Development B: 200 homes with a BNG of 8%
Development C: 150 homes with a BNG of 10%

Step 1: Multiply each BNG by the number of homes, then sum all totals.
Development A: 12%×100=1200
Development B: 8%×200=1600
Development C: 10%×150=1500
All developments: 1200 + 1600 + 1500 = 4300

Step 2: Divide the total from Step 1 by the total number of homes
4300 / 450 = 9.56%

Disclose the housing provider's BNG target for new homes, and whether these targets exceed minimum requirements (i.e. 10%).

Criterion 8:

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?

Guidance

Pollutants are substances or materials which impact the environment and its creatures. Pollutants include, but are not limited to: air pollutants, asbestos, water pipes containing lead, diesel spills, disposal of paints, PFAS. Please note that greenhouse gases are not included in this criterion, as they are covered by C5, also mould is covered by C19.

Housing providers should disclose their strategy (or collective strategies) for identifying, managing and reducing pollutants that could cause harm to the environment and people (including residents, staff and the local community). The strategy(s) should cover both existing stock and construction activities.

Having an environmental management system that is certified to, or working towards, ISO14001 (or equivalent), would be considered best practice, and is encouraged to be disclosed.

Criterion 9:

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?

Enhanced reporting option:
% of materials from responsible sources.

Guidance

Having a strategy in place to increase the use of responsibly sourced materials in building and repairs works provides a demonstration that the housing provider is committed to minimising the environmental impact that its activities have on the planet. Tracking and measuring the success of a responsible sourcing strategy is also an important mechanism in ensuring that the organisation remains invested in achieving the targets it has set out.

Best practice strategies will cover the use of materials by the housing provider and its supply chain.

For enhanced reporting:

Disclose the percentage of materials used by the housing provider (for all building and repairs works) that are from responsible sources, as a proportion of the total materials used (%).

Responsibly sourced materials are those that have met (or developed using) a recognised international standard or that have been certified as from an environmentally friendly source (i.e. ISO 14001, EMAS, BES 6001 etc.).

Criterion 10:

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

Enhanced reporting option:
% of materials that are recycled and/or diverted from landfill.

Guidance

Having a strategy in place for waste management incorporating building materials provides a demonstration that the housing provider is committed to minimising the environmental impact that its activities have on the planet. Tracking and measuring the success of a waste management strategy is also an important mechanism in ensuring that the organisation remains invested in achieving the targets it has set out.

The waste management strategy should incorporate building materials and cover both hazardous and non-hazardous waste.

This criteria is aimed at waste that is directly or indirectly produced by the housing provider, rather than domestic, residential waste.

For enhanced reporting:

Disclose the percentage of materials that are recycled and/or diverted from landfill as a proportion of total waste material (%). This should exclude hazardous materials.

If the housing provider only measures and reports this in relation to development activities, this should be clearly disclosed.

Criterion 11:

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

Guidance

Having a strategy in place for good water management provides a demonstration that the housing provider is committed to minimising the environmental impact that its activities have on the planet. Tracking and measuring the success of a water management strategy is also an important mechanism in ensuring that the organisation remains invested in achieving the targets it has set out.

The water management strategy should cover both homes and corporate operations including development.

Housing providers may track the water efficiency of new homes by considering:
Average internal water efficiency of completed homes in past year [litres/person/day]

Housing providers may track the water efficiency of corporate operations by considering:
Consumption of metered mains water on sites and site offices [m3/100m2].

Criterion 12:

For properties that are subject to the rent regulation regime, report against one or more Affordability Metric:

1. Rent compared to average private rental sector (PRS) rent across the relevant Local Authority
2. Rent compared to the relevant Local Housing Allowance (LHA)

Enhanced reporting option:
Report against both Affordability Metrics.

Guidance

Only rent should be included in this calculation (i.e. does not include service charge).

The rent values can either be an average per home over the 12-month reporting period, or the rent level per home as at the end of the reporting period (i.e. rent as at financial year end, 31st March).

Rent compared to PRS:
The % difference between the rent of units and the average private rental sector rent for the same number of beds, using local authority median rent data.

For England, Scotland, Northern Ireland and Wales this can be found at Price Index of Private Rents, UK: monthly price statistics - Office for National Statistics

Rent compared to LHA:
The % difference between rent and the relevant Local Housing Allowance.

Whilst figures can be disaggregated by number of beds, local authority etc, please report one portfolio wide figure for % of PRS rent and/or % of LHA rent.

Worked example:
For a portfolio with three homes with monthly rents of £500, £600, and £700 in local authorities with LHAs of £600, £700, and £800 respectively, rent would be at 86% of the LHA.
£500/£600 = 0.83
£600/£700 = 0.86
£700/£800 = 0.88
0.83 + 0.86 + 0.88 = 2.57
2.57/3 = 0.86 = 86% of LHA

Criteria 13 & 14:

Share, and number, of existing homes (C13) and new homes (C14), by tenure.

Enhanced reporting option (C14 only):
Number homes acquired and disposed of in the last 12 months, by tenure type.

Guidance

Both % and number of homes should be provided to get an understanding of scale and composition of a housing provider's stock by tenure type. Disclosures should reflect the housing provider's stock at a point in time (i.e. the portfolio as at financial year end).

'Existing' homes are those that reached practical completion before the start of the last financial year (i.e. before 1st April). If stock has been transferred or acquired by the housing provider within the reporting period, but which completed construction before the last financial year, it is still to be included in Criterion 13. It is the date of construction - not the date that the home entered the housing provider's portfolio - which is being considered here.

'New' homes are new build homes. That is, homes that reached practical completion within the last financial year (i.e. after 31st March). This does not include homes in the pipeline, under construction or that have reached partial completion.

Unlike Criteria 2, homes that have been built for outright sale should be included in this criterion. Non-residential units should remain excluded from all reporting.

For enhanced reporting (C14 only):

Disclose the number of homes disposed of and acquired in the reporting period (i.e. the last financial year), by tenure type, as two separate figures. Please note that it is the date that the home entered the housing provider's portfolio - rather than the date that it was constructed - that is considered here. Both new and existing homes (i.e. those that are new build and old stock) can be included in these figures.

Criterion 15:

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

Guidance

This criterion highlights the effects of fuel costs on the affordability of homes for residents, demonstrating the housing provider's consideration of additional costs for residents, as well as their focus on maximising the energy efficiency of homes.

Given the focus on retrofit activities in Criterion 4, disclosures should focus on describing the support services provided to residents, although a description of retrofit works can also be included, if seen as appropriate.

Criterion 16:

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

Guidance

Security of tenure is a key differentiator between social housing and the private sector and evidence suggests this security makes a huge difference to people's lives and ability to find work, access informal and formal local support networks and services and build family lives. Good practice in the housing sector is now to offer long term tenancies (such as lifetime assured tenancies) to general needs residents where possible.

Criterion 17:

Describe the condition of the housing provider's portfolio, with reference to gas safety checks, fire risk assessments and electrical safety checks.

Enhanced reporting option:
% of homes for which all required asbestos management surveys or re-inspections have been carried out.
% of homes for which all required legionella risk assessments have been carried out.
% of homes for which all required communal passenger lift safety checks have been carried out.

Guidance

This criterion is included to ensure that the housing provider's portfolio of homes meet the minimum compliance and safety requirements. Meeting internal policies and legal requirements should be seen as the minimum expectation, rather than exemplary.

Disclosures should reflect the housing provider's stock at a point in time (i.e. the portfolio as at financial year end) and should be reported as a % of total stock.

For enhanced reporting:

Disclosures should report on the percentage of asbestos, legionella and lift safety surveys, assessments or checks that have been carried out, as a proportion of total number of areas/lifts for which these assessments are required (%). For example, 99% of lifts (which require communal passenger lift safety checks) have had them carried out.

It is helpful to contextualise these figures for the reader also. Therefore, where these assessments are conducted for a whole building, block or communal area, these can be converted to the unit level by considering the number of homes with access to, or use of, those areas. For example, 99% of lifts have an up-to-date safety check (x% of our homes are in buildings with a lift).

Criterion 18:

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

Enhanced reporting option:
What is the target date for bringing homes that do not meet the standard into compliance?

Guidance

Report the percentage of the housing provider's owned and/or managed homes that meet the relevant national housing quality standard, as a proportion of the total number of homes owned and/or managed (%).

Disclosures should reflect the housing provider's stock at a point in time (i.e. the portfolio as at financial year end).

Examples of national quality standards include the Decent Homes Standard (for England and Northern Ireland), the Scottish Housing Quality Standard (SHQS), or the Welsh Housing Quality Standard.

For Scottish housing providers (reporting against the SHQS) please report the percentage of homes that have met the standard, rather than the percentage of homes that have not failed. This means that exemptions/abeyances should not be included in this calculation.

Criteria 19:

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

Enhanced reporting option:
How many cases of damp and mould were reported in the period that required action?
What % of the housing providers portfolio do these homes account for?

Guidance

Report how the housing provider manages and mitigates the risk of damp and mould for its residents. Responses should include reference to both Category 1 and Category 2 Hazards as defined by the Housing Health and Safety Rating System (HHSRS). More information available here: https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-guidance-for-landlords-and-property-related-professionals.

Responses to also include a description of resident engagement and communication around damp and mould, the reporting processes between residents and the housing provider, and the provision of advice around home ventilation.

For enhanced reporting:

Disclosure the number of cases of damp and mould reported in the reporting period (i.e. financial year) that required action from the housing provider. Every case that required action from the housing provider should be included in this calculation, including if there are multiple cases per property.

The total number of homes (for which the above cases relate to) should be disclosed as a percentage of the total number of homes owned and/or managed by the housing provider.

Criterion 20:

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

Guidance

Report the results of the housing provider's most recent tenant satisfaction survey and how the housing provider has acted on these results.

Response should include:

- The date the survey was conducted. This may be within the reporting period or prior to it.
- The number of residents who responded and how representative these respondents are as a percentage of the total number of residents (%).
- The sampling method used.

Response to include results from:

- England's Tenant Satisfaction Measures (TSM) TP01 - "Taking everything into account, how satisfied or dissatisfied are you with the service provided by your landlord,"
- Scottish Social Housing Charter - "4.1 Satisfaction with the overall service provided"
- Welsh Social Landlord Tenant Satisfaction survey question: "How satisfied or dissatisfied are you with the service provided by your social landlord?"

Criterion 21:

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

Guidance

Empowering residents to hold their landlords to account is a key method for social landlords to differentiate themselves from private landlords.

Report the arrangements that are in place to enable residents to hold management to account for the provision of services. This can include, but it not limited to, resident scrutiny panels, resident feedback channels and board representation.

Criterion 22:

In the last 12 months, in how many complaints has the national Ombudsman determined that maladministration took place?
How have these complaints (or others) resulted in change of practice within the housing provider?

Guidance

Report how many complaints the national Ombudsman determined that maladministration took place within the reporting period and how these complaints (and others) have resulted in a change of practice within the organisation.

The absolute number of complaints should be reported, not the percentage. Complaints upheld include incidences of maladministration, service failure and severe maladministration within the reporting period (i.e. financial year).

The national Ombudsman includes the Housing Ombudsman Service (HOS) in England, the Scottish Public Services Ombudsman (SPSO) in Scotland, the Public Services Ombudsman for Wales, or the Northern Ireland Public Services Ombudsman (NIPSO) for Northern Ireland. Please note, due to potential differences in reporting period, the figure reported here may differ from that reported to the national Ombudsman.

Criterion 23:

What are the key support services that the housing provider offers to its residents?
How successful are these services in improving outcomes?

Guidance

Describe the key support services that the housing provider offers to its residents and how successful are these services in improving outcomes. This can include, but is not limited to, services that help residents:

- Increase skills and/or gain employment
- Budget and/or better manage their money (i.e. this includes support services aimed at reducing debt and/or accessing benefits)
- Improve their mental and/or physical health
- Targeted support for vulnerable tenants, such as those at risk of domestic abuse and antisocial behaviours.

Housing providers should describe the service(s), report how many residents have directly benefitted from the service(s) (and how representative these residents are of the housing provider's total resident population), and any key performance indicators (KPIs) used to measure the success of the service(s). Housing providers should report the results of the KPIs for the reporting period, with reference to changes in outcomes for residents.

Criterion 24:

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.

Enhanced reporting option:
Social Value calculations (including monetisations)

Guidance

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

Disclosures likely include examples or case studies of where the housing provider has been engaged in placemaking or placeshaping activities, such as creating community gardens, children's play areas, murals etc. and wider community engagement or social inclusion activities.

These should describe how the housing provider's management and community investment teams have worked with residents, external partners and the wider local community to bring about positive changes to a particular place(s), spanning the physical realm and local services.

Housing providers should disclose any key performance indicators (KPIs) used to measure success, and the results of these within the reporting period.

A housing provider's Section 106 / CIL contributions should be excluded from this criterion.

For enhanced reporting:

Housing providers should disclose Social Value and SROI calculations (including monetisations) of all resident support services and placemaking activities [£]. The approach and methodology should be clearly disclosed or referenced. It is important that figures are contextualised to give them meaning.

Criterion 25:

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

Guidance

Report if the housing provider is registered with the national regulator of social housing. For example, the Regulator of Social Housing in England, the Scottish Housing Regulator in Scotland,the Regulatory Board in Wales, or The Department for Communities in Northern Ireland.

Criterion 26:

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

Guidance

Report the housing provider's most recent regulatory grading/status. For example, English housing providers will have a numerical V/G grading (i.e. V1/G2), Welsh housing providers will have a "Standard, Increased Intervention or Statutory Action" grading, and Scottish housing providers will have a "Compliant, Working Towards Compliance or Statutory Action" status.

Criterion 27:

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

Guidance

Report the Code of Governance that the housing provider follows. It is expected that non-profit housing providers in England will follow the National Housing Federation's (NHF) Code of Governance issued in 2020, that Scottish Registered Social Landlords comply with the Scottish Housing Regulator's Standards of Governance and Financial Management, that Welsh housing providers follow the Community Housing Cymru's Code of Governance, and that housing providers from Northern Ireland follow the Northern Ireland Federation of Housing Associations (NIFHA) Code of Governance.

Criterion 28:

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?

Guidance

Report if the housing provider are a Not-For-Profit or not (Yes/No).

If not, the housing provider should give insight into the ownership and control of the organisation by disclosing who the largest shareholder is and their ownership (%) and voting rights (%).

Criterion 29:

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

Enhanced reporting option:
Is the housing provider required to report against TCFD?
If yes, is the housing provider doing so?

Guidance

Describe how the housing provider's board manages ESG risks, and whether ESG risks are incorporated into the housing provider's risk register.

ESG risks refer to the potential negative impacts that environmental, social, and governance (ESG) factors can have on an organisation's financial performance, operations, reputation, and overall sustainability. These risks are becoming increasingly important as investors, regulators, and other stakeholders emphasise the need for businesses to manage their ESG-related challenges. The 12 thematic areas of the SRS are the ESG areas considered relevant and material to housing providers and provide a good indication of ESG risks facing housing providers. The way a housing provider uses its Risk Management Framework provides a clear view into how they handle and mitigate ESG risks.

For enhanced reporting:

Disclose if the housing provider is required to report against the TCFD recommendations (now part of IFRS), (Yes/No). If yes, the organisation should state if it is currently doing so (Yes/No).

Established in 2015 by the Financial Stability Board - an international body that monitors and advises the global financial system – the Task Force on Climate-Related Financial Disclosures (TCFD) is a set of recommendations for disclosing climate-related financial risks and opportunities in mainstream corporate reporting. The framework asks companies to report on how climate change will affect their business in a consistent, comparable, and reliable way. It aims to enable businesses, investors, lenders, and other stakeholders to make more informed financial decisions.

The UK became the first country to make reporting mandatory in 2021, with the following entities falling withing scope:

- All UK companies that are currently required to produce a Non-Financial Information Statement. This includes UK companies that have more than 500 employees and are either traded companies, banking companies or insurance companies.
- UK registered companies of LLPs with more than 500 employees and with securities admitted to AIM/ a turnover of more than £500m.

Where relevant, the disclosures are required at a group level. This means the reporting requirements and scope thresholds apply on a consolidated basis. For example, where a company was a parent company at any time within the financial year, if in that year a group headed by it had more than 500 employees and an aggregate turnover of more that £500m net, then the parent company would be within the scope of the requirements.

To see if the housing provider is within scope, please visit: https://www.gov.uk/government/publications/tcfd-aligned-disclosure-application-guidance/task-force-on-climate-related-financial-disclosure-tcfd-aligned-disclosure-application-guidance

Criterion 30:

Has the housing provider been subject to any adverse regulatory findings in the last 12 months - that resulted in enforcement or other equivalent action?

Enhanced reporting option:
If yes, describe.

Guidance

Report if the housing provider been subject to any adverse regulatory findings in the reporting period (data protection breaches, bribery, money laundering, HSE breaches etc.) that resulted in enforcement or other equivalent action.

This criterion is included to raise any issues that have adversely affected the housing provider in the reporting year. It serves an important purpose in ensuring that any issues relating to the organisation's governance must be disclosed to investors.

For enhanced reporting

If the housing provider has answered 'Yes' to this criterion, the housing provider should describe the adverse regulatory findings.

Criterion 31:

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 EDI into the recruitment and selection of board members and senior management?

Guidance

Describe how the housing provider ensures it gets input from a diverse range of people into the governance processes. Responses should include how the housing provider considers resident voice at the board and senior management level, and whether the housing provider has EDI policies for the recruitment and selection of Board members and senior management.

Senior management will be different for each organisation - however it will consist of senior employees who work together to manage and lead the organisation. Typically this is members of the executive team who are the highest level of managers in an organisation, immediately below the Board of directors. Housing providers should disclose who it considered to be senior management in the response.

Criterion 32:

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?

Guidance

Report the percentage of the housing provider's Board and senior management that have turned over in the last two years. This should be separate turnover figures for both the Board and management. Each figure should cover the last two years and be the total turnover (i.e. including all termination reasons such as voluntary and non-voluntary).

Worked example:

There are 10 members of the management team, one member left and was replaced in the 2023/24 financial year, and two members left and were replaced in the 2022/23 financial year. Thereby management team turnover is 30%.
1+2 = 3
3/10 = 0.3 = 30%

Senior management will be different for each organisation - however it will consist of senior employees who work together to manage and lead the organisation. Typically, this is members of the executive team who are the highest level of managers in an organisation, immediately below the Board of directors. Housing providers should disclose who it considered to be senior management in the response.

Criterion 33:

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

Guidance

Report the absolute number of Board members on the housing provider's Audit Committee with recent and relevant financial experience. For example, if 4 of the 8 Board members on the Audit Committee have recent and relevant financial experience, the response should be 4. Housing providers are encouraged to describe the financial experience of each individual or as a collective.

Criterion 34:

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

Guidance

Report the percentage of the housing provider's Board that are non-executive directors. For example, if 4 of the 8 Board members are non-executive directors, the response should be 50%. Non-executive directors are members of the housing provider's Board of directors who aren't company employees. This means that they don't engage in the day-to-day management of the organisation, and act as an independent advisor.

Criterion 35:

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

Guidance

Report if a succession plan has been provided to the housing provider's Board in the reporting period. A Board succession plan is a company's long-term strategy that outlines the process for replacing Board members or executive directors and identifying successors for leadership roles.

The recent presentation of a succession plan to the Board indicates that an organisation has taken appropriate steps to prepare for future changes in the makeup of the organisation's senior management team. This evidences clear planning and preparedness in the housing provider's governance.

Criterion 36:

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

Guidance

Report how many years the housing provider's current external audit partner been responsible for auditing the organisation's accounts. This should be an absolute number representing the number of whole years.

This is a standard question asked by investors - where the same auditor has been used for many years, there is a concern that over time there will be a conflict of interest and therefore a lack of scrutiny.

Criterion 37:

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

Guidance

Report when the last independently-run, Board-effectiveness review took place. This should be a date, reported as a month and year (XX/XXXX). A Board-effectiveness review is a comprehensive evaluation of a company's board of directors, aimed at assessing how well the Board is fulfilling its duties and responsibilities. The review focuses on the Board's overall performance, decision-making processes, governance practices, and how effectively it contributes to the organisation's success.

Criterion 38:

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

Guidance

Report how the housing provider handles conflicts of interest at the Board. Boards handle conflicts of interest through established policies and procedures designed to identify, manage, and mitigate situations where a board member's personal interests may interfere with their fiduciary duties. Proper management of conflicts ensures that board decisions remain fair, transparent, and in the best interest of the organisation. As housing providers grow, the likelihood for a conflict of interest increases.

Criterion 39:

Does the housing provider pay the Real Living Wage?

Guidance

Disclose if the housing provider pays the Real Living Wage. This includes all part- and full-time employees. Where apprentices and/or contractors have been included, this should be clearly disclosed.

The Real Living Wage is calculated and set by the Living Wage Foundation. Visit here for more information: https://www.livingwage.org.uk/

Note that the Real Living Wage is different to, and higher than, the Minimum Wage and the National Living Wage. It is a rate based on the cost of living, and voluntarily paid by over 15,000 UK businesses.

Housing providers do not need to be an Accredited Living Wage Employer to answer yes to this question.

Criterion 40:

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

Guidance

Report the housing provider's median gender pay gap. This reflects the difference between the middle value of male and female pay, showing how pay distribution differs between genders.

This should be calculated in line with the UK government standard, available here: https://www.gov.uk/guidance/gender-pay-gap-reporting-overview

Criterion 41:

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

Guidance

Report the housing provider's CEO: median-worker pay ratio. This is a metric that compares the compensation of a company's Chief Executive Officer (CEO) to the median pay of its employees. The ratio provides insight into the income inequality that may exist within the organisation.

This should be calculated in line with the UK government standard, available here.

Criterion 42:

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

Guidance

Report how the housing provider is ensuring that equality, diversity and inclusion (EDI) is promoted across its staff. Disclosures should provide a description of any EDI policy(s) and how it is operationalised within the organisation.

Criterion 43:

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

Guidance

Describe the actions taken by the housing provider to support the physical and mental health of its staff. This can include, but is not limited to, actions taken to create a positive work environment such as promoting a healthy work-life-balance, ensuring manageable workloads, and encourage open and supporting communication. It can also include the provision of mental health training, virtual counselling services, fitness programs, mindfulness and relaxation activities, health and wellness checks, team building activities and peer support groups.

Criterion 44:

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

Enhanced reporting option:
What % of employees have received qualification that are relevant for their professional development, within the last year?

Guidance

Describe how the housing provider supports the professional development of its staff. Professional development refers to the process of acquiring new skills, knowledge, and competencies that help individuals grow in their careers. Actions can include, but are not limited to, training and education opportunities, mentoring programs, career development plans, access to professional networks, skill-building workshops, and feedback and performance evaluations.

For enhanced reporting:

Disclose the percentage of employees that have received qualification(s) that are relevant for their professional development within the reporting period as a proportion of the housing provider's total employees. A professional qualification is any course or training that is relevant for carrying out current or future work responsibilities whereby the employee receives a certificate (or equivalent) at completion.

This should be disclosed as one percentage figure, then split by demographic (i.e. multiple percentage figures with corresponding narrative). Common demographic factors include age, gender, race, ethnicity, education level, job role and location. The housing provider should split by those that it considers to be appropriate for its organisation.

Criteria 45 + 46:

How is social value creation (C45) and sustainability (C46) considered when procuring goods and services? What measures are in place to monitor the delivery of this social value (C45) and the sustainability of your supply chain (C46)?

Enhanced reporting option:
What is the relative weighting of social value (C45) and environmental impact (C46) considerations in procurement policies?

(C45 only) How much social value has been delivered from the housing provider's supply chain in the last 12 months?

(C46 only) How does the housing provider monitor supply chain risks, and what initiatives has the housing provider taken to drive higher sustainability performance across its supply chain?
Describe how social value creation and environmental impact is considered by the housing provider when procuring goods and services.

Guidance

Social value in procurement refers to the positive impact (or reduction of negative impact) that purchasing decisions can have on society beyond simply acquiring goods and services at the best price. The housing sector has the potential to deliver social value in multiple ways, such as through contracting local businesses and social enterprises and creating job opportunities for residents.

Sustainability in procurement refers to the positive impact (or reduction in negative environmental impact) that purchasing decisions can have on the environment beyond simply acquiring goods and services at the best price. This can include requiring contractors to reach certain sustainability standards, to use materials from responsible sources, or have environmental protection policies, for example.

Responses should also include a description of the measures that are in place to monitor the sustainability of its supply chain and the delivery of social value.

For enhanced reporting:

Housing providers should disclose the relative weighting of social value and environmental impact considerations in its procurement policies.

This can be a fixed weighting applied to all procurement contracts. For example, an organisation might allocate 10% of procurement scoring to social value delivery across all contracts. However, in some cases, the weighting may vary depending on the type or value of the contract. In these instances, we ask for a simple average of the social value weightings across all contracts, without factoring in contract value.

For example: If two contracts have a social value weighting of 10%, and three contracts have a weighting of 50%, the simple average is 34% (calculated as: 10+10+50+50+50 / 5 = 34%).

This calculation reflects the average weighting across all contracts, regardless of their individual values. No adjustment based on contract value is required.

The housing provider should report two separate figures for social value and environmental impact considerations.

For C45, housing providers should also disclose how much social value has been delivered from the housing provider's supply chain in the reporting period. If housing providers choose to, the approach and methodology should be clearly disclosed or referenced. It is important that figures are contextualised to give them meaning.

For C46, housing providers should also provide a description of how the housing provider monitors supply chain risks associated with the environment, and what initiatives the organisation has taken to drive higher sustainability performance across its supply chain.