



ENVIRONMENTAL MANAGEMENT POLICY

Originator:	Regulatory Compliance Team
Approval date:	June 2025
Review date:	June 2028

1	Introduction
1.1	As a responsible business, employer and provider of housing services, Pine Court Housing Association (PCHA) seeks to promote positive environmental practices in its core business activities.
1.2	<p>The Policy sets out the provisions PCHA will have in place for positive environmental actions associated with:</p> <ul style="list-style-type: none"> • Its status as an employer and the running of office facilities • How it will encourage positive environmental actions from those that carry out work on its behalf and supply chain management • Work it carries out on its rental property portfolio
1.3	The Policy does not cover the waste or recycling obligations for those it provides landlord services to, although, every effort will be made to promote responsible waste management and recycling opportunities for these customers and provide advice on how they can reduce energy usage.
1.4	<p>Operation of the Policy enables PCHA to meet the requirements of the Regulatory Framework for Social Housing, introduced by the Regulator for Social Housing (RSH) as follows:</p> <ul style="list-style-type: none"> • When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas • Registered providers must co-operate with relevant partners to promote social, environmental and economic wellbeing in the areas where they provide social housing
1.5	<p>In operating the Policy PCHA will ensure it meets the requirements of the relevant legislation and regulatory codes as follows:</p> <ul style="list-style-type: none"> • Environmental Protection Act 1990

- Environmental Protection (Duty of Care) Regulations 1991
- Environmental Permitting Regulations 2010
- Energy Efficiency Regulations 2015
- Hazardous Waste Regulations 2005
- List of Waste Regulations 2005
- The Waste Framework Directive (WFD) 2008
- The Waste (England and Wales) Regulations (WR) 2011
- Waste Electrical and Electronic Equipment (WEEE) 2013
- Waste Transfer Regulations 2005
- Control of Substances Hazardous to Health (COSHH) 2002 as amended
- Environmental Damage Regulations 2009
- Scrap Metal Dealers Act 2013
- Control of Pollution (Oil Storage Regulations) 2001

1.6 Access and Communication

1.6.1 PCHA is committed to ensuring that the services it provides are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.

1.6.2 Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.

1.7 Equality, Diversity and Human Rights

1.7.1 PCHA is committed to fairness and equality for all customers, colleagues, and stakeholders.

1.7.2 PCHA's approach to Equality, Diversity, and Inclusion (EDI) goes beyond legal or statutory obligations, however, PCHA will meet or exceed its legal requirements as outlined in the Equality Act 2010 and the Human Rights Act 1998. This policy also demonstrates how PCHA will meet the requirements of Public Sector Equality Duties, which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation.

1.7.3 PCHA is fully committed to eliminating unfair and unlawful discrimination. Hate Crime, Harassment, and Bullying will also not be tolerated, and take proactive steps to prevent such behaviours.

1.7.4 It is unlawful to discriminate directly or indirectly based on the following protected characteristics:

- Disability
- Gender
- Gender identity, or gender reassignment status
- Race, racial group, ethnic or national origin, or nationality
- Religion or belief
- Sexual orientation
- Age
- Marriage or civil partnership status
- Pregnancy or maternity

1.7.5	PCHA are also committed to ensuring that individuals are not treated less favourably due to their social, economic, or cultural backgrounds, as well as specific medical conditions as defined in the Equality Act.
1.7.6	PCHA regularly review policies and practices to ensure they reflect its commitment to equality and diversity.
2	Statement of Intent
2.1	PCHA will operate a comprehensive Environmental Management System (EMS) incorporating an 'aspects and impacts register' of all activities, products and services it provides. The aim of this register is to determine which of those aspects and impacts are significant and require control measures and actions to improve performance.
2.2	<p>In operating the EMS PCHA will ensure that it:</p> <ul style="list-style-type: none"> • Complies with all relevant legislation, standards and codes of practice relevant to its area of operations and strives to make efficient use of energy and materials, including substitution of renewable resources, wherever possible • Reduce waste by actively promoting the recycling of materials and the use of recycled goods and ensure that all associated residual waste materials are disposed of in a safe and responsible fashion • Seek to reduce harmful emissions wherever possible • Reduce energy and materials (including water use) consumption in PCHA offices and help residents in housing owned by PCHA to save energy in the running of their homes • Reduce the overall carbon footprint • Promote environmental awareness to employees, sub-contractors and customers
2.3	PCHA will ensure that its systematic efforts to improve environmental performance are externally verified and will look to maintain internationally recognised standards such as ISO 14001 Environmental Management Systems, or similar.
3	Policy
3.1	<u>Environmental actions as an employer</u>
3.1.1	As a responsible employer PCHA will seek to minimise or eliminate the negative environmental impacts associated with the operation of office facilities.
3.1.1.1	<p>PCHA will adopt the following approach:</p> <ul style="list-style-type: none"> • Establish baseline positions for environmental aspects and impacts • Put in place effective monitoring systems • Periodically review findings • Through benchmarking and industry standard comparisons, set challenging but realistic targets for improvement
3.1.1.2	As a result of this approach PCHA will take action in the following areas:

3.1.2	Staff Agile working
3.1.2.1	PCHA empowers its employees to carry out all or some of their work at any place (an approved worksite) and time of their choice with maximum flexibility and minimum constraints e.g. home, library etc.
3.1.2.2	Agile working by PCHA employees will achieve the following: <ul style="list-style-type: none"> • Reduced emissions associated with travel to work, improving carbon footprint performance • Reduced office waste i.e. printer paper, plastics etc. • Reduced energy consumption and water use in office accommodation
3.1.3	Reduce office energy consumption:
3.1.3.1	For any buildings PCHA owns and manages from which it delivers housing services, PCHA will seek to reduce energy consumption associated with building operations i.e. electricity or gas usage.
3.1.3.2	To achieve this aim PCHA will: <ul style="list-style-type: none"> • Invest in smart metering facilities to be able to determine precise usage and challenge accuracy of rates being charged. PCHA will also use this information to identify areas / installations of high consumption and look over a phased programme to replace with more energy efficient systems e.g. replacing computer servers with more modern energy efficient units • Investigate the possibility of installing voltage power optimisation technology (matching more closely voltage supply with actual requirements of electrical equipment) • Investigate the possibilities and install wherever viable green technologies (micro - generation) to reduce energy consumption
3.1.4	Improve recycling rates:
3.1.4.1	PCHA will set targets to reduce the amount of office waste created and improve recycling rates. It will look to achieve this by: <ul style="list-style-type: none"> • Increasing the number of documents stored in electronic form to cut down on paper usage • Operate account managed printing facilities to identify areas of the business that produce the largest volumes and work towards reducing their printing output via communication by other means • Employing waste carriers that will sort office waste off-site for recycling and set year-on-year targets for improvement including arrangements for confidential waste recycling and safe disposal of electrical / computer equipment in accordance with WEEE 2013 Regulations
3.1.5	Encourage sustainable transport
3.1.5.1	PCHA will look to reduce fuel emissions by:

- Encouraging sustainable forms of transport e.g. cycling through promotion of the 'bike to work' scheme (subsidised cycle and equipment purchase), provision of safe cycle storage and shower facilities at any office location
- Encouraging use of combined visits across multiple teams for housing management

3.1.6 **Promoting positive environmental behaviours**

3.1.6.1 PCHA will use its internal communication channels to promote positive environmental behaviours from its staff including home energy saving advice and ways in which they can reduce the amount of office waste created / increase recycling rates.

3.1.7 **Standardised Environmental, Social and Governance Reporting**

3.1.7.1 To drive up environmental standards in the social housing sector, PCHA have adopted a standardised approach for recording Environmental, Social and Governance (ESG) performance and good practice measures.

3.1.7.2 The aim of this approach is to demonstrate to external finance providers that are seeking ethical business investment opportunities, PCHA's credentials in a measurable and comparable way.

3.2 **Supply chain and contractor management**

3.2.1 **Contractor selection and monitoring**

3.2.1.1 When selecting all major and regular suppliers of goods and services, including sub-contractors PCHA will require companies which it chooses to work to pass 'preferred supplier' requirements.

3.2.1.2 PCHA will carry out periodic checks to ensure environmental performance targets and arrangements are being adhered to and will remove contractors and suppliers where non-compliance is discovered. PCHA will also require suppliers / contractors that have achieved preferred supplier status to reapply if not used in the previous 12-month period.

3.2.2 **Intra-Group arrangements**

3.2.2.1 PCHA will work with other companies within the Sovini Group to monitor and improve environmental performance including measures for:

- Product selection – working together to pool knowledge to select replacement components for both responsive repairs to PCHA owned properties and those used in investment programmes that have improved life cycles and require less on-going maintenance / replacement
- Recycling of trade waste - setting targets that exceed industry best practice (Waste and Resources Action Programme targets) including arrangements for reducing packing and recycling of metals
- Fleet management – ensuring low emission vehicles are used and reducing business mileage through the use of journey optimisation and intelligent job scheduling technologies, including use of mobile working solutions

3.3	<u>Property management</u>
3.3.1	Property attributes
3.3.1.1	PCHA will meet the requirements of the Energy Efficiency Regulations 2015 by ensuring each property for rent (domestic and commercial) has an Energy Performance Certificate (EPC) rating of 'E' or above and has targets in place to bring all properties to EPC C rating or above by 2030.
3.3.1.2	<p>In compliance with the above Regulations and the 'Minimum Energy Efficiency Standard', PCHA will arrange for energy performance assessments using an EPC rating on all its void properties. Where ratings require improvement, PCHA will take action as appropriate, examples include:</p> <ul style="list-style-type: none"> • Roof and wall insulation • Replacing old, inefficient heating with energy efficient systems • Installing double glazed windows • Installing energy efficient lighting
3.3.1.3	PCHA will ensure a copy of the EPC is provided to all new tenants / leasees for properties that it rents when they first move into the property and the existing ratings will be available when properties are advertised.
3.3.1.4	<p>In addition to the above EPC requirements, PCHA will develop and maintain a 'sustainability index' of all domestic properties that it rents and will assess information in this alongside, where possible, stock condition information and prototype surveys. This approach will be used to:</p> <ul style="list-style-type: none"> • Determine future investment strategies for buildings and facilities to improve environmental performance • Inform any decisions on stock rationalisation options • Identify potential for installation of renewable and low carbon energy technologies • Assist in the preparation of grant funding applications
3.3.1.5	Where possible PCHA will ensure any new build properties it commissions or takes ownership of incorporate design features that reduce energy consumption or low carbon technologies for energy production.
3.3.2	Customer information provision and signposting
3.3.2.1	Through newsletters and general information produced on its website, PCHA will encourage actions from its customers that have a positive environmental impact including reducing energy usage and recycling opportunities.
3.3.2.2	PCHA will work in partnership with energy providers, local authorities and other agencies to provide advice and referrals where customers may be experiencing fuel poverty or to take advantage of opportunities to reduce home energy usage, e.g. through the installation of smart metering or accessing favourable tariffs.

3.3.3	External funding
3.3.3.1	In order to improve environmental performance and in line with value for money initiatives, PCHA will seek to maximise opportunities for accessing external funding, wherever possible.
3.3.3.2	This may apply to environmental initiatives that relate to the management of its rental properties and office facilities / employer functions and include joint ventures with external partners.
4	Implementation
4.1	All PCHA staff need to be aware of the PCHA Environmental Management Policy to direct their actions and so that they may address any customer queries that may arise.
4.2	The Data and Quality Assurance Manager will have specific responsibility for ensuring all necessary certification and licenses, that support the operation of this Policy are in place and up to date which will be checked regularly through system audits.
5	Performance
5.1	<p>The following performance indicators underpin the operation of this Policy will be reported internally to senior management teams:</p> <ul style="list-style-type: none"> • Reduction in energy consumption in PCHA offices • Increase in volume of office waste recycling • Reduction in total, annual carbon footprint (CO2) emissions in comparison with the base year's data
5.2	An assessment of the above is included in the PCHA Value for Money Statement and ESG reporting.
5.3	The above targets will be reviewed and amended on an annual basis, based on actual performance.
6	Consultation
6.1	All PCHA Staff and customer representatives have been consulted in the development of this Policy.
7	Review
7.1	The Policy will be reviewed once every three years from the date of Operations Director's approval or sooner if required by the introduction of new legislation, regulation or if necessitated by changes to PCHA working practices / as a result of system audits.

8	Equality Impact Assessment			
8.1	Was a full Equality Impact Assessment (EIA) required?	No		
8.2	When was EIA conducted and by who?	The EIA was conducted by the Strategic Regulatory Compliance Manager and the Policy and Strategy Administrator in March 2025.		
8.3	Results of EIA	The EIA did not indicate any differential impacts on any of the groups with protected characteristics.		
9	Scheme of delegation			
9.1	Responsible committee for approving and monitoring implementation of the Policy and any amendments to it	Operations Director-PCHA		
9.2	Responsible officer for formulating Policy and reporting to committee on its effective implementation	Operations Director-PCHA		
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Operations Director-PCHA		
10	Amendment log			
Date of revision:		Reason for revision:	Consultation record:	Record of amendments:
26/11/2019		In line with the review schedule	See section 6	The Policy has been developed to cover PCHA’s activities only.
12 th April 2022		In line with the review schedule	See section 6	Change at 1.4 – inclusion of Energy Efficiency Regulations 2015. Change at 4.2 –amended to read ‘the Data and Quality Assurance Manager will have specific responsibility for ensuring all necessary certification and licenses are in place and up to date which will be checked regularly through system audits’.

			<p>Changes at section 5 as follows:-</p> <ul style="list-style-type: none"> • Removed the % reduction in water consumption in PCHA offices • Reworded that to achieve in excess of 85% for office waste recycling • Replaced the % reduction in total carbon footprint (CO2) emissions from office and fleet use by 40% with - Reduction in total, annual carbon footprint (CO2) emissions in comparison with the base year's data
17 th June 2025	In line with the Review Schedule	See section 6	<ul style="list-style-type: none"> • Removal of reference to Head Office Facility throughout • EIA updated at Section 8 • Equality, Diversity and Human Rights statement updated