



COASTAL HOUSING
ENVIRONMENT, SOCIAL
& GOVERNANCE REPORT

2024



INTRODUCTION

Coastal Housing Group became an adopter of the Sustainability Reporting Standard for Social Housing (SRS) in 2023. For us, it was a means to publicly state our commitment to becoming a more sustainable housing association. The requirement to publish annual reports was a stimulus for us to ensure that we continually monitored our progress.

Over the last two years since we launched our sustainability strategy, we have consciously shifted how we work in order to better measure our carbon footprint and identify areas where it can be reduced.

We have improved how we capture our emissions from Coastal vans and staff's own vehicles, improved our data collection around business waste, and engaged with suppliers about their own emissions. This means that every year, our published environmental data becomes more robust and reliable.



Chief Executive Debbie Green presents at the 2023 Swansea City Centre Conference. Coastal sponsored the event's Energy and Environment Zone.

As our business grows, we are conscious to ensure that the decisions we take will not lead to detrimental effects for either the communities we serve or the planet which sustains us. We have directed millions of pounds of investment towards decarbonising our existing stock and we are part of concerted efforts to minimise the embodied carbon of our new-build homes. As the economy transitions to one of net zero emissions, we want to be a leader in our sector.

This is Coastal's second SRS report, as well as our last in our current guise. As of January 2025, we'll be part of a new, larger organisation after merging with RHA. RHA were early adopters of the SRS so we'll be gaining more experience, expertise and enthusiasm to ensure that sustainability is a central organising principle for us in the future.

Debbie Green
Chief Executive

CLIMATE CHANGE

C1. DISTRIBUTION OF EPC RATINGS OF EXISTING HOMES (THOSE COMPLETED BEFORE THE LAST FINANCIAL YEAR).

Coastal is pleased to report that the average of stock for which it has SAP scores (74.6%) is 76.5 (mid 'C'). Of all properties with SAP scores, the percentages* are as follows (85% rated 'C' or better):

- **A: 0.3% (NO. 14)**
- **B: 38.9% (NO. 1,856)**
- **C: 45.8% (NO. 2,185)**
- **D: 12.6% (NO. 600)**
- **E: 1.4% (NO. 66)**

Of all properties, Coastal needs to complete 1,608 EPCs (25.2%). Accounting for these as 'unverified', Coastal's properties appear as follows (64% confirmed as rated 'C' or over):

- **A: 0.3% (NO. 14)**
- **B: 29.1% (NO. 1,856)**
- **C: 34.2% (NO. 2,185)**
- **D: 9.4% (NO. 600)**
- **E: 1% (NO. 66)**
- **UNKNOWN: 25.2% (1,608)**

*Totals not 100% due to rounding.

C2. DISTRIBUTION OF EPC RATINGS OF NEW HOMES (THOSE COMPLETED IN THE LAST FINANCIAL YEAR).

Following a restructure and restaffing of Coastal's development department in 2021/22 and a subsequent period of reviewing and planning Coastal's new build programme, only **37** new-build homes were completed during 2023 (**25** for social rent and **12** for low-cost homeownership). This number will increase significantly in the coming years. However, Coastal is pleased to report that **100%** of these homes achieved an EPC rating of a high 'B', scoring between **86** and **91**.

An additional **13** homes (of varying ages) were purchased from the open market for social rent.

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?

Coastal's first comprehensive sustainability strategy, *All Possible Action*, was approved by Coastal's Board and published in autumn 2022. This was the first time that Coastal had produced a sustainability strategy and the document included KPIs agreed with senior staff from across Coastal. However, an explicit net-zero target was intentionally omitted due to the immaturity of Coastal's knowledge of its own carbon footprint, as well as external uncertainty about how achievable a net-zero target would be. Reasons for this uncertainty included unpredictable funding for the decarbonisation of existing homes as well as the UK's electricity grid.

In 2025, Coastal expects to complete a merger with RHA Wales to form a new, 8,500 home landlord. This will necessitate a new sustainability strategy for the new organisation. It is intended that the new sustainability strategy build upon the strengths of *All Possible Action* and include learning from the life of that strategy. The new strategy will include clearer SMART targets and a target for the organisation to be 'net-zero ready'.

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?

Since the start of the programme, Coastal has been actively involved in the Welsh Government's *Optimised Retrofit Programme* (ORP). Since then, Coastal has also become involved with the *Homes as Power Stations* project, part of the Swansea Bay City Deal programme. The former concentrates on a 'fabric first' approach by dealing with heat loss, the latter concentrates on decarbonising heat by electrifying heating systems and installing batteries and solar panels to properties.

In 2023, Coastal treated **23** flats with external wall insulation. All these flats were in pre-1919, solid wall buildings. One house was also upgraded with external wall insulation. Where necessary, loft insulation was also topped up and windows were replaced where residents allowed access. These upgrades brought the treated properties up to EPC 'C'.

C5. SCOPE 1, SCOPE 2 AND SCOPE 3 GREEN HOUSE GAS EMISSIONS

Coastal has worked with SHIFT environment for several years to calculate its carbon footprint. For the calendar year 2023, Coastal's emissions were

SCOPE 1: 1,903.51 TONNES CO2E

SCOPE 2: 955.78 TONNES CO2E

SCOPE 3: 3,587.31 TONNES CO2E

TOTAL: 16,446.59 TONNES CO2E

Intensity ratio: 2.60 tonnes CO2e/home managed. This is an increase since Coastal's first SHIFT assessment in 2021 (2.13 tonnes CO2e/home managed) and we are working to understand the reasons for this increase.

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?

Coastal has worked with SHIFT and its insurers to establish the respective risks of flooding and overheating to its properties. Whilst we don't have a flood risk assessment to individual property level, SHIFT have estimated that **83.3%** of Coastal's homes are at low risk of flooding.

90.1% of Coastal's homes are estimated to be at low risk of overheating.

Post-merger, the organisation which Coastal will form part of, intends to explore new data analysis tools including GIS mapping to examine flood and overheating risk as the increased portfolio of homes will be spread across a much wider area. GIS mapping would enable us to examine flood and overheating risk under various climate change scenarios and help us to better guide remedial measures.



Most floods experienced to date have been due to urban drainage systems becoming overwhelmed, but homes were typically not affected because Coastal's town centre residential properties tend to occupy first floors and above.

Many of the increasing incidents of flooding in the UK are due to urban drainage systems becoming overwhelmed.

ECOLOGY

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.

The Welsh Government, which controls planning policy in Wales, requires new developments to introduce net biodiversity benefits, but not to a set percentage which can be manipulated by developers as in other UK nations. Coastal works closely with planning departments as well as its own estates maintenance teams to ensure biodiversity is preserved on its sites. These principles are enshrined in *All Possible Action*, Coastal's sustainability strategy.

Welsh legislation requires sustainable drainage and planning policy requires landscaped areas and areas for children's play. Coastal's estates team then work on sites to create no-mow areas and wildflower meadows which will support pollinating insects, other invertebrates and birds. In 2023, Coastal created **79** wildflower meadows and **57** no-mow areas across its sites.

Coastal is proud to have installed Swansea city centre's first living green wall, supported by Welsh Government funding. New building projects in Coastal's programme also feature green roofs, which will complement Coastal's trial green roof at its own offices.

In 2023, Coastal's estates team achieved the organisation's first Green Flag award for its Mount Pleasant Hospital site. Coastal repeated that feat in 2024 when the Green Flag award was retained.

**[MORE INFORMATION CAN BE FOUND AT COASTALHA.CO.UK/
NATUREZONE](https://www.coastalha.co.uk/naturezone)**

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?

Coastal's current sustainability strategy contains a specific section on dealing with pollutants. Coastal's maintenance department actively manages an asbestos directory and has refreshed its approach to responding to damp and mould reports. Excess paint is disposed of responsibly with Coastal's decorators' merchant because Coastal directly employs its own decorating team.

Coastal has no known internal lead piping and external lead pipes are dealt with in cooperation with Welsh Water.

Coastal is especially proud that it has eradicated the everyday use of glyphosate-based weedkillers except for use by specially trained staff to deal with Japanese knotweed. This is better for the long-term health of staff and residents.



Excess paint is disposed of responsibly with Coastal's decorators' merchant.

RESOURCE MANAGEMENT

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?

Coastal does not currently have a specific strategy for sourcing maintenance materials from responsible sources but it does monitor the sustainability policies of suppliers it regularly uses such as *Worcester Bosch*, *Howdens Kitchens* and *Crown Paints*. This is an area which will be developed once Coastal has completed its merger with RHA and incorporated in the successor document to *All Possible Action*.

Coastal is working with its stationery supplier to obtain better data on the sustainability of its office supplies, currently estimated by SHIFT (based on an office inspection) to be **51%** responsibly sourced.

Coastal has already eliminated the use of bleach and other more harmful chemicals from its office cleaning supplies, having moved to more plant-based solutions.

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?

Coastal's office waste is removed by its own contractor rather than the local authority. This contractor was selected because they have their own recycling yards and picking lines. Because of the way their business is set up, the contractor was able to report that **93.6%** of Coastal's office waste was diverted from landfill prior to the introduction of the new Welsh guidelines in April 2024.

Coastal's development department insists that contractors are part of the *Considerate Constructors* scheme and waste transfer slips and reports are provided by contractors.

C11. DOES THE HOUSING PROVIDER HAVE A STRATEGY FOR WATER MANAGEMENT?

IF SO, HOW DOES THE HOUSING PROVIDER TARGET AND MEASURE PERFORMANCE?

Coastal's current sustainability strategy does contain a section on water use. Water use is also measured by SHIFT as part of their assessment. In 2024, this assessment (based mostly upon build-date estimates) read:

- **SMALLER THAN 180L BATH: 33.27%**
- **LOW FLOW TAPS: 33.27%**
- **LOW FLOW SHOWERS: 33.27%**
- **DUAL FLUSH TOILETS: 46.6%**
- **FLATS (REPRESENTING LESS WATER USAGE IN GARDEN): 58.18%**
- **WATER BUTTS: 0%**
- **WATER METERS: 78.28%**
- **GREY WATER / RAINWATER HARVESTING SYSTEMS: 0%**
- **RESIDENTS GIVEN INFORMATION ON WATER EFFICIENCY: 0%**

This leads to an average water consumption figure of **138L** per day per resident.

In 2023, Coastal installed an intelligent water meter for its own offices in order to isolate its own usage from the rest of the businesses based in the same building. Based on average

numbers of staff attending the office, over the course of a year **359.9m³** of water was used at the Head Office. This equates to **5.14m³** per employee.

In future, Coastal will record better data about where water butts are provided and seek to provide more as part of its Welsh Housing Quality Standard 2023 (WHQS) work.

AFFORDABILITY & 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)**

LHA rates had not been updated in Wales since 2020, but have since been updated in 2024.

Coastal does monitor its rent against the local private sector, but also uses the Joseph Rowntree Foundation's 'living rent' model. Under this method, rent should be no more than **28%** of the average income in a locality without service charges, or **33%** including service charges.

Breakdowns for the rent data per property type and local authority area is provided in the following table:

COASTAL RENTS BY LOCAL AUTHORITY AREA, WITH COMPARISONS TO LOCAL HOUSING ALLOWANCE (LHA), PRIVATE RENTAL SECTOR (PRS) RENTS, AND JOSEPH ROWNTREE FOUNDATION'S 'LIVING RENTS'

	Coastal avg. rent	LHA	PRS	Living rent
Neath Port Talbot County Borough Council				
1 Bedroom	£440.03	107%	80%	68%
2 Bedroom	£487.32	108%	74%	58%
3 Bedroom	£534.53	107%	67%	52%
4 Bedroom	£616.26	107%	69%	57%
	Coastal avg. rent	LHA	PRS	Living rent
City and County of Swansea				
1 Bedroom	£427.90	81%	71%	69%
2 Bedroom	£489.16	89%	70%	66%
3 Bedroom	£573.26	95%	68%	64%
4 Bedroom	£676.54	82%	71%	72%
	Coastal avg. rent	LHA	PRS	Living rent
Carmarthenshire County Council				
1 Bedroom	£433.38	108%	79%	75%
2 Bedroom	£509.47	104%	73%	61%
3 Bedroom	£597.56	112%	79%	69%
4 Bedroom	£654.04	101%	69%	75%
	Coastal avg. rent	LHA	PRS	Living rent
Bridgend County Council				
1 Bedroom	£382.00	95%	66%	66%
2 Bedroom	£410.64	78%	60%	59%

C13. SHARE, AND NUMBER, OF EXISTING HOMES (OWNED AND/OR MANAGED) COMPLETED BEFORE THE LAST FINANCIAL YEAR ALLOCATED TO:

Breakdown of 'General needs'	2023/24
Elderly needs	867
General needs	4,327
Managed agent	200
Adapted property	135
Extra care	115
Intermediate rental	58
General needs' total	5,702
Owner occupier	180
Leasehold	187
Shared ownership	39
Welsh housing partnership	496
Total	6,604

C14. SHARE, AND NUMBER, OF NEW HOMES (OWNED AND/OR MANAGED) THAT WERE COMPLETED IN THE LAST FINANCIAL YEAR, ALLOCATED TO:

- **SOCIAL RENT: 25 (67.6%)**
- **LOW COST HOME OWNERSHIP: 12 (34.4%)**
- **ACQUIRED FOR SOCIAL RENT: 13**

C15. HOW IS THE HOUSING PROVIDER TRYING TO REDUCE THE EFFECT OF HIGH ENERGY COSTS ON ITS RESIDENTS?

Coastal is a long-standing participant of the Welsh Government's *Optimised Retrofit Programme* (ORP) and the City Region's *Homes as Power Stations* (HAPS) programmes. Coastal uses these programmes to maximise energy efficiency of its homes primarily to tackle climate change. But, by saving energy, occupants of treated houses also save money.

Coastal employs a full-time Financial Health Manager who is expert in welfare benefits and other methods of income maximisation. He leads a team dedicated to supporting residents with complex financial circumstances and offer targeted guidance and information.

Coastal's housing officers are trained to recognise residents in financial distress at the earliest opportunity and work with residents to ensure rent obligations are met. Late in 2023, we reorganised teams to enable housing officers to focus more key tasks such as rents and lettings and we created a team dedicated to responding to resident contact on rents and finances.

C16. HOW DOES THE HOUSING PROVIDER PROVIDE SECURITY OF TENURE FOR RESIDENTS?

Coastal offers all residents the most secure contracts possible under Welsh housing law. The majority of social residents have secure occupation contracts which mean they can live in the property for as long as they maintain the terms of the contract; there are no fixed-term contracts.

Under the Renting Homes Wales Act, there are very limited grounds upon which the landlord can end the contract. Residents with standard contracts have to live in the property for six months before Coastal would be able to serve a notice to end it and that would be a six month period, a total of at least 12 months before Coastal can re-obtain possession. However, Coastal is committed to not evicting residents into homelessness and works across multiple agencies to achieve this ambition. Actual eviction rates are low (**0.3%** in 2023).

Coastal uses standard contracts where it doesn't own the property and therefore cannot offer a secure type contract. For example, houses managed under the Welsh Housing Partnership are technically leased from the Welsh Government on a rolling basis, so Coastal is unable to offer unlimited contracts for this group of intermediate-rented homes.

BUILDING SAFETY & QUALITY

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.

% OF HOMES FOR WHICH ALL REQUIRED FIRE RISK ASSESSMENTS HAVE BEEN CARRIED OUT.

% OF HOMES FOR WHICH ALL REQUIRED ELECTRICAL SAFETY CHECKS HAVE BEEN CARRIED OUT.

- **99.6% OF HOMES HAD AN IN-DATE GAS SAFETY CHECK***
- **100% OF HOMES THAT WERE COVERED WITH A FIRE RISK ASSESSMENT WERE IN-DATE**
- **91.5% OF HOMES HAD AN IN-DATE ELECTRICAL CHECK****

C18. WHAT % OF HOMES MEET THE NATIONAL HOUSING QUALITY STANDARD?

OF THOSE WHICH FAIL, WHAT IS THE HOUSING PROVIDER DOING TO ADDRESS THESE FAILINGS?

- **100% OF HOMES MEET THE WELSH HOUSING QUALITY STANDARD, SUBJECT TO SOME ACCEPTABLE FAILS.**

*0.4% overdue because of no access provided.

**8.5% overdue because of no access provided.

C19. HOW DO YOU MANAGE AND MITIGATE THE RISK OF DAMP AND MOULD FOR YOUR RESIDENTS?

Coastal maintenance inspectors attend all reports of damp and mould. They determine the course of action required, which ranges from advising residents on managing condensation, issuing works to repair items such as fans, windows etc, cleaning down and decorating mould affected areas in severe cases/vulnerable households or issuing larger works to eradicate sources of rising or penetrating damp.

RESIDENT 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?

In Coastal's 2024 resident survey, **84%** of residents were satisfied with the service provided with Coastal Housing, against **8%** who were dissatisfied. This put Coastal 11th out of 46 respondent social landlords. These findings were based on a **25%** return rate of a sample of 3,000 of Coastal's properties. The survey was carried out in December 2023.

C21. WHAT ARRANGEMENTS ARE IN PLACE TO ENABLE RESIDENTS TO HOLD MANAGEMENT TO ACCOUNT FOR THE PROVISION OF SERVICES?

All areas of housing service improvement are shaped by resident voice, both through studying demand, interventions and from targeted feedback. Coastal does not have a single Resident Committee as we focus on gathering the widest, most diverse range of voices from across all geographies, household types on strategy, policy and service delivery. Housing officers hold regular surgeries in local sites and resident engagement events are

held, for example one seeking views around re-wilding at Coastal's Mount Pleasant Hospital site in April 2024. Coastal's complaints procedure is also available in several languages on a dedicated area of its website: www.coastalha.co.uk/making-a-complaint/ and these are reported quarterly to board, with an annual deep dive report into themes and areas for improvement.

C22. 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?

There have been no such complaints upheld against Coastal by the Public Services Ombudsman for Wales.

RESIDENT SUPPORT

C23. WHAT ARE THE KEY SUPPORT SERVICES THAT THE HOUSING PROVIDER OFFERS TO ITS RESIDENTS?

HOW SUCCESSFUL ARE THESE SERVICES IN IMPROVING OUTCOMES?

Whilst Coastal has no in-house support service, all housing teams are trained to provide information, guidance and advice on tenancy sustainment, welfare benefits and all aspects of occupation contract management. Eviction and legal action are always a last resort when all other options have been exhausted including assistance with budgeting, income maximisation and mediation. We work closely with multi-agency partnerships to connect residents to agencies who can support them with any challenges being faced.

Coastal provides properties for a range of specialist managing agents to deliver supported housing from, including people living with long term health conditions and those facing transitions from care, the secure estate, hospital, etc.

Coastal has invested in Local Area Coordination in Swansea since 2016. Local Area Coordinators walk alongside people to understand what a good life looks to them and helps them make new connections and friends, get involved in groups and activities, overcome personal challenges, get their voices heard by people in power, be involved in improving public services and making a contribution to community

In 2023, Coastal invested and helped launch Cwtch Mawr, the first multi-bank in Wales. The multi-bank takes returned, opened or lightly damaged items from retailers and puts together furniture, kitchen, linen and other packages to support residents who otherwise have very little by providing new goods to their homes. Coastal is currently working with Cwtch Mawr on their impact assessments which will allow Coastal to benchmark the effect of this partnership.

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.

As of 19th July 2023, Coastal is officially a signatory to the *Wales Place Making Charter*, a Wales-wide initiative operated by the *Design Commission for Wales* and supported by

Welsh Government. We are pledged to uphold this nationally recognised placemaking code.

Coastal is proud of its two-decade history of major town centre regeneration. Starting with the redevelopment of the old Post Office, a 1950s concrete building in Swansea's Wind Street heritage area, Coastal has gone on to work with local authorities on major regeneration schemes in Neath Port Talbot and Bridgend. Further sites have also helped the overall redevelopment of Swansea city centre, such as Castle Quarter and Urban Village. Coastal is heavily involved in the regeneration of Swansea's High Street in concert with the local authority, Welsh Government and other stakeholders. New phases in this 20-year High Street project are planned to begin from 2025.

Coastal also applies principles of the *Placemaking Charter* and *Manual for Streets* onto all of its developments in urban and suburban areas. For example, Coastal's mixed tenure site at Pennard on the Gower Area of Outstanding Natural Beauty had to respond to its rural setting and enhances its village location with a sensitive design.

STRUCTURE AND GOVERNANCE

C25. IS THE HOUSING PROVIDER REGISTERED WITH THE REGULATOR OF SOCIAL HOUSING?

Coastal Housing Group is regulated by the Housing Regulation Team on behalf of the Welsh Ministers.

C26. WHAT IS THE HOUSING PROVIDER'S MOST RECENT REGULATORY GRADING/STATUS?

The Welsh Housing Regulator introduced a new grading system in January 2022 and committed to provide HAs with an annual judgement. Our most recent regulatory judgements, issued in July 2023, were:

Governance and Tenant Services - **Green** (compliant)

The association meets the regulatory standards and will receive routine regulatory oversight.

Financial Viability - **Green** (compliant)

The association meets the regulatory standards and will receive routine regulatory oversight.

C27. WHICH CODE OF GOVERNANCE DOES THE HOUSING PROVIDER FOLLOW, IF ANY?

The board has adopted Community Housing Cymru's Code of Governance and a detailed review of compliance against the code is conducted on an annual cycle.

C28. IS THE HOUSING PROVIDER A NON-PROFIT?

Yes. Coastal Housing is not-for-profit.

C29. EXPLAIN HOW THE HOUSING PROVIDER'S BOARD MANAGES ESG RISKS.

ARE ESG RISKS INCORPORATED INTO THE HOUSING PROVIDER'S RISK REGISTER?

Coastal Housing Group has a risk management policy in place which provides a framework for the management of risk to support the Group's achievement of its strategic objectives (as set out in the Corporate Plan), protect people and assets, and ensure long term financial strength.

The policy explains Coastal's underlying approach to risk management and documents internal roles and responsibilities. It outlines key aspects of the risk management process, and identifies the main reporting procedures.

The board has overall responsibility for ensuring the adequacy of the strategic risk management framework and operation of the process and receives regular update reports on risk.

C30. HAS THE HOUSING PROVIDER BEEN SUBJECT TO ANY ADVERSE REGULATORY FINDINGS IN THE LAST 12 MONTHS THAT RESULTED IN ENFORCEMENT OR OTHER EQUIVALENT ACTION?

No.

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?

The board is composed of Members with diversity of skills, experience and thought. An Equality, Diversity and Inclusion strategy is in place which provides a vision and framework for ensuring services, policies and procedures are inclusive, and do not disadvantage residents, employee or board members on the basis of the characteristics defined in the Equality Act. Our strategy relates to culture and purpose in that it underpins our

commitment to develop strong diverse communities as well as a committed diverse workforce and board.

60% of board members are women. **20%** of the board members are from black, asian or minority ethnic backgrounds.

None of the board members have disclosed a disability.

The current resident engagement strategy (2022 to 2025) demonstrates the multiple and various ways that resident voice is heard by the Board. This includes estate walkabouts by Board, focus and reference groups, system interventions, service specific surveys, complaints, etc.

Average age of the board is **57**. (September '23 - 58).

Average tenure of the board is **4 years**. (September '23 - 2 years 10 months).

A project is underway to collect more robust resident demographic data.

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?

20% of the board has turned over in the last two years.

There has been no turnover in the senior management team in the past two years.

C33. NUMBER OF BOARD MEMBERS ON THE HOUSING PROVIDER'S AUDIT COMMITTEE WITH RECENT AND RELEVANT FINANCIAL EXPERIENCE.

Of the four members, one has recent and relevant financial experience. In addition the two Executive members attend audit meetings, both of whom are qualified accountants and

have extensive experience of financial and treasury management. One of those has also worked in a senior audit role.

C34. WHAT PERCENTAGE OF THE BOARD ARE NON-EXECUTIVE DIRECTORS?

Currently **80%** of the board are non-executive directors.

C35. HAS A SUCCESSION PLAN BEEN PROVIDED TO THE HOUSING PROVIDER'S BOARD IN THE LAST 12 MONTHS?

An annual succession plan is provided to the board of management.

C36. FOR HOW MANY YEARS HAS THE HOUSING PROVIDER'S CURRENT EXTERNAL AUDIT PARTNER BEEN RESPONSIBLE FOR AUDITING THE ACCOUNTS?

Auditors have been in place for **16 years**. However, during that time, we have been subject to partner rotation to avoid conflicts and of course, as auditors, they are bound by professional standards which safeguard against conflict of interest and lack of scrutiny.

The role of auditor is frequently tendered, however the pool of potential auditing firms is small due to the size of Coastal and the appetite of larger auditing firms to bid for the work.

C37. WHEN WAS THE LAST INDEPENDENTLY-RUN, BOARD-EFFECTIVENESS REVIEW?

June 2021

C38. HOW DOES THE HOUSING PROVIDER HANDLE CONFLICTS OF INTEREST AT THE BOARD?

Board members are asked to declare any conflicts of interest at the start of every board and committee meeting or as anything arises through the duration of the meeting. Members are also required to complete an annual declaration of interest form.

STAFF WELLBEING

C39. DOES THE HOUSING PROVIDER PAY THE REAL LIVING WAGE?

Yes.

C40. WHAT IS THE HOUSING PROVIDER'S MEDIAN GENDER PAY GAP?

The gender pay gap at Coastal is **0.10%** in favour of female employees.

C41. WHAT IS THE HOUSING PROVIDER'S CEO : MEDIAN-WORKER PAY RATIO?

The ratio of the median-salaried worker to Chief Executive Officer pay is **1:4.15**

C42. HOW IS THE HOUSING PROVIDER ENSURING EQUALITY, DIVERSITY AND INCLUSION (EDI) IS PROMOTED ACROSS ITS STAFF?

An Equality, Diversity and Inclusion strategy is in place which provides a vision and framework for ensuring services, policies and procedures are inclusive, and do not disadvantage residents, employee or board members on the basis of the characteristics defined in the Equality Act.

Our strategy relates to culture and purpose in that it underpins our commitment to develop strong diverse communities as well as a committed diverse workforce and board.

C43. HOW DOES THE HOUSING PROVIDER SUPPORT THE PHYSICAL AND MENTAL HEALTH OF ITS STAFF?

There are numerous policies in place to support staff wellbeing, including family friendly policies, dependants leave, flexible working and home working. Permanent Health Insurance is a contractual provision which includes access to a package of health and wellbeing support independent of Coastal. Coastal strives to be an employer of choice, with the acquisition and retention of talented staff a priority. Therefore, an active role is taken to support staff who have also organised their own support groups such as the Menopause Support Group and the Men's Health Group.

C44. HOW DOES THE HOUSING PROVIDER SUPPORT THE PROFESSIONAL DEVELOPMENT OF ITS STAFF?

Coastal will pay for one professional subscription per year. Coastal will provide financial support and time to complete relevant qualifications.

SUPPLY CHAIN

HOW IS SOCIAL VALUE CREATION CONSIDERED WHEN PROCURING GOODS AND SERVICES?

WHAT MEASURES ARE IN PLACE TO MONITOR THE DELIVERY OF THIS SOCIAL VALUE?

Coastal delivers social value through its supply chain in various ways, such as contracting local businesses and social enterprises, and creating jobs and training opportunities for our community members.

Coastal monitors what it spends with contractors on a geographical basis and publishes these figures in its annual report. In 2022/23, Coastal spent **62%** of its outgoings with suppliers based in Swansea, Neath Port Talbot, Bridgend and Carmarthenshire. Another

20% was spent with suppliers based elsewhere in Wales and **18%** with suppliers in the rest of the UK.

A percentage of the quality score during tendering contracts is given to Social Value and specific contractual requirements/clauses included. This is adapted on a contract by contract basis to reflect local factors. Examples include requiring employment and training opportunities to be targeted to local participants, community volunteer time and contributions in kind and financially to not-for-profit organisations. One measure used is the *Value Wales Community Benefits Measurement Tool* which last year generated **£1.90** for the Welsh economy per **£1** invested in our development program.

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?

Coastal's *Maintenance Contractor Code of Conduct* from 2022 requires contractors to disclose environmental data to us. Lyreco, Coastal's office provision supplier, provides environmental impact statements for products we buy from them. Coastal operates a Fairtrade policy when purchasing coffee, tea, sugar etc. No bleach-based cleaning products are used at our sites.

Our Estates teams use pelargonic acid for weed control in all instances except for Japanese knotweed. The latter case is the only instance in which we will use glyphosate on our land, and then it is only administered by staff with the appropriate training.

Development contractors are required to record the level of waste materials recycled or reused, record energy use and water saved during the contract. Coastal is looking to modern methods of construction, insulation and carbon neutral options during design phases in order to procure in an environmentally sensitive manner. Contractual requirements include: waste recording/recycling requirements; donation of unused or spare materials to not-for-profit organisations; use of PIR lighting and energy saving devices on site; use of local subcontractors to minimise carbon footprint. Contractors are obliged to pass on the requirements to subcontractors.

At all newly developed sites, active travel information (bus timetables, cycling and walking routes etc.) is provided to residents at the point of handover. All new developments now also include charging points for electric vehicles.