



Monmouthshire Housing  
Tai Sir Fynwy



Monmouthshire Housing Group's

# Annual Self-Evaluation Against Regulatory Performance Standards

March 2023



# CEO's Introduction

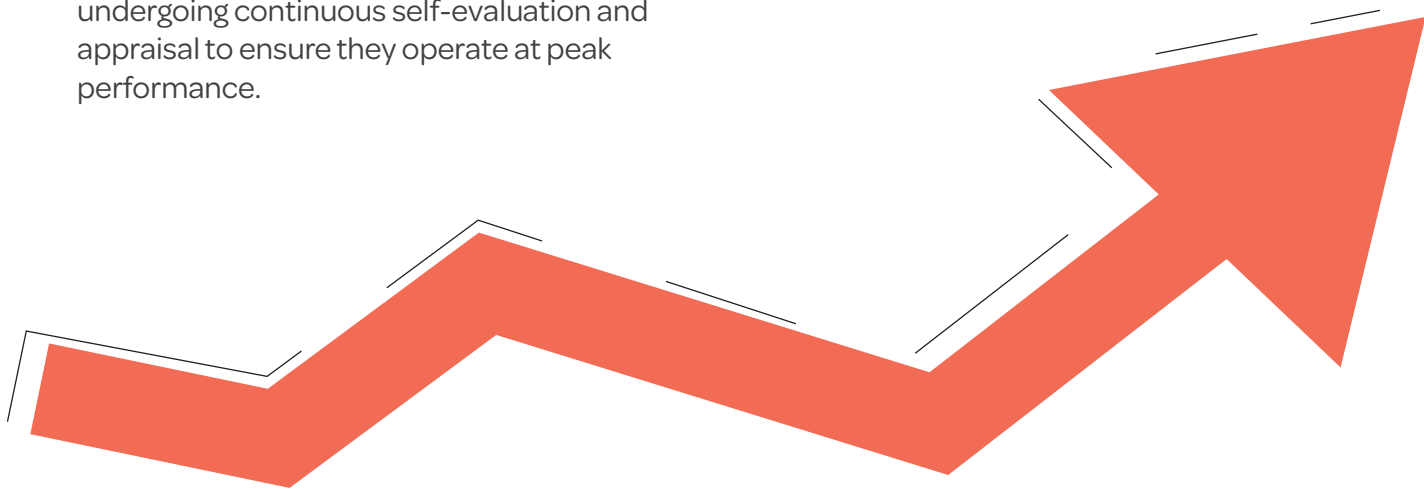
Welcome to MHA Group's Self Evaluation Report. All RSL's in Wales are required to undertake an objective self-assessment on current performance, identification of current and future risks, and also areas for improvement. We are proud to share our achievements with you.

MHA has just emerged from a tumultuous period caused by the pandemic. We are now also enduring a Cost-of-Living crisis as a result of multiple factors such as pent-up demand, an already emerging energy crisis, exacerbated significantly by the war in Ukraine, and a labour crisis caused in no small part by Brexit and reduced workforce following on from the Pandemic. Nevertheless, performance has continued to be strong. Tenant satisfaction at MHA is amongst the best we have ever achieved, and staff satisfaction, despite the much reported "great resignation" and movement to flexible working, has held up with turnover comparatively low.

In the past few years MHA has moved to a remunerated skills-based Board in both the Group Board and the Board of the subsidiary, CAPSEL. This has resulted in a marked increase in both the quality and quantity of scrutiny, also an increase in ambition and the ability to assess and take measured risks. MHA has not rested on its laurels and the Board are undergoing continuous self-evaluation and appraisal to ensure they operate at peak performance.

# Compliance with Regulatory Standards

In addition to the Board and Committee's rolling monitoring programmes, we have also consulted on performance against the Code of Governance and WG's Performance Standards with our virtual tenant consultation group. The feedback received was constructive, honest and extremely positive with one customer quoting "this reads very well, is very clear and is a positive and fair report for all". Another customer referred to RS4(a) - bullet 10 citing "whilst your satisfaction feedback looks acceptable, I feel there is room for improvement, especially in the feedback of the consultations" which has been fed into the Customer First Programme.



# Governance

**RS1:** The organisation has effective strategic leadership and governance arrangements which enable it to achieve its purpose and objectives

Reviewed annually MHA operates within a five-year rolling Corporate Plan. Our overarching LEEP headlines (Landlord, Environment, Economic and People) identify organisational and deliverable 'smart' objectives which meet the needs of the business and help us to achieve positive outcomes for our customers.

**(a) Has a strategy which reflects its vision, culture and values and sets out how the organisation will achieve its core purpose as a social landlord.**

Putting people first is fundamentally at the centre of everything we do day to day. Our purpose is not just to provide safe and affordable homes for people but to support and enable our tenants and service users to have a 'brilliant quality of life'.

In terms of planning, our corporate cycle begins with a Board Strategy Planning session in November. At this session members tackle: the high-level challenges facing the business and that of our key stakeholders; identifies risk appetite; discusses innovation and future opportunities and revisits the 'vision'. This establishes a platform for further investigation and development by the senior management team. Between November to January the draft corporate plan is developed, in conjunction with colleagues at all levels, to bring in operational issues, consultation 'on the ground' and resourcing. Board members will meet again to consider the draft corporate plan and agree the direction of travel for the foreseeable future.

Once the five-year plan is approved by the Board, assignment of the objectives and outcomes is delegated to respective Committees and Board, where appropriate. Progress is challenged throughout the year, whilst considering changing circumstances and ongoing relevance to ensure plans still meet the desired needs. Minutes of Board meetings demonstrating oversight are available upon request.



## Supporting evidence and Assurance

- The Annual Review report and Annual Accounts & Financial Statement (2021/22) (Welsh versions available on our website) touches on the differences we are making within our communities.
- This year's Corporate Plan is heavily resourced and focussed on the current economic situation and what we are doing, in addition, to help those most vulnerable within our society.
- Annual Budget setting process and approval to ensure alignment with Corporate Plan.
- 30 year Business Plan reviewed and approved annually by Board which includes robust stress testing of individual and multi-variable scenarios.
- 2022/23 rebranding exercise involved a series of special Board meetings to consider how the values and vision is reflected in the new brand.
- Our Digital Strategy supports the wider strategic aims (see more information below).
- MHA plays a very active role in shaping the direction of the housing sector via responding to Consultations, attendance at various SDG's with CHC and working directly with WG officials on issues such as Homelessness and Development.
- Our 'golden thread' approach (from Board to front line) translates corporate objectives into meaningful day to day activity.
- Annual rent setting approach based on affordability and with tenant engagement & consultation.
- No evictions into homelessness approach embedded in the way we work.
- Good quality data and information (externally validated by auditors) supports and influences decision made at Board level. The 'pyramid of reporting' is reviewed in June annually and structures the reviewing responsibilities for PI information, from top down with Board overseeing business critical issues (Priority 1), Committee (Priority 2) and SMT (who oversee all but also monitor Priority 3's at an operational level).

- Real Living wage employer with a range of employee benefits to support health & wellbeing. Details of staff benefits are available here.

In terms of setting our Vision and Values these are reviewed annually to interlink with setting of the corporate objectives and core purpose, all are promoted internally and externally to stakeholders. In addition:

- All board/SMT report templates require the author to reflect how the values and vision are linked.
- We are proud to display our Mission Statement "To provide high quality homes and services that put people first" at our Head Office and website, and this serves as a constant reminder to staff and those visiting or interested in us of our core purpose. Our Values and a positive 'can do' culture are embedded throughout the business and applied during recruitment and tested regularly through one to ones and staff surveys. Impacts of having a positive culture can be evidenced through Best Companies survey results, and Public Health Wales Corporate Health Standard Gold (3-year Re-assessment) – currently striving for Platinum Standard.
- Our colleague Facebook Workplace has a dedicated 'Better Together' page led by our senior management team. Director Bulletins are communicated via video monthly sharing progress against our corporate plans with open Q&A sessions.

**We believe we fully comply with this standard:**



## **(b) Complies with its own governing documents and meets the requirements of an appropriate Code of Governance.**

MHA's Compliance Monitoring Framework (CMF)\* pulls all legislative standards and reporting requirements into one area, and this includes the adopted CHC Code of Governance and the Welsh Government Regulatory Standards. The framework is reviewed by the Board and Committees through a rolling assessment programme, providing assurance where we are complying with standards, and identifying room for improvement where standards are not fully met. This includes the Community Voice Committee (see below for more information) \*This particular method of oversight commenced in July 2021 (delayed due to changes in Regulatory Framework and COG)

### **Supporting evidence and Assurance**

- The Standing Orders and Financial Regulations, delegatory powers, and Terms of Reference for Board and Committees are reviewed regularly mirroring MHA's Rules of the Association.
- Auditors review our governance arrangements, the last review (April 2022) achieved 'substantial assurance' rating with no recommended improvements.
- We operate a rolling Governance Improvement Plan, learning from good practice elsewhere and tightening up practices to meet the changing environment. This includes 'room for improvement' actions identified within the CMF.
- We enjoy a good, open relationship with our Regulators.
- Intragroup agreements have all been updated recently and ensure appropriate governance mechanisms are in place between MHA and its subsidiary.
- MHA's subsidiary – Capsel Ltd has its own Chair who is separate to the MHA Chair.
- Board effectiveness review in place.

- Board effectiveness training undertaken during the last year. This includes our subsidiary, Capsel.
- Board & Committee roles have job descriptions and person specifications in place. A suite of JD/PS's are available upon request, covering all roles.
- Board Membership Policy in place.
- Annual appraisal process in place for Board and subsidiary Board members is detailed within the Board Performance Management Framework, available upon request.
- Board training plan in place for Board & Committees (see PMF – board effectiveness planning above).

Our subsidiary company, Capsel, is not bound by the same charitable status so afforded more flexibility in terms of development, generating profit and building new homes on behalf of the Group. It has a strong governance oversight structure in place with the Group Audit and Financial, Governance and Remuneration Committees overseeing their work and minutes of meetings presented at Board level bi-monthly. Three of the Group Board Members are also members of this Board.

- Capsel conducts a Compliance Workshop annually and develops a governance improvement plan which is regularly reviewed. Similarly with their Intragroup Agreement and Service Level Agreement with the parent body, their own term of reference, standing orders and financial regulations.
- Capsel have their own strategy and plans which align and support that of the Group's.

**We believe we fully comply with this standard:**



**(c) Sets and delivers measurable, evidence-based commitments across all areas of its business in relation to equality, diversity and inclusion (including anti-racism and tackling hate crime) reflecting the diversity of the communities it works in and with.**

Our Corporate Plan reflects the need to build on the effective initiatives currently being delivered in this area. This year's objective to "undertake a review of our EDI Policy and practices" has guided us through this development.

**We can evidence progress made through the following actions taken:**

- Commissioned Tai Pawb to undertake an "Equality Health Check" to assess current performance and gaps.
- Revised, updated and promoted the EDI Policy to increase awareness and understanding of the issues currently faced by those within minority groups and protected characteristics.
- Developed a 3-year strategy and strong action plan based on good practice, outcomes of the Health Check, Equality Impact Assessments (7 conducted within the last 2 years), satisfaction analysis using tenant insight data and discussions with specific service users. This has been reviewed by Tai Pawb who confirmed "It was felt that this was an excellent piece of work and a great example of good practice".
- A sound governance monitoring structure in place from Board level down (Committees responsible for development of strategy and operationally challenging and monitoring progress against the rolling 3-year action plan).
- Currently reviewing our Welsh Language Scheme.

- An existing EDI training and Unconscious biased training programme in place for all Board and colleagues.
- Hate Crime training has been implemented for all front-line colleagues. National Campaigns are promoted with access to awareness raising sessions e.g. LGBTQ+, and Neurodiversity. We will continue to seek out other such relevant training for frontline staff see EDI Action Plan.
- CVC members have undertaken bespoke EDI session with TPAS Cymru.
- Carry out annual gender pay gap analysis, results of which are promoted in the Annual Review 2021/22.
- Improved our equality monitoring and have a Guaranteed Interview Scheme for those with a disability, or from a minority ethnic group when recruiting to new posts.
- We are a Disability Confident Employer, and aim to upgrade this accreditation to Disability Confident Leader.
- Our Anti-Social Behaviour Policy and Procedure sets how we will deal with instances of Hate Crime.

**In addition, we:**

- Produce an Annual Sustainable Communities Impact Report reflecting our customer needs and demonstrating the outcomes achieved within the last year. A short video summarises this report can be found on our website - "What it feels like for us - Sustainable Communities" The latest assessment will be available in June 2023.
- Undertake business cases for new developments demonstrating we are meeting local needs and that of the Local Authorities' homeless strategies.

**We believe we partially comply with this standard:**



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**(d) Has a diverse Board, reflecting the communities the RSL works in and with, and has the skills and knowledge required to be effective.**

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MHA's 10-strong professional and remunerated Board come from all walks of life bringing with them a wealth of skills, experience and diversity of thought, some with housing background but majority from other sectors relevant to our purpose and ambitions.

**Supporting evidence and Assurance**

- The recruitment process for MHA Group's Board (incl. our subsidiary Board - Capsel) are based on merit and objective selection at interview, competencies required and specific skills gaps identified when undertaking annual skills audits. This year's audits recognised an imbalance reflective of the communities within which we work. Full results of the March 2023 Board Performance Evaluation Report is available upon request.
- Our Recruitment & Induction programme is currently under review to further improve inclusivity, specifically around tone, language and imagery used in recruitment campaigns.
- The Boards undertake bespoke strategic EDI training with Tai Pawb, providing a greater understanding of the barriers faced by under-represented groups.
- The Board has in place a voluntary 'Community Voice' group which forms part of the decision-making governance structure. Membership includes a range of stakeholders, relevant to the communities we serve, including tenants, leaseholders and agency representatives. It also has mechanisms in place to conduct wider consultation with diverse groups. Recruitment is open, fair and inclusive and all are provided with a comprehensive support and training package.

During performance evaluation and skills audits (conducted annually) membership skills and training programmes are also aligned to the needs of the corporate plan objectives.

**We believe we partially comply with this standard:**



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**(e) Makes logical decisions based on clear, good quality information which includes assessment of risk and, where appropriate, the views of tenants.**

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MHA Group's Standing Orders & Financial Regulations set out the scheme of delegatory powers assigned to Board, Committees, subsidiary, Chairs and Officers. We have a robust risk management framework with monitoring oversight structures and our governance report templates specifically identify financial consequences, business risks, value for money, environmental and staffing implications and what customer consultation has been undertaken.

**Supporting evidence and Assurance**

- Minutes from Committees are considered in detail at each Board meeting.
- Strategies and Policies approved by the Board and Committees and reviewed periodically through a cyclical review planner, managed by the Business Improvement Team's Policy Officer.



- Risks are considered at each Board & Committee meeting. The full Risk Dashboard is considered at every Board meeting with a cover report noting top scoring risks and any other changes. The full Risk Dashboard goes to every A&R Committee with notes as above. Ops, FG&R & Development have a Risk Dashboard presented at every meeting with the risks prevalent to each area, detailing any changes.
- Conduct adhoc specialised Board meetings to address more complex issues, with support of external expertise.
- Strategic away days held each year to explore key themes for corporate planning purposes. These are held in November where risk appetite is also discussed. Members will identify direction of travel for next 12 months/longer term and set clear objectives which are finalised and approved the following March.
- Our Annual Sustainability Impact Assessments outline community progress and demonstrate outcomes of consultation and engagement – see above.
- Equality Impact Assessments inform the impact of service delivery changes on those within minority groupings. Actions required monitored by the EDI Steering Group, SMT and FG&R Committee.
- The Community Voice Committee (made up of tenants, leaseholders and community members and Chaired by a Group Board Member) represent the tenant/leaseholder voice and have a direct link with the Board. This committee currently tackled fuel poverty and development of the new Engagement Strategy, and have moved onto the Customer First Programme (currently reviewing the Customer Care Policy and standards). They are also designated monitoring responsibilities against elements of the Code of Governance and Performance Standards.
- Tenant satisfaction reported to Board on an annual basis.
- Robust project management structure in place to monitor key strategic projects such as MHA's Digital Strategy, overseen by the internal Digital Programme Board.
- Customer First Programme (see RS3 below).
- Board challenge analysis of the full tenant satisfaction survey annually, together with improvement plans.
- We hold an informative AGM every year for share members and other interested stakeholders communicating progress and how the money has been spent in the last 12 months. (See link to latest video from our CEO on our website).
- We hold regular service user focus groups to drive service improvements.
- We have a strong Health & Safety reporting programme embedded throughout the business.
- All new ventures (business cases) are linked to the corporate plan and vision and identify risks.
- Internal and external audit and professional advice sought on key projects (i.e. VAT on commercial developments, Cyber Security, Pensions, legal advice on Joint Ventures etc.).

**We believe we fully comply with this standard:**



## **(f) Enables and supports tenants to influence strategic decision making.**

Currently under review our Engagement Strategy brings together a holistic approach to embedding tenants and service users at the heart of decision making at MHA. As mentioned above every report considered by Senior Management, Board or Committees consider the outcome of consultation and our Community Voice Committee acts as a critical friend in driving top quality services. We remove barriers and provide excellent support to all whom engage with us, from planning and development through to targeted service-user focus groups.

### **Supporting evidence and Assurance**

- Annual Tenant Impact Assessments carried out to assess the value of engagement, see above.
- Following a robust recruitment drive and package of support the Community Voice Committee (CVC) have completed a six-month foundation training programme, identified their workplan for the next 12 months., and are also working in partnership with the business improvement team, specifically the Customer First Programme.
- MHA strives to empower tenants/ leaseholders and communities by working co-productively and building on what's strong. Enabling people to find their own answers to problems has produced great results and has increased individual and community aspiration. Almost 4 years into the Engagement team's 'Community Planning programme' has seen the approach remove barriers to people engaging with the organisation and has led to people finding ways into training, employment, and volunteering in local community groups. The approach also enabled us to maintain engagement and contact by shifting to virtual through the pandemic. This has

helped families become more resilient and helped strengthen communities by giving local people the skills and confidence to do things for themselves. Strong partnerships with GAVO and MCC are now supporting tenants and residents, who have cut their teeth in community planning, to establish community hubs. To the benefit of MHA, this activity is nurturing active community leaders to provide future candidates for Community Voice and to provide peer support to encourage tenants to take part in focus groups and service reviews.

- In terms of practical assistance, we offer childcare, transport/cover fuel costs for example to remove some of the barriers our tenants face when engaging in local events.
- Tenant Voice audit was carried out last summer by our auditors, Mazars. No concerns were identified. The outcome informs our continuous improvement plans and feed into the wider service review.
- We monitor complaints and compliments and learn from them. For example; revisiting our policy around voids garden clearance and re-communicating this to the relevant departments, as well as making improvements to repair appointments by calling ahead of the visit. Lessons learnt are considered by SMT on a quarterly basis, to ensure actions are implemented.
- Customer Excellence Accreditation (see RS3 for more information).
- Our Customer First Programme with progress monitored by the CVC.
- Equality Impact Assessments are carried out during service reviews and actions monitored by our EDI Steering Group.

**We believe we fully comply with this standard:**



**(g) Complies with all relevant legislation, regulatory requirements and statutory guidance and communicates in a timely manner with the regulator, including on material issues that relate to actual or potential non-compliance.**

Supported by robust governance processes the Board leads and provides direction to ensure we are legally and legislatively compliant as a business. Centrally, our reporting obligations are detailed within the CMF (mentioned above) providing a snapshot of deadlines and responsible officers and this is overseen by the Company Secretary and Finance, Governance & Remuneration Committee. Annually the Board sign off the Self Evaluation report prior to Regulatory assessment.

We enjoy a good working relationship with our Regulator and meet quarterly to communicate progress. All senior officers and board members are familiar with the Adverse Events reporting process and criteria and understand their responsibilities.

**Supporting Evidence**

- Board Members and staff regularly attend networking and conferences relevant to their areas of expertise to keep abreast of changes in the legislative environment.
- The Governance Team are members of the Strategic Governance Group and have opportunities to influence the wider environment. Outcome of meetings are fed back to senior management.
- Clear compliance calendar in place to identify key submissions and dates monitored, again, by the FG&R Committee. This calendar forms part of the Compliance Monitoring Framework.

- The Board engages external specialists to advise on key statutory, regulatory and legislative matters e.g. Health & Safety, Treasury, Legal, Pensions etc.
- Additional expertise appointed to Committees independent to Board e.g. Audit, Development.
- A cyclical policy planner ensures that all policies are reviewed and brought up to date at least bi-annually, unless significant changes are required outside of this timeline.
- All data breaches are reported to the Information Commissioners Office and SMT/ Board. We also promote a quarterly staff newsletter providing hints and tips around prevention, learn lessons from each data breach and also 'near misses' (as this is often indicative of wider issues).
- Board & Committee members, Executive and senior staff attend networking events to keep up to date with key sectoral developments (i.e. development, NHF/CHC Finance Conference, Housing Conferences, CEO and other briefings/webinars. Development is also identified through the annual appraisal process.
- Regular reporting to Board / Committees on Schedule 1, Gifts & Hospitality, Declaration of Interests.
- Officers and Board Members are required to acknowledge sight of the organisation's Code of Conduct Policy annually and declare interests, results of which form part of the Internal Controls report.
- In depth specialist audit work commissioned for high-risk areas such as cyber security.



## **RS2:** Robust risk management and assurance arrangements are in place

MHA Group has a dedicated Group Audit & Risk Committee managing a strong risk management policy, strategy and procedures and, with the assistance of the Group Board and external expertise, they continue to evolve and improve to mirror the changing environment. Our extensive corporate risk register is accessible to Board Members at all times and dashboards and assurance maps are reviewed and considered through structured reporting monthly.

### **(a) Has an effective framework for risk management, internal controls and assurance that enables it to successfully identify and manage existing and emerging risks which threaten delivery of its strategy or compliance with legislative or regulatory requirements.**

#### Supporting evidence and Assurance

- A highly-skilled and dedicated Audit & Risk Committee.
- Independent Audit Committee member with an audit background sits on the Audit & Risk Committee.
- All report templates to Board, Committees, subsidiary and senior management require the author to reflect 'Financial Consequences & Business Risks'.
- Risk Management Strategy and Policy.
- Strategic Risks reported to Board & Committees on a regular basis. Risk Dashboard to each Board with notes on highest scoring risks, also full Risk Dashboard to A&RC each meeting. FG&R, Ops & Development receive a dashboard of the risks "owned" by them, The new interactive risk dashboard allows Board members access directly into the "live" risk register at any point. In addition, A&RC will request a full report into controls of selected risks at each meeting.
- A comprehensive corporate risk register.
- Financial performance monitored regularly, and long-term forecasts are stress tested against key risks.
- Business Continuity Plan recently updated, and scenario planning undertaken.
- IT disaster recovery plan in place
- Intragroup agreements reviewed to ensure fitness for purpose and to protect MHA from any risks associated with its subsidiary.
- MHA's subsidiary has its' own Board with an independent Chair.
- Our risk appetite is tested annually during Strategic Planning Days
- Internal Audit plan in place which considers key sector risks and risks from MHA's risk map.
- Independent professional advice used where required e.g. Savills for Treasury activities.
- Committee/Board risk Dashboards/ Assurance Map are regularly reviewed.
- The Risk Framework is managed through our Performance Management software (Pentana), making this easily accessible to all staff and board members.
- Verto project management software identifies risk and mitigating actions for all projects.
- Our Finance, Governance & Remuneration Committee consider a 6-monthly governance update against their responsibilities detailed in their Terms of Reference. This includes progress against Governance Improvement Plans.
- Compliance Contracts in place for stairlift/ passenger lifts (independent inspections),
- MHA value external insight and have a 3-year test programme of internal and external audits.
- In terms of IT security, we have robust system back-ups, regular cyber security audits and penetration testing and resilient technology employed to maximise system up time and reliability.

- Viability and stress testing (project by project).
- Sector risks considered as part of annual review.
- Regularly reviewed intragroup agreements, on-lending arrangements, and Standing Orders & Financial Regulations (including Capsel's).

**We believe we fully comply with this standard:**



## **(b) Does not put social housing assets or tenants at undue risk.**

Safety is our number one priority and have a plethora of measures in place to ensure that we are protecting our tenants, leaseholders and other service users in their homes and the communities in which they live. To provide additional assurance we seek out external validation that our processes are robust and annually achieve accreditations such as ISO9001, ISO140001 and Green Dragon.

### **Supporting evidence and Assurance in addition to the above...**

- We operate a number of safety policies, procedures and practices (such as fire risk assessments, various electrical, legionella, oil/gas, stair/passenger lift compliance assessments, asbestos surveys, etc.).
- A strong risk management framework (see above).
- Health and safety responsibilities 'sit' predominantly with the Group Audit & Risk Committee and Board.
- Conduct feasibility studies for each new venture outside of core business.
- Our Treasury 'Golden Rules' provide parameters to ensure we do not exceed borrowing or breach covenants.

- The Asset Management Team is currently undertaking a review programme for composite doors in response to the Grenfell Tower inquiry.
- During the Pandemic the Incident Management Team met daily (at the peak) to consider operational issues and react to changes to government rules.
- The Risk appetite is tested annually during Strategic Board Planning sessions.
- We have a dedicated internal H&S Working Group who meet quarterly (led by the Property Director) and consider legislative, policy and procedural changes, and give staff a platform to address concerns. Our specialist consultant, Thomas Carroll, also attend group meetings providing updates and advice.
- All acquisitions undergo structural survey, site investigations and other due diligence.
- MHA's Housing Programme Board was established several years ago to provide a strategic overview of all construction/building works programmes and projects within the Housing portfolio and the interdependencies between the two. The Board considers all proposals for development and building works projects, which are to be funded by MHA's Capital and Revenue Account, Social Housing Grant, Housing Finance Grant, Section 106 (Affordable Housing) and any external funding, recommending projects for approval to SMT and MHA Board (in accordance with the Association's financial regulations).
- Asset Management Strategy in place and robust appraisal process informs decisions to invest in or dispose of properties.
- RIDDOR reporting and 'Don't Walk By' arrangements.
- Key performance indicators are also monitored by Committees and Board including tenant satisfaction results.

**We believe we fully comply with this standard:**



# Delivering High Quality Homes & Services

**RS3: High quality services are delivered to tenants**

## **(c) Maintains accessible and up to date business continuity, contingency and disaster recovery plans.**

### Supporting evidence and Assurance

- MHA's Business Continuity Plan (accessible remotely) has been revised with the support of external consultants who have run a scenario-based exercise in the summer with relevant colleagues.
- Business Continuity Plans can be accessed remotely.
- In addition, officers regularly conduct desktop testing exercises and have robust IT disaster recovery measures in place, to include recovery of key systems and objectives within a 24-hour window.
- Business continuity measures are in place for key contacts such as customer services team phone lines.
- We maintain business continuity and disaster recovery plans and have arrangements in place to quickly recover data and the availability of systems in case of an incident, including total loss of access to our HQ. This recovery is tested annually. We also have a range of cyber-security measures in place for data, access and e-mail protection. Penetration tests are conducted regularly as well as cyber-security audits.

**We believe we fully comply with this standard:**



Our bi-annual Tenant Satisfaction Surveys and various 'real time' consultation enable us to test the strength of our services. However, we also believe in seeking out good practice outside of the sector. MHA were awarded the Customer Excellence Accreditation 5 years ago and verification is tested annually. According to the CE Assessment Unit MHA were awarded the highest number of 'compliance+' scores (28 in total), in addition to 29 'compliant' awards with no partials or non-compliance identified. This accreditation measures 'information and access', 'delivery', 'timelines and quality of service', 'culture' and 'customer insight'.

## **(a) Keeps tenants safe in their homes and promptly identifies and corrects any under-performance or non-compliance on landlord health and safety matters.**

### Supporting evidence and Assurance

- See RS2(b).
- In addition to the gas and electrical safety inspections MHA operates a 'no access' procedure with Audit & Risk Committee monitoring repeat offenders.
- Fire Risk Assessments include additional properties under Fire Safety Act 2021.
- A Legionella risk management programme is in place for sheltered schemes and domestic properties with stored water.

- An Asbestos register and management plan is in place, internal staff and external contractors are provided with asbestos information prior to carrying out work within our homes.
- New procedures have been put in place to ensure adherence to the Fitness for Human Habitation requirements of the Renting Homes Wales Act, with particular attention to Damp, condensation and mould.
- External contracts are in place for servicing and maintaining legionella, fire safety equipment, lifts (LOLA), and sewerage treatment plants.
- The emergency alarm systems are covered by a maintenance contract with the supplier and alarm monitoring is contracted to a specialist receiving centre. Conscious of the important role community alarms play as part of safeguarding residents the performance of both equipment and monitoring contracts is closely supervised. In the light of the impending analogue switch off in 2025 the last year has been spent examining potential options for the alarms service in terms of digital upgrade in preparation for developing a programme for renewal.
- SMT and Audit & Risk Committee receive update reports every quarter, which include how we maintain legal compliance and function, KPIs for high-risk areas such as fire, legionella, asbestos, gas, stairlifts, gas safety, smoke detectors and electricity. Health & Safety is a fortnightly agenda item at Senior Management Team meetings.
- Tenant satisfaction this year has seen a marked increase – “MHA provides a home that is safe and secure” – 92.1% (up from 90.1% in 2019/20).
- Safeguarding policy and procedures, Domestic Abuse and dementia training provided to all relevant customer facing staff.
- Tenancy health checks have been reintroduced and rolled out to all teams across housing and communities. These checks enable a full property inspection and well as the ability to build rapport and offer support. We have embedded fitness for human habitation criteria into the checks as well as information regarding scooters to supplement fire risk information. Checks will be scheduled routinely across teams and a RAG rating will be given alongside a coproduced action plan where any improvements are needed. Targeted checks are also completed where there is a change of circumstances that may affect tenancy sustainability and in order to offer proactive support.

**We believe we fully comply with this standard:**



## **(b) Delivers services which meet the diverse needs of tenants.**

Following the delivery of the “Making Poverty a Priority” summit 2021/22 a working group has been established from representatives across this business to deliver an action plan to alleviate the impact of the cost of living. The “COLIN” (Cost of Living Increase) group have realised some of their goals such as the establishment of the Working Wardrobe, shared services with Warmer Wales to ensure tenants can access energy advice, collaboration with MCC to support access to food initiatives to minimise the impact of the 16% rise in food costs. Combating the stigma of poverty is important to enable engagement and access and this has led to range of cost mitigation programmes in partnership with community activists that are branded and focused on sustainability. MHA are actively supporting the increase in Community Fridges and Pantries, supporting clothing reuse initiatives and have recently launched a sustainable period project with financial support from MCC.

## **Team Objectives**

### **CSA**

- Tenant portal
- Live chat
- Triage support

### **Engagement**

- After school provision
- Support for digital
- Sustainable clothing

### **Inclusion**

- Out of hours service
- Self serve budgeting
- In work poverty project

### **Income**

- Rentflex campaign
- Rent statements
- Account stabilisation

### **Neighbourhoods**

- Hardship to homes in need
- Early support for new tenants
- Neighbourhood plans

### **New Homes**

- Fuel efficiency guide
- Furniture offer
- Trauma informed service

### **Support**

- Rebrand hardship
- Develop local surgeries
- Improve access to support

### **Building Services**

- PV & ASHP programme
- Sceme energy efficiencies
- Concern cards / hardship

This is one of the many initiatives to support the diverse needs of our tenants and other service users (see Annual Review for 2021/22 and our Corporate Plan for more information).



## **In addition:**

### **Additional supporting evidence and assurance**

- MHA's revised Engagement Strategy.
- Equality impact assessments carried out when reviewing services (7 undertaken since 2020), with actions monitored by the dedicated EDI Steering Group.
- Customer First Programme – a rolling programme of work which focuses on ensuring our services are designed and led by tenants needs and expectations. Recommendations are informed by an extensive discovery stage, which includes the completion of an equality impact assessment, as well as tenant consultation via focus groups, surveys, interviews and reviewing existing feedback. We have successfully completed our first two projects and are now beginning to deliver on the recommendations.
- Disabled adaptations made following OT assessments.
- Reviewed our Homesearch website and services to improve accessibility (which includes 'how to' videos) see link to website - Monmouthshire Homesearch - Help. We also offer assisted bidding to those who struggle with the process.
- Tenancy Coaches support vulnerable tenants (see Annual Impact report for more information).
- We have a dedicated New Homes Team who advertise, shortlist, complete risk and needs assessment (pre-tenancy work), undertake sign-ups and support people to have a successful & sustainable MHA tenancy, by offering an intensive, one-stop-shop housing management service, both before they sign-up and for the first 4-6 weeks after the new tenant moves in.
- Our Community Safety Team work in partnership with the Police, local authority, Safer Monmouthshire and other support agencies we signpost to (see Annual Review available on our Website for outcomes of this work).
- Our Moneywise Team provides a free confidential service to help and support tenants who are in financial difficulty (maximising their income and reducing outgoings), budgeting, benefit checks, applying for affordable credit, setting up bank accounts, home insurance, fuel savings and Discretionary Assistance Funding. They also support those moving onto universal credit with prioritisation of sanctions, hardship, and appeals and are managing unprecedented demand during the rising living costs crisis. This support is supplemented through our Work & Skills Wise Team who are focused on enabling tenants to move into work for the first time or return to work, or support tenants looking to improve their working conditions and income. The Moneywise team have established new partnerships with Warm Wales and South East Wales Energy Advice to provide specialist support to mitigate fuel costs and brokered a scheme with Gateway Credit Union to provide savings and loans products for oil buying as well as supporting a collective buying initiative. Initiatives to ensure that moving into work is as financially beneficial as possible has seen Work & Skillswise work to reduce the cost of the working day, of which the Working Wardrobe is one part.
- EDI and Unconscious Bias is core training for all staff (see above for more information on our EDI Policy, Strategy & action plan).
- Our Community Planning 'what matters most to you' consultation and co-production approach.
- Responding to requests from Occupational Therapists to install disabled adaptations to tenants homes via the Home Adapt Scheme. This ensures tenants are able to live safely in their own homes for longer.

- We employ dedicated IConnect and Community Living Officers to support day to day wellbeing and confidence building when using the internet.
- Accessibility Audits planned for all properties including roll out of the new Fire Strategy and individual evacuation plans
- Agility of staff to work within communities supported with appropriate IT/facilities.
- Outcome of Older Persons Review - see RS4(d) for more information. Supporting the review implementation is the 2 year digital upgrade programme for hardwired community alarm systems. This will ensure continuity of service beyond the 2025 analogue switch-off as well as expanding functionality and building more resident choice and self-determination in our alarms offer.

**We believe we partially comply with this standard:**



**(c) Achieves and maintains high levels of tenant satisfaction with services.**

MHA Group are proud to share top quartile results across all indicators within the Welsh Government’s Social landlord: Tenant Satisfaction Survey May 2022. This is a testament to our dedication and commitment to putting our tenants first and delivering the very best services within Monmouthshire communities. One of MHA’s key objectives this year is to maintain overall customer satisfaction at 90%. See <https://gov.wales/social-landlords-tenant-satisfaction-survey-may-2022-html>

Our own Tenant Satisfaction Survey (March 2022) achieved its highest response rate to

date (38%) which again demonstrates the trusting relationships we enjoy with our service users, that we are listening and acting on feedback. Having the capacity to drill down to street level, understanding where the issues lie, what we are doing well and how we can make positive change has proved invaluable. Teams are using this information to drive action.

Surveys are an extremely useful tool in gaining ‘in realtime’ customer perceptions and, again, we value all types of feedback to inform delivery of our individual services. Here are other examples of the types of surveys and other formal consultation we undertake and learn from:

- Leaseholder Survey results and Leaseholder Focus Groups (held May 2019 to review the Leaseholder Handbook)
- Voicescape surveys for repairs and customer services (see VfM Statement available on website for results).
- New tenant surveys
- Live chat satisfaction surveys,
- Homesearch feedback on website
- ASB surveys.
- Complaints monitoring,
- Right First Time results

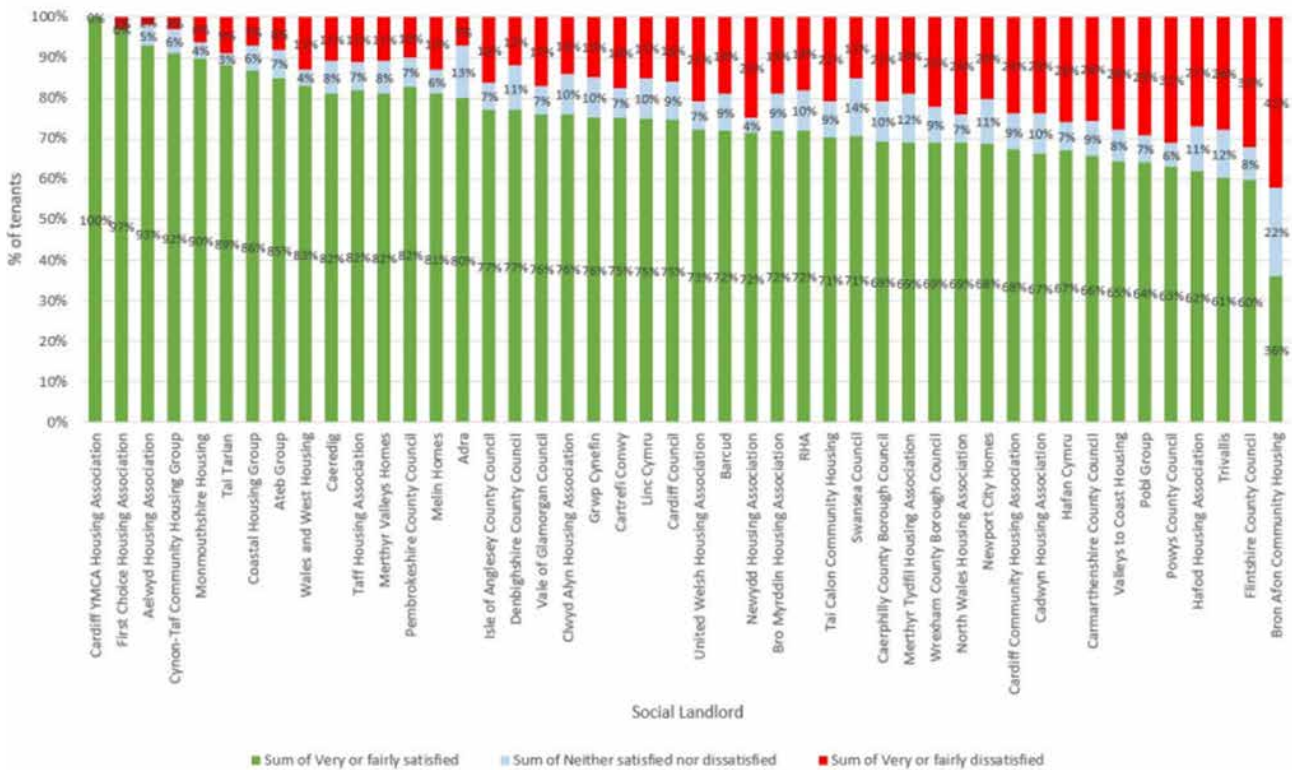
The annual satisfaction surveys are scrutinised by the Senior Management and Board, and relevant Committees have sight of other general performance and satisfaction within their areas. Members are clear how consultation has influenced policy and procedural change through the governance report templates.

In relation to repairs and maintenance, tenant satisfaction continues to increase, see results of this year’s satisfaction survey below:

Repairs and maintenance

2021/22	2019/20	Status	Trend
89.8%	87.7%	✓	▲

Generally, how satisfied or dissatisfied are you with the way your social landlord deals with repairs and maintenance?



	2021/22	2019/20	Trend
Attitude of the workers	96.9%	96.9%	▬
Quality of work	94.4%	93.4%	▲
keeping dirt and mess to a minimum	95.9%	95.8%	▲
Ability to make an appointment	94.1%	91.7%	▲
Repair being done "right first time"	88.2%	86.1%	▲
Time taken before work started	90.3%	88.7%	▲
Speed of work completion	92.9%	91.8%	▲
Contractors doing the job expected	91.8%	91.7%	▲
Being kept informed of delays	83.4%	83.1%	▲
Showing proof of identity	81.2%	78.9%	▲
Appointment kept by MHA	95.3%	94.3%	▲

**We believe we fully comply with this standard:**

**(d) Makes landlord performance information available to tenants.**

MHA strongly advocates transparency and

so it is important to us that we are open and demonstrate recognition of our strengths but also where we need to improve. All corporate publications are accessible on our website, and we also promote their location via social media, relevant to the stakeholder audiences. However, in the spirit of inclusivity, we recognise that not all tenants access social media so use other appropriate tailored methods to communicate these messages.

### Supporting evidence and Assurance

- The Tenants Annual Review report (available on MHA's website) is available in English and Welsh. For those who do not access social media a hardcopy is posted out, available in alternative formats. This year 2,360 hardcopies posted, 60 of these in large print and the remainder emailed.
- MHA's VfM statement 2021/22 demonstrates our approach to driving value and how we performance as a social landlord. Again, this is promoted using a range of tools to suit the audience's needs.
- Leaseholders receive a dedicated newsletter at least once a year covering feedback from satisfaction surveys and general support. They have a dedicated section of our website which was redeveloped as a result of the Scrutiny Panel's 32 recommendations (two leaseholders joined this review - 2019) Leaseholders ([monmouthshirehousing.co.uk](http://monmouthshirehousing.co.uk))
- The Community Voice Committee's remit is to ensure we are fully transparent in terms of our performance and are continuously driving high satisfaction.
- Throughout the year our social media programmes pushes out regular positive outcomes achieved within the communities and how we are performing against our goals.
- The Homeseach website has a dedicated section on feedback demonstrating an open approach to letting homes - Monmouthshire Homeseach - Feedback

**We believe we fully comply with this standard:**



**RS4:** Tenants are empowered and supported to influence the design and delivery of services

### **(a) Creates a culture which values and promotes tenant involvement.**

MHA's values are embedded throughout the business. We are open, accountable, transparent and committed to achieving high levels of performance and satisfaction. This would be impossible without service users help and involvement. Our Engagement Strategy will demonstrate the range of opportunities for involvement and support available which is flexible and inclusive to meet the individual's needs.

#### **Supporting evidence and Assurance**

- See 'Sustainable Communities Annual Impact Report – see (RS3(b) above. Monitoring of which forms part of the Community Voice and Operations Committee's remit.
- The Tenant Handbook outlines how tenants can get involved and has recently been updated to reflect changes due to the Renting Homes Wales Act (2016). It is provided to new tenants but is also available to existing tenants for reference.
- Our Complaint and Compliments Service adopts the Ombudsman for Wales approach, feedback sought on the service following closure of the complaint. Compliments are passed onto relevant colleagues.
- See RS1(e) above for information about our Community Voice Committee. Established in September 2021 following a full recruitment campaign, the CVC have had 6 months foundation training (inhouse and TPAS). Outside of their workplan members also attend other consultation across the county and report back to their colleagues.
- Tenant satisfaction survey results that "views are listened to" achieved 77.2%.

- Under the Work & Skills programmes we offer tenant volunteering/work placement opportunities.
- See RS3(d) for more information on Leaseholder Engagement.
- Service user focus groups inform Equality Impact Assessments, service reviews etc. with attendees offered a support package to remove barriers preventing them from attending. Attendees receive feedback on what has changed as a result of their input.
- Lower satisfaction informs neighbourhood planning initiatives (see RS3(b) above).
- Communities are consulted on their surroundings and how they can be improved (satisfaction this year with "appearance of neighbourhood" – 84.8% up from 83.3% on the previous year).

**We believe we fully comply with this standard:**



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**(b) Enables tenants to understand the organisation’s approach to tenant involvement, how they can get involved and how the organisation will listen to and act on tenants’ feedback and learns from complaints.**

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See RS4(a) above.

**Additional supporting evidence and assurance**

- A menu of engagement is promoted on our website and corporate publications, together with support package. These are held in person or virtually dependent upon capabilities and vouchers offered in recognition of time afforded to us.
- A ‘Tenant Voice’ Audit undertaken in August by our auditors see above.
- Through the procurement of primarily major works and development contracts we provide social value, by securing the provision of labour and materials, a cash award or training and development opportunities to support local communities, community initiatives and projects.
- We consult with Tenants and Leaseholders on major works projects that impact the useability of the home or aesthetics e.g. Cwrt Severn replacement windows project.
- We have a Major Works Co-ordinator role within the Asset Management team who supports Tenants and Leaseholders and acts as the main point of contact for enquiries and information about the project.
- We consult with tenants and local residents on new homes development schemes to help integrate these homes into the community at an early stage in the development process.
- We have done and will continue to provide local Roadshows etc on new development within existing communities. E.g. Oakley Way, Brookside etc.

**We believe we fully comply with this standard:**



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**(c) Provides opportunities for tenants to be involved, can demonstrate that tenants are satisfied with them and can demonstrate the difference involvement is making.**

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See RS4(a and b) above

**Additional supporting evidence and assurance**

For Annual Impact Assessments, results of satisfaction surveys, Service User Focus Groups, VFM Statement, Engagement Strategy, Complaints - see above.

**We believe we fully comply with this standard:**



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**(d) Can demonstrate diverse tenant views and expectations inform the development and review of housing and related services, and the response to any under-performance.**

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**Supporting evidence and Assurance**

- Equality Impact Assessments (see RS3(b) and RS4(a) above).
- EDI Strategy and action plan (see RS1(c) above).

- See remit of the Community Voice and Operations Committees.
- Annual target setting across a plethora of service areas and monitoring of same through a pyramid approach, cascading from the Board to operations.
- Our Asset Management Strategy (see RS8(a)). This demonstrates our approach to management of obsolete properties, overseen by the Housing Programme Board.
- Our ASB/Community Safety Team partner with other support agencies and regularly consult with tenants through surveys, walkabouts and neighbourhood planning events (see Annual Review for more information).
- We hold open days / evenings to showcase new developments and invite feedback from the immediate local community.
- The Older Persons Offer, developed in 2020 followed extensive consultation with existing customers and staff, research into the issues that affect older people, available technology and industry best practice, as well as analysing our own data to provide insight into how older people engage with our services. Key successes to date are:
  - We created 2 new Community Living Officer roles to support tenants living at our sheltered schemes to improve their wellbeing and enable them to continue to live independently.
  - Achieved RNIB accreditation to deliver “Visibly Better” communities.
  - Created user friendly outdoor spaces that support the maintenance of hobbies and wellbeing.
  - Implemented wellbeing checks for tenants who have no family, silent customers or those who find it hard to participate.
  - Actively promoted pet-friendly schemes, where tenants are able to keep a pet.
  - Worked with partners to trial intergenerational projects and diverse activities that support independent living such as laundry, cooking and getting involved.
- Rolled out digital notice boards in every scheme to promote key elements of the tenant handbook, activities and up to date information.
- Introduced table top digital tablets to enable residents to participate in digital activity collectively and connect with other schemes. This has led to multi-scheme fitness and creativity sessions.
- Through the Community Living Officers developed a programme of activity to promote communal interaction alongside regular coffee mornings and surgeries.
- Developed a partnership with Care & Repair Monmouthshire to refer residents for support to enable them to enjoy their homes more independently through minor adaptations and advice.
- Complaints Service (see RS1(f) above).
- Customer First Programme (see RS3(b) above).
- HomeAdapt/DFG service was reviewed last year changing the way we promote the service and increasing benefits to the customer.
- In June 2022 we re-designated a further 154 OAP, age-restricted one and two bedroomed apartments to General Needs in response to overwhelming housing demand from younger applicants, particularly single homeless households. In response to the growing homelessness crisis in the County we have significantly increased the proportion of properties let to homeless applicants i.e. from 25% to 77% of all general needs lets in quarter 3 2022/23.

**We believe we fully comply with this standard:**



**RS5:** Rents and service charges are affordable to current and future tenants

**(a) Ensures all applicable rules and statutory guidance (including the current rent agreement) are complied with.**

**Supporting evidence and Assurance**

- MHA are the first RSL in a devolved nation to be accredited as part of the Housing Quality Networks (HQN) accreditation scheme for the work undertaken to Maximise Income and Sustain Tenancies. As part of the process MHA completed a self-assessment and evidence portfolio to demonstrate fulfilment of six key standards, evidencing how we work in partnership with stakeholders to support tenants to maintain their tenancy.
  - Customers and Communities
  - Income collection
  - Arrears prevention and recovery
  - Welfare Reform
  - Financial Wellbeing
  - Value for Money
- Our rent statements are transparent and accountable.
- MHA have a Local Rent Policy in place linked to local earnings.
- Developed a Living Rent Model in 2021 which has started the process of rent convergence over a period of time. As part of this exercise the rents for over 1,500 tenants were frozen in the initial year of implementation.
- Briefing sessions held for Board members to explore various affordability scenarios for future years rent increases
- 88.7% tenant satisfaction that rent provides value for money, an increase on 87.8% in 2019/20.
- Tenant survey on rent affordability undertaken to inform decision making process.
- Energy hardship/arrears monitoring, support and affordability assessments for existing and prospective tenants (incl Experian used to identify hidden debt and signposting support).
- Neighbourhoods focussed on tenancy sustainability and reducing legal actions - zero evictions.
- Proactively reduced service charges (i.e. communal lighting by installing energy efficient measures).
- Procurement of competitive fuel provider for communal heating in sheltered schemes to drive down costs.
- Carried out Service Charge value assessments, comparing existing with new builds (at design stage),
- Use Rentsense software to get to the heart of affordability issues, targeting those in need of help.
- Local Rent Policy linked to local earning data (ASHE), and latest rent increased fell below EPI.

**We believe we fully comply with this standard:**





**RS6:** The organisation has a strategic approach to value for money which informs all its plans and activities

**(a) Determines its strategic approach to value for money, ensuring the approach relates to its social purpose, and makes strategic and operational decisions in line with it.**

MHA produces a VfM Statement annually (see website for 2021/22) and this is made available to all stakeholders. This supports the VfM Policy and informs corporate planning, delivery of services (incl. contracted services) and appraising development opportunities to ensure we make value-based decisions and maximising the resources we have available.

**Supporting evidence and Assurance**

- MHA has a dedicated organisational Procurement Officer and our efforts are validated by auditors.
- Procurement Strategy in place
- Refinanced in 2021 and secured one of the lowest long term rates in the sector which will facilitate further investment in our homes Value for money is a key principle within our Digital Strategy, and the five-year programme of work will enable us to; rationalise our systems, make better use of automation, as well as grow our data analytics skills. This will enable us to deliver services in a more cost-effective way and free colleagues time up to spend more time with our tenants, particularly those who have complex needs and/or vulnerabilities.

- Delivered a successful refinancing exercise during 2021 which led to facilities to the value of £85m being secured at some of the most competitive rates secured in the sector. In addition, this exercise led to c58% of MHA's stock being unencumbered which will facilitate significant strategic & growth opportunities should they arise.
- External consultants are used occasionally to verify VfM or not in key service areas such as repairs and voids for example.
- Continuously reviewing the performance of our homes through our Asset Management Strategy, investigating opportunities for innovative housing solutions, selling off obsolete properties and purchasing new stock.
- Conduct regular service reviews (see above).
- Our Regeneration working group links in with neighbourhood planning use insight data and feedback to target services and meet the needs of local communities.

**We believe we fully comply with this standard:**



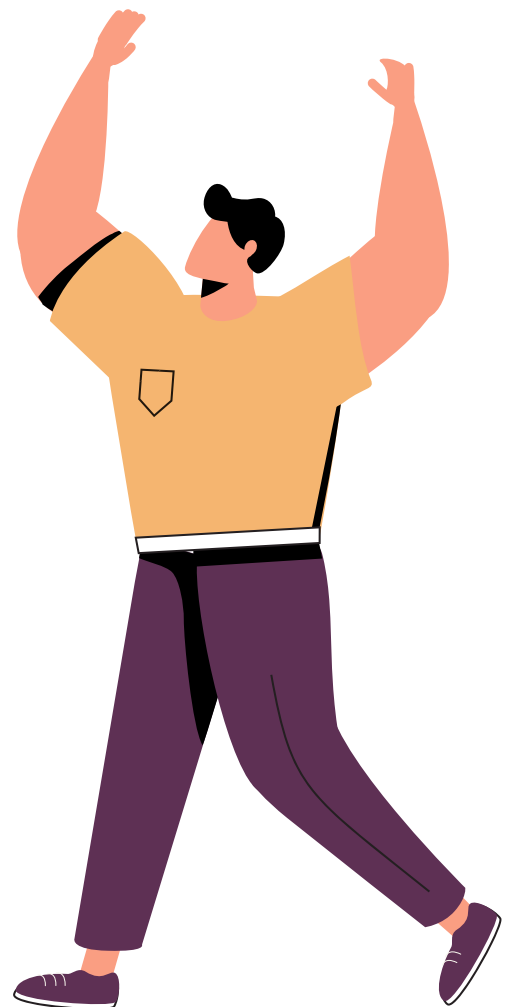
**(b) Can demonstrate to stakeholders, including tenants, that it achieves value for money in delivering its strategy and services.**

**We believe we fully comply with this standard:**



**Supporting evidence and Assurance**

- MHA holds an Annual General Meeting with stakeholders and share members, promoting the Annual Financial Statement and Accounts (available on our website) which demonstrates how we have invested in services and the impact made. Similarly with the Annual Review report (see above).
- On an annual basis, MHA benchmarks its performance against CHC's agreed VFM indicators as noted in the published Global Accounts with comparative information being analysed by both the Audit & Risk Committee and Finance, Governance & Remuneration Committee.
- Joint bidding and resource pooling are exercised to drive down costs and maximise effectiveness.
- Digital strategy - ways of delivering VFM/ efficient services in medium and longer term (see RS6(a) above).
- Efficiency saving initiatives internally (i.e. emergency alarm contracts, mobile phones etc.),
- Partnership with Warm Wales to offer energy advice and grants to Tenants
- Investment in stock to improve energy efficiency e.g. loft insulation
- Reviewed services that could be brought back in house to improve efficiencies and service deliveries
- Through Capsel Ltd, MHA's subsidiary company, we have the capacity to make significant VAT Savings.
- Staff salaries are benchmarked on a 3 yearly basis.



## **RS8: Assets and liabilities are well managed**

### **(a) Has an accurate and up to date understanding of its assets and liabilities.**

#### **Supporting evidence and Assurance**

- We maintain an Asset & Liability Register which is reviewed by our External Auditors when signing off the Annual Financial Statements
- Stock condition surveys in place however, data is now c.5 year old and the last SCS was financial based for funding. These will need to be revisited as part of the WHQS 2023 programme for decarbonisation to confirm current baseline data and to identify the appropriate target energy pathways. Work on this is due to commence in 2023.
- Contracts register in place
- Board approves the long-term financial plan on an annual basis for submission to Welsh Government
- Stress testing of Business Plan approved by Board
- Monthly management accounts and quarterly management accounts presented to Board
- Regular treasury reporting to Finance, Governance & Remuneration Committee
- Engagement of external professional advice where appropriate e.g Savills on decarbonisation costs
- Our Asset Management Strategy (approved by the Board this year) focusses on; increasing the supply of homes, maintaining existing homes and max. the efficiency of the asset, including disposals. This is supported by repair and maintenance policies.
- Use Keystone Asset Management system to record and manage assets, and plan forward programme of maintenance and improvements.
- Operations Committee receives progress updates on the Major Works Programme.
- Data integrity and compliance requirements audited.
- All new development schemes are approved by MHA Board or the Development Committee.
- Development Committee receive progress updates on all development schemes from feasibility to completion.
- Group Board Member Skills, see RS1(d).
- MHA carry out representative stock condition surveys every five years to support our maintenance programs and also financial planning. Our next major survey will be carried out in 2023 when it is anticipated the scope will be increased to cover the additional detailed information required to support our decarbonisation program. The last data integrity audit on our stock condition data was carried out by Mazars in November 2021 where a substantial reassurance was issued for Asset Data.
- 'Don't Walk By' Policy and H&S training for all levels of staff

**We believe we fully comply with this standard:**



## **(b) Maximises the use of assets to achieve its social purpose and the objectives of the organisation.**

### Supporting evidence and Assurance

- Our Innovative Housing Programme (downsizing initiative to provide smaller property for tenants under occupying – redesignation of old garage sites) have completed 4 developments - Elm Road, Caldicot (4 x 1 bed mews for younger people). St Teilos, Abergavenny (4 x 1 bed bungalow that can be adapted to 2 bed for older people). We have won a Constructing Excellence Award for innovation for these developments - see press release [www.monmouthshirehousing.co.uk/news/mha-win-constructing-innovation-award](http://www.monmouthshirehousing.co.uk/news/mha-win-constructing-innovation-award)
- We have also just recently completed a mews development at Western Avenue, Chepstow (8 x 1 bed mews) and a mixed scheme at Pembroke Road, Chepstow (this is a combination of 4 x mews and 5 x 2 bed bungalows) - see press release for more info [www.monmouthshirehousing.co.uk/news/our-award-winning-homes-for-the-future-are-coming-to-chepstow](http://www.monmouthshirehousing.co.uk/news/our-award-winning-homes-for-the-future-are-coming-to-chepstow)
- See Housing Programme Board above.
- Our 'Gold' Voids standards improve tenancy sustainability/satisfaction and provide carpeting throughout, décor with blinds offered.
- Asset Management Strategy (see RS8(a) above).
- We have an ambitious development programme to meet demand and growing needs of affordable housing and also carry out community planning and consultation.
- In addition to the energy efficiency work that MHA carries out to reduce energy consumption and CO2 emissions to protect the environment, MHA continually invests in improving the environment of its estates. This year we are completing the final

phase of the regeneration of our Oakley Way estate in Caldicot. This regeneration project has transformed the area through a mixture of redevelopment and complete refurbishment.

- Our Tenancy Health Checks, not only assess wellbeing of occupiers but also the condition of the property and garden.
- The Decarb Agenda - Monmouthshire Housing has already carried out significant programs of work through its existing WHQS program and PV installation programs. The average EPC SAP score for our stock is already over 76 based on actual EPC's which is considerably higher than the minimum SAP65 score required by WHQS. MHA are currently planning a fabric first approach to further decarbonise our properties to meet the proposed new WHQS 2023 standard.
- Continuously exploring JV opportunities with other RSLs.
- Buy-backs - We lease 10 properties to partner organisations (Local Authority, MIND and Cyfannol Women's Aid) for them to use as homeless temporary accommodation, supported housing and/or women's aid refuge.
- Purpose built bespoke properties for disabled tenants.
- We have a long-standing service level agreement with the Local Authority to manage the Common Housing Register and Choice-Based Lettings service for Monmouthshire. All social housing is allocated via one route and applicants are prioritised depending on their housing need and local, connection. Properties are allocated in accordance with an agreed eligibility criteria which maximises the occupancy of social housing and aims to create sustainable tenancies. For more information visit [www.monmouthshirehomesearch.co.uk](http://www.monmouthshirehomesearch.co.uk)

- In accordance with the Common Allocations Policy (Monmouthshire Homesearch) MHA will utilise local letting plans on new developments to ensure that we create balanced and sustainable communities, the criteria is dependent on the size and type of new homes being built but can include, for example, criteria increasing the proportion of lets to applicants who are economically active.

**We believe we fully comply with this standard:**



**(c) Uses accurate information about assets and liabilities to inform strategic and financial decisions.**

**Supporting evidence and Assurance**

- See RS(b) above.
- Stock Condition Surveys (informs planned maintenance programmes and corporate plan etc.) linked to Business Plan.
- Redesignation of OAP stock to GN based on current and future demand.
- EPCs inform our decarbonisation plans.

**We believe we fully comply with this standard:**



**RS9: The organisation provides high quality accommodation**

**(a) Ensures publicly funded homes meet all applicable standards, rules and statutory guidance issued in connection with quality of accommodation, including the current Welsh Quality Standard.**

Mitigating risk and ensuring the safety of our tenants, leaseholders and their homes are a top priority for MHA Group. We are committed to our regulatory and compliance obligations and deliver good quality accommodation to all. In addition, proactive work is underway addressing our obligations under the Renting Homes Act and we have commenced the WHQS2 Lifetime Homes programme.

**Supporting evidence and Assurance**

- Our Asset Management Strategy focuses on maximising the performance of our properties and also sets out our approach to addressing the Decarb agenda and ‘Fit for Human Habitation’ Standards.
- All new homes are designed and built to WDQR 2021/Secure by Design standards and built in accordance with Building Regulations
- Our initial WHQS programme completed in 2013 (incl. acceptable fails) and since this time properties are maintained to this standard - certificates checked regularly by our auditors and reported to Welsh Government.
- Our growth ambitions are set out in the Corporate Plan – Our current 30 year business plan includes £52m for the development of new properties over the next 5 years.
- H&S audits, external support, action plans.

- According to the Tenant Satisfaction Survey results for 2021-22 - 87.5% of tenants were satisfied with the overall quality of their home and 92.1% of felt their home is safe and secure.
- All void properties are surveyed to inform if WHQS is met, and void standards offer full decoration, are carpeted throughout and new tenants offered temporary blinds achieving high satisfaction.
- As mentioned above we are compliant with all statutory requirements relating to gas, fire, electrical, asbestos, legionella etc.
- Our own tenant satisfaction survey demonstrates high levels of satisfaction with “neighbourhood as a place to live” (87.5% up from 86.4% in 2019/20) and “quality of home” (87.5%).

**We believe we fully comply with this standard:**



## Financial Viability

**RS7:** Financial planning and management is robust and effective

**(a) Sets financial plans which enable it to deliver its strategy and achieve its social purpose, and there is appropriate reporting to the Board against these plans.**

MHA has a robust financial plan in place which supports the delivery of its Corporate Plan and is reported to Board and relevant committee for detailed scrutiny.

### Supporting evidence and Assurance

- The Board approves the budget & Business Plan on annual basis after further detailed scrutiny by the Finance, Governance & Remuneration Committee
- The Business Plan is submitted to the association’s funders for detailed review on an annual basis.
- Business Plan review by MHA’s Treasury Advisers with formal reporting to Finance, Governance & Remuneration Committee.
- 5 year Corporate Plan approved by Board with regular review by Board and relevant committees.
- Board are involved in and approve annual project budgets (detail monitored regularly through Operations Committee) and now with Verto coming on line will be able to monitor down to the individual project level.
- Internal and External audit provision in place.
- Stress testing of 30 Year Business Plan reviewed annually by Board and FGR.
- Appraisal model used to assess viability of schemes.
- Development Programme reviewed regularly and monitored via Development Committee.
- Golden Rules (7 criteria) set by Board and reported to funders and regulators.

**We believe we fully comply with this standard:**



- viability assessments for new developments.
- External Audit Management Letter, Annual Accounts & Financial Statements.
- AGM.
- Specialist advice on Pensions etc.
- Development planning regularly reviewed.
- social housing funding applications.
- Disposal of surplus assets/obsolete properties.
- Significant number of unencumbered properties which could provide further security if required.

## **(b) Is financially viable in the short, medium and longer-term, and maintains sufficient funding and liquidity to support this.**

MHA has a strong financial plan which informs the production of its annual Treasury Strategy to ensure liquidity in the short, medium and long term.

### **Supporting evidence and Assurance**

- BP stress testing in relation to individual material risks and multivariable scenarios.
- Business Plan forecast of debt profile over Business Plan term.
- Treasury Management Strategy and Policy in place.
- Investment Policy.
- Intragroup agreements with commercial subsidiary in place.
- Treasury advisers contracted on annual retainer.
- Unused £20M Revolving Credit Facility in place.
- Deferred loan drawdown of £15m in place.
- Golden Rules in place.
- Feasibility studies/due diligence.
- Monthly management accounts and 2 year cashflows.
- Quarterly Treasury report reviewed by Finance, Governance & Remuneration Committee.
- 2 year cashflow forecasts considered by Finance, Governance & Remuneration Committee on a quarterly basis.

**We believe we fully comply with this standard:**



### **(c) Monitors, reports on and complies with all covenants it has agreed with funders.**

Regular reports are produced for Board and relevant committees and lenders as required under facility agreements.

#### **Supporting evidence and Assurance**

- Annual Covenant Compliance Certificates produced and audited where relevant.
- Monthly covenant statements prepared as part of management accounts and quarterly Treasury reports and reported to Board and FGR.
- Compliance calendar notifying of key submission dates for funders and regulator and all financial data.
- A business critical KPI.
- Treasury Management strategy.
- Compliance monitoring and reporting measures.
- BP aligned with corporate plans and development ambitions.
- Financial risks feature in risk map.

**We believe we fully comply with this standard:**



### **(d) Identifies and effectively manages risks to the delivery of financial plans including appropriate stress testing, scenario planning and use of internal thresholds.**

The Business Plan is stress tested and key financial risks are monitored by Board.

#### **Supporting evidence and Assurance**

- BP stress testing in relation to individual material risks and multivariable scenarios.
- Mitigation action identified and agreed as part of Business Plan approval process.
- Treasury Management Strategy reviewed by Board each year.
- Black Swan testing included as part of stress testing exercise.
- Cashflow forecasts reporting through Board/ Committees,
- Expertise commissioned where required (re-financing etc.).
- Development Viability Models use of SV.
- 30 Year business Plan aligned with Corporate Plan.
- Prudent assumptions used in Business Plan & associated stress testing.
- Analysing impact of key risks on financial covenants.
- Golden Rules in place as part of Treasury Policy and as advised by treasury advisers.
- Risk register in place and reported to Board & relevant committees on a regular basis.



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**(e) Has an effective treasury management strategy and associated processes.**

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See above. Treasury Management Policy & Strategy, Audits outcome & Recs.

**We believe we fully comply with this standard:**



# Continuous Improvement Plan

In our opinion MHA Group complies with all performance standards as at the date of publication. However, we are a forward-thinking organisation and continue to monitor our performance, as mentioned within the 'Introduction', and seek out improvement regularly.

A number of actions identified within the Compliance Monitoring Framework programme have already been actioned. We also operate a rolling Governance Improvement Plan (GIP), overseen by the Finance, Governance and Remuneration Committee, which picks up areas for improvement identified from audits, good practice and the like. In addition, during the last 2 years, we have undertaken a number of comprehensive service reviews in conjunction with our tenants and customers. This has led to numerous recommendations on how the services could be improved and we are currently working through implementation action plans for the following service areas; anti-social behaviour, customer accessibility, disabled adaptations, allocations/lettings, income recovery and older persons accommodation.

During the course of consultation on this document a number of additional actions have been identified (below).

Ref	Regulatory Standard	Continuous Improvement Activity	When
RS.1a	Strategy reflects its vision, culture and values, achieving core purpose as a social landlord	Recruit to Chair vacancy as current Chair nearing completion of term of office	July 2023
RS.1b	Monitor & improve performance against the Code of Governance and Performance Standards	Review CMF following year 1 completion and set new compliance calendar for 2023/24	May 2023
RS.1c	Sets and delivers measurable, evidence-based commitment to EDI	Roll out EDI policy and strategy	Dec 2022
		Establish EDI Steering Group sub areas for Staff/Communities - to manage actions within plan	Feb 2023
	Performance against Welsh Language Scheme	Conduct review of Scheme and produce action plan	May 2023

Ref	Regulatory Standard	Continuous Improvement Activity	When
RS.1d	Has a diverse Board, reflecting the communities the RSL works in and with, and has skills and knowledge to be effective	Update Capsel Website to include Board Management roles and bios, objectives and values	Sept 2023
		Complete Annual Skills Audit for MHA Group Board & Capsel Board	Mar 2023
		Undertake annual Board Performance Evaluation and create NED learning and development plan.	Mar 2023
		Address representative imbalances highlighted with the Skills Audit, and undertake proactive and targeted advertising of vacancies	June 2023
		Refresh succession plan for Board	Dec 2023
		Undertake bespoke Tai Pawb EDI training with the Community Voice Committee	Jan 2023
		Appoint vacancies within the Community Voice Group to ensure members are representative of communities.	May 2023
RS.1e	Make logical decisions based on clear, good quality information, incl. assessment of risk and tenants' views	Conduct regular reviews of clear delegations between the Board, Committees, subsidiary and senior management team)	Mar 2024
		Further develop Equality Impact Assessments from an EDI perspective, to shape services	Dec 2023
RS1.f	Enables and supports tenants to influence strategic decision making	Conduct consultation around Rent Setting Policy	Mar 2024
		Engagement Review findings and implementation plan approved by Board and complete 1st year of plan.	May 2024
RS.1g	Compliance with all relevant legislation and regulatory requirements	Undertake annual review of Committee and Board Effectiveness	Jan 2023
		Submit all relevant Returns within the Compliance Calendar 2023/24	Mar 2024
		Produce Tenants Annual Review 2022 and distribute.	June 2023

Ref	Regulatory Standard	Continuous Improvement Activity	When
RS.2a	Effective framework to manage risk, internal controls and assurance	Review use of Pentana to manage risk and consider alternatives (i.e. Decision Time)	Mar 2024
		Conduct annual risk appetite statement	Nov 2023
		Embed a consistent programme government and management tool incl. cost benefit review analysis of projects	Mar 2023
RS.2b	Does not put assets or tenants at undue risk	Pilot the Plas Mawr 'Person Centred Fire Risk Assessment' roll out to support tenants to manage risk better	Dec 2023
RS.2c	Maintain accessible and up to date business continuity, contingency and disaster recovery plans.	Undertake regular penetration testing, full recovery and cyber-security audits	Mar 2023
RS.3b	Delivering services which meet the diverse needs of tenants	Implement recommendations from Cost of Living Increase (COLin) Group	Mar 2024
		Implement the Customer First Programme's programme of work	Mar 2024
		Assess impact from iConnect project when it closes	Mar 2025
		Develop a Financial Inclusion and wellbeing strategy to sustain tenancies and address poverty	Oct 23
		Launch new Tenant App improving accessibility to services	Nov 2023
RS.3c	Achieves and maintains high levels of tenant satisfaction with services	Embed the new timescales and SLA for tenant contact and support offered during ASB cases.	Sept 2023
		Review satisfaction of Homeseach applicants to further improve services	Oct 2023
RS.3d	Makes landlord performance information available to tenants	Review all corporate publications, specifically presentation of performance information to our customers.	Nov 2023

Ref	Regulatory Standard	Continuous Improvement Activity	When
RS.4a	Creates a culture which values and promotes tenant involvement	Roll out refresh campaign on CVC's activity and what difference it's making through consultation with service users & Customer First programme	Mar 2024
		Communicate findings from Tenant Engagement review and what's being implemented (internally and externally)	Aug 23
		Review and implement new Customer Care Strategy/Policy	August 2023
RS.4b	Getting involved and how MHA will listen and act on feedback	Community Voice to review complaints received and identify trends and actions required.	Mar 2024
		Review results from Voicescape activity identifying live satisfaction across all services, and action accordingly.	Mar 2024
RS.4c	Tenants are happy with difference involvement is making and opportunities for people to be involved	Implement changes identified following the Tenant Engagement Review	Mar 2024
RS.5a	All rules and statutory guidance are complied with	Review our approach to Fees and Charges to promote responsible attitudes towards their home and manage recharges effectively, fairly and accurately.	Sept 23
		Complete any follow-up work related to the Rented Homes Act.	May 2023
RS.6a	Strategic approach to Vfm	Rethink our approach to VFM	Mar 2024
		Embed procurement KPI's into governance reporting structure	Dec 2023
RS.6b	Can demonstrate to all stakeholders it achieves Vfm in delivering strategy and services	Review our approach to collecting former tenant arrears to maximise income collection and use resources effectively	Mar 2024
		Further exploration of energy efficiency projects to assist tenants with COL	Mar 2024

Ref	Regulatory Standard	Continuous Improvement Activity	When
RS.7a	Sets financial plans enabling delivery of strategy and achievement of social purpose, with appropriate reporting of plans to Board	Review use of Abovo appraisal tool to assess viability of schemes, and consider alternatives	Sept 2023
RS.7b	Financially viable in short, medium and long term	Review current pension offer with support from external specialist advisors	Nov 2023
RS.7c	Monitors, reports on and complies with covenants agreed with funders	Review covenants with funders to max headroom (e.g. inclusion of ORP funding, Gift Aid and Sales income)	Mar 2024
RS.8a	Accurate and up to date understanding of A&L	Undertake Stock Condition Surveys to inform decarb strategy in response to WHQS2	Mar 2024
		Review of Keystone AM System in partnership with other HAs	Feb 2024
RS.8b	Max use of assets to achieve its social purpose and corporate objectives	Further explore JV and collaboration opportunities with other HA's to identify projects of mutual benefit	Mar 2024
RS.9a	Ensure all homes meet applicable standard, rules and statutory guidance issued in connection with quality of accommodation	Increase investment in decarbonisation programmes.	Mar 2024





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