



## Valleys to Coast

Emma Williams  
Director of Housing and Regeneration  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

20th January 2023

Dear Emma

Thank you for your letter dated 15 December 2022.

Valleys to Coast is committed to providing homes and communities where our customers are safe and happy. Our current 10 year Corporate Strategy for the period 2021-31 clearly sets out our priorities, relevant to the issues set out by the Welsh Government, which will help us mitigate the challenges we face. Amongst the priorities we have set out, we have included:

Supporting *Safe and Happy Customers*, by:

- Delivering brilliant services that are easy to use, accessible, responsive and reliable, with an offer of digital solutions so good that customers choose to use them;
- Developing the voice of the customer to help shape, improve and evaluate our services; and
- Understanding our customer needs, providing choice.

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Valleys to Coast Housing Limited ◦ Welsh Assembly Registration No. L137

Valleys to Coast Housing Limited is a Registered Society with Charitable Rules - No. 30205R

Registered Office: Tremains Business Park, Tremains Road, Bridgend CF31 1TZ

Chairman: Anthony Whittaker ◦ Chief Executive: Joanne Oak



Supporting *Safe and Happy Homes*, by:


- Moving towards being carbon neutral by 2030 through developing our carbon zero commitment and an ambitious programme to improve the energy efficiency of our homes;
- Investing in our homes to ensure they are maintained to a high standard and fit for purpose; and
- Maximising opportunities to develop new homes that provide for present and future living.


To help us to deliver our Corporate Strategy priorities we have a number of operational delivery strategies, namely:

- Asset Management Strategy
- Safe & Happy Sustainable Future Strategy
- Customers & Communities Engagement Strategy

Having recently completed our self-evaluation of compliance with the Regulatory Framework (2022) and following consideration by the Regulator as part of the assurance evidence submitted, Valleys to Coast received a regulatory judgement outcome of green 'compliant' for both Governance and Tenant Services and Financial Viability.

Given the continued challenge, it is positive to receive this judgement. We have worked hard to continuously improve the organisation given the under investment in our stock following the lack of investment into our homes and external spaces. As set out in our 'Missing Piece' report, the homes within our stock at point of transfer received a c£1400 per property dowry grant, whereby subsequent stock transfer organisations will receive a dowry equivalent to c£13,000 per home. So whilst we continually improve the operational and financial performance of Valleys to Coast, our homes still experience ageing





components which place greater risk on the detrimental effects of the failures in those components.


In 2021 we instigated a Turnaround Project which focused on a number of long term failings within Valleys to Coast, namely:


- Levels of Customer Satisfaction
- Fire Safety
- Landlords Health & Safety (compliance)
- Complaints & disrepair
- Property issues inc pests, disrepair, rubbish
- High number of voids
- Backlog of repairs and surveys

We have delivered improvements in all areas, however given the short period the project has been running and the challenging external disruptions which have hindered speed of progress we continue to drive forward our improvements.

Through our improved finance and asset management processes and data, looking ahead to next financial year we will be able to invest in one of the largest planned maintenance programmes that Valleys to Coast has had since the early years of stock transfer. These improved revenue and capital investment programmes together with our regeneration programmes (supported by our Social Housing Asset Performance Evaluation (SHAPE)) and our development programme will help us to focus our investment into our homes over the period of our Corporate Plan and beyond.

As part of our preparation for the Renting Homes Act (Wales) 2016, we undertook a comprehensive review of Fitness for Human Habitation (FFHA) and the Matters and Circumstances contained within The Act. This review gave us confidence that our homes met the FFHA (Part 2) requirements, and






that we had identified risks associated with the 29 Matters and Circumstances (Part 1), along with actions and responses relating to any higher risk areas, such as Damp, Mites & Mould or Fungal Growth and Cold.

We are aware of how important the condition of the home is in mitigating the risk of damp and mould being present. We acknowledge that a good condition, energy efficient and appropriately ventilated home is essential. Our asset management data contains a breadth of information which helps us to manage our homes and prioritise investment work. We can confirm that:

- The average SAP rating of our homes is 74
- Of our 6,020 homes 5,687 have a fully operational and serviced gas fuelled condensing combination boiler. 44 have Air Source Heat Pumps and the remainder will be either communal heating within our sheltered housing schemes, electrical storage or a minor number of solid fuel heated properties where contract holders have refused heating upgrades.
- 1,110 of our homes have External Wall Insulation (EWI) installed, with installations to a further 39 being completed by the end of March 2023. We are also planning (utilising planned investment budgets and Optimised retrofit Programme (ORP) funding) to install EWI to a further 250 homes in 2023/24.
- 100% of our homes are compliant with the Welsh Housing Quality Standards (WHQS) in respect of the provision of extractor fans.
- 100% of our homes have double glazed windows with trickle ventilators.

With the energy efficiency of a home being so important and the cost of living challenge being posed to residents we would recommend that the Welsh Government re-evaluates its funding through the Optimised Retrofit Programme (or similar) to speed up the improvement in social rented homes.





In response to the questions, we reply as follows:

**Q. Whether you have carried out a review of this nature in recent weeks and if not, why not?**

A. We have completed a review in recent weeks. We have broadened our review to identify any issues which may contribute to a risk of damp and mould e.g. failed extractor fans, blocked up ventilation and so on rather than just focusing on reports of 'damp and mould'.

**Q. If you have carried out a review, what did the review tell you?**


The review has informed us that of our stock of 6,020 homes:


- We have 490 properties from which the customer has reported an issue which **may** relate to damp and or mould or any other relevant issue such as failed extractor fans etc.
- We have 38 disrepair claims for which the claim being made by the claimant has reported damp and/or mould
- We have 35 complaints relating to damp and mould

**Q. If there are any damp and mould cases which are not being dealt with effectively, what is the scale of this and what are your plans for remediation?**

Where we are dealing with damp and mould cases through our disrepair and complaints process, we are confident that all the necessary processes are being followed effectively, we do not place a hold on any works whilst the cases are being managed, in fact, we endeavour to be proactive in completing any necessary remedial works.

With regards to the 490 properties that may have potential damp and mould cases, we are going to further investigate. We have developed a Task & Finish project which will enable us to redistribute our technical resources to get to each and every property within the next 10 weeks to survey every home. We will assess each case using a range of property





conditions and known tenancy matters to help ensure that we survey the higher priority homes first. Upon completion of the survey we shall undertake any necessary remedial works and/or provide the customer with an appropriate level of high quality advice and guidance on how they can help ensure that their home remains free from high levels of moisture and potential mould growth.


We have worked alongside other RSLs to share best practice and pool resources to develop clear communications to support our customers, including comprehensive advice on our website, video explainers, and printed leaflets in an easy read format. We encouraged our customers to join a TPAS Cymru session aimed at supporting them to challenge our communication on this issue, and invited customers to give us feedback on the information published on our website.


This project is being incorporated into our Renting Homes (Wales) Act 2016 risk register in order that it becomes part of our day to day approach to dealing with issues as they are identified.

Further to this, the learning from the Task & Finish group work will help us to inform and develop our future ways of working to ensure our response to reports of damp and mould becomes business as usual. We will also reflect upon and consider the 'Think Points' contained within the Welsh Government's 'Social Housing Conditions and Disrepair - feedback to Social Landlords' report when developing future operational methodologies.

**Q. Explain the data you hold in relation to damp and mould, including the level of stock coverage and how often the data is scrutinised and refreshed.**

We have comprehensive stock condition survey data for in excess of 87% of our homes as at December 2022. We maintain this level of stock condition survey data through our directly employed stock condition survey team. Whilst the survey is currently primarily a method to inform the programming of future investment into our homes through the





renewal of building components, our survey team members are trained and experienced to report any other property and/or tenancy management issues which may pose a risk to the living conditions for the customer. We are currently reviewing the content of the Stock Condition Survey to ensure it formally takes into account a wider range of 'condition' issues. Furthermore, we undertake to survey each home every five years and update any property condition surveys to reflect the improvement works carried out through our planned maintenance and voids programmes, updating and refreshing our data .

**Q. Explain the assurance the governing body has scrutinised to give them confidence the organisations' systems and processes are the best they can be and do not discriminate in any way, to ensure damp and mould issues are dealt with promptly and effectively**


We have a quarterly performance report that is presented to the Board which contains KPI's and project updates. Further detailed operational KPI's and update reports are presented to our committee's. Our Development and Asset Committee receive regular updates on our Repairs and Maintenance Improvement Programme and updates on delivery of our Asset Management strategy.

We are improving our systems and data, a new repairs and maintenance software system which will Go Live later in this calendar year.

The Project plan we are developing through the Task and Finish group will be reported through the following:

- Performance Executive - Our Leadership Team
- Development & Assets Committee
- Board of Management






As part of the thematic review with our internal audit services we will also consider any necessary additional assurances and benchmark KPI's we can adopt.


The Board has been kept informed of the situation with a focused discussion at its most recent meeting held on the 19 December 2022. The Board has received a report on the context and findings of our data review along with a copy of this letter and the Project plan. An away day with Board Members is scheduled for 9 February 2023 during which the recommendations made in the National Housing Federation and Chartered Institute of Housing's 'The Better Social Housing Review' report will be used as a basis to review and challenge both our current and future priorities.

We have recently developed our EDI strategy, which was approved by the Board and is currently going through an assurance advisory exercise with our Internal Audit. The Board also agreed to commit to Tai Pawb's 'Deeds not Words' pledge. Our plan to implement actions in line with the pledge is included as part of our EDI Implementation - 4 year road map.

We ensure there is a fully accessible service where customers can contact us to report a repair via a variety of different methods including in writing, telephone, face to face, email and online during normal office hours. The telephone service is available 24/7 for reporting repairs out of hours. We also provide the same methods of reporting a complaint should customers have concerns with the service we provide. We have adopted the new ombudsman guidelines for reporting and responding to complaints, which has recently been audited with the outcome report due to be presented to our Audit and Risk Committee at its next meeting in February.







As part of our Repairs and Maintenance improvement plan we commissioned an independent customer satisfaction survey, including both our internal trades delivery team and external contractors. The responses were segmented according to the basic equalities data we hold. This data is by no means complete but it did evidence that there was no significant difference in satisfaction for the repairs across gender, property size, disability, or having children. This was presented to our Board following which we have made a commitment to undertake a similar survey at the end of January 2023.

Valleys to Coast is focused on its core purpose of providing safe and happy homes and whilst we are challenged by the historic lack of investment, we continue to improve our homes and the services for our customers.


We have also reviewed our position against the relevant recommendations made in the The National Housing Federation and Chartered Institute of Housing's 'The Better Social Housing Review' as summarised below:

**Review Recommendation 1**

Every housing association, and the sector as a whole, should refocus on their core purpose and deliver against it.

**Valleys to Coast Position**

Our Corporate Plan clearly sets out the priorities and commitments we are making towards our core purposes and how we ensure that we will improve and deliver against those purposes, with a laser focus on the "Brilliant Basics" recognising our core landlord responsibilities.





## **Review Recommendation 2**

Housing associations should work together to conduct and publish a thorough audit of all housing in England

### **Valleys to Coast Position**

Whilst not specifically proposing that Valleys to Coast are engaged in such an audit in England, Valleys to Coast are active members of the various Community Housing Cymru SDGs through which there is a sharing of experience and learning, whilst further to this, our colleagues are also actively engaged in cross organisational working to enhance our experience and understanding of what is happening outside of our organisation, thereby maximising the opportunity to introduce improvements into the homes and services we provide.

Through our Internal Audit shared services, as a collective of RSL's we have commissioned a thematic review of Damp and Mould to ensure we share and learn from best practice.

## **Review Recommendation 3**


Housing associations should partner with tenants, contractors and frontline staff to develop and apply new standards defining what an excellent maintenance and repairs process looks like


### **Valleys to Coast Position**

Valleys to Coast is committed to supporting and enabling its tenants to influence strategic decision making by providing opportunities and choice as to how and when they engage with us. This is set out in our 3-year Engagement strategy, which sits alongside an engagement tracker to evidence customer involvement and success. This is reported to the Board as part of our performance reporting.

We have procured a number of partnership agreements with local contractors who have experience in delivering repairs and maintenance services to housing association customers.

Further to this, we have committed to introducing a Wholly Owned Subsidiary (as from April 2024) that will deliver our primary repairs





services. Through these formal partnership arrangements we will continue, through our Engagement Strategy, to partner with tenants, contractors and frontline staff to develop and apply new standards, defining what an excellent maintenance and repairs process looks like.

**Review Recommendation 4**

Housing associations should work with all tenants to ensure that they have a voice and influence at every level of decision making across the organisation, through both voluntary and paid roles

**Valleys to Coast Position**

Valleys to Coast is committed to supporting and enabling its tenants to influence strategic decision making by providing opportunities and choice as to how and when they engage with us. This is set out in our 3-year Engagement strategy, which sits alongside an engagement tracker to evidence customer involvement and success.

**Review Recommendation 5**

Housing associations should develop a proactive local community presence through community hubs which foster greater multi-agency working

**Valleys to Coast Position**

As a single local authority housing association we are engaged at a number of multi agency partnership working.

Should any further information be required, please do not hesitate to contact me.

Yours sincerely



**Darrin Davies**

**Corporate Director of Development & Growth**

