

## Valleys to Coast Housing Regulatory Standards - Improvement Plan

Valleys to Coast Housing, Registration No 30205R

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

### Our Self Evaluation at a Glance

RS1	RS2	RS3	RS4	RS5	RS6	RS7	RS8	RS9
a	a	a	a	a	a	a	a	a
b	b	b	b		b	b	b	
c	c	c	c			c	c	
d		d	d			d		
e						e		
f								
g								

Ref	Regulatory Standard		
RS1	The organisation has effective strategic leadership and governance arrangements which enable it to achieve its purpose and objectives		
Requirements	Improvement action	Responsible Lead	Deadline
a) Has a business plan which reflects its vision, culture and values and sets out how the organisation will achieve its core purpose as a social landlord	The operating plan is reviewed annually to review and refresh the annual objectives, as may be required, to ensure that they remain aligned with the corporate plan and fit for purpose in light of any new or emerging challenges of the operating environment.	CEO	Board Feb 2023
b) Complies with its own governing documents and meets the requirements of an appropriate Code of Governance	3 years on since the voluntary undertaking, and in line with 5.8.2 of the CHC Code of Governance, the new Director of Governance will undertake a governance review, the first phase of which will focus on the brilliant basics of good governance and will include a review of the governing documents. The outcome of which will be reported to the Board in spring 2023.	Director of Governance, Strategy and Performance	Spring 2023 Board
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	<ol style="list-style-type: none"> <li>1. Recognising our responsibilities in relation to improving our standards in relation to EDI, the focus of the last Board development day was EDI. Board Members received an afternoon of EDI training, facilitated by Tai Pawb and were presented with our four year Equality, Diversity and Inclusion Road map for consideration and approval.</li> <li>2. An EDI working group has also been convened to help drive any necessary improvements in relation to EDI.</li> </ol>	<ol style="list-style-type: none"> <li>1. Corporate Director of People, Culture and OD</li> <li>2. EDI working group</li> </ol>	<ol style="list-style-type: none"> <li>1. September 2022</li> <li>1. Year 1 of action plan March 2023</li> </ol>

	3. A data gathering exercise to establish the EDI profile of our customers is underway.	3. Corporate Director of Housing, Communities and Customers	2. April 2023
d) Has a diverse Board, reflecting the communities the RSL works in and with, and has the skills and knowledge required to be effective.	As set out at point 3 above, the data gathering will help us to better understand the EDI profile of the people of the communities that we serve which will enable us to assess how well our Board reflects this and inform any recruitment plan to address any identified gaps, as may be required. .	Corporate Director of Housing, Communities and Customers and the Director of Governance	September 2023
e) Makes logical decisions based on clear, good quality information which includes assessment of risk and, where appropriate, the views of tenants	<p>Valleys to Coast through its Leadership team, Audit &amp; Risk Committee and Board is undertaking a root and branch review of its strategic risks to ensure that they are aligned to the refreshed Corporate Plan and Sector Risk profile.</p> <p>Workshop sessions, facilitated by Barcud Shared Services were held during February and June 2022.</p> <p>The annual Board schedule has been revised to ensure that the Board has a number of opportunities throughout the year to consider and shape the various inputs and outputs as part of the annual planning process. The first opportunity took the form of a Board Strategy day which was held on 9th February 2023 where the Board and the Executive Leadership Team came together to think about the impact of the challenges posed by the external operating environment and to assess the impact on future planning to assist in shaping a robust model as part of the annual budget setting for the year ahead.</p>	<p>Leadership Team/ARC/Board</p> <p>Leadership Team</p>	<p>ARC October 2022</p> <p>End March 2023</p>

	<p>In addition to this, an externally facilitated Board Development Day with a focus on finance is scheduled to take place on 27th March. The second Board Strategy day will follow this on 19th June and will focus on business planning, providing the Board with early visibility and therefore an opportunity to consider and inform our planning parameters.</p> <p>Going forward, the Treasury report provided to the Board as part of the Integrated Performance Report on a quarterly basis will link to the 30 year plan and provide a more comprehensive explanation as well as graphical representations.</p> <p>We will also produce guidance on the content of 30 year plan inputs and outputs which will include more concise extracts to demonstrate attributes of scenarios.</p>		
<p>f) Enables and supports tenants to influence strategic decision making</p>	<p>We will continue to work to develop our relationship with our tenant shareholders to enable them to have more involvement in influencing strategic level issues. The Director of Governance, Strategy and Performance will work with the Community Engagement Team to explore opportunities and develop a plan accordingly.</p> <p>This will include customer engagement regarding our repairs and maintenance services.</p>	<p>Director of Governance, Strategy and Performance</p>	<p>End December 2023</p>
<p>g) Complies with all relevant legislation, regulatory requirements and statutory guidance and</p>	<p>Considering the significance of the impact of the Renting Homes (Wales) Act, a programme approach has been adopted to ensure any necessary changes are implemented.</p>	<p>Corporate Director of Housing, Communities and Customers</p>	<p>End December 2023</p>

<p>communicates in a timely manner with the regulator, including on material issues that relate to actual or potential non-compliance</p>	<p>This is being led by our Director of Housing, Communities and Customers supported by our in-house legal expert. The Programme is being monitored through our Leadership team and our Audit and Risk Committee.</p> <p>Training has been rolled out to Managers across the organisation to help them to understand the new requirements and the changes required as a result of this legislation.</p>		
<b>Ref</b>	<b>Regulatory Standard</b>		
<b>RS2</b>	<b>Robust risk management and assurance arrangements are in place</b>		
<b>Requirements</b>	<b>Improvement action</b>	<b>Responsible Lead</b>	<b>Deadline</b>
<p>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</p>	<p>Undertake a root and branch review of our strategic risks and risk register.</p> <p>Strengthen our risk management process to include the acquisition and implementation of the Risk module of Decision Time.</p> <p>Develop an Emerging Risk Register.</p>	<p>Director of Governance, Strategy and Performance</p>	<p>ARC October 2022</p>
<p>b) Does not put social housing assets or tenants at undue risk</p>	<p>Complete an Asset Performance Evaluation of our domestic assets based upon the SHAPE model.</p> <p>Continue to implement improvements set out in our 2 year Health &amp; Safety Improvement Programme</p>	<p>Corporate Director of Development and Growth</p>	<p>End December 2024</p> <p>End December 2023</p>
<p>c) Maintains accessible and up-to-date business continuity, contingency and disaster recovery plans</p>	<p>Our internal audit plan this year has focussed on business continuity and disaster recovery, a follow up audit in relation to our business continuity plan is scheduled for end September 2022. Work to streamline our Business Continuity Plan will be undertaken over the coming months.</p>	<p>Director of Governance, Strategy and Performance</p>	<p>End December 2022</p>

<b>Ref</b>	<b>Regulatory Standard</b>			
<b>RS3</b>	<b>High quality services are delivered to tenants</b>			
<b>Requirements</b>	<b>Improvement action</b>		<b>Responsible Lead</b>	<b>Deadline</b>
a) Keeps tenants safe in their homes and promptly identifies and corrects any under-performance or non-compliance on landlord health and safety matters	We will continue to implement improvements and monitor the priority improvement areas set out in our Health and Safety Improvement Plan.		Corporate Director of Development and Growth	End December 2023
b) Delivers services which meet the diverse needs of tenants	<p>Valleys to Coast understands the importance of diversity and how it has a positive impact on its culture, decision making and sense of belonging for colleagues and customers. As an organisation, we have signed up to the Deeds not Words pledge and we have a 4 year EDI action plan in place to ensure we achieve our aim of being a diverse and inclusive organisation by 2026.</p> <p>This road map is focused on our customers and ensuring we are meeting the current needs of the people who live in our homes and that we are able to progress with their changing needs. It is acknowledged that this is the beginning of the journey and there will be learning throughout the process that may take the road map in a different direction. A 'start where</p>		Corporate Director of Housing, Communities and Customers	Ongoing throughout next 4 years

	<p>you are' approach has been taken to ensure action is taken from the very beginning of the journey.</p> <p>In summary, we are in a position where we can bespoke our service around individual needs as they present themselves to us. Where we need development is identifying unconscious bias, automating mass contact for specific needs and normalising conversation around diversity in the business.</p>		
<p>c) Achieves and maintains high levels of tenant satisfaction with services</p>	<p>Implement improvement actions to address customer feedback through the Beaufort survey.</p> <p>Commission Beaufort to conduct a follow up satisfaction survey.</p> <p>Review and improve how customer satisfaction data is relayed and considered by the Leadership Team to inform decision making.</p> <p>Undertake the STAR survey and use data to shape and inform services and decision making.</p>	<p>Corporate Director of Housing, Communities and Customers/Corporate Director of Development and Growth</p>	<p>Ongoing throughout 2022/2023</p>
<p>d) Makes landlord performance information available to tenants</p>	<p>We will work with our customers to understand what information, in addition to that already shared (Corporate Plan, Financial Statements, Engagement plan etc), they would like to know as well as how they would like to receive this information</p> <p>We have planned a new programme of performance</p>	<p>Corporate Director of Housing, Communities and Customers/Head of Communications</p>	<p>July 2023</p>

	<p>information sharing, starting at the end of Q1 2023-24, which will highlight key data in an easy-to-read infographic/animated format that is contextualised so that people understand the data and the impact that has on them as a customer. The target date on our continuous improvement has therefore been changed from End December 2023 to July 2023.</p> <p>We have undertaken an audit of our communication methods and using information gained during recent surveys we are committed to ensuring our customers are kept informed via traditional methods, for example printed customer newsletters twice a year and specific targeted letters by post where required; alongside developing our digital communication channels to ensure a regular flow of information to those who sign up to our text messages and e-newsletters. We will also use our social media channels to continue engaging with our customers, working on a new strategy to increase our reach into targeted audience groups (for example using TikTok to reach younger customers and stakeholders). We are also seeking to establish a 'working together' group enabling and encouraging customers to review and feedback on our various methods of communication and the range of information we are making available. As part of our EDI action plan we are committed to ensuring our communications are fully inclusive and accessible.</p>		
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Ref	Regulatory Standard		
RS4	Tenants are empowered and supported to influence the design and delivery of services		
Requirements	Improvement action	Responsible Lead	Deadline



<p>a) Creates a culture which values and promotes tenant involvement</p>	<p>Implement and embed the consideration of customer feedback as standard practice across the business.</p>	<p>Corporate Director of Housing, Communities and Customers</p>	<p>Ongoing throughout 2022/23 and 2023/24</p>
<p>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.</p>	<p>Survey staff to identify areas which may need to improve customer engagement and to identify and remove any barriers to engagement.</p> <p>We will embed engagement as part of our onboarding recruitment process.</p> <p>Development of an e-learning module on customer engagement for all new and existing colleagues to help embed this as standard practice across the organisation.</p> <p>Update and review the engagement tracker with details of the outcomes and impacts of various engagement opportunities and methods to better understand how our new approach has impacted the business.</p> <p>The engagement graphics from the strategy will be published on the website to demonstrate how customers can get involved.</p> <p>The quarterly leadership update will be uploaded to the website and include upcoming plans and events for the next 1/4 so people know what is happening across the business.</p>	<p>Corporate Director of Housing, Communities and Customers</p>	<p>Ongoing throughout 2022/23 and 2023/24</p>

	Improved recording system for complaints that will allow for better analysis of the complaints.  We will develop a compliments module so we can learn from successes.		
c) Provides opportunities for tenants to be involved, can demonstrate that tenants are satisfied with them and can demonstrate the difference involvement is making	We will undertake a satisfaction survey of our engagement methods to understand if they are delivering what the customers want and need.  We will improve and encourage the capturing of outcomes and impacts, recorded on the tracker through our business partnering approach.	Corporate Director of Housing, Communities and Customers	Ongoing throughout 2022/23 and 2023/24
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	Strengthen our ability to demonstrate diverse views - this will be addressed through the implementation of action set out in the EDI roadmap.	Corporate Director of Housing, Communities and Customers	Various - in line with 4 year EDI roadmap

Ref	Regulatory Standard		
RS5	Rents and service charges are affordable for current and future tenants		
Requirements	Improvement action	Responsible Lead	Deadline
a) Ensures all applicable rules and statutory guidance (including the current rent agreement) are complied with	Director of Finance to attend sector events and training as appropriate to ensure the organisation remains on the front foot regarding rules and statutory guidance and any changes on the horizon.	Director of Finance	End December 2022
Ref	Regulatory Standard		

RS6	The organisation has a strategic approach to value for money which informs all its plans and activities			
Requirements	Improvement action	Responsible Lead	Deadline	
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	<p>Update our VFM Strategy to reflect any changes to our definition following completion of the work, supported by Cwmpas, in relation to VFM.</p> <p>Embed the VFM strategy across the business to ensure a consistent approach and that VFM is considered as part of strategic and operational decision making.</p>	Director of Finance	End December 2023	
b) Can demonstrate to stakeholders, including tenants, that it achieves value for money in delivering its strategy and services	As set out above, work to review and better understand what VFM means in the context of Valleys to Coast will enable us to share how we achieve this with our stakeholders.	Leadership Team	End December 2023	
Ref	Regulatory Standard			
RS7	Financial planning and management is robust and effective			
Requirements	Improvement action	Responsible Lead	Deadline	
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	<p>Review period close down processes to improve efficiencies in reporting.</p> <p>Review format and content of Board reports as part of Governance review to ensure the information is clear, relevant and timely.</p>	Director of Finance/Director of Governance, Strategy and Performance	End December 2023	
b) Is financially viable in the short, medium and longer-term, and maintains sufficient funding and liquidity to support this	In order to achieve our full potential as an organisation and to be able to go beyond the minimum requirements, in partnership with the local council and WG, the Association will continue to explore opportunities to secure additional grant funding and consider other novel funding mechanisms to enable us to invest further in our homes and communities .	CEO/Corporate Director of Development and Growth	End December 2023	
c) Monitors, reports on and complies with all covenants it has agreed with funders	Continually monitor covenants to ensure that they don't become a barrier to investing in our homes.	Director of Finance	End December 2022	

	Review the golden rules set by the Board to ensure they remain fit for purpose.		
d) Identifies and effectively manages risks to the delivery of financial plans including appropriate stress testing, scenario planning and use of internal thresholds	<p>Expenditure plans are predominantly designed to deliver baseline compliance vs WG standards whilst remaining sustainable under reasonably 'stressed' conditions.</p> <p>Legacy underfunding has resulted in limited opportunity to invest in housing stock to a quality beyond compliance and maintain this 'safety' margin.</p> <p>The capacity to accommodate extreme stress in economic factors and meet ever more demanding regulatory demands e.g. the de-carb agenda presents a risk to financial sustainability and will be a challenge going forward.</p> <p>Stress testing for the new financial year will include consideration of new and emerging challenges in the operating environment and to consider options to mitigate risk to financial viability. Feedback on potential mitigation actions will travel deeper into the organisation to identify specific 'triggers' which prompt action and '1st steps' that go beyond the description of a mitigation and estimate the value of the impact.</p> <p>Our Board reporting for the year ahead will include enhanced tables and graphs in relation to the scenario narrative specifically relating to free cash, covenants and headroom for years 1-5, 10 and 30 although Board appetite for such information will be tested to ensure this is relevant and sufficient.</p>	Director of Finance	November 2022


e) Has an effective treasury management strategy and associated processes	Review treasury management strategy to ensure that this includes consideration of ESG requirements i.e. negotiating covenant relief with lenders; seeking ESG lender based incentives and exploring novel routes of funding.	Director of Finance	End March 2023
<b>Ref</b>	<b>Regulatory Standard</b>		
<b>RS8</b>	<b>Assets and liabilities are well managed</b>		
<b>Requirements</b>	<b>Improvement action</b>	<b>Responsible Lead</b>	<b>Deadline</b>
a) Has an accurate and up to date understanding of its assets and liabilities	Update recording and review process to achieve more proactive use of the Assets and Liabilities register.	Director of Finance/ Corporate Director of Development and Growth	End December 2023
b) Maximises the use of assets to achieve its social purpose and the objectives of the organisation	Explore options and opportunities to secure additional funding to invest further in improving our homes and the impact we can have on the communities we serve across Bridgend County Borough.	Corporate Director of Development and Growth/Director of Finance	End December 2023
c) Uses accurate information about assets and liabilities to inform strategic and financial decisions	Review of performance metrics to consider the accuracy and value of the information captured and reported in relation to our assets and liabilities.	Corporate Director of IT, Digital and Data	End December 2022
<b>Ref</b>	<b>Regulatory Standard</b>		
<b>RS9</b>	The organisation provides high quality accommodation		
<b>Requirements</b>	<b>Improvement action</b>	<b>Responsible Lead</b>	<b>Deadline</b>
a) Ensures publicly funded homes meet all applicable standards, rules and statutory guidance issued in connection with quality of	Work towards compliance with WHQS2.	Corporate Director of Development and Growth	Ongoing throughout the period working towards the deadline TBC

accommodation, including the current  
Welsh Housing Quality Standard

following  
consultation.

This improvement plan was approved by the Board of Directors on 22nd August 2022, Resolution No. B44.22/23.

Signed:



[Chair]



[Chief Executive]

Date: 22nd August 2022