

Valleys to Coast Housing Self-Evaluation of Compliance with the Regulatory Standards

Valleys to Coast Housing, Registration No 30205R

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

Pursuant to the Regulatory Framework for Housing Associations Registered in Wales this document comprises the Association's self-evaluation of compliance with each of the Regulatory Standards.

Where full compliance with any of the Regulatory Standards cannot be evidenced, actions to be taken to improve the compliance position are set out in our improvement plan. The action plan also details actions we will undertake to drive continuous improvement across the organisation in line with the requirements of the Regulatory Standards.

Our Self Evaluation

Our self evaluation reflects our performance during a considerable change journey and one of the most challenging economic and volatile periods. During the pandemic we were in a stop/start period as we navigated out of Covid, resulting in the changes that we wanted to drive forward taking longer than anticipated and so the journey continues.

In 2020 we launched our 10 year corporate plan which was firmly rooted in our purpose of "safe and happy". Our plan outlines three phases of delivery - Foundation, Build and Grow. We have great aspirations as an Association but the first three years of our strategy will see us focussing on the 'Brilliant Basics' to ensure we have strong foundations in place. Our Turnaround Programme, which focussed on improving our repairs and maintenance service and customer satisfaction in this area is an example of how we have used data and customer feedback to inform our focus. Prior to the inception of our Turnaround Programme, our data indicated that the quality of our repairs and maintenance service was not where it needed to be and so, to address any issues identified and to improve the service, the Turnaround Programme was created to provide a clear and measured approach to improving the service to our tenants.

We are a financially stable organisation and at its meeting on 25 July 2022 our Board received the external Audit Completion report which confirmed a clean audit of our accounts for the 2021/22 financial year. Since our last judgement we have refinanced and have a strong pipeline of new homes which is keeping us on track to deliver our aspiration of building 1000 new homes over the term of our strategy.

We have continued to strengthen our governance with the appointment of a new Director of Governance who will be undertaking a Governance Review throughout quarters 3 and 4. Although still relatively new in post, the Director of Governance has already added value, in particular through the identification of a technical defect and immediately taking the relevant action, and implementing a remedial action plan to rectify the situation and to ensure controls are in place to mitigate any risk of this happening again.

We have adopted a new approach to engagement with our customers to help us reach a diverse range of individuals through a number of engaging and creative formats. Engagement opportunities will be vibrant and appealing and designed in such a way to ensure that the information provided is relevant and accessible to our tenants. Valleys to Coast actively engages with tenants to ensure that they understand the organisation's approach to tenant involvement and are aware of how they can get involved. We are working towards embedding a whole organisation approach to customer engagement which means all teams will be working with and listening to customers to ensure the services we deliver meet their needs.

We are committed to Equality, Diversity and Inclusion but recognise we are on a journey. We are developing our Equality, Diversity and Inclusion 4 year road map, with training for the Board scheduled to take place in September 2022.

We remain committed to delivering Safe and Happy homes which meet at least the minimum compliance requirements in terms of safety and building quality standards. As an organisation we have an appetite to do more and to improve our homes beyond the minimum standards but due to the lack of Dowry/MRA investment in Bridgend we are limited in terms of what we can reasonably deliver to our customers. The Association will continue to engage with the local authority and the Welsh Government in a bid to

secure additional funding to enable us to continue to improve the quality of the homes we provide and the impact we can have on the communities we serve across Bridgend.

Joanne Oak, CEO and Anthony Whittaker, Chair of the Board.

August 2022

CC The Board

Compliance 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	Commentary	Assurance evidence	Compliance Status
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	<p>Valleys to Coast has a Corporate Plan which reflects its vision, culture and values, setting out how the organisation will achieve its core purpose and is supported by our annual operating plan.</p> <p>The organisation has a suite of Key Performance Indicators (KPIs) which are monitored by the Leadership Team on an ongoing basis and performance against each is reported to the Board and relevant committees on a quarterly basis.</p>	<ul style="list-style-type: none"> • Corporate Plan • Annual operating plan • Quarterly integrated performance reporting to the Board. • Leadership Performance Executive meetings held monthly. 	
b) Complies with its own governing documents and meets the requirements of an appropriate Code of Governance	<p>Valleys to Coast has a suite of governing documents in place which includes the Association Rules, the Board Standing Orders and Financial Regulations, as well as the Terms of Reference for each of the Board subcommittees. These documents were last reviewed, updated and approved by the Board in 2021.</p> <p>Valleys to Coast adopted the latest version of CHC Code of Governance shortly after it was published in 2021. An initial review of compliance against the Code was presented to the Board for consideration and approval at its meeting in August 2021. The initial review</p>	<ul style="list-style-type: none"> • Internal Audit outcome reports • Subcommittee reports to the Board - minutes and verbal updates • Audit and Risk Committee Annual report to the Board • Code of Governance - Annual review of compliance report • Appointment of a Director of Governance with an independent link to the Board and Audit and Risk 	

	<p>indicated substantive assurance of compliance with the main principles of the Code but did identify a number of areas which would require strengthening.</p> <p>We have recently appointed a Director of Governance to lead the governance team in ensuring the highest standards of governance are in place, and to advise the Board and Leadership Team on governance best practice.</p> <p>Taking advantage of fresh eyes, the Director of Governance will undertake a review of the governing documents which comprise the governance suite throughout quarters 3 and 4 of this financial year as part of a wider governance review.</p> <p>The Board also receives assurance in relation to compliance with its governing documents through the provision of internal audit outcome reports, as may be required. The last governance review internal audit assurance report was provided to the Board at its meeting in July 2021 confirming substantive assurance evidence that the recommendations from the voluntary undertaking had been embedded in the governance framework.</p>	<p>Committee Chairs as well as the Leadership Team.</p>	
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<p>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</p>	<p>Valleys to Coast recognises its responsibilities in relation to Equality, Diversity and Inclusion which is reflected in the 2022/23 operating plan.</p> <p>Measurable, evidence based commitments are not yet in place but an EDI steering group has been established and work is ongoing to develop an EDI plan which will see an incremental approach to achieving excellence in this area over the next 4 years.</p> <p>Acorn recruitment were commissioned in June 2021 to help with the recruitment of new Board Members with specific skills and diversity characteristics, as identified through a review of the skills matrix, our Board Diversity submission, and the expectations set out within the 2021 CHC Code of Governance. Following the recruitment process, four new Board Members were appointed to the Board, one of whom with expertise in Equality, Diversity and Inclusion and Organisational culture.</p> <p>We have also signed up to Tai Pawb's 'Deeds not Words' pledge. Our plan to implement actions in line with the pledge is included as</p>	<ul style="list-style-type: none"> ● EDI Implementation - 4 year plan ● Commitment statements in Corporate Plan. ● Annual operating plan priorities. ● Appointment of Board Member with specialism in Equality, Diversity and Inclusion. 	
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	part of our EDI Implementation - 4 year road map.		
d) Has a diverse Board, reflecting the communities the RSL works in and with, and has the skills and knowledge required to be effective.	<p>Valleys to Coast's Board comprises 10 Members (4 male and 6 female) with a variety of backgrounds and specialisms who, collectively, have the skills and knowledge required to be effective. The profile of the Board is reviewed on an ongoing basis and certainly as part of the annual appraisal process and through the Board Diversity submission to WG. This information is used to identify any skills and experience gaps and to inform Board recruitment requirements.</p> <p>A number of our current Board Members are from the Bridgend area and one Member of the Board is a Valleys to Coast tenant.</p> <p>Whilst the Association certainly strives to have a Board that reflects the communities we work in, further work is required to establish the EDI profile of our customers before we can be certain that the Board composition accurately reflects our communities. This work is identified and included in the EDI four year road map.</p>	<ul style="list-style-type: none"> • Our Board Members • Board skills matrix and annual development plan. 	
e) Makes logical decisions based on clear, good quality	Valleys to Coast make logical decisions based on clear, good quality information, including	<ul style="list-style-type: none"> • Risk Management Framework 	

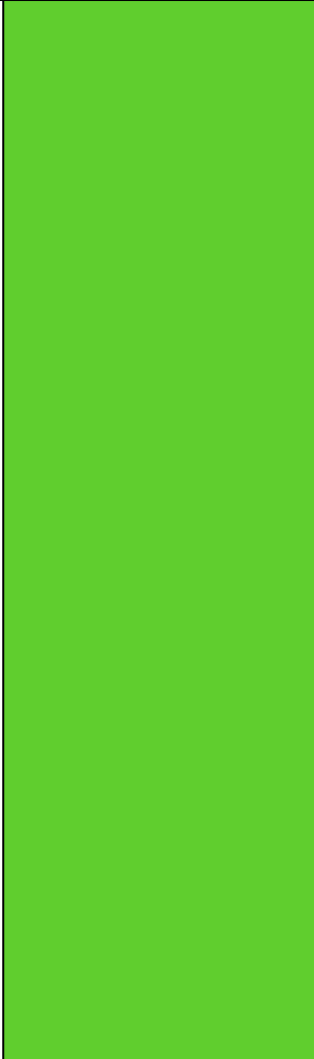

<p>information which includes assessment of risk and, where appropriate, the views of tenants</p>	<p>assessment of risk and views of tenants. We have a scheme of delegation which outlines the decision-making process and responsibilities of the Board and its Committees.</p> <p>Our Board reporting template is formatted in such a way that ensures stakeholder and customer voice, Value for Money, financial implications, Environmental, Social and Governance, Equality, Diversity and Inclusion, risk management and assurance are areas covered in all papers.</p> <p>The recent report on the rent setting policy demonstrates consideration of clear information and the broader risk and stakeholder views to inform the Board's decision.</p>	<ul style="list-style-type: none"> • Scheme of Delegations • Board report template • Risk workshop - agenda and presentation 	
<p>f) Enables and supports tenants to influence strategic decision making</p>	<p>Valleys to Coast is committed to supporting and enabling its tenants to influence strategic decision making by providing a number of opportunities and a 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.</p>	<ul style="list-style-type: none"> • 3-year Engagement Strategy • Q2 board customer engagement update • Housing strategy • Customers were involved in the most recent round of Board recruitment as well as the recruitment of frontline colleagues such as Community Housing Partners and Community 	

	<p>Following consultation with the Board, it was agreed that the Association ought to continue to engage customers in a number of creative and vibrant formats to ensure the information is relevant and relatable.</p> <p>Over the last year, customers have been engaged in Board recruitment, developing our Housing Strategy and directing our focus through satisfaction feedback.</p> <p>The STAR survey results are also reported to the Board and the results analysed to shape and inform our service delivery. The most recent example of this was the introduction of the Turnaround Programme which focussed on improving service delivery of maintenance and repairs after customer feedback indicated that performance in this area had fallen below expected standards.</p>	<p>Living Partners.</p> <ul style="list-style-type: none"> • Low levels of customer satisfaction in the STAR survey drove decisions around the improvement projects for Turnaround DLO improvement and the ASB review in Housing customers and communities <p>Introduction to the turnaround Programme</p>	
<p>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</p>	<p>Systems, processes and workflows across the organisation are designed to ensure that Valleys to Coast complies with the law. Key activities subject to legal / regulatory matters are covered by documented policies, procedures and guidance notes which are reviewed on a regular basis.</p>	<ul style="list-style-type: none"> • Policies and procedures • Quarterly Integrated Performance Report to the Board • Internal Audit outcome reports to ARC, bringing any matters of 	

	<p>Corporate membership of relevant organisations (e.g. CHC), briefings from professional advisors, general networking and provision of ongoing training / support / supervision of staff increases awareness of compliance issues, and changes in legislation / regulatory requirements. Assurance is provided to the Board through performance reporting, regulatory returns, external reviews and inspections and Health & Safety audits. In addition, activities are reviewed by our Internal Auditors in accordance with the Internal Audit plan.</p> <p>We also have an open and honest relationship with our Regulation Manager and strive to ensure that we are proactive in communicating any potential matters of regulatory interest. This is achieved through the submission of our regulatory returns, regular meetings with our Regulation Manager on an ongoing basis, proactive conversations and communication on any material issues which arise - recent examples include Gas Capping and the appointment/election defect.</p> <p>We seek specialist advice in relation to high risk areas such as compliance and pensions and seek assurance through our internal audit plan.</p>	<p>concern/significance to the attention of the Board</p> <ul style="list-style-type: none"> • There is provision within our Rules and Standing Orders for the Board and any of its subcommittees to seek external independent expert advice on any matter as may be required 	
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Ref	Regulatory Standard		
RS2	Robust risk management and assurance arrangements are in place		
Requirements	Commentary	Assurance evidence	Compliance Status
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>Valleys to Coast has a comprehensive board approved risk management framework in place which is monitored and reviewed on a quarterly basis by our Audit & Risk Committee. During 2021/22 the Audit and Risk Committee agreed to a deep dive approach which ensures regular review of risks and provides an opportunity to assess and have early sight of any emerging issues that may affect our ability to achieve our strategic objectives.</p> <p>In line with 4.7.3 of the CHC Code of Governance, the Board reviews the Association's approach to risk management on an annual basis.</p> <p>The Welsh Government report on Sector Risks, published annually, is considered to inform the appropriateness of our strategic risks.</p>	<ul style="list-style-type: none"> • Risk Management Framework • Risk workshop sessions with Leadership, ARC and Board- January and June 2022 • ARC approved Internal Audit Plan • Board reports 	
b) Does not put social housing assets or tenants at undue risk	<p>Valleys to Coast does not put social housing assets or its customers at undue risk and the health and safety of our customers is our highest priority.</p> <p>Our Corporate Plan and Asset Management Strategy, as well as performance reporting in relation to Health and Safety compliance and on other key metrics, as well as the Internal</p>	<ul style="list-style-type: none"> • Audit and Risk Committee in place with oversight of risk management and internal controls • Development & Assets Committee with oversight of asset and landlord compliance performance • Asset Management Strategy 	


	<p>Audit plan provide assurance to the Board and help to keep us on track in meeting our objective of providing safe and happy homes.</p> <p>Oversight of internal controls and risk management is monitored on an ongoing basis by the Audit and Risk Committee.</p>	<ul style="list-style-type: none"> • Performance reporting - Quarterly Integrated Performance Report • SHAPE model 	
c) Maintains accessible and up-to-date business continuity, contingency and disaster recovery plans	<p>Valleys to Coast maintains accessible and up to date business continuity, contingency and disaster recovery plans. We have successfully navigated through the pandemic by deploying our remote working infrastructure and managed our business through effective planning.</p> <p>Our Disaster Recovery Plan (DRP) was developed following the outcome of an advisory internal audit which took place between May and August 2021. A follow up review in relation to this matter reported to the Audit and Risk Committee at its meeting on 18th July 2022 provided substantive assurance that the DRP was adequate and fit for purpose.</p>	<ul style="list-style-type: none"> • Business Continuity Plan • Disaster Recovery Plan • Internal Audit - Business & IT Continuity (Advisory) audit (02.21/22) 	
Ref	Regulatory Standard		
RS3	High quality services are delivered to tenants		
Requirements	Commentary	Assurance evidence	Compliance Status
a) Keeps tenants safe in their homes and promptly identifies and corrects any under-performance or	<p>The Association has a comprehensive Health & Safety Policy in place which sets out how we shall maintain compliance with all relevant statutory health and safety requirements associated with our employer and landlord</p>	<ul style="list-style-type: none"> • Health & Safety Policy • Health & Safety Improvement Plan • Internal Audit Reviews. 	

<p>non-compliance on landlord health and safety matters</p>	<p>functions. Monitoring of our compliance with health and safety requirements through performance reporting helps to ensure that we keep our customers safe in their homes by allowing us to promptly identify and correct any under-performance or non-compliance quickly.</p> <p>We employ a Health & Safety Team who provide an advisory and assurance function within the organisation to implement and monitor health and safety requirements. The Health & Safety Team provides regular reports to the internal Performance Executive, as well as the Audit & Risk and Development and Assets Committees.</p> <p>All of our existing homes comply with the requirements of the Welsh Housing Quality Standards (other than those that have fallen out of compliance due to Covid access issues) and our new homes comply with the Development Quality Requirements.</p>	<ul style="list-style-type: none"> • Health, Safety & Compliance Reporting to Development & Asset Committee 	
<p>b) Delivers services which meet the diverse needs of tenants</p>	<p>Valleys to Coast consistently strives to deliver services that meet the diverse needs of our customers. We offer a number of ways in which our customers can communicate with</p>	<ul style="list-style-type: none"> • Means of contacting us displayed on our website - https://www.valleystocoast.wales/contact-us/ 	

	<p>us and likewise ensure we communicate with customers in the most appropriate way to suit their needs. Communication methods include telephone, email, letter, text, whatsapp, in person when we are out onsite visiting or undertaking community events or as requested by the tenant and various social media platforms.</p> <p>Bespoke engagement plans are developed as required to help people who are struggling to engage or maintain tenancies, this often involves working with other agencies.</p> <p>PCFRAs are undertaken in our sheltered schemes to tailor service provision to meet the diverse accessibility needs of our tenants. .</p> <p>Equality Impact Assessments are completed on all new polices as well as having selected views by Tai Pawb.</p>	<ul style="list-style-type: none"> • Equality Impact Assessments implemented across the organisation - prompts for colleagues to consider EIAs are included as standards within our policies and report templates • EDI 4 year road map 	
<p>c) Achieves and maintains high levels of tenant satisfaction with services</p>	<p>Valleys to Coast continually strives to achieve and maintain high levels of customer satisfaction. Customer feedback is sought as a matter of course (in the variety of ways as outlined above) and fed back and considered by both the Leadership Team and the Board to</p>	<ul style="list-style-type: none"> • Turnaround programme • STAR survey • Beaufort research - independent customer satisfaction survey • Engagement Tracker 	

	<p>review and improve services and to address any issues raised, as may be required.</p> <p>The organisation partakes in the STAR survey every two years and works in partnership with Beaufort Research to gain a more structured and in depth understanding of what our customers want to inform and shape not just what services our customers need and want but also, how these should be delivered to meet a diversity of needs.</p> <p>Recent examples of customer feedback shaping services include feedback in relation to how we manage ASB and the delivery of our repairs and maintenance service, both of which have been reviewed following receipt of less than favourable customer satisfaction feedback.</p>		
d) Makes landlord performance information available to tenants	<p>We make available a number of documents to our tenants on our website including our corporate plan, annual financial statements and regulatory judgement outcome.</p> <p>We do however recognise that we could do more around this and so will review and implement some improvements in this area.</p>	<p>https://www.valleystocoast.wales/about-us/our-publications/</p>	
Ref	Regulatory Standard		
RS4	Tenants are empowered and supported to influence the design and delivery of services		

Requirements		Assurance evidence	Compliance Status
a) Creates a culture which values and promotes tenant involvement	<p>Valleys to Coast strives to create a culture which values and promotes customer involvement.</p> <p>As outlined at RS3 (b) above, we engage with customers in a variety of ways and always seek to ensure engagement opportunities (beyond providing feedback) are creative, vibrant and relevant to the intended audience.</p>	<p>We have a 3 year Customer Engagement Strategy which was recently updated and published on our website.</p> <p>We also keep an engagement tracker document to keep a record of customer engagement and involvement and to identify where this has been successful.</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>Valleys to Coast enables an environment for customers to understand the organisation's approach to tenant involvement and how they can get involved and is currently working toward implementing a whole organisation approach to customer engagement. This approach will mean that <i>all</i> teams will be working with and listening to customers as a matter of course to shape and inform what we do as an organisation and how we do it.</p> <p>As stated above, our customer engagement strategy is available to customers on our website. We have also produced an Engagement strategy video to explain how we plan to undertake the various engagement activities.</p>	<ul style="list-style-type: none"> • Customer Engagement Strategy • Engagement strategy video • Colleague survey 	

	<p>We have undertaken a survey to understand how all colleagues are working with customers. We received 36 responses from colleagues. 23 respondents said they had engaged with customers and communities in the last year. However, when asked whether we listen and act on their feedback 22 said as an organisation they feel we only sometimes listen, 3 said no and 11 said yes. It is positive to see that 22 colleagues are planning to do more engagement next year but 14 said they were not sure.</p> <p>Colleagues feel that time, short staffing and budget are barriers but this is an area we seek to proactively improve and therefore recognise that there is a need for cultural change to embed this as standard practice.</p>		
<p>c) Provides opportunities for tenants to be involved, can demonstrate that tenants are satisfied with them and can demonstrate the difference involvement is making</p>	<p>Valleys to Coast strives to provide tenants with a number of opportunities to be involved. Customer satisfaction with the engagement activities and the opportunities made available, as well as the impact of these engagement events is demonstrated in our Engagement tracker. The engagement tracker logs the variety of engagement methods whether it's online or through social</p>	<ul style="list-style-type: none"> • Engagement tracker • Wildmill Action Plan <p> EAP - Wildmill</p>	

	<p>media, over the telephone, face to face or by letter. It also demonstrates we consult on a wide number of topics to suit different peoples individual interests.</p> <p>Customer involvement has impacted much of the strategic thinking and development of Valleys to Coast as a business.</p> <p>An example of a positive outcome as a result of some of the more operational engagement can be seen in the action plan which was developed for one of our largest estates at Wildmill.</p>		
<p>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</p>	<p>Through the examples stated above, and as a result of the way we approach engagement with our customers, diverse tenant views and expectations have and do inform the development and review of housing and related services, and the response to any under-performance.</p> <p>Recent examples of this, as set out above, include the review of our approach to managing ASB and the delivery of our repairs and maintenance services.</p>	<ul style="list-style-type: none"> • Engagement tracker • STAR survey • Beaufort research - customer satisfaction 	
Ref	Regulatory Standard		

RS5	Rents and service charges are affordable for current and future tenants		
Requirements		Assurance evidence	Compliance Status
a) Ensures all applicable rules and statutory guidance (including the current rent agreement) are complied with	<p>Our staff are encouraged to attend training and engage in networking events relevant to the sector to keep abreast of sector challenges, as well as any changes in legislation and/or statutory guidance to ensure that we are compliance with all applicable rules and statutory guidance (including the current rent agreement).</p> <p>Rent levels for our General Needs and Sheltered properties are informed by the Welsh Government Rental Agreement, with which we comply. We have also implemented a living rent model and ensure affordability, informed by our tenants, is at the heart of our decision making.</p>	We engaged with almost 800 residents to capture their views on the rent levels by engaging via social media - Tenant Engagement regarding Rent Increases	
Ref	Regulatory Standard		
RS6	The organisation has a strategic approach to value for money which informs all its plans and activities		
Requirements	Commentary	Assurance evidence	Compliance Status
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	We have a Value for Money strategy in place which covers our approach to social purpose and the delivery of Value for Money throughout the organisation. Our strategy is being updated in 2022 and will be presented to the Board for approval.	Board approved Value for Money Strategy	

	We recognise we need to do more as an organisation to understand what value for money means in the context of Valleys to Coast. We commissioned Cwmpas to support us in developing our social value policy and enable us to update and embed our VFM strategy.		
b) Can demonstrate to stakeholders, including tenants, that it achieves value for money in delivering its strategy and services	<p>We report on key Value for Money metrics through the management accounts process on a monthly basis, and also as part of the quarterly performance reporting that is presented to the Board.</p> <p>Further work to establish a suitable way of conveying this to our tenants and other stakeholders is required.</p>	Quarterly Integrated Performance Report to Board	
Ref	Regulatory Standard		
RS7	Financial planning and management is robust and effective		
Requirements		Assurance evidence	Compliance Status
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	Through the planning cycle Valleys to Coast 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.	<ul style="list-style-type: none"> Board, 23rd August 2021 - B44.21/22 30 year Business Plan Board, 22nd November 2021 - B61.22/22 Report on Asset Performance Evaluation 	

	<p>Throughout the year the Board receives various recommendations in relation to the financial plans for the year ahead and subsequent updates throughout the year regarding financial performance as part of the Quarterly Integrated Performance update report.</p>	<ul style="list-style-type: none"> • Board, 22nd November 2021 – B62.21/22 Budget Review and Forward Look • Board, 7th March 2022 – B85.21/22 Annual Budget 2022/23 • Treasury Management Policy 	
<p>b) Is financially viable in the short, medium and longer-term, and maintains sufficient funding and liquidity to support this</p>	<p>Valleys to Coast ensures that it is financially viable in the short, medium and longer-term, and maintains sufficient funding and liquidity to support this.</p> <p>Financial viability testing through modelling and review mechanisms is an integral part of our short, medium and long term planning cycles.</p> <ul style="list-style-type: none"> • Long Term – 30 Year Financial Plan is stress tested to ensure resilience to economic and commercial parameters; Cashflow model output identifies funding trigger points enabling treasury planning and monitoring of liquidity horizon • Medium Term – Approved Budget Plan sets delegated authority for expenditure in the year and provides benchmark for measuring performance. Current financial year cashflow, 24 month rolling cashflow and +3 year liquidity reporting is updated with refreshed forecast data on a monthly basis. These metrics inform credit facility 	<ul style="list-style-type: none"> • As above • Management Accounts 	

	<p>drawdown decisions and medium term treasury planning</p> <ul style="list-style-type: none"> ● Short Term - Management Accounts with accompanying commentary and Treasury report published monthly. Exec committee review ensures early identification of issues and corrective intervention. Bank deposits and revolving credit facility managed proactively to optimise interest costs whilst maintaining daily liquidity 		
<p>c) Monitors, reports on and complies with all covenants it has agreed with funders</p>	<p>Valleys to Coast has assigned a dedicated professional treasury resource to monitor, report and manage treasury transactions. A comprehensive treasury report covering lending positions, covenant performance (interest cover, asset cover, gearing) and forecast cashflows is refreshed and published monthly.</p> <p>Board endorsed 'Golden rules' are operating to ensure headroom against a covenant breach and to signal corrective action as may be required.</p> <p>Regular communication with funders is maintained including visibility of the treasury report and timely preparation of annual compliance statements.</p> <p>Proactive engagement with lenders has resulted in agreed modifications of covenant</p>	<ul style="list-style-type: none"> ● Board, 21st May 2021 - B03.21/22 Treasury and Refinance Update ● Golden rules in place 	

	parameters where appropriate (carve out) and sharing of business plans.		
d) Identifies and effectively manages risks to the delivery of financial plans including appropriate stress testing, scenario planning and use of internal thresholds	<p>Valleys to Coast financial plans take due account of the organisation's risk register and overall sector risks.</p> <p>Modelling and review mechanisms incorporated into its short and medium term planning cycles seek to reflect both crystallised and calibrated future financial risks.</p> <p>These mechanisms include: monthly reforecasting against budget positions, budget viaments approval, covenant golden rules monitoring, procurement spend limits, thresholds for development appraisal metrics.</p> <p>Long term modelling through the 30 year plan incorporates stress testing underlying assumptions e.g. macro economic factors, income constraints and sector specific cost escalation. Extensive Scenario planning is conducted to calibrate the impact of significant economic/commercial events and identify potential mitigations or rescue actions.</p>	As provided in RS7 (a)-(c) above.	
e) Has an effective treasury management strategy and associated processes	Valleys to Coast's long term treasury strategy was agreed with the board and implemented in 2021 resulting in a refinancing exercise to	<ul style="list-style-type: none"> • Treasury Strategy • Treasury Policy 	

	<p>optimise the capacity, flexibility and value for money on lending positions.</p> <p>Acting in collaboration with experienced external advisors this strategy will continue to respond appropriately to the evolving operating environment.</p> <p>Valleys to Coast's treasury policy delivers the operational aspects of the treasury strategy. The policy was refreshed in 2022 and defines the following: roles, responsibilities, delegated authorities, thresholds for fixed variable interest rate exposure, golden rules, delegation limits, liquidity targets, counterparties definition, reporting and derivative policies and success criteria (VfM, compliance etc).</p>		
Ref	Regulatory Standard		
RS8	Assets and liabilities are well managed		
Requirements		Assurance evidence	Compliance Status
a) Has an accurate and up to date understanding of its assets and liabilities	Valleys to Coast has an accurate and up to date understanding of its assets and liabilities, and has an up-to-date Assets and Liabilities Register, which was presented to the Audit and Risk Committee for review and scrutiny, in line with its Terms of Reference as set and agreed by the Board. This has been	<ul style="list-style-type: none"> • Assets and Liabilities Register • Report to the Audit and Risk Committee, 18 July 2022 - ARC09.22./23 Assets and Liabilities Register - Annual update 	

	<p>considered by the Board in discharging its responsibility to approve the Annual Accounts. The Register monitors the value and depreciation of our assets and plays a valuable role in short and long-term business planning.</p>		
<p>b) Maximises the use of assets to achieve its social purpose and the objectives of the organisation</p>	<p>We have a Corporate Plan and Budget, both of which are reviewed annually to ensure that they are on track and continue to be appropriate in light of any new or emerging challenges or issues.</p> <p>Valleys to Coast endeavours to maximise the use of its assets to achieve its social purpose and the objectives of the organisation and does this by taking a measured approach through appraising our homes before any significant investment is made to ensure that the property delivers positive benefits, both financially and socially.</p> <p>Our ability to fully achieve our potential as a social landlord, however, is challenged by the lack of dowry funding we were granted as part of the transfer agreement. Valleys to Coast was the first large stock transfer organisation in Wales and unfortunately is unique in facing this financial challenge as other LSVTs were granted a far more substantial and ongoing investment as part of their respective transfer agreements. We will continue to work in</p>	<ul style="list-style-type: none"> • Corporate Strategy • Board, 23 August 2021 - B44.21/22 30 year business plan 	

	partnership with the local authority and Welsh Government to secure additional funding to maximise the positive impact we can make to our tenants and the communities we serve across Bridgend County Borough.		
c) Uses accurate information about assets and liabilities to inform strategic and financial decisions	<p>Data in relation to rent loss and voids is monitored on an ongoing basis and reported to the Leadership Team on a monthly basis or earlier as may be appropriate.</p> <p>Data relating to the condition of our stock and status of compliance with WHQS build quality was used as evidence as part of our recent refinancing.</p> <p>We report our Asset and Liability register to the Audit and Risk Committee on an annual basis, and our detailed loan information and excess security is presented to the Board within our Treasury Report which is updated monthly. We ensure that we report the level of excess security that we hold as this is a consideration for any future borrowings or refinance.</p>	<ul style="list-style-type: none"> • KPI Suite • Stock condition survey data • WHQS compliance data • Assets and Liabilities Register 	
Ref	Regulatory Standard		
RS9	The organisation provides high quality accommodation		
Requirements	Commentary	Assurance evidence	Compliance Status
a) Ensures publicly funded homes meet all applicable standards, rules and statutory guidance issued in connection with quality of accommodation,	All new homes comply with DQR standards and all existing homes meet the requirements of the WHQS.	WG Housing Data returns including the annual WHQS submission.	

including the current Welsh Housing Quality Standard	WHQS has been met by Valleys to Coast. The customer choice improvements are completed when the property becomes void.		
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This self-evaluation was approved by the Board of Directors on 22nd August 2022, Resolution No. B44.22/23.

Signed:



[Chair]



[Chief Executive]

Date: 22nd August 2022

