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United Welsh Housing Association

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Status of this report

This report has been prepared for the internal use of the named body. Our reports are prepared:

- In relation to audit, under the relevant enabling legislation and the responsibilities detailed in the Code of Audit and Inspection Practice, and in the context of the 'Statement of Responsibilities', issued by the Auditor General for Wales.
- In relation to inspection, following inspection work carried out under the Local Government Act 1999, as amended by the Public Audit (Wales) Act 2004, and in accordance with guidance issued by the National Assembly for Wales.

Reports are prepared by the staff of the Wales Audit Office and appointed auditors, and addressed to non-executive directors/members or officers including those designated as accounting or accountable officers. They are prepared for the sole use of the named body, and no responsibility is taken by the Wales Audit Office or appointed auditors to any director/member or officer in their individual capacity, or to any third party.

Summary

The Welsh Assembly Government has appointed the Wales Audit Office to carry out inspections of housing associations in Wales

1. Inspections of housing associations in Wales are carried out under Section 96c of the Government of Wales Act 1998. They assess how associations are meeting the expectations of the Assembly Government, as set out in its Regulatory Code for Housing Associations in Wales, March 2006 (the Regulatory Code). The relevant expectations are summarised at Appendix 1.
2. The inspection of United Welsh Housing Association (the Association) was undertaken in December 2006. The inspection team comprised Nick Selwyn, Carol Kay, Sam Spruce and Margaret Retalick. The inspectors sought to answer two key questions in relation to the Association:
 - Does the Association deliver good quality services?
 - Does the Association secure continuous improvement in services?
3. The first question is applied to individual service areas, and the second is applied to the Association as a whole in relation to inspected services. The judgements used in answering the two questions are described in Appendix 2.

The Association was providing excellent services in two areas, good services in three areas and satisfactory services in three areas

4. The inspectors concluded that the Association was providing excellent services in rents and housing for people with support needs, good services in equal opportunities, lettings and providing housing, and satisfactory services for its relationship with residents, managing housing and maintaining homes.

The Association demonstrated strong corporate and strategic capabilities

5. The Association demonstrated strong corporate and strategic capabilities. It had a clear strategic direction and Directorate Operational Plans were focussed on supporting delivery of the corporate strategy. The Association had established a comprehensive performance management system that was focussed on delivering targets within its corporate strategy.

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6. The Association had recently reviewed its approach to Best Value to inform the development of a new system to better support continuous improvement. It had good arrangements in place to support future progress and sufficient staff capacity and support mechanisms to enable it to deliver its corporate strategy.

The Association demonstrated good practice in some areas

Supported Housing Compact

7. The Association had developed a Supported Housing tenant compact, which included a clear framework within which the Association was working with its managing agents to develop opportunities for resident involvement. The Compact was appropriate to a wide range of support users, and had resulted in clear, tailored action plans for involvement activity.

Equalities information on the Association's intranet

8. The Association's intranet contained a wide range of useful information in relation to equalities issues, such as religious festivals and religious and minority ethnic matters. This information was readily accessible by all staff, allowing them to take appropriate action and give appropriate and informed advice.

Welfare Benefits Advice Service

9. The Association employed a full time Welfare Benefits Adviser whose main roles were to maximise housing benefit income in all areas and to provide comprehensive advice and support to tenants and housing teams on housing benefit and other welfare benefits, including debt advice. The Welfare Benefits Advice service was subject to ongoing evaluation and for the period April to October 2006 succeeded with Welfare Benefits claims for tenants worth £122,842.

Eviction protocol

10. The protocol was aimed at reducing the number of tenants encountering rent arrears difficulties and at risk of losing their home. The protocol enabled the Association to effectively manage a reduction in rent arrears without progressing to the eviction of residents in arrears, through dedicated debt advice and support work.

***Select a Home* Choice Based Lettings Scheme**

11. The Association operated a choice based lettings scheme, *Select a Home*, for letting all its empty homes and provided a range of information to applicants and tenants seeking housing. Performance in letting empty houses had improved since the scheme's introduction.

Managing Agent engagement in supported housing

12. The Association had developed a forum for all of its supported housing managing agents, which met on a quarterly basis. The Association provided regular information to support the work of its partners, including regular updates as to what was happening at the Association, guest speakers, question and answer sessions and 'meet the team' sessions.

This report makes a number of recommendations for improvement

13. The Detailed Report includes recommendations for improvement in each of the areas examined. These are brought together in Appendix 3.

The Association is required to take action in response to this report

14. The Detailed Report and the Association's commentary on it will be available on the Wales Audit Office website (www.wao.gov.uk), which also includes reference to good practice found during this and other inspections.
15. The Association is required to circulate our separate summary of this report to tenants and key stakeholders within eight weeks of publication. The Association should also produce a commentary and an action plan setting out how it will respond to the inspection findings within eight weeks of publication.
16. The lead inspector will review the action plan, confirming whether it is acceptable or identifying any necessary changes, and will make recommendations to the Assembly Government regarding the frequency of progress reviews. The Assembly Government's regulation coordinator assigned to the Association will undertake the progress reviews and, in consultation with the lead inspector, will 'sign off' completion of the action plan

United Welsh Housing Association is a large housing association providing housing and support services to communities throughout South East Wales

17. The Association was formed in 1989 and is one of the larger general needs and supported housing associations in Wales. The Association currently has approximately 3,650 properties in management and its geographical area covers 12 local authorities primarily in South East Wales. The bulk of accommodation is general needs housing for families and single persons, accounting for 65 per cent of homes. Just under 20 per cent of the Association's properties were sheltered housing for older persons and approximately 17 per cent were for people who require additional specific support.
18. The Association's head office was located in Caerphilly and there was a regional Housing office in Cardiff. The Association had 124 staff and had Investors in People status, Charter Mark and was fourth in the Financial Times Best Workplace 2005. At the time of the inspection the Association had a Board of Management of 14, including three Tenant Board members.

The Association was providing “excellent” services in two areas, “good” services in three areas and “satisfactory” services in three areas

The Association provided ‘satisfactory’ services in its relationship with residents

The Association was encouraging resident involvement and was working towards improving its approach in some areas through clearer planning and allocation of roles

19. For its general needs housing, the Association did not have a comprehensive framework for its resident involvement activity. In contrast, the Association had developed a clear framework for the involvement of residents of its supported housing, which we have highlighted as an area of good practice.

Good Practice - Supported Housing Compact

The Association had developed a Supported Housing tenant compact, which included a clear framework within which the Association was working with its managing agents to develop opportunities for resident involvement appropriate to a wide range of support users. The Association's supported housing team was working with its community services team to implement the compact approach across the Association's supported housing users and had, at the point of inspection, fully implemented the compact approach within half of its supported housing stock. This approach resulted in clear, tailored action plans for involvement activity, and staff were able to point to positive cultural changes in the approach to resident involvement across all of its managing agents as a result of this approach.

20. The Association had recognised the need to improve its approach to working with its general needs residents. It had taken clear action to lay the foundations for an improved approach by working with residents to develop an independent tenants' representative organisation – Voice4Tenants (V4T). Residents contacted during the course of the inspection were able to see an improvement in the Association's approach to resident involvement since the development of V4T. All Association tenants were automatically members of V4T and had the opportunity to elect V4T's Executive Committee. V4T, which had been in place for some 18 months at the point of inspection, sought the views of residents through a programme of Area Forums. Much of V4T's activity in the 18 months since its inception had focussed on establishing an effective framework, within which to reflect the views of residents and allowing it to operate independently, and its involvement in policy and strategy development had been limited. The Chair of V4T met regularly with the Chief Executive and Chair of the Association and was preparing to become a board member of the Association.
21. The Association also encouraged resident share membership and, at the point of inspection, had two tenant board members with a third looking to join the Board through election at the next AGM. Relevant training and support was provided to all tenant board members and to the Executive Committee of V4T.
22. The Association recognised that it had no clear and comprehensive framework for resident involvement in its general needs housing. It did not have a Tenant Participation Strategy and its Tenant Participation Compact in respect of its general needs housing was out of date. The Association had a Community Development Strategy, but that too was out of date. The Association was about to start working with V4T to develop a new Tenant Participation Strategy to provide a framework within which to develop and improve the Association's approach to resident involvement and community development. The Association was not working to clear action plans and priorities in respect of its resident involvement in general needs and its community development activities. As a result, its activity could be unfocussed and reactive. This was acknowledged by the Association and action had been taken to integrate the work of the Community services team into the new Corporate Plan and commence regular reporting of activity to managers. However, the Association lacked clear priorities and targets for its resident involvement and community development activity and did not formally record the evaluation of the outcomes of these activities.

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23. Resident involvement activity in the Association was in the main supported and managed by its Community Services Team. This team had carried out a range of community development activities, such as the provision of computers and relevant training within the Association's Living + schemes and work with young people, and had been successful in developing effective external partnerships and in securing external funding from, for example, Cyd Coed and Communities First, for a number of the communities within the Association's area of operations. The team had also been involved in successful problem solving activities, for example, in relation to difficult to let properties at Bon Marche House. The team was responsible for the development and support of residents groups of which, at the point of inspection, there were 14. The Association acknowledged that it needed to more effectively integrate the work of the Community Services team and that of other teams across the Association in order to ensure that all staff were clear on the activities and priorities of the various teams and were able to effectively plan and coordinate their activity.
 24. There was a lack of clarity within the Association as to the roles and responsibilities of staff other than members of the Community Services team for effective resident involvement. This meant that opportunities for other staff to use their regular contact with residents to promote and support resident involvement were not being used effectively and that resident involvement was not seen as the responsibility of all teams across the Association.
 25. Staff and residents were unclear about the full range of options available for involving residents, and residents were not sure how to access available opportunities and how their involvement could make a difference. This had been confirmed by the Association's 2006 residents' survey which concluded that there was confusion amongst residents when they were asked to comment on the opportunities that they had to participate in management and decision making. The Association was working with V4T to develop a leaflet – "Ways of Participating" – giving information for all tenants on opportunities for involvement. The Association acknowledged that it needed to do more to engage with difficult to reach groups such as young people, ethnic minorities and people with disabilities, and was developing arrangements to allow it to identify those elements of communities not engaging in its current involvement opportunities.

The Association produced a range of high quality and readily accessible information and advice for residents, and was beginning to develop plans to secure more resident involvement in the production of its published information and to address gaps in current service information

26. The Association provided housing services from offices in Caerphilly and Cardiff. Both offices were compliant with the Disability Discrimination Act 1995 (as amended) and displayed a useful range of information and advice leaflets. The Association had a standard list of information to be made available within the public areas of offices, although there was a minor inconsistency with information actually on display at the time of the inspection. All information was available on request. Signposting of disabled access at the Association's Cardiff office was not complete, meaning that it could be difficult for disabled customers with mobility issues to access the office.
27. The Association had recently developed a marketing strategy, which included proposals to develop and improve internal and external communication to maximise its effectiveness.
28. The Association produced a regular newsletter for general needs tenants – *Linkup* – and for supported housing residents – *The Focus*. Both newsletters were produced by editorial boards and there was a tenant on the editorial board for *Linkup*. Both newsletters provided a range of useful information for residents and were produced on a quarterly basis.
29. The Association had a limited range of high quality, well designed and user friendly published information and advice for residents. This included an easy to use and informative Tenants' Handbook, which had been recently updated and circulated to all residents and which was felt to be very useful by residents contacted during the course of the inspection. The Association had a range of useful information leaflets but did not have specific service leaflets on the key service area of welfare benefits advice.
30. Residents contacted during the inspection were particularly enthusiastic about the usefulness and comprehensive nature of the information pack provided for new tenants, which included information about local services as well as about tenancy matters and which tenants felt provided a very good introduction to their new tenancy. Information and advice could also be accessed via the Association's website, which provided a wide range of information of interest to existing and potential customers. The website included the opportunity to report repairs and obtain further information on re-housing, and the response was swift when tested during the inspection. There had been no resident involvement in the development of the Association's range of published information.
31. The Association was piloting SMS texting as an additional method of communication with residents and, although the pilot had not been running for long enough for its effectiveness to be evaluated, initial indications were that this was proving effective.

The Association was actively seeking and taking account of the views of residents

- 32.** The Association had identified a need to further develop and improve its approach to consultation. The Association's marketing strategy had identified the need to widen its range of consultation methods and proposed to set up a network of focus groups involving both staff and tenants. The Association had developed proposals to identify and target particular sectors of its customer base, and was awaiting the outcome of an application for Assembly grant funding before acting on these proposals.
- 33.** The Association carried out a bi annual survey of all its residents and the results of these surveys had been incorporated into key corporate planning documents and were used by operational staff to inform their priorities for action. In addition, the Association carried out a range of ongoing resident surveys covering repairs, anti social behaviour (ASB) and lettings. The results of these surveys were regularly analysed. The Association also carried out a large number of ad hoc consultation processes both general and local in relation to issues of current importance, such as ASB. The Association had a Consultation Policy and Procedure setting out how consultation processes should be conducted, although this applied only to consultations carried out by housing management teams.
- 34.** The Association had a strong commitment to consultation with residents and was able to provide many examples of how it had acted on these views, for example in relation to the development of V4T, design solutions adopted at their Forgeside development and youth provision in Lansbury Park. However, the Association had found that its consultation processes were not always effective in attracting the response levels it needed.
- 35.** Resident consultation was carried out by a wide range of staff from various teams across the Association. No arrangements were in place to plan and coordinate the Association's many consultation exercises, with the result that the quality of consultation varied and feedback to residents on consultation outcomes was not consistent. Both staff and residents expressed concerns that residents suffered from consultation overload.

The Association's arrangements for ensuring that it was answerable to residents for the quality of services provided could be more effective

36. The Association had developed a comprehensive range of service standards for residents and had published these in a leaflet which had been circulated to all residents. There had been very limited resident involvement in the development of these service standards and there was very limited awareness of the standards amongst residents contacted during the course of the inspection. There were no comprehensive arrangements in place to monitor achievement of the service standards and to report performance to residents. Elements of the service standards were individually monitored eg, call statistics. However, monitoring carried out in other service areas, for example ASB, was not geared to monitoring achievement of the published service standard. Some aspects of service delivery, for example monthly site inspections and returning calls within one day, were inconsistently monitored.
37. The Association provided residents with information on its performance through various publications circulated to all tenants – the annual report, a performance supplement to its newsletter and notepad interleaved with performance information. The information provided to residents gave comparative information showing the Association's performance over time and also in comparison to average housing association performance across Wales.
38. The Association was changing its approach and literature for complaints whilst the inspection team were on site. The Association had developed a new leaflet which gave clear timescales for dealing with complaints and which met Assembly Government requirements. The Association was proposing to alter its complaints policy and procedures to reflect the changes to its published literature. A working group had been set up to address issues on complaints identified by the Association's bi annual residents' survey, in relation to low levels of awareness of the complaints policy and low levels of satisfaction amongst those who had used the service. There was no tenant involvement in this working group.
39. The Association had a monitoring system in place for logging and tracking complaints. This system had not been designed to monitor performance against the Association's published service standards, either as set out in its service standards leaflet or in its new complaints leaflet. Managers were monitoring performance against a 21 day deadline for complaint closure although this was not a published service standard of the Association. At the point of inspection, approximately 1,000 complaints had been closed and there were 29 "live" complaints, 15 of which had been open more than 21 days. Information was not being entered into the monitoring system consistently and some of the issues entered on the monitoring system were not in fact complaints.

40. The Association reported on complaints monthly to managers and quarterly to the Board. These reports listed all complaints, but had not been designed to allow the ready identification of emerging issues and to encourage learning from complaints received. For example, reports did not indicate why complaints had been upheld, or the number of complaints by responsible directorate or by subject area. The reports also did not indicate whether the Association was meeting its own service standards in relation to complaints.

Recommendations	
<i>Relationship to residents</i>	
R1	<p>The Association needs to:</p> <ul style="list-style-type: none"> engage with tenant and resident representatives to develop a Tenant Participation Strategy and update its Tenant Participation Compact and community development strategy; and develop clear action plans and priorities in respect of its resident involvement in general needs housing and its community development activities. <p>These should be subject to regular monitoring and evaluation with progress against targets reported to tenants and resident representatives.</p>
R2	<p>The Association needs to develop more effective methods of engaging with difficult to reach groups – eg, young people, ethnic minorities and people with disabilities – and engage more effectively with those currently not involved.</p>
R3	<p>The Association needs to review its management of complaints to address weaknesses in its management systems, approach to monitoring and evaluation and public dissemination of information on its complaints policy.</p>

The Association had “good” arrangements for equal opportunities

The Association was actively promoting respect for diversity and equality of opportunity

41. The Association had commissioned comprehensive research into the housing circumstances of households within its main areas of operation. This research indicated a Black and Minority Ethnic (BME) population of 8.43 per cent in Cardiff, 1.35 per cent in Rhondda Cynon Taf and 0.91 per cent in both Caerphilly and Blaenau Gwent.
42. The Association had an Equality and Diversity Strategy and a BME Housing Strategy. A copy of the Association’s BME Housing Strategy had been circulated to all tenants. Both strategies had linked action plans which were up to date. The Association’s BME Housing Strategy had been recently reviewed and approved by Tai Pawb, the national BME Housing agency.

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43. The Association's work on equalities was supported by three Equalities Champions – one from the senior management team and two on the board of management. The Association had an equality and diversity forum comprising staff from across the organisation with responsibility for coordinating and promoting the Association's equalities work. The forum met quarterly and monitored progress on relevant action plans. At the point of inspection, the main priority for the forum was to develop its work to give more coverage to wider equalities issues such as disability. The Association had provided staff with useful information on equalities via its intranet.

Good Practice - Equalities information on the Association's intranet

The Association's intranet system contained a wide range of useful information in relation to equalities issues, such as religious festivals and religious and minority ethnic matters. This information was readily accessible by all staff, allowing them to take appropriate action and give appropriate and informed advice.

44. The Association carried out equalities monitoring in respect of employment and service provision, including monitoring of access to services such as repairs, arrears, property refusals as well as access to housing. Monitoring information was reported quarterly to managers and to the Board with appropriate analysis, and prompted appropriate action. The Association gathered equalities information on all new tenants and had carried out a number of surveys of existing tenants, through which it had increased the level of equalities information on tenants from 35 per cent to 60 per cent.
45. The Association had a customer communication policy which specified how the Association would ensure that its communications would meet the diverse needs of its customers. The Association collected information from all new tenants on their communication preferences. These preferences were noted on the IT system to ensure that expressed preferences were adhered to for all communication. The Association had surveyed existing tenants to gather information on their communication preferences. The Association was a member of LanguageLine and was able to offer translation facilities in both of its offices.
46. The Association had a commitment to provide published information in a variety of formats and was able to provide evidence of a range of circumstances where tenants' communication needs had been positively responded to. The Association's newsletter for supported housing tenants was available on disk and on tape and all publications met RNIB (Royal National Institute for the Blind) design guidelines. However, the Association's commitment to providing information in alternative formats had not been widely advertised to tenants. For example, the Association had only recently begun to include a statement in all publications indicating that they could be made available in different languages or formats on request.

47. The Association was working in a range of partnerships aimed at promoting equalities. For example, the Association was a member of the multi agency racial harassment group in Cardiff and of the Caerphilly multi agency forum for equality. The Association had part funded research on refugees and asylum seekers and was working with the Somali Progressive Association in Cardiff to secure a BME floating support worker. The Association had worked with local authorities in Cardiff and Bridgend to develop their BME strategies and was a partner with four local authorities and five housing associations in the South East Wales Regional BME Strategy. A member of the Association's senior management team was a board member of Tai Pawb.
48. The Association had a racial harassment policy in place. Due to a lack of recent cases, the inspection team were unable to test the operation of this policy in practice.

The Association had effective arrangements in place for dealing with requests for services in Welsh

49. The Association did not have a Welsh Language Scheme and was awaiting guidance from the Welsh Language Board before developing one.
50. The Association had surveyed tenants to ascertain their language preferences and, where requested, would provide a service through the medium of Welsh. The Association had arrangements in place to deal with requests for provision of services in Welsh and front line staff were aware of how to deal with a request for a service in Welsh. Arrangements would have been more robust had they been clearly available to all staff, perhaps via the Association's intranet.
51. With the exception of its Annual Report, none of the Association's publications was available bilingually. The Association had recently included Welsh language material in its Linkup newsletter. Whilst the Association was committed to providing published information in Welsh on request, it had only recently begun to include statements in publications making this commitment clear to residents.

Recommendations	
<i>Equal opportunities</i>	
R4	The Association needs to ensure information on services is made available in alternative formats and this is widely publicised to ensure all those seeking assistance can access services.
R5	The Association needs to develop and implement a Welsh Language Scheme based upon the advice of the Welsh Language Board.

The Association had a “good” approach to providing housing

The Association was working effectively in partnership with local authorities to identify and meet housing needs

52. The level of engagement by the Association with the 12 local authorities in which it operated varied. The Association was zoned by the Assembly Government to develop new accommodation in Cardiff, Caerphilly and Blaenau Gwent, and in these areas the Association was formally involved in the development and delivery of key local strategies and plans, including the local Housing Strategy, Homelessness Strategy and Supporting People Operational Plans. We also evidenced the positive contribution of the Association in a variety of strategic forums focussing on homelessness, supported housing, housing management, Move on and temporary accommodation across a number of local authority areas. However, the Association was not involved in the development Health, Social Care and Well Being Strategies in all Council areas, which was surprising given the level of supported and specialist older persons housing being managed and developed by the Association.
53. Local authority partners especially highlighted the positive contribution of the Association in relation to identifying potential development opportunities and its commitment to delivering new affordable housing to address identified needs. As well as the provision of new general needs housing, the Association was also recognised as having made a significant contribution towards increasing the supply of supported housing schemes in many communities and, in particular, the development of hostels for homeless people at Ty Gobaiith and Oak House in Cardiff. Many of these services were valued by local authorities and recognised by them as addressing the high support needs of important client groups. Concern was expressed, however, about local authority nominees not being able to access supported hostel accommodation in Cardiff, although the Association stated that this had not been raised with them previously.

The Association had a Community Housing Protocol with Cardiff, was developing a similar agreement in Caerphilly, and in other areas was working in active partnerships

54. The Association had a Community Housing Protocol in place with Cardiff County Council. The protocol covered issues such as nominations, advice, housing management, joint training and working, development and benefits, and was a key document to support the delivery of the Local Housing Strategy, the Homeless Strategy and the Supporting People Operational Plan. The Council also held operational meetings on Housing Management issues jointly with all housing associations in Cardiff.

55. The Association, along with three other housing associations, was also working with Caerphilly County Borough Council (Caerphilly CBC) to develop a Community Housing Agreement, although the work of the group was on hold pending the release of an Assembly Government report on the effectiveness of community housing agreements. The Association did not have formal community housing agreements with other Councils and partnership work, whilst apparent, operated less formally.

The Association was effectively engaged in physical renewal and regeneration activity

56. The Association was actively engaged in regeneration activity in a number of the communities in which it operated. For example, the Association was consulted on the development of the Caerphilly CBC Private Sector Housing Renewal Strategy, and also on its revision in November 2005, and the Association's contribution to the physical regeneration of housing within the area had been recognised. Similarly, the Association was a member of the Cardiff Accessible Homes project, a scheme which pooled properties in the city for people with disabilities and shared a common waiting list in order to match disabled applicants to the property most appropriate to their needs.
57. The Association was also actively engaged in community development and regeneration projects in partnership with different agencies and bodies including Communities First Partnerships, Local Authority Community Strategies and the work of voluntary sector groups.

Recommendation	
<i>Providing housing</i>	
R6	The Association needs to address operational issues in respect of nominations performance with Cardiff County Council.

The Association had an “excellent” rents service

The Association had an effective debt prevention service that was focussed on meeting the needs of residents.

58. We found specific examples where the Association had taken a lead in the development of services, and highlight the work of the Welfare Benefits Advisor as an example of good practice.

Good practice – Welfare Benefits Advisor Service	
The Association employed a full time Welfare Benefits Adviser whose main roles were to maximise housing benefit income in all areas and to provide comprehensive advice and support to tenants and housing teams on housing benefit and other welfare benefits, including debt advice. The Welfare Benefits Advisor service was subject to ongoing evaluation and for the period April to October 2006 the financial gain from successful Welfare Benefits claims for tenants was £122,842.	

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59. Approximately four to six weeks after the start of a new tenancy, tenants were offered a finance health check by the Welfare Benefits Advisor, who looked at entitlements to welfare benefits and income and expenditure management. Our survey of new lettings found that all tenants had received information on the service and those who had made a referral were positive about the work of the Welfare Benefits Advisor.
60. In addition to the specific service for new tenants, the service was also available to all existing general needs and supported housing tenants. The service of the Welfare Benefits Advisor was in significant demand and, due to the limited capacity of the service, the focus of the work was targeted at high risk groups. Managers at Living + Schemes also had access to tenants rent accounts and assisted them with advice and support on dealing with rent account management.
61. The Welfare Benefits Advisor had also developed agreements with three Citizens Advice Bureaux – Cardiff, Caerphilly and Torfaen – to provide more in depth specialist advice for tenants identified as being in financial difficulties. Although the Association had sought to establish similar arrangements with other Citizens Advice Bureaux, a number had elected not to participate.
62. The Association had also established Service Level Agreements with five Local Authority Housing Benefit services – in Cardiff, Caerphilly, Blaenau Gwent, Torfaen and the Vale of Glamorgan – and the Association’s officers undertook verification of Housing Benefit Claims in Cardiff. The Welfare Benefits Advisor had also agreed arrangements with some local authorities to recover overpayments from future Housing Benefit payments to enable tenants to manage their debt more effectively and minimise the risk of them losing their home through rent arrears.
63. We found that the Association advertised the Welfare Benefits Advisor service on the reverse of its rent arrears letters and included information in its Tenants Newsletter, *Linkup*. In addition, the Tenants Handbook and the Association’s Website included broad information for tenants on Housing Benefit and rent payments, and directed them to seek advice from the Association if they experienced difficulty paying their rent. However, there was no specific service leaflet setting out what the Welfare Benefits Advisor service did or any literature that provided broad debt advice, and there were no specific service standards for the service. The Welfare Benefits Advisor informed inspectors that this was an area for future development.
64. In addition, awareness of the service, whilst improving from 51 per cent to 55 per cent as reported in the 2006 Tenants Satisfaction Survey, was still relatively low. We were also informed that liaison and work with tenants groups and representatives around the development of the Welfare Benefits Advisor service was limited.

The Association had effective procedures in place to manage rent accounts and rent arrears performance had improved in recent years.

65. The Association had reviewed its Rent Arrears Policy and Procedure in September 2006. The Association offered tenants seven methods of paying rent – direct debit, pay zone, pay point, post office, telephone, internet and by post – and advertised payment methods in the *Linkup* newsletter. Rent statements were issued quarterly (unless requested more frequently) and the Association had responded to customer comments to try and make them more useful and understandable.
66. We found that the Association had effective control and recovery arrangements in place and was using innovative ways of managing rent arrears, including texting tenants and operating a traffic light system for arrears letters to denote the severity of outstanding debt and the likely impact on the tenants if arrears were not cleared.
67. Reported performance on rent arrears had improved in recent years, with net arrears reducing from 4.5 per cent in 2001/2002 to 1.6 per cent in 2005/2006. Over the same period, rent collected as percentage of total rent collectable had risen from 95.4 per cent to 100.4 per cent.
68. However, in the light of performance achieved in 2005/2006, future targets for the service were not very challenging: the 2006/2007 Net Arrears target was set at 1.75 per cent and the target for the percentage of total rent collectable was set at 100 per cent. Performance in 2006/2007 to the time of the inspection had marginally dipped, with net arrears running at 1.94 per cent (which was still the lowest mid year figure the Association had reported in eight years), and rent collected as percentage of total rent collectable being 97.43 per cent for the 2nd quarter of 2006/2007.
69. Housing Officer performance on rent arrears was managed via monthly one-to-one supervision meetings with Area Housing Managers. Staff had individual targets to achieve and ongoing high arrears cases were subject to review at these meetings. Association wide performance was reported to the Senior Management Team monthly and the Board quarterly.
70. All evictions were approved by the Board and, at the time of the inspection, the eviction of 187 tenants had taken place. The Welfare Benefits Advisor had introduced an Eviction Protocol which we highlight as an area of good practice. We were told that although current demand for the service was manageable, significant increases in demand would limit the work of the Welfare Benefits Advisor in other areas.

Good practice – Eviction protocol

The protocol was aimed at reducing the number of tenants encountering rent arrears difficulties and at risk of losing their home. The service was initially developed to focus on single persons who were identified as a particular high risk group but had subsequently been rolled out to all cases which had progressed to the Notice Seeking Possession (NSP) stage. The protocol enabled the Association to effectively manage a reduction in rent arrears without progressing to the eviction of residents in arrears through dedicated debt advice and support work.

71. The Association's Former Tenants Arrears Policy was focused on write offs and the use of an external debt recovery agency. Where no payments were being received and the Association was unable to trace a former tenant, then they would seek to write off the arrears. The Association had established a formal control system that denoted the level of arrears that could be written off and had systems to re-write arrears on to former tenant accounts if the person was traced in the future.
72. The Association did not, however, use garnishee or attachment of earnings orders to recover debt, although we were informed that their use had been identified as a potential area for improvement in the future. The Association was also seeking to develop a pilot scheme with another association to create an administrative post to coordinate the activity of the two Associations on recovery of former tenants' arrears.
73. The Association had a "Five Star Loyalty" scheme which provided residents with a range of benefits in return for paying rent promptly. To qualify for membership tenants were required to have maintained a clear rent account for 12 weeks and to owe no other debts to the Association. The scheme had approximately 900 members and an annual budget of £15,000. At the time of the inspection the Association was reviewing its effectiveness and was considering a range of opportunities to develop it further.

Recommendations**Rents**

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| R7 | The Association needs to set appropriate and challenging targets for rent arrears recovery which support year on year improvement in performance. |
| R8 | The Association needs to review its recovery and control measures and consider introducing garnishee and attachment of earnings orders to recover debt. |

The Association had a “good” lettings service

The Association was letting empty properties quickly and to a high level of tenant satisfaction but did not consistently apply one element of the relet standard to vacant homes

74. The Association had developed a minimum let standard for letting its vacant homes. However, the standard had been formulated without any tenant involvement and was not included within the letting pack provided to new tenants of the Association, although some information was included in the Tenants Handbook. We also found that no monitoring took place on whether the standard was being applied consistently to all empty homes.
75. The Association had introduced a satisfaction survey on the quality of the homes it let and regularly published results in its newsletter, *Linkup*. For example, for the period January to March 2006 the Association let 81 homes and reported 95 per cent satisfaction with the information provided at the letting, 88 per cent satisfaction with the quality of internal decorations and cleanliness and 86 per cent satisfaction with the tidiness of the garden. We inspected a number of empty homes progressing through the void process and considered those ready for letting to be in good condition.
76. Our survey of new lettings found that, with the exception of transfers (who were not happy about the condition of homes they moved to), all new tenants were very pleased with the condition of the property when they moved in. All repairs had been done with nothing outstanding and a copy of the Tenancy agreement and the Tenants Handbook, along with the lettings satisfaction survey, were supplied at the signing. Overall, the majority of tenants were satisfied with the services provided and the information and advice given.
77. The Association's performance on the management of its empty homes had improved in recent years, with the average time taken to relet vacant units having fallen from 21 days in 2001/2002 to 7.16 days in 2005/2006. Similarly, rent loss as a result of voids had fallen from 2.14 per cent in 2001/2002 to 0.46 per cent in 2005/2006, and the percentage of vacant units let within one week had risen from 50 per cent in 2001/2002 to 71 per cent in 2005/2006. We found that the Association's performance targets for 2006/2007 had not been set at levels to drive further improvements with, for example, the target for the average time taken to relet vacant units set at 10 days. Performance in the 2nd Quarter 2006/2007 had declined, rising from 7.16 days to 12 days.
78. We found some weaknesses in the Association's approach to gas safety checks on relet properties. There were no systematic checks taking place on properties that had been referred to contractors, and there were limited records providing assurance to the Association that these tests had been completed. Of 10 properties we reviewed, only one had written confirmation of a gas safety check.

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79. The Association had developed a system of undertaking options appraisals for voids needing £5,000 or more investment. This required staff to consider alternatives prior to approval of works, including disposal, following a strategic assessment of long term lettings potential. The 2006/2007 void repairs budget was approximately nine per cent over profiled spend, as at November 2006, although the overall response repairs budget was less than one per cent overspent.

The Association operated choice based lettings and made available a range of written and web based information on applying for housing and on how the Association let its homes

80. The Association had a standard application form and allowed people to apply in writing or on line. Customer Service Advisors also assisted applicants and tenants to complete forms at their offices. The Association operated a choice based lettings scheme, *Select a Home*, for letting all its empty homes and provided a range of information to applicants and tenants seeking housing.

Good practice – *Select a Home* Choice Based Lettings Scheme

All properties that were available for letting were advertised on a fortnightly basis. Adverts were sent out to applicants on the Association's waiting list and to partner organisations. The Association's application forms included questions to determine how applicants wished to receive property adverts – via the post or by e-mail. Adverts included pictures, information on the properties available for letting, and the outcome of the most recent lettings under the *Select a Home* scheme, including number of bids, registration date of the successful bidder offered the property and their priority. Adverts also included a summary of all the Association's stock holdings by area, the number of vacancies in the last year and the number registered for rehousing, to enable applicants to make informed decisions on where to bid for housing.

81. The Association had developed an information leaflet that set out how the scheme operated. The leaflet included a statement that the information was available in alternative formats to meet the needs of individual applicants and tenants. The Association's website included information on how to apply for housing and incorporated virtual tours of a number of homes.
82. The *Select a Home* leaflet did not, however, include detailed information on the Association's approach to exclusions, applicant' and tenants' rights to a review of an allocation decision, or what the Association's appeals system was. Without this detailed information being available, people in housing need would not know whether they were eligible for the Association's housing or not. Similarly, adverts did not include any statement noting that it was available in alternative formats to meet the needs of people with reading difficulties, although the Association informed us that this could be provided if the specific needs of an individual were known.

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83. Applicants could bid for up to two properties under each advert and bids were accepted in person at the Association's offices, in writing, by telephone and on line. The Association was also exploring the option of introducing texting for bids.

The Association was working effectively in partnership with local authorities over the allocation of its housing

84. We found that the Association had formal Nominations Agreements in place with the City and County of Swansea, Caerphilly and Blaenau Gwent County Borough Councils and operational arrangements for nominations under Community Housing Agreements with Cardiff County Council and Torfaen County Borough Councils. The Association was also negotiating to join the Vale of Glamorgan Council's Common Housing Register and choice based lettings scheme *HOMES4U*.
85. Under its Lettings Policy the Association sought to let 50 per cent of all empty homes to nominees of local authorities. Higher or lower rates could be jointly agreed to reflect local priorities, and in Caerphilly the Association had developed a separate agreement to make available an increased amount of accommodation specifically for homeless nominees. Information on the Association's nominations performance was included in performance management reports. In 2005/2006 the Association let 44 per cent of its homes to Council nominees, six per cent below the 50 per cent target. Performance for 2nd quarter of 2006/2007 had declined marginally to 41.5 per cent.
86. The Association was a partner to the Council led multi-agency approach to management of public protection and exclusions in Cardiff and, whilst the Association was not a statutory partner on either the Multi Agency Risk Assessment Committee (MARAC) or Multi Agency Public Protection Panel (MAPPP) in its areas of operation, it had been involved in the support and rehousing of individual high risk cases and this work was valued by local authorities.

The Association was seeking to achieve a balance in housing allocations and opportunities existed to improve its approach to exclusions and the management of priority cards

87. The Association's Lettings Policy had targets focused on ensuring 50 per cent of all lets were to Council nominees and up to 25 per cent were transfers. All applicants were entitled to receive three reasonable offers. A failure to accept any of the three offers could result in the applicant being withdrawn from the housing waiting list.
88. All lettings were made on a date order basis, with designated groups of applicants having a priority card for bidding. These included, for example, people in need of police protection who had been referred by the police. We found that the Association did not have written criteria to assist in determining the priority of some categories of applicant, for example people with severe mobility problems which made living in their current home difficult. Without such criteria, the Association was unable to ensure a consistent service. The Association recognised this as an area for improvement.

89. Priority cards were set for a period of three months, at the end of which they expired and were withdrawn. We found that the Association included information on the ear off slip of the individual adverts sent to applicants as part of the advertisement process on changes in priority but did not notify applicants formally that their priority card had expired and been withdrawn, and it was left to applicants to contact the Association to get them re-registered. Applicants are informed of this when they first apply for a priority card i.e. that the card will automatically expire after three months if it is not used. Applicants were not therefore made aware of important changes in their priority for housing, which may have affected their decisions when bidding for accommodation.
90. The Association undertook regular reviews of its waiting list and was contacting all applicants who had not responded to an advert or bid for a home for six months, to help ensure an accurate and up to date register of people in housing need was maintained. Allocations were monitored on an ongoing basis with regular reports being produced showing performance against targets.
91. The Association had developed three Local Lettings schemes in 2006, to address issues of neighbour nuisance and sustainability of accommodation in specific communities. The schemes were set up in accordance with Welsh Assembly Government guidance, being time based and subject to regular monitoring and review.
92. We found that the Association operated Exclusions, rather than Suspensions, and had excluded 52 people to the time of the inspection. The Association did, however, offer Assured Shorthold Tenancies in certain circumstances to manage individual clients who otherwise would have been excluded. This approach had been adopted on 11 occasions. There was no regular monitoring taking place of those excluded and, whilst the Association had developed a detailed appeals procedure, this was not advertised sufficiently widely to ensure that those excluded were able to exercise their rights.

Recommendations	
<i>Letting housing</i>	
R9	The Association needs to set challenging targets to support continued improvement in its management of empty homes and systematically monitor and evaluate the application of its relet standard to ensure compliance with the standard.
R10	The Association needs to improve the range and coverage of the information it provides on the <i>Select a Home</i> scheme to ensure those seeking housing had detailed information on the Association's approach to exclusions, on applicants' rights to a review of an allocation decision, and on the Association's appeals system.
R11	The Association needs to introduce written criteria to assist in determining whether or not to award priority cards for all lettings categories, and to ensure that applicants are formally notified of a decision to withdraw a priority card and their rights to request a review.

The Association provided a “satisfactory” housing management service

The Association generally ensured that residents were offered the most secure form of occupancy compatible with the purpose of the housing and the sustainability of the community

- 93. The Association was using assured tenancies as standard in its general needs housing stock having decided, following consultation with tenants, not to use initial assured shorthold tenancies as probationary tenancies. The Association's policy made provision for the use of assured shorthold or of tailored tenancy agreements for high risk lettings, and a small number (11) had been used in practice.
- 94. Wherever possible, the Association used assured tenancies for its supported housing, although assured shorthold tenancies were in use for some projects and excluded licences were used in a small number of projects. Use of excluded licenses was aimed at helping project based staff to manage schemes more effectively, and to protect the quality of life of residents and neighbours, and their operation was closely monitored by the Association. However, their use is at odds with Welsh Assembly guidance to ensure residents had the most secure form of occupancy agreement.
- 95. Tenants were provided with information on their rights and responsibilities through the Tenants' Handbook. An explanation of the nature of the tenancy offered was detailed in the Association's lettings pack, and all new tenants were provided with a copy of the Welsh Assembly Government's Guarantee for Housing Association tenants.

The Association was helping to safeguard the quality of life of residents and neighbours through its proactive approach to dealing with anti-social behaviour, although more effective use could be made of the system for monitoring cases

- 96. Estates visited during the course of the inspection were found to be in good condition. The Association had an Estate Management Policy which sought to promote a proactive approach to ensuring that estates were kept in good condition. The major element of this policy was monthly estate inspections undertaken by housing officers. These inspections were not always happening on a monthly basis and housing officers were not always ensuring that a resident's signature was obtained during the course of the inspection. Residents contacted during the course of the inspection were not aware of that monthly inspections should have been taking place.

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97. The Association's 2006 Tenants' Survey indicated low levels of satisfaction with its ASB service, with only 41 per cent of those accessing the service indicating that they had received good help and advice. This low level of satisfaction was confirmed by the Association's own ongoing ASB satisfaction survey. Residents contacted during the inspection referred, in particular, to not being kept informed as to what was happening with their ASB complaint and the Association accepted that some cases had not been progressed expeditiously, primarily as a result of complainants not returning information to the Association.
 98. The Association's ASB policy and procedure were adopted following consultation with residents, and specified clear standards for action and a range of options for tackling ASB. The Association was able to provide evidence of significant successes in tackling difficult cases, for example through the use of injunctions, and had publicised their successes to residents through their newsletter.
 99. All residents reporting ASB were provided with an information pack on tackling ASB. All reports were logged on the Association's ASB monitoring system at the point of initial reporting to front line staff, who had been trained on how to respond to reports of ASB. However, the ASB logging system was not being used consistently: not all required information was being input; cases were not being closed within the specified 28 day deadline; reasons for case closure were not always noted; and the system was not being used to provide regular reports to management. Also, the system had not been designed to allow the Association to monitor its performance against its own service standards for ASB.
 100. The ASB policy and procedure specified response times within which those complaining of ASB should be contacted or met. However, these were not consistent with the response times specified in the Association's service standards publication. Further, an information pack and leaflet – "Anti Social Behaviour – Tackling It Together" – provided to all residents reporting ASB did not include any information on response times. As a result, tenants were unclear on how quickly their landlord should be responding to their ASB complaints.
 101. The Association had appointed a ASB Coordinator whose role was to provide specialist support and advice to housing officers dealing with ASB cases, liaise with relevant external agencies, directly handle long-standing and/or serious ASB cases and to provide information to housing managers to allow them to ensure that housing officers were adhering to correct procedures. Although it was intended that this role should also focus on preventative work, there had been little preventative work to date by the ASB Coordinator. Preventative work was not solely the responsibility of the ASB Coordinator.
 102. The Association had developed partnerships with a variety of agencies such as local authorities, community safety partnerships, probation services, social services and the police aimed at achieving effective approaches to tackling ASB. The Association was also working with a range of multi agency problem solving groups and multi agency race forums.

Recommendations	
<i>Managing housing</i>	
R12	The Association needs to ensure its programme of estate inspections regularly takes place and is advertised to residents in advance to ensure they have the opportunity to highlight issues of concern.
R13	The Association needs to review the management and delivery of its ASB policy, and address weaknesses in its logging and monitoring of incidences of ASB and its service standards to ensure these are fully complied with.

The Association was providing a “satisfactory” maintenance service

Response repairs performance had marginally declined in some areas and the results of the 2006 tenant satisfaction survey indicated satisfaction below the benchmark level

- 103.** Tenants could report repairs verbally, in writing, by telephone, on line or through a third party, and the tenants we spoke to informed us that the initial response by the Association was generally good. Customer services advisors had access to and used the Locator Repairs Diagnostic tool to assist in correctly defining the repairs reported by tenants. The Association had an emergency out of hours service, with repairs reported after 5.30 pm being directed by an automated message to Torfaen Control Centre, which handled out of hours repair enquiries on behalf of the Association.
- 104.** The Tenants’ handbook included broad information on the response repairs service, including contact details and response repairs categories. This information was also published on the Association’s website. The Association also had a specific Maintenance Service Standards Compact that had been developed jointly by the Association, its contractors and V4T, and which set out the standards of service on response repairs tenants could expect from the Association. We identified a number of areas for improvement in the standard. For example, some targets were set without the agreement of tenants, and not all performance information was being reported to tenants or to V4T.
- 105.** The Association did not offer tenants appointments at the point they reported repairs, leaving the organisation of work for the Association’s contractors to agree. However, the Association did not monitor the operation of appointments by its contractors and was not able to determine the effectiveness of this aspect of the service. The Association had recognised this service weakness and its Corporate Plan for 2006/2007 had included a target to develop and introduce an appointments system in 2007.
- 106.** The Association undertook satisfaction monitoring of response repairs by asking all tenants who had reported a repair to complete and return a satisfaction slip. For the period June to August 2006 tenants reported 95.3 per cent overall satisfaction with the repairs work.

107. However, the Tenant Satisfaction Survey in 2006 had highlighted repairs as a major area of concern for tenants. The overall level of satisfaction with the repairs service had fallen from the 2004 survey results of 66 per cent to 63 per cent, which was 10 per cent below the STATUS benchmark (the overall average of all Housing Association surveys) response of 73 per cent. Over the same period, satisfaction with the speed of the response repairs service fell from 65 per cent to 62 per cent, and only 64 per cent of tenants felt that the Association was good at keeping them informed of when contractors would call to do a repair, a fall of nine per cent from the 2004 survey and 14 per cent below the STATUS benchmark of 76 per cent. Increasing dissatisfaction with the repairs service was borne out by our survey of tenants, where we were informed that whilst repairs work was completed generally on time, in most cases contractors had to return at least once, and a number of tenants had repairs outstanding after weeks of waiting for the contractor to return.
108. The Association had set itself a target of being in the top quartile of performance on six key performance indicators, three of which related to response repairs. We found that this had not been achieved for two out of the three response repairs measures, where the Association's performance was in either the 2nd or 3rd quartiles (Exhibit 1).

Exhibit 1: Proportion of repairs reported as completed within target

Category of repair	UWHA reported performance 2004/2005	UWHA reported performance 2005/2006	Wales top quartile range 2004/2005
Emergency	99%	97%	100%
Urgent	97%	96%	98-100%
Non-urgent	98%	98%	98-100%

Source: Performance Indicators for Registered Social Landlords in Wales National Assembly for Wales (data has not been subject to audit).

109. Pre-inspections were not recorded as response repairs requests, with the start dates for measuring their completion fixed from the point that an order was issued, rather than when the tenant first reported the repair. Our analysis of pre-inspection orders raised between September and November 2006 showed that 11 per cent of all response repair requests received were categorised as pre-inspections. Of this figure, 48 per cent had not been progressed at the time of the inspection, including jobs raised in September 2006. Consequently, the Association was not recording accurately response repairs performance. We were informed that the Association was planning to introduce new performance indicators for the response repairs service.
110. The Association had set itself a target of completing post inspections on 15 per cent of all response repairs, to monitor the quality of contractors' work. Of the 3,281 response repair jobs raised between September and November 2006, only 150 post inspections (4.5 per cent) had been organised, of which 62 were still outstanding at the time of the inspection. This was well below the minimum target set by the Association and the level accepted as good practice.

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111. The Association also required its contractors to undertake random post inspections of 15 per cent of their day-to-day responsive repairs work. We found that no formal monitoring or evaluation of these post inspections was being undertaken, as contractors were not required to report on the outcome of their inspections other than to provide an address of the property inspected. Finally, in Caerphilly concerns had been expressed over the state of disrepair of the Association's general housing stock, which had resulted in statutory repair notices having been served on the Association on three occasions. The tenants in these cases reported straight to Caerphilly CBC without first making a complaint to the Association.

The number of properties with outstanding gas services had reduced significantly in the previous 18 months, although opportunities to improve the Association's approach existed, and the Association had a positive approach to asbestos management and energy efficiency

112. The number of homes with valid gas certificates had increased significantly in the previous 18 months, rising from 83 per cent to 95.7 per cent at the time of the inspection. Of the outstanding non-access cases, there were seven over one year and the longest case was three-and-a-half years. Outstanding services were flagged on the Association's IT system to ensure non-access issues could be addressed during any contact from tenants with outstanding services. The Association had served notice on its contractor to terminate the gas servicing contract due to poor performance, with effect from January 2007.
113. The Association had recently undertaken an internal review of gas servicing and introduced a new policy to address identified management weaknesses. We found the new approach to be more robust than the previous one. It had tighter timescales and a clear focus on legal action to ensure access, including the use of injunctions. However, the Association had not progressed to an injunction at the time of the inspection. Also, the timescales and escalation process within the procedure were not being adhered to for the individual properties we checked against the database. We also found that the Association had verified only two per cent of the work of its contractor, and identified a number of issues of concern with the database which the Association positively addressed during the inspection.
114. The Association had undertaken a full survey of asbestos and had created an asbestos register, which could be accessed by all staff via the Association's Intranet page. Scheme managers had been provided with a copy of the asbestos register for their particular schemes.
115. The Association had a five year rolling cyclical maintenance programme in which it was investing approximately £250,000 per year, and had developed a cyclical decorations policy which gave tenants choice over the colours that could be used. The Association had set an energy efficiency target to ensure all its properties achieved a minimum SAP rating of 65. The average at the time of the inspection was 67 and, although 1,109 homes did not meet this minimum standard, the Association had identified future works under its planned maintenance programme to address this.

The Association had developed and made available to its residents a five year planned maintenance programme to achieve the Welsh Housing Quality Standard (WHQS), and further work was planned to improve the quality of stock condition information to support achievement of the standard

116. The Association had recently completed an assessment of all its properties which identified that 602 homes were fully compliant with the WHQS and 2,057 failed on one or more component. The information to underpin this assessment was drawn from three sources – stock condition survey work undertaken by consultants prior to April 2006, in house survey work undertaken by the Association’s staff from April 2006 onwards, and the results of a tenants’ questionnaire carried out in October 2006 on the more qualitative aspects of the Standard.
117. The information from these exercises was collated and fed into a planned maintenance database which enabled the Association to produce a draft five year planned maintenance programme to achieve the WHQS. The Association had undertaken some consultation with V4T on the draft planned maintenance programme and was intending to undertake full consultation with all residents before the end of December 2006.
118. We identified a number of issues with the data held by the Association:
- The Association had only achieved a 33 per cent response from the tenants’ survey on the qualitative aspects of the WHQS. This represented an incomplete profile and the Association had no proposals to increase coverage, for example through new lettings or when there was a change of tenancy.
 - A number of the qualitative measures arising from the tenants’ survey had not been costed comprehensively, which meant that the level of investment currently identified to achieve the WHQS may be lower than the actual sum likely to be needed.
 - There was no independent verification of the survey information to ensure the validity of findings, although the Planned Maintenance team did undertake some reality checking with Housing Management staff.
 - 10 per cent of the previous stock condition data was not sufficiently robust to enable a determination of future investment priorities and needed to be qualified.

Recommendations	
<i>Maintaining housing</i>	
R14	The Association needs to review its Maintenance Service Standards Compact to address identified weaknesses.
R15	The Association needs to develop and introduce a repairs appointments system.
R16	The Association needs to review its management of pre inspections and ensure they are accurately recorded from the point they are first ordered.

R17	The Association needs to improve its management of post inspections and ensure that robust systems are in place to achieve good practice levels of 10 per cent post inspections that are completed within an appropriate timescale after the completion of works.
R18	The Association needs to ensure its gas servicing policy is fully complied with in all cases and undertake an appropriate level of verification checks of the work of its contactors.
R19	The Association needs to address weaknesses in its stock condition information by developing appropriate systems to fully capture qualitative measures of the WHQS to enable investment plans to be accurately assessed and agreed.

The Association was providing “excellent” services for people with support needs

The Association made housing available for people who had support needs and had developed a comprehensive range of services specifically for residents of supported housing and its managing agents.

- 119.** The Association made available 549 homes for people requiring a range of support. Client groups included women and their children escaping domestic abuse, people with learning difficulties, people with mental health problems, young people leaving care, ex-offenders and homeless or potentially homeless people who required support. In addition to designated supported housing, approximately 18 per cent of the Association’s stock was sheltered housing for older people.
- 120.** A total of 31 voluntary sector agencies managed more than 137 projects in the Association’s properties. In addition, the Association managed two projects directly and acted as the accredited support provider for a further eight agencies providing services to its tenants. The Association had developed management agreements for the support providers it worked with and undertook yearly reviews to evaluate performance and assess the effectiveness of the services provided. We found that all agreements were in place, with the exception of a small number where the approach of the relevant local authority meant agreements were not required.
- 121.** Access to supported housing projects was via referrals, including self-referrals. The Association had not set specific targets for future lettings, electing instead to base the decision on prioritising the needs of individuals at the point of undertaking a letting. However, the Association did seek to ensure that a person selected for a scheme could be adequately supported within the project. We found that an adequate supply of Move On From schemes was a major issue of concern for all service providers, especially in Cardiff, and the Association with its partners was focusing on developing more effective approaches to address this shortfall, including supplying an extra five per cent nominations for move-on in Cardiff and with Caerphilly via a local authority referral panel.

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122. We found the Association's engagement with managing agents of supported housing to be positive and highlight this as an area of Good Practice.

Good practice – Managing Agent engagement in supported housing

The Association had developed a forum for all of its managing agents, which met on a quarterly basis. The Association provided regular information to support the work of its partners, including regular updates as to what was happening at the Association, guest speakers, question and answer sessions and 'meet the team' sessions. In addition, the Association had also published a Newsletter – *Support Matters* – which provided good quality information on the work of the Association, and an update for managing agents on wider supported housing issues which was produced three times a year.

123. The Association was in the process of determining the full costs of upgrading its shared housing and hostels, required to ensure compliance with the 2011 Welsh Assembly Government homelessness accommodation standards deadline. Survey work was scheduled to be completed early in 2007 and the Association had prioritised achievement of the standards within its corporate strategy for 2007/2008.
124. The Association had also created a specialist Older Persons Housing Team called 'Living +' that had been developed following a Best Value review of older persons' services. The Living + team was focused on developing the Association's approach to the development, regeneration and management of housing and services for older people, and was responsible for providing housing management services for people aged over 54, including lettings, rent arrears and tenancy management.
125. The Association had a Tenants Support Scheme which provided floating support in three areas: Blaenau Gwent (15 bed-spaces), Cardiff (eight bed-spaces) and Caerphilly (21 bed-spaces). This was a valuable and well utilised scheme. There was no access to floating support in Torfaen, the Vale of Glamorgan or Monmouth. In these locations, the Association depended upon referrals to other agencies and could not, therefore, ensure access to floating support for those tenants who may have required it.

The Association tailored information and its services to residents to meet their specific needs, where known, and had a robust approach to managing high risk clients

126. The Association had developed a comprehensive flagging system to allow it to effectively identify those customers who required support or who required services to be provided in ways to meet their specific needs. At the time of the inspection, the Association had information on approximately 60 per cent of its tenants recorded on its IT systems, which enabled it to tailor the delivery of services to them, and was seeking to increase coverage through the completion of a brief questionnaire for all new lettings. The Association had surveyed all its tenants on three occasions to gain a full tenant census, and was focussing its resources on updating records when properties were let.

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127. We identified a range of information that had been tailored to meet the needs of clients who were unable to read or were visually impaired. This included the provision as a matter of course of audio tapes and compact discs as standard and large print versions of key documents such as Newsletters.
128. We also evidenced a high degree of tailoring of services to meet the needs of tenants who required other forms of support. For example:
- giving applicants with support needs longer to decide whether they wished to accept a property, and offering pre meetings with scheme managers to gain an insight into sheltered housing in Living + schemes;
 - introducing simplified service charge and rent statements that had been developed in consultation with tenants;
 - taking account of an individual's support needs when taking arrears action, copying arrears letters to support workers and involving support workers when serving a NSP; and
 - prioritising the provision of welfare benefit advice to single males as a group, who had been identified as being particularly vulnerable to debt problems.
129. The Association had developed a lone worker policy which set out a structured approach for staff to deal with potentially difficult situations. The policy included guidelines for conducting home visits and phone back systems for staff to follow, to ensure their safety and to support them in dealing with difficult situations. There was a flagging system on the computer system for potentially high risk clients which alerted staff to a range of risks.
130. In terms of managing high risk clients, the Association had developed a Risk Assessment and Risk Management in Housing Policy. The Policy made clear that it was not the Association's intention to exclude vulnerable people from securing accommodation. Instead it was geared towards identifying and working with people to manage risks to ensure tenants both maintained their homes and did not cause a risk to staff or other residents. The policy had clear and appropriate definitions of what constituted risk, how to undertake risk assessments and the Association's approach to risk management. However, we did find that some Housing Officers preferred to work off paper files, rather than use the IT system, and were consequently unaware of the risks flagged on the IT system.

The Association demonstrated ‘strong corporate and strategic capabilities’

The Association had a clear strategic direction and Directorate Operational Plans were focussed on delivery of the corporate strategy

131. The Association’s vision was captured in its five year Corporate Strategy 2007/2008: “To be the organisation of first choice.” The Association had also adopted three service aims:
- Aim - Develop new business;
 - Aim - People choose to become our tenants and then stay with us; and
 - Aim - Optimise organisational performance and use of resources.
132. The Corporate Strategy was reviewed yearly by the Association’s managers. This review included, for example, presentations on local authority key strategies, the findings from tenants’ surveys, service specific performance issues and new areas for development. The draft Corporate Strategy produced from this exercise was then reviewed and agreed at a further away day by the Association’s Board.
133. Corporate Strategy targets were delivered through Directorate Operational Plans. These were formally monitored on a monthly basis within Directorates, with progress against key actions evaluated. The Association’s Senior Management Team received reports on overall progress quarterly, and the Board received reports every six months.
134. There was limited engagement with stakeholders. The Chair of V4T attended the board awayday, when the Corporate Strategy was agreed, but there was no formal engagement with the body of tenants or their representative groups. Similarly, local authorities were not consulted formally on the Corporate Strategy, although the Association did consider key partner priorities when drafting the Strategy.

The Association had established a comprehensive performance management system focussed on delivering targets within its Corporate Strategy.

135. The Association had established a performance management framework, with focussed and regular monitoring and evaluation of performance taking place throughout the Association. Performance against agreed performance measures was reported to the Board, the Senior Management Team and within Directorates on agreed cycles. A range of Key Performance Indicators (KPIs) had been established that were directly linked to delivery of Corporate Strategy objectives, with annual performance targets set by the Board. The Association also linked performance to the personal objectives of individual members of staff, which were agreed as part of the appraisal process and included measurable targets linked to the Association’s KPIs.

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136. Standardised reports were produced by service area and an annual analysis of performance compared with peer housing associations was also undertaken. Directorates also reported some aspects of performance by geographical area (Area Housing Office) and specialist service area (such as Living + and Supported Housing). However, there were no local performance indicators or area based targets.
137. Whilst the performance management framework was focussed on delivering the Association's targets, these were not always very challenging. For example, the net arrears target for 2006/2007 was 1.75 per cent, compared with 2005/2006 performance achieved of 1.64 per cent, and the target for the average time taken to relet vacant units was set at 10 days for 2006/2007, compared with 2005/2006 outturn performance of 7.16 days
138. Performance improvements were not always delivered. For example, the Association's performance had improved in a number of areas in recent years and, of the six KPIs for which the Association had set itself a target of being in the top quartile of performance, this had been achieved in relation to four – lost income as a result of empty homes, net rent arrears, cash collected and completion times for non-urgent repairs. Performance had declined in other services areas, , such as emergency repairs completed within target time, and the Association was not achieving top quartile performance for two of the three KPIs relating to response repairs. There was also no external validation of key performance information, although some internal validation as part of ongoing audit work had been undertaken in a small number of service areas, such as rent arrears.

The Association had recently reviewed its approach to Best Value to inform the development of a new system to better support continuous improvement

139. We found that the Association was changing its approach to continuous improvement and had completed, in July 2006, a review of its Best Value Review process to address weaknesses identified in its previous activity. No subsequent service reviews had been undertaken or were underway at the time of the Inspection.
140. The Association's new approach identified two options for future continuous improvement activity – formal full scale reviews against an agreed methodology, and less formal improvement activity focused on specific under performing services that did not require a full review to ensure improvement. Future improvement activity was being coordinated by a Service Improvement Steering Group (SISG) which was chaired by the Chief Executive and included staff from across the Association. The Association had also advertised in its Newsletter for expressions of interest from tenants to become members of the SISG.

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141. The Association had analysed the future priority areas where it needed to improve and was seeking to address a number of the weaknesses we identified during the inspection, including limited tenant and external stakeholder engagement in review teams, and no stakeholder involvement in agreeing priorities for review. The Association informed us that it would determine its future priority review areas in the light of its tenant satisfaction survey results, customer feedback and indicators of poor performance.

The Association had good arrangements in place to support future progress and sufficient staff capacity and support mechanisms to enable it to deliver its Corporate Strategy.

142. We concluded that the Association was committed to tackling poor and under performing services and its Corporate Strategy 2007/2008 was focused on improving the right things. The Association had prioritised action on repairs and its relationship to residents, and on those matters that were highlighted as issues of concern from the 2006 Tenants' Survey, such as the introduction of a repairs appointments system by December 2007.
143. We also found that the support mechanisms necessary to deliver the Corporate Strategy priorities were in place. The Association's Appraisal System identified the key tasks for individuals and how their work and priorities for the forthcoming year integrated with delivery of the Corporate Strategy's aims and objectives. Appraisal Forms highlighted both the corporate targets staff were responsible for delivering against and their individual performance targets for the year.
144. Targets were set following approval of the Corporate Strategy, to link delivery of the Strategy to each individual member of staff, and we evidenced regular review meetings being held within the year to monitor progress in meeting targets. The appraisal system was linked to the core competencies of the Association and the skills required to deliver against these. A Training Plan had been developed that was focused on the core competencies, and all staff were supported to undertake appropriate and regular training.
145. The Association set its budgets at the same time as it adopted the Corporate Strategy, to ensure that adequate resources were available to support the delivery of strategic priorities. We found that the Corporate Strategy influenced and shaped the budget setting process, with resources allocated to support the delivery of key targets, rather than service improvements being fitted to mirror existing budget priorities.
146. The Association had effective Information Technology services to support staff to deliver improvements, including a customer focused website and Directorate specific and Association wide Intranet pages with a full range of comprehensive service information. The Association had also completed a review of its Information Services (IS) in September 2006 and was considering purchasing a new IS system to overcome and address identified weaknesses and to develop better levels of integrated working. The IS review was service user led with a range of staff workshops undertaken to determine how best to meet the future business needs of the Association, and the specification developed from this exercise was focused specifically on meeting the needs of IS service users.

147. The Association had established a robust approach to risk management which was focused on identifying, managing and mitigating risk. The Risk Management Policy clearly recognised the roles and responsibilities of the Board, the Audit Committee, the Senior Management Team and individual staff, and operated in accordance with a comprehensive nine-point scoring system which considered the consequence of the risk and the probability of it occurring. All risks were identified in terms of the Corporate Strategy and a risk register had been developed which listed all identified risks, the individual or team responsible for addressing them, and potential stakeholder implications. We evidenced how this was monitored and managed.
148. The Association had achieved Investors in People, Charter Mark and Financial Times Best Workplace awards, and the staff we spoke to during the course of the inspection were very positive about the Association and how it had improved in recent years. The Association had a regular staff Newsletter, *United!*, and our focus groups with staff highlighted the Association's good employment terms and conditions, positive family orientated human resource policies and strong social activity.
149. We concluded that the Association had good systems in place to support it to deliver its Corporate Strategy priorities in the future.

Recommendations	
<i>Securing continuous improvement</i>	
R20	The Association needs to ensure it effectively engages with all stakeholders – eg, representative tenant groups, local authorities and other partners – when developing and agreeing its Corporate Strategy.
R21	The Association needs to ensure it sets appropriate targets that support year on year improvement and establish validation systems for key performance information to ensure their accuracy.

Appendix 1

Summary of relevant Welsh Assembly Government Regulatory Code expectations

Aspect	Summary of Regulatory Code expectations
Relationship to residents	<p>Encourage resident involvement. (Regulatory Code 2.2.4)</p> <p>Provide readily accessible, clear and accurate information and advice for residents. (Regulatory Code 2.2.1)</p> <p>Be answerable to residents for the quality of services provided. (Regulatory Code 2.2.2)</p> <p>Ask for, listen to, and take account of the views of residents. (Regulatory Code 2.2.3)</p>
Equal opportunities	<p>Actively promote respect for diversity and equality of opportunity, work towards the elimination of discrimination in all their activities, and promote good relations between people of different racial groups. (Regulatory Code 2.3.1)</p> <p>Treat the Welsh and English languages on the basis of equality. (Regulatory Code 2.3.2)</p>
Providing Housing	<p>Work in partnership with local authorities and other agencies to identify and provide for the housing-related needs of the area.</p> <p>Have effective Community Housing Agreements with relevant authorities wherever possible.</p> <p>Participate in community development or neighbourhood renewal and regeneration initiatives. (Regulatory Code 1.1.1)</p>
Rents	<p>Keep rent arrears to a minimum through the use of effective debt prevention, control and recovery mechanisms. (Regulatory Code 1.2.2.)</p>
Letting Housing	<p>Ensure that, as far as possible, people in housing need are aware of and have good access to the Association's housing. . (Regulatory Code 1.3.1.)</p> <p>Work in partnership with relevant local authorities on the allocation of housing. . (Regulatory Code 1.3.2.)</p> <p>Ensure that those housed are fairly selected, and should seek to achieve a balance in housing allocation. (Regulatory Code 1.3.3.)</p> <p>Let properties quickly and efficiently. (Regulatory Code 1.3.4.)</p>
Managing Housing	<p>Ensure that residents are offered the most secure form of occupancy compatible with the purpose of the housing and the sustainability of the community. (Regulatory Code 1.4.1)</p> <p>Help to safeguard the quality of life of residents and neighbours. (Regulatory Code 1.4.2)</p>
Maintaining Housing	<p>Ensure that homes are let in good condition. (See Letting Housing). (Regulatory Code 1.5.1)</p> <p>Maintain homes in good condition by ensuring that cyclical maintenance and responsive repairs are carried out effectively. (Regulatory Code 1.5.2)</p> <p>Identify, plan for, and carry out the maintenance and improvements necessary to meet the WHQS by 2012. (Regulatory Code 1.5.3)</p>
Housing for people with support needs.	<p>Make housing available for people who have support needs and ensure they have access to appropriate services. (Regulatory Code 1.6.1)</p> <p>Apply all key expectations equitably to customers who require support, tailoring service delivery to meet their specific needs. (Regulatory Code 1.6.2)</p>

Appendix 2

The two questions and terminology applied

Does the Association deliver good quality services?

Judgement	Description
Excellent	The association demonstrates all the positive characteristics of a 'good' association. Over and above that, performance is of a very high standard, strongly influenced by best practice in the sector.
Good	The association demonstrates a strong commitment to and effective delivery of high standard services, given context and resources.
Satisfactory	Performance generally meets the standard you would expect of an association working in that context with those resources. Any failures to comply with regulatory guidance are minor.
Scope for considerable improvement	Although performance does not breach regulatory code, the Association's performance is unimpressive compared with peer group. Performance may not comply in all respects with regulatory guidance.
Fails to comply with the Regulatory Code	Performance fails to achieve outcomes specified in the regulatory code.

Does the Association secure continuous improvement in services?

Judgement	Description
Demonstrates strong corporate and strategic capabilities	The association is working to be a 'learning organisation'. It demonstrates all the positive characteristics of an association which is raising standards in service delivery. In addition, there is a systematic programme of cross-cutting reviews which are not only delivering service improvements but are also informed by the Association's high level strategic goals, with clear monitoring and measurement against these goals.
Is raising standards in service delivery	The association uses formal processes, participation and consultation, training in basic continuous improvement, reward and recognition systems, within a range of service areas. Measurable improvements have happened as a result. However, any cross-functional reviews and resulting improvements have been ad hoc rather than a result of a structured programme of such reviews.
Shows weaknesses in processes and performance	While some service improvements are evident, these result from one-off initiatives (such as a new product or process, a training initiative), or an initiative by a particular individual or team, rather than from a structured ongoing programme of reviews. Consultation with service users and their involvement in change is weak. The association lacks challenging targets for performance improvement and cannot demonstrate a convincing track record.
Fails to demonstrate capability	The association's approach to changes is reactive and unstructured. Improvements (if any) arise from tackling manifest problems, ad hoc suggestions, etc., rather than the systematic approach outlined by Assembly Government guidance on Best Value.

Appendix 3

Summary of inspection recommendations

<i>Relationship to residents</i>	
R1	<p>The Association needs to:</p> <ul style="list-style-type: none"> engage with tenant and resident representatives to develop a Tenant Participation Strategy and update its Tenant Participation Compact and community development strategy; and develop clear action plans and priorities in respect of its resident involvement in general needs housing and its community development activities. <p>These should be subject to regular monitoring and evaluation with progress against targets reported to tenants and resident representatives.</p>
R2	<p>The Association needs to develop more effective methods of engaging with difficult to reach groups – eg, young people, ethnic minorities and people with disabilities – and engage more effectively with those currently not involved.</p>
R3	<p>The Association needs to review its management of complaints to address weaknesses in its management systems, approach to monitoring and evaluation and public dissemination of information on its complaints policy.</p>
<i>Equal opportunities</i>	
R4	<p>The Association needs to ensure information on services is made available in alternative formats and this is widely publicised to ensure all those seeking assistance can access services.</p>
R5	<p>The Association needs to develop and implement a Welsh Language Scheme based upon the advice of the Welsh Language Board.</p>
<i>Providing housing</i>	
R6	<p>The Association needs to address operational issues in respect of nominations performance with Cardiff County Council.</p>
<i>Rents</i>	
R7	<p>The Association needs to set appropriate and challenging targets for rent arrears recovery which support year on year improvement in performance.</p>
R8	<p>The Association needs to review its recovery and control measures and consider introducing garnishee and attachment of earnings orders to recover debt.</p>

Letting housing	
R9	The Association needs to set challenging targets to support continued improvement in its management of empty homes and systematically monitor and evaluate the application of its relet standard to ensure compliance with the standard.
R10	The Association needs to improve the range and coverage of the information it provides on the <i>Select a Home</i> scheme to ensure those seeking housing had detailed information on the Association's approach to exclusions, on applicants' rights to a review of an allocation decision, and on the Association's appeals system.
R11	The Association needs to introduce written criteria to assist in determining whether or not to award priority cards for all lettings categories, and to ensure that applicants are formally notified of a decision to withdraw a priority card and their rights to request a review.
Managing housing	
R12	The Association needs to ensure its programme of estate inspections regularly takes place and is advertised to residents in advance to ensure they have the opportunity to highlight issues of concern.
R13	The Association needs to review the management and delivery of its ASB policy, and address weaknesses in its logging and monitoring of incidences of ASB and its service standards to ensure these are fully complied with.
Maintaining housing	
R14	The Association needs to review its Maintenance Service Standards Compact to address identified weaknesses.
R15	The Association needs to develop and introduce a repairs appointments system.
R16	The Association needs to review its management of pre inspections and ensure they are accurately recorded from the point they are first ordered.
R17	The Association needs to improve its management of post inspections and ensure that robust systems are in place to achieve good practice levels of 10 per cent post inspections that are completed within an appropriate timescale after the completion of works.
R18	The Association needs to ensure its gas servicing policy is fully complied with in all cases and undertake an appropriate level of verification checks of the work of its contactors.
R19	The Association needs to address weaknesses in its stock condition information by developing appropriate systems to fully capture qualitative measures of the WHQS to enable investment plans to be accurately assessed and agreed.
Securing continuous improvement	
R20	The Association needs to ensure it effectively engages with all stakeholders – eg, representative tenant groups, local authorities and other partners – when developing and agreeing its Corporate Strategy.
R21	The Association needs to ensure it sets appropriate targets that support year on year improvement and establish validation systems for key performance information to ensure their accuracy.



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