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Merthyr Tydfil Housing Association

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Summary

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

1. The Welsh Assembly Government has appointed the Wales Audit Office to carry out inspections of housing associations in Wales, under Section 96c of the Government of Wales Act 1998. Inspections 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 Merthyr Tydfil Housing Association (the Association) was undertaken in November/December 2005. 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 a range of 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 satisfactory, good or excellent services in all areas

4. The Association was providing excellent services in relation to providing housing to meet local needs. The quality of the Association's arrangements covering equal opportunities, letting, managing and arranging housing for people with support needs were all assessed as good. The quality of the Association's arrangements relating to relationships with residents, rents and maintenance were all assessed as satisfactory.

The Association was raising standards in service delivery and had the characteristics of a continuously improving association

5. The Association had a clear strategic direction and effective systems in place that ensured strategic objectives were met. There were effective arrangements for performance management, while its arrangements for continuous improvement were developing. The Association demonstrated evidence of service improvement in a range of service areas, but there was a deterioration in performance in some service areas. The Association's recent track record indicated that it had the capacity to deliver improvements.

The Association demonstrated good practice in a number of areas

Choice based lettings scheme (CBLs)

6. Following a Best Value Review, the Association switched from a points based letting system, based on housing need, to a choice based scheme in 2001. The scheme improved customer choice, improved the time taken to let properties, and customers found it easier to understand than the previous system.

Mission Statement

7. The Association used external facilitators to engage with both tenants and staff in developing its mission statement. Following on from this, the Business Plan produced departmental and personal objectives, with training and support to help achieve them. The effectiveness of this approach was evident during the inspection when all staff were very clear on corporate objectives and priorities.

This report makes a number of recommendations to support the further development of services

8. This 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

9. This 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.
10. The Association is required to circulate our separate summary of the 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.
11. 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 Regulation Co-ordinator assigned to the Association will undertake the progress reviews and, in consultation with the Lead Inspector, will 'sign off' completion of the Action Plan.

Merthyr Tydfil Housing Association is a community based association, established in 1977 and operating in the Merthyr Tydfil unitary authority area

12. Merthyr Tydfil Housing Association Ltd (the Association), is a Registered Social Landlord, established in 1977 as a non-profit making Industrial and Provident Society. The Association develops, owns, manages and maintains homes and has 1007 properties in management at 28 November 2005. The head office is in Merthyr Tydfil town centre. The Association provides a community office in Treharris as a base for the Communities First area.
13. The Association is governed by a Board of eight plus four co-opted members, including spaces for four tenant board members. At the time of the Inspection only one member of the Board was a tenant. The Board meets 11 times per year with themed meetings each quarter – housing services; asset management; finance. An Audit sub committee meets on a quarterly basis.
14. The Chief Executive leads the Corporate Management Team of senior staff responsible for co-ordination of functional teams. The Association employed 36 staff including a direct labour team and was the grant recipient and employer of three staff for the Communities First programme in Treharris.
15. The Association had secured £6.5 million Social Housing Grant to build 100 new homes over the next three years, enabling a development programme of £10 million.

The Association was providing excellent services in respect of providing housing and good or satisfactory services in other areas

The Association had “satisfactory” arrangements in place for its relationship with residents

The Association encouraged resident involvement at a community level but needed to do more to promote and support residents to shape service development

16. Resident involvement is the responsibility of the Association’s Community Development team. This team promotes a wide range of resident involvement activity at community and individual level, including the development of tenants and residents associations. All of these associations were at an early stage of development. In addition to these groups, the Association had also developed a Youth Forum.

17. The Association offered residents a wide range of opportunities for involvement through the framework provided in its Tenant Participation Policy and Tenant Participation Compact.
18. There is provision for up to two tenant places on the Association's Board. At the time of inspection, there was one tenant board member but the process of recruiting of a new member had commenced.
19. The Community Development team had developed a range of local partnerships and had successfully obtained funding for a large number of community activities.
20. Whilst there was tenant involvement at Board level, there was scope for further resident involvement in policy development and decision making. For example, there was no resident involvement in the Association's recent review of the Tenant Participation Policy or Tenant Participation Compact. This gap was acknowledged by the Association but, despite a recent review of its framework for resident involvement, it had no clear plans to tackle this.

The Association was producing clear and accurate information and advice for residents for most aspects of service, but needed to produce further information about refurbishment proposals and to make information more accessible in reception areas

21. The Association provided a wide range of published information and advice for residents. A Tenant Handbook was provided for all tenants that sets out, for example, how tenants could pay their rent and how to report a repair. *The Beacon* Tenants Newsletter provided relevant and useful information in an attractive format. A useful range of information leaflets were available for residents. The Association reported to tenants on performance via its Annual Report.
22. Information and advice could also be accessed via the Association's web site, which included the opportunity to report repairs and obtain information on re-housing.
23. Tenants, and notably young people, were involved in the production of the Newsletter through the contribution of articles and involvement in an editorial board. However, there was no tenant involvement in the production of other information to residents, such as leaflets; the tenant compact and the tenants' handbook.
24. Residents could access the Association's services via its recently refurbished offices close to Merthyr Tydfil town centre. The offices had recently been refurbished and were compliant with the Disability Discrimination Act. However the information available within the office reception area did not display the full range of services that the Association offered, such as community development and opportunities for tenant involvement. Also, there was no provision for children's play facilities.
25. All information – with the exception of the Annual Report - was provided in standard format and English only. The Association acknowledged the need to develop the language and format of their information to meet the needs of the wider community.
26. The Association did not ensure that tenants had all the information they needed. For example, our discussions on site indicated that staff and tenants would like

regular, up to date information on the Association's proposals for refurbishment of its older properties - which make up almost half of the Association's housing stock.

The Association asked for, listened to, and took account of the views of residents in relation to local, community issues, but needed to do more in relation to shaping the way the Association worked

27. The Association carried out tenant surveys every four years. The most recent, postal, survey was carried out in 2004. This was followed up via a series of focus groups and individual interviews to explore in more detail issues raised around developing other service areas.
28. Repairs satisfaction surveys were circulated to all tenants reporting a non urgent repair. A target for survey returns had been set and was regularly monitored. Survey return was encouraged via a monthly prize draw.
29. In support of the Association's mission statement, the Association offered a wide range of opportunities to residents at community level to express their views, and was able to provide a range of examples where residents' views had been listened to and acted upon, for example in relation to developing longer term, more effective solutions to anti social behaviour problems.
30. The Association had attempted, through focus groups linked to the business planning process, to encourage resident input to policy and strategy but had had only limited success. This meant that residents were not fully involved in influencing or shaping Association's priorities.

The Association needed to further develop the information provided to residents to ensure that it is answerable to them for the quality of services provided

31. The Association provided residents with information on its own performance via its Annual Report and residents were provided with information on how the Association's performance compared with other service providers in an annual supplement to the Tenant Newsletter, following publication of the National Assembly's Performance Indicators.
32. The Association had a complaints policy and procedure and reported comprehensively on complaints received and action taken.
33. A range of service standards existed within various Association policies and procedures. However, there was no single service standards document to which residents could refer. Adherence to service standards was not monitored and reported to residents.

Recommendations	
<i>Relationship to residents</i>	
R1	Work with residents to clearly articulate a tenant participation and community development objectives as a basis to map out a clear way forward for both activities.

R2	Work with tenants to develop, publish and monitor a comprehensive range of service standards to ensure accountability to residents for quality of service.
R3	Develop a realistic action plan for more tenant involvement that helps to shape the way that the Association works and the information provided to tenants.

The Association had “good” arrangements in place for equal opportunities but was failing to treat the Welsh and English languages on the basis of equality

The Association actively promoted respect for diversity and equality of opportunity, worked towards the elimination of discrimination in all activities, and promoted good relations between people of different racial groups, in the context of the community in which the Association operates

34. From the Census 2001 the Black Minority Ethnic (BME) population of Merthyr Tydfil is only 1.1 per cent, compared to 2.13 per cent across Wales. This group comprised of a diverse range of BME residents and showed a marked difference with the BME population elsewhere in Wales. Compared to the population of Merthyr Tydfil as a whole, people from BME communities had higher levels of owner occupation, lower levels of private renting, a higher car ownership rate, and were more likely to be in professional and managerial occupations.
35. The Association had good arrangements in place to promote equalities as there was strong commitment and clear and consistent leadership provided about statutory and good practice expectations. The Association was analysing and actively promoting BME and equal opportunity issues and, as a consequence, was able to demonstrate how it was responding to those issues.
36. The Association was a Basic Skills Employer, and promoted job opportunities within the Association to people with literacy and physical disabilities. The Association actively monitored the number of applicants but, due to the low number of job vacancies arising since achieving the Basic Employer status, had not assisted anyone with employment at the time of the inspection.
37. The Association had an Equal Opportunities Policy, a Black and Minority Ethnic (BME) Housing Strategy and a Race Equality Plan, and was a partner in the Merthyr Tydfil Race Equality and BME Housing Action Plans. Both plans were actively monitored and actions were up to date.
38. In addition to actions linked to these plans, the Association was involved in a range of new initiatives aimed at achieving equality of opportunity, such as a Global Village event and an information event organised through the local Multi Agency and Diversity Forum, which was chaired by the Association’s Chief Executive. The Chief Executive and Board Chair were acting as Race Equality Champions for the Association.
39. Feedback from the Local Authority highlighted that the Association was proactively driving and raising awareness of strategic BME issues across the Authority. An example of this was the joint appointment of a BME Housing Strategy Co-ordinator.

40. The Association's Race Equality Plan included a range of actions designed to establish a framework from which the Association could actively manage diversity issues. The Association was in a position where it had a framework and an information base from which it could assess the impact that its policies were having. The Association had identified, from its participation in a website for BME people, that there had been an increase in the numbers of BME people seeking re-housing with the Association and in the actual numbers re-housed. An outcome from this to increase the target for re-housing BME applicants from one per cent to two per cent to reflect demand.
41. The Association collected, monitored and reported equalities data in respect of employment and housing services activities. The Association met the requirements of the Commission for Racial Equality Code of Guidance in Rented Housing. It analysed and reported to the Board on a six monthly basis by ethnicity the number of housing applicants and lettings, the quality of housing offered, and service delivery in terms of repairs and complaints, and had targets as yardsticks for measuring success or failure.
42. The Association had a racial harassment policy and all cases had been logged in line with the policy.
43. All staff and board members had received equality and diversity training.
44. The Association had made provision for making information and advice available in community languages via the Multi Agency Diversity Forum. Only limited information was provided in alternative formats, but the Winter 2005 edition of the tenants newsletter was available in audio tape format.
45. The Association provided information and advice services in appropriate formats for a variety of circumstances of support needs, such as use of minicom, use of induction loops and sign language, for which staff have received training.

The Association was not treating the Welsh and English languages on the basis of equality

46. The Association had no formal arrangements in place to ensure that all staff were aware of how to deal with a request for a service in Welsh, although informal arrangements were in place. The Association had identified the number of tenants who spoke Welsh, which was a small number, and had established that it had more tenants who needed to communicate through the use of sign language to access the Association's services than in Welsh or any other community language.
47. The Association had a draft Welsh Language Scheme but was unable to progress towards adoption due to national work being carried out by the Welsh Federation of Housing Associations and Welsh Language Board to develop template Welsh Language Schemes for use of housing associations across Wales.
48. With the exception of the Annual Report and the Race Equality Strategy, none of the Association's publications were available bilingually. The Association was, however, progressing plans to provide a bilingual web site which will greatly enhance the level of information available in Welsh.

Recommendations

Equal Opportunities	
R4	Ensure that formal arrangements for dealing with a request for service in Welsh are clear and communicated to all staff.
R5	Ensure that the Association progresses its draft Welsh Language Scheme in the context of the national work being undertaken by the Welsh Federation of Housing Associations and the Welsh Language Board.

The Association had adopted an “excellent” approach in providing housing

The Association was working in partnership with the local authority and other agencies to identify and provide for the housing related needs of the area, but did not have a Community Housing Agreement with the local authority in place

49. The Association was working closely with the Local Authority and had been engaged in developing and delivering the local Housing Strategy. The Association did not have a current Community Housing Agreement with Merthyr Tydfil County Borough Council, but the need for one was recognised by the Local Authority which intended to put one in place early in 2006. Local authority and Association officers met on a monthly basis to progress projects, and the Association was a member of the Strategic Housing Partnership that met quarterly. We made contact with officers at Merthyr Tydfil County Borough Council who provided positive feedback about working relationships at operational and strategic levels.
50. The Association was able to demonstrate effective partnership working through a variety of projects that were providing for local housing need. Examples included the development and management of a local direct access hostel for homeless people, involvement in the Single Homelessness Forum, membership of the Supporting People planning group, and helping to shape and influence the Supporting People Strategy.

The Association participated effectively in community development, neighbourhood renewal and regeneration initiatives

51. The Association was leading and participating in community development, which supported one of the themes of its mission statement ...'to generate surpluses to reinvest in communities...' The Association committed £57,000 each year to support in-house community development activity and had secured external funding to employ a youth worker via Children in Need. It was the host employer for the Communities First area in Treharris and had previously successfully hosted the Communities First team in Troedyrhiw. At the time of the Inspection, the Association had been approached by Merthyr Vale Communities First Area to give support to the Partnership Board.
52. The renewal and regeneration activity that was taking place clearly supported the mission statement of the Association and was assisting the Local Authority to deliver its strategic objectives. Participation in the Renewal Areas to assist in

housing improvements and development of new accommodation was one example. The Association also had a key role in regenerating areas such as Dowlais Flats and the associated new build family housing, adapted bungalows at Tramroadside for families with physical disabilities, area renewal schemes at Merthyr Vale, and an assisted home-buy scheme to encourage people to move-on into home ownership.

The Association was providing a “satisfactory” rents arrears service to tenants

The Association had satisfactory arrangements for debt prevention, although the take-up of the advice service by tenants in arrears needed to improve

53. The Association was providing an advice service via Shelter Cymru one morning per week. The service assisted 93 tenants in 2004/2005 which is just 17 per cent of the number of tenants in arrears of 533 during the same period. All tenants in arrears are advised of the availability of the service. At the time of the inspection the Association was considering a number of ideas to increase the take up of the Shelter advice service.
54. The Association had hosted Merthyr Tydfil Credit Union and promoted the benefits of saving and borrowing to its tenants via its newsletters.
55. Staff were familiar with housing benefit rules and entitlements and worked closely with the Local Authority Housing Benefit team, although there was no service level agreement in place. The average number of days to process a new housing benefit claim by the Local Authority was 57 days, compared to the Welsh average of 45 days (NAWPI's 2004/05). Given that more than 80 per cent of the Association's tenants were in receipt of housing benefit, late payments were having a detrimental effect on the Association's arrears performance.

The Association's control and recovery mechanisms were having limited impact on performance

56. The Association had recently revised rent arrears procedures to ensure prompt action at earlier stages in the arrears process, focusing on early personal contact. A follow up visit six weeks into a new tenancy was intended to alleviate any potential problems with rent payments. The Tenants' Handbook informed tenants of the action the Association would take in the event of arrears, including detailed arrears procedures and how to apply for housing benefit.
57. The Association offered a range of rent payment methods including Allpay, by telephone, via the internet, credit card and direct debit.
58. Trends showed an overall reduction in the percentage of tenants in arrears, from 62 per cent at 31 March 2003 to 53 per cent at 31 March 2005, as a result of action taken by the Association to reduce rent arrears.
59. However, the Association's performance on current tenant net rent arrears had deteriorated significantly, from 2.1 per cent at 31 March 2003 to 3.2 per cent at 31

March 2005. The amount of rent collected had also deteriorated during the same period from 102 per cent to 97 per cent, although the Association explained that this was mainly due to time lags in Housing Benefit payment cycles (Exhibit 1).

60. The deterioration in performance was linked to factors relating to the performance and actions of the Housing Benefit department and the County Court process. Sample file checks on site confirmed this. In addition, an under resourced bailiff service had resulted in arrears continuing to rise even after possession has been granted by the court. The Association needed to mitigate the impact of these factors through proactive management of the situation to avoid arrears increasing.
61. Specialist staff dealt with the recovery of rent arrears and individual targets were set. Although performance against these targets was monitored on a fortnightly basis, the level of arrears had remained relatively high since the introduction of specialist roles in July 2004.
62. The Association's performance on collection of former tenants' arrears was also deteriorating, rising from 2.8 per cent to 3.3 per cent of rent collected during 2004/2005. This performance was in the bottom quartile compared to other RSLs in Wales. The use of external debt recovery agents appeared to be having little impact.
63. Given the increasing arrears levels, extensive monitoring was undertaken and regularly reported to Board. For example, the percentage of tenants in arrears by weeks owing was reported to the Board on a quarterly basis. This helped to identify where arrears problems were arising. However, no evaluation had been made of the extent and impact of early intervention. To date, the specialist role had been focussing on reconciling rent accounts rather than getting rent payments made.

Exhibit 1: Current rents Performance Indicators – three year trend

Indicator	2003	2004	2005
Rent due from current tenants but unpaid as a percentage of rent roll (net of unpaid housing benefit).	2.1%	4.1%	3.2%
Percentage of tenancies in arrears	62%	60%	53%
Rent collected as a percentage of total rent collectable	102%	103%	97%

Source: Performance Indicators for Registered Social Landlords in Wales 2004-2005 National Assembly for Wales

Recommendations	
Rents	
R6	Set clear targets for debt prevention and agree how these will be achieved.
R7	Evaluate whether early contact as per the rent arrears procedure is being achieved and evaluate the impact of early and consistent intervention to help mitigate the risk of rent arrears.

The Association was providing a “good” lettings service

The Association was letting properties quickly and efficiently

64. Lettings procedures for new tenants were comprehensive. The Lettings pack provided a good introduction to the Association and included a summary of the Association’s Business Plan. All viewings were accompanied by officers.
65. The Association was achieving top quartile turnaround time on void properties. Trends showed that figures improved over the last two years and that the introduction of a choice based lettings scheme had had a positive impact on these figures.
66. The Association had a void standard detailed within its void policy that all properties were required to meet before being offered to new tenants. We visited properties considered available for letting and found that they complied with the specified standard. However, whilst used as a reference for staff, there was no published lettings standard, and therefore tenants did not know what standard to expect when offered a new home.
67. The Association provided decoration allowances, and we found clear criteria for standards of decoration and the issue of decoration allowances.
68. The Association managed letting performance using excel spreadsheets, which were updated by the Housing Manager for each letting. Good working relationships between maintenance staff and Tenancy Management Officers ensured a focused approach to quick re-let times.

Good practice: Choice Based Lettings Scheme (CBLS)

In April 2001 the Association switched from a conventional points-based lettings system based on housing need to a choice-based one. It did so following a Best Value Review covering Access to Housing, and with the consent of the Welsh Assembly Government. The aims and objectives of switching to a CBLS were to:

- improve the extent of consumer choice in lettings;
- support the long term sustainability of local communities;
- improve the lettability of property in areas of low demand;
- provide the Association with information to manage its stock more effectively;
- retain the fairness of the allocations process;
- improve the speed and efficiency of letting properties; and
- increase customer satisfaction.

Twelve months after its implementation, the Association applied for an Innovation and Good Practice grant from the Welsh Assembly Government in order to evaluate the project against its aims and objectives. The consultants’ report concluded that CBLS had improved consumer choice; had successfully increased waiting lists for areas of low demand; improved time taken to let properties; and customers found it easier to understand than a points-based system.

69. The introduction of a Choice Based Lettings Scheme (CBLS) and wider publicity at a local level had resulted in a more diverse interest in the Association’s accommodation with, for example, more people from BME groups seeking re-housing. The CBLS had also helped to address the issue of hard to let properties.

The Association worked in partnership with the Local Authority on the allocation of housing

- 70. There were close working relationships with the Local Authority and work was in progress to develop a common housing register based on choice and an adapted properties register.
- 71. The Association monitored nomination levels and 47 per cent of its lettings in 2004/2005 were to Local Authority nominations. In previous years the Association had met its 50 per cent target.
- 72. The exclusions element of the Association's Allocation Policy was not compliant with the most recent guidance issued by the Welsh Assembly Government. Nor was it consistent with that of Merthyr Tydfil County Borough Council.
- 73. The Association participated in the protocol drawn up by South Wales Police in dealing with re-housing of Schedule One offenders. The Association's relationship with the Multi Agency Public Protection Agency (MAPPA) had been formalised and the Chief Executive Officer sits on the Multi Agency Risk Assessment Committee (MARAC). Internal arrangements were in place for re-housing high risk applicants.

The Association ensured that those housed were fairly selected and sought to achieve a balance in housing allocation

- 74. The Association monitored and evaluated the outcomes of its Allocation Policy against clear annual targets for applicants, tenants, nominees and the homeless, and reported this information to the Board on a quarterly basis. The Association actively managed equality and diversity issues and this information was also reported to the Board on a quarterly basis.
- 75. Since the evaluation of the Choice Based Lettings Scheme (CBLS) 12 months after its introduction in 2001, using an Innovation and Good Practice Grant from the National Assembly, there has been no evaluation of the effect of the CBLS on helping to sustain communities or on the turnover of tenancies. Even though the Association was undertaking End of Tenancy Surveys which are reported to Board each quarter, the Association needed to monitor tenancy turnover more robustly using data from the computer when the property becomes vacant, rather than relying solely on exit surveys of outgoing tenants.

Recommendations	
<i>Letting housing</i>	
R8	Publish a lettings standard and ensure that it is made available to all new tenants as part of the lettings process.
R9	Ensure that the exclusions element of the allocation policy is revised to a suspensions policy so that it is compliant with the most recent guidance published by the Welsh Assembly Government and is consistent with Merthyr Tydfil County Borough Council's suspension policy.
R10	Evaluate the effect of the CBLS on sustaining communities and the turnover of tenancies.

The Association was providing a “good” housing management service

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

- 76. The Association had elected not to use introductory tenancies, and all new general needs tenancies were offered assured tenancies. Assured shorthold tenancies were being used in supported accommodation, including those in receipt of floating support. Assured shorthold tenancies were also being used in market rented housing.
- 77. Tenants were provided with information on their rights and responsibilities through the Tenants' Handbook and all new tenants were provided with a copy of the Welsh Assembly Government's guarantee for Housing Association tenants.
- 78. Vulnerable tenants had access to support from external agencies to help sustain their tenancies and, while in receipt of support, were issued an assured shorthold tenancy. Although this form of occupancy was not as secure as it ought to have been, the Association had made a conscious policy decision, following consultation with its managing agents and an external consultant, to use this type of tenancy to ensure the sustainability of the community and to meet the compatible housing needs of vulnerable people. Due to the limited range of supported housing options in Merthyr Tydfil, there were no alternative types of accommodation available for care leavers or prison leavers other than floating support in general needs accommodation. A regular review mechanism ensured that support packages were appropriate and security of tenure could be reviewed.

The Association was helping to safeguard the quality of life of residents and neighbours

- 79. The Best Value Review (BVR) of Community Development in 2003/04 identified the need to improve arrangements for community engagement. One specific outcome of the BVR related to dealing with antisocial behaviour and led to the designation of specialist officers in 2004. The introduction of Tenancy Management Officer roles had had a positive impact in dealing with antisocial behaviour. The joint working between the Tenancy Management Officers and the Community Development staff had seen effective multi-agency relationships developing with the Police, voluntary organisations and the Local Authority.
- 80. Comprehensive staff training in dealing with antisocial behaviour had been provided, and the Association had introduced a new antisocial behaviour policy and procedures that complied with statutory expectations. The Association was using a variety of methods for dealing with antisocial behaviour, including Acceptable Behaviour Contracts; demoted tenancies and Anti-social Behaviour Injunctions. In addition, community development staff were encouraging a more community based resolution to antisocial behaviour, where appropriate. For example, in addressing the nuisance caused by ball games in Dowlais, the local community police and

Community First team had engaged with young people in a constructive way. However, some tenants were not aware of the options adopted by the Association and no evaluation had been undertaken to assess the impact of action for residents.

81. For all new tenancies, a joint visit with community development staff was carried out six weeks after the start of the tenancy, to encourage commitment to the area and the sustainability of the tenancy. Services such as employment and education and training opportunities were promoted to improve quality of life and engagement with Communities First staff. However, some tenants we spoke to said they had not received such a visit. The Association needed to monitor that all tenants were receiving joint six weekly visits and to evaluate their impact.

Recommendations	
<i>Managing housing</i>	
R11	Engage with residents on anti social behaviour; ensuring that residents are effectively informed of the options available to resolve issues of anti social behaviour, and evaluate the impact of action for residents.
R12	Ensure that the six weekly visits are carried out for all new tenants and evaluate their impact

Overall the Association was providing a “satisfactory” service in maintaining its homes

The Association was not ensuring that responsive repairs were being carried out effectively because it was not able to demonstrate value for money and an understanding of performance, although resident satisfaction levels with responsive repairs were high

82. The service was readily accessible to tenants who had a wide range of ways to report repairs – in person, by telephone and via the web site. During the course of the inspection, the Association implemented a separate, freephone number for repairs. An out-of-hours service was provided by Merthyr Tydfil County Borough Council. This service operated satisfactorily when tested during the inspection.
83. Observations during the on-site inspection indicated that repairs requests were being handled by front line reception staff who had no technical training. No repairs diagnostic aid was available to either staff or tenants and no checks were in place to ascertain the accuracy of reported repairs. There was no system in place to avoid the possibility of potential mis-diagnosis of repairs reporting. Also, there was no repairs appointments system.
84. Checking on site indicated that systems designed to ensure that pre inspection times were counted as part of overall response times were not operating correctly. On-site checks also indicated that a failure to input repair request information for emergency repairs immediately may have been distorting performance figures. Both these findings cast some doubt on the accuracy of current reported response times and indicated a need to regularly audit response statistics.

85. Whilst the local knowledge of officers was used to cater for the needs of vulnerable tenants, there was no systematic approach and the Association had not implemented action originally identified in 2003 outlined in its draft Vulnerable Tenant Maintenance Policy.
86. The Association's target completion times for the three repair categories complied with Assembly guidance and the Association met those targets in 2004/2005 (Exhibit 2).
87. The Association issued satisfaction questionnaires with all urgent and routine responsive repairs. A target questionnaire return rate had been set and performance against the target regularly monitored. Levels of tenant satisfaction with the repairs service were high and regularly reported to the Board. All tenants with whom we made contact during the course of the inspection expressed high levels of satisfaction with the quality of the responsive repairs service. All repairs where dissatisfaction had been expressed were investigated and reported on. Although on site checks identified that these were very few, nevertheless assessments were made of whether policy/procedures needed to change.

Exhibit 2: Proportion of repairs reported as completed within target

Reported performance against target completion was in the top quartile.

Category of repair	MTHA performance 2003/2004	MTHA reported performance 2004/2005	Wales Top quartile range 2004/2005
Emergency	99%	100%	100%
Urgent	99%	99%	98-100%
Non-urgent	95%	98%	98-100%

Source: Performance Indicators for Registered Social Landlords in Wales, National Assembly for Wales 2004/2005.

Note: The performance indicators have not been audited and should thus be treated with caution.

88. The Association used a large number of local contractors to carry out responsive repairs. The Association had 28 contractors on its approved contractors list, 16 of which had been used during the current financial year. Most emergency and urgent repairs were carried out by an in-house team of two (four during the winter season).
89. While there were formal mechanisms in place to monitor the volume of works being given to particular contractors, the Association did not benchmark its contractors' day-works rates. The Association produced statistics on the volume and value of work undertaken by individual contractors, but there were no systematic performance monitoring systems in place. The Association had a 10% target for post inspection of all works completed and performance was reported to the Board on a quarterly basis. For the previous 12 month period, 13 per cent of repairs had actually been post inspected. Whilst the Association had made a positive decision to use a large number of, often small scale, local contractors, this decision was not underpinned by an analysis of value for money and procedures to ensure accountability.

Exhibit 3: Reduction in repairs numbers

Category of repair	MTHA Repair Numbers 2003/2004	MTHA Repair Numbers 2004/2005	% reduction in repairs numbers
Emergency	595	555	7%
Urgent	1414	1069	24%
Non-urgent	1628	1349	17%
Total	3637	2973	18%

Performance Indicators for Registered Social Landlords in Wales, National Assembly for Wales 2004/2005.

90. Analysis of repairs numbers indicated a substantial reduction in the numbers of repairs between 2003/2004 and 2004/2005 (Exhibit 3). The reduction in numbers was less marked for emergency repairs whilst urgent repairs reduced by almost a quarter. These figures were highlighted to the Association during the inspection but the Association were unaware of the variations and unable to provide an explanation. The Association would benefit from carrying out more analysis of repairs performance in order to fully understand performance and demonstrate value for money.
91. The Association had a code of conduct for contractors but tenants were unaware of its provisions. The Association had a 10 per cent target for post inspections, which was regularly monitored, but it did not have a target for the level of pre inspections. The Association was able to identify fluctuations in the level of pre inspections but needed to do more to investigate the underlying reasons for these, as a means of assessing the quality of the diagnosis of repair.

The Association was managing statutory servicing effectively

92. The Association had a comprehensive Gas Safety Maintenance procedure which specified access procedures and a range of methods aimed at a speedy resolution of no access issues. At the time of the inspection, 37 gas services were outstanding, ie four per cent of the housing stock. The up to date position regarding gas servicing was reported to every meeting of the Senior Management Team and regular reports to the Board were about to start.
93. The Association planned gas servicing so that servicing was carried out during the first six months of the servicing year, with the remaining six months earmarked for action on those properties where access was problematical.
94. Information on gas servicing provided to service users was limited. It was not sufficiently robust in emphasising risks to service users and it was not made widely available, such as in new tenancy packs, newsletters and posters. Directly involved staff were very aware of the importance of gas servicing, but there were no flags on the IT system or other means of notifying other customer facing staff of non access issues which could have been raised with customers contacting the Association for other reasons. The Association did not carry out an assessment of tenant satisfaction with statutory servicing work.

95. The Association had carried out asbestos surveys and training for staff but it had yet to load survey information onto its IT system, such that the survey information was not readily available to staff and contractors. Tenants had not been provided with advice on the location of asbestos and how to deal with it.

The Association managed cyclical and planned maintenance repairs effectively

96. The cyclical and programmed repairs work for 2006/2007 were to be based on the information obtained from the Association's recent stock condition survey. The Association's financial plan reflected the need to meet those commitments. To the time of the inspection, the programme had been established using up to date stock condition information, supplemented by feedback from Housing, Maintenance and DLO staff to ensure that staff knowledge, experience and skills are considered. The annual programme was approved by the Board and comprised cyclical works, service contracts and other major planned works.
97. All tenant liaison was carried out by the surveyor responsible for the particular project. Only those residents directly affected by the programme were advised of planned works. Residents were offered an element of choice when having new windows; doors; and kitchens fitted. Residents with whom we made contact expressed a high level of satisfaction with planned maintenance processes.
98. All planned maintenance works were tendered using a combination of local contractors from the Association's approved list and contractors obtained via *Constructionline*, the UK's register of pre-qualified local and national construction and construction-related suppliers. Future planned maintenance programmes were expected to pick up component replacements indicated by the stock condition survey as being required to achieve the Welsh Housing Quality Standard (WHQS).
99. The Association had set itself the target of achieving a 70:30 split between planned and responsive maintenance. However, this target was aspirational and the Association was not actively managing its repairs and maintenance service to achieve this target.

The Association had identified the maintenance and improvements necessary to meet the Welsh Housing Quality Standard (WHQS) by 2012, although specific programmes of work were not in place

100. The Association had costed WHQS requirements and, based on these figures, had submitted a 30 year Business Plan to the Welsh Assembly Government. The Association was in the process of setting up a five year ongoing rolling programme of stock condition surveys, but had yet to develop programmes of work to achieve WHQS by 2012.
101. Approximately half of the Association's properties consisted of high density terraced housing, mostly built prior to 1919. The Association carried out a stock condition survey in 2003/2004 which had indicated that a proportion of their stock could not be fully brought to WHQS standard in respect of space standards and energy ratings. The Association had advised the Welsh Assembly Government and was awaiting advice on how to proceed in respect of those properties.

102. The Association did not have an Affordable Warmth Strategy. However, it had been working with British Gas on the 'Here to Help' programme and, during 2004/2005, carried out affordable warmth works to 630 properties. For 2005/2006, the Association had sourced £35,000 funding from the Home Energy Efficiency Scheme (HEES) to carry out draught stripping to timber doors and windows.

Recommendations	
<i>Maintaining housing</i>	
R13	Analyse and understand repairs performance and demonstrate value for money.
R14	Ensure that information on the importance of gas safety is provided to tenants.
R15	Develop a strategy and action plan for dealing with asbestos in homes.
R16	Develop an affordable warmth strategy to reflect the work that is currently being undertaken with tenants.

The Association had “good” arrangements in place for housing people with support needs

The Association made housing available for people who had support needs and ensured they had access to appropriate services

103. The Association provided for a wide range of support needs, planning provision in consultation with key stakeholders, such as Women's Aid, Adref and Voluntary Action Merthyr Tydfil, and working in liaison with the Supporting People team at the Local Authority to meet the identified needs of vulnerable people. The Association provided for:
- young people leaving care;
 - people affected by domestic violence;
 - homeless people;
 - adults with Learning Disabilities; and
 - adults with a mental illness.
104. The Association ensured that people with support needs had access to appropriate services by providing them with individually tailored support packages, which were systematically reviewed to ensure progress. The ways in which vulnerable tenants could access support were clear. There were also clear move-on arrangements in place.
105. The Association was taking on appropriate self-referrals from applicants with support needs and carried out an assessment of support at application stage. The Association did not deliver support services directly but through agreement with other support providers such as Mind, Barnardos and Gofal.
106. At an operational level, relationships between Tenancy Management Officers and key workers were developing and successfully helping to sustain tenancies.

107. The Association was meeting the needs of existing tenants who became vulnerable through working with local voluntary and statutory services. When appropriate, the Association had successfully secured funding from the Welsh Assembly Government for adaptations to properties and had worked closely with Merthyr Care and Repair to project manage works.
108. The Association was in the process of building adapted bungalows to re-house applicants with specific physical needs. Working with the Supporting People team and occupational therapists, the Association was assisting existing tenants and other housing association tenants to move-on to more appropriate accommodation.

The Association applied all key expectations equitably to customers who required support but did not systematically tailor its service delivery to meet their specific needs

109. The Association met the needs of its tenants who had specific requirements by offering a flexible and responsive front-line service. Whilst manual records were kept of those with specific support requirements, this information was not stored on the Association's IT database and therefore there was scope for a more responsive, tailored service to meet an individual's specific needs.
110. The Association granted assured short hold tenancies to residents with support needs in projects and general needs tenancies where floating support was provided. Key workers, as well as the Tenancy Management Officers, were present at lettings to help explain and reinforce occupancy rights and obligations and ensure that tenancy matters were part of an individual's support planning framework.
111. The Association had a draft Repairs for Vulnerable Tenants policy and procedure that was sensitive to the special requirements of vulnerable people with support needs. However, during the inspection it was apparent that these policies and procedures were not being applied consistently. For example, during the inspection we interviewed a new tenant of a sheltered housing scheme that had been given redecoration vouchers at the start of tenancy and visited an adapted property that was ready for letting whereby the new tenant was being offered redecoration vouchers when the Association's policy clearly indicated that decoration should have been carried out by the Association.
112. The Association provided information and advice services in appropriate formats for a variety of circumstances of support needs, such as the use of minicom, induction loops and sign language, for which all staff had received training.

Recommendations

Housing for people with support needs

- R17 Ensure that IT systems allow for the ready identification of tenants with support needs, so that action can be taken to tailor services.
- R18 Ensure that the draft vulnerable tenant maintenance policy, dated 2003, is implemented.

The Association was raising standards in service delivery and had the characteristics of a continuously improving association

The Association had a clear strategic direction

- 113. The Association's strategic direction was captured in the 2004-2009 Business Plan and was reviewed annually at an away day involving staff and board members. A major review took place every four years.
- 114. The Association had a clear mission statement to "provide good quality accommodation and effective support and regeneration services...to generate surpluses to reinvest in communities..."
- 115. The Association had involved stakeholders in developing the mission statement, through a series of focus groups to which staff, community stakeholders and all tenants were invited to participate. However, there was a poor take up by tenants. The Association also did not engage with key external stakeholders, such as the Local Authority.
- 116. The Business Plan themes matched the strategic aims of the Local Authority – economic regeneration, life long learning, housing, leisure (potential positive practice) - and it was possible to measure the impact of the Association's work in meeting the strategic objectives of the Local Authority.
- 117. Strategic themes of the Association were measured using defined objectives – stakeholder, financial and resources, internal process, learning.

Good Practice

The Association produced its mission statement with the support of an external facilitator engaging with customers through focus groups (tenants; community stakeholders; staff; Board). This helped to position the Association, identified its strengths and weaknesses and established four strategic themes. The Business Plan has a fundamental review every four years and an annual review at an away day with staff and board members. Departmental objectives flow from the Business Plan and individual objectives are set, with training and support, to achieve outcomes. The effectiveness of this approach was evident during the inspection when all staff interviewed were very clear on corporate objectives and priorities.

- 118. Delivery of the Business Plan was managed by means of an Operational Plan that had specific, measurable, achievable, recorded and timely targets linked to the themes of the mission statement.
- 119. The Business Plan was subject to a formal annual review, with progress reports against targets being made to the Board on a quarterly basis. An annual report was produced which set out achievements against key objectives.
- 120. The Management team also reviewed progress against the Business Plan objectives on a monthly basis and departmental objectives provided a clear link with operational activity and individual objectives.

The Association had effective arrangements for performance management and its arrangements for continuous improvement were developing

121. The Board agreed a list of performance targets on an annual basis and performance against these targets was monitored on a regular basis – at Board level, by the Management Team and individually at regular one to one meetings.
122. Organisational and individual targets linked clearly to Business Plan objectives and performance was managed using agreed annual targets that flow from the Business Plan. Staff received annual appraisals where individual staff objectives were linked with the Business Plan.
123. A range of Best Value service reviews had been carried out – Access to Housing; Tenant Participation and Community Development; Reactive and void maintenance; Planned Maintenance and Development; and Rents and Service Charges. The Association's rationale for its Best Value Review programme was based on service performance and external requirements, such as those of the Welsh Assembly Government. The Association had also completed a 'light touch' Review of services to people from BME Groups. This helped the Association to prepare its BME Housing Strategy and Action Plan.
124. The Association had a comprehensive review methodology based on the 4 Cs principles of Best Value. Staff and tenants had input into shaping the Best Value Review Plan, although there had been no tenant involvement in deciding the priorities for review.
125. Some of the reviews completed had had limited outcomes and benefits – Access to Housing being the most notable exception, where the Association changed the way that it allocated homes and introduced a choice based lettings system. Outcomes from the reactive and void maintenance review were limited to the introduction of a separate freephone number which took two years to implement.
126. The Association could have managed its Best Value Review programme more effectively: a couple of reviews took a long time to complete and the outcomes of some reviews have been limited. There was also a lack of focus on resolving some reviews, even though each review had a time frame of six months established at the start.
127. The Association acknowledged that the benefits of its best value processes had not matched the resources demanded, and have been exploring alternative, less resource intensive methodologies, such as process mapping.
128. There had been some involvement of tenants in best value review processes, mainly through surveys and focus groups. However, proposals to use tenants as researchers and to have a large pool of potential tenant focus group members have not materialised.

The Association demonstrated evidence of service improvement in a range of service areas but there was deterioration in performance in some service areas

129. Over the previous three years the Association had achieved and maintained its Investors in People status, which had led to more focused training and development for staff linked to the Business plan; established a Staff Employer Partnership Group and gained an award for sustaining wellbeing in the workplace; and had recently been awarded a Green Dragon Environmental award. There had been a concentration on improving internal, business related activities, rather than services to customers, to ensure that the culture of the organisation reflected its commitment to providing quality services and improving service to its customers.
130. A Best Value Review of community development and tenant participation in 2004/2005 had resulted in the integration of housing and community development services. As a result of this review, there had been effective joint working, such as the six weekly home visits to new tenants, and an increase in community engagement activity. Similarly, the Best Value Review on allocations in 2000 resulted in the introduction of a choice based lettings scheme, and there are other clear and measurable improvements such as the letting of hard to let properties, improved lettings performance and an increased awareness within the community of the Association's stock and its availability.
131. Performance levels that directly impact on services to tenants indicated an improvement in performance over the previous two years. There had been significant improvement in the number of working days taken to re-let properties, from 15 days to three days, and the percentage of properties let within one week has improved from 73 per cent in 2003/2004 to 90 per cent in 2004/2005.
132. However, the Association achieved poorer performance in relation to indicators impacting upon business performance, with performance trends showing deteriorating performance in relation to current arrears. Whilst the Association had taken steps to address this, there had been little positive impact on improving performance. At the time of the inspection, the Association had asked its internal auditors to carry out an appraisal review of its rent recovery service.

The Association was developing plans for further improvement

133. The Association had demonstrated over the previous few years that it could deliver improvements and was developing a framework within which it could support continuous improvements more effectively.
134. The Association updated its Best Value Review Plan in 2004/2005 and was exploring other techniques to drive service improvement. This was a discussion item at its most recent Staff and Board Member Conference in October 2005, when the Association decided to pilot 'lean processes' or 'process mapping' in addition to its current planned programme of reviews.
135. The Association had implemented a planned process to develop staff and Board members' skills to enable their effective participation in these reviews. The initial training process culminated in an away day and was expected to help to evaluate

whether the model was appropriate for future service improvement reviews. Staff were also tasked with identifying and prioritising future service review areas within their teams.

136. At the time of the inspection the Association needed to develop realistic improvement plans with mechanisms for their implementation and monitoring.

The Association's recent track record indicated that it had the capacity to deliver improvements

137. The capacity of the Association to deliver improvement was supported by a staff performance appraisal and development system which reviewed performance in the context of Departmental targets, and reviewed personal development opportunities provided and those required in the forthcoming year. These arrangements enabled the Association to focus staff performance and development on the achievement of the Association's business objectives.
138. Members of the Board were invited to identify their training needs on an annual basis and a programme with a designated budget was provided. The Association had recently undertaken a training programme for Board members and carried out a skills audit to establish key competences.

Recommendation	
<i>Strategic direction and continuous improvement</i>	
R19	Ensure that tenants and external stakeholders are involved in developing Business Plan priorities.
R20	Develop realistic improvement plans with mechanisms for their implementation and monitoring.

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 Welsh Housing Quality Standard (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	The Association should work with residents to clearly articulate its tenant participation and community development objectives as a basis to map out a clear way forward for both activities.
R2	The Association should work with tenants to develop, publish and monitor a comprehensive range of service standards to ensure accountability to residents for quality of service.
R3	The Association should develop a realistic action plan for more tenant involvement that helps to shape the way that the Association works and the information provided to tenants.
<i>Equal Opportunities</i>	
R4	Ensure that formal internal arrangements for dealing with a request for service in Welsh are clear and communicated to all staff.
R5	Ensure that the Association progresses its draft Welsh Language Scheme in the context of the national work being undertaken by the Welsh Federation of Housing Associations and the Welsh Language Board.
<i>Rents</i>	
R6	The Association needs to set clear targets for debt prevention and agree how these will be achieved.
R7	Evaluate whether early contact as per the rent arrears procedure is being achieved and evaluate the impact of early and consistent intervention to help mitigate the risk of rent arrears.
<i>Letting housing</i>	
R8	Publish a lettings standard and ensure that it is made available to all new tenants as part of the lettings process.
R9	Ensure that the exclusions element of the allocation policy is revised to a suspensions policy so that it is compliant with the most recent guidance published by the Welsh Assembly Government and is consistent with Merthyr Tydfil County Borough Council's suspension policy.
R10	Evaluate the effect of the CBLS on sustaining communities and assess impact on turnover of tenancies.
<i>Managing housing</i>	
R11	The Association needs to engage with residents on ASB; ensuring that residents are effectively informed of the options available to resolve issues of ASB and

	evaluate the impact of action for residents.
R12	Ensure that the six weekly visits are carried out for all new tenants and evaluate the impact of the visits and the resources utilised
	<i>Maintaining housing</i>
R13	The Association needs to analyse and understand its repairs performance and demonstrate value for money.
R14	Ensure that the Association provides information to its tenants on the importance of gas safety.
R15	The Association needs to develop a strategy and action plan for dealing with asbestos in its homes.
R16	The Association needs to develop an affordable warmth strategy to reflect the work that is currently being undertaken with tenants.
	<i>Housing for people with support needs</i>
R17	Ensure that IT systems allow ready identification of tenants with support needs to allow action to be taken to tailor services.
R18	The Association needs to ensure that the draft vulnerable tenant maintenance policy, dated 2003, is implemented.
	<i>Strategic direction and continuous improvement plans</i>
R19	The Association should ensure that tenants and external stakeholders are involved in developing Business Plan priorities.
R20	The Association needs to develop realistic improvement plans with mechanisms for implementation and monitoring of those plans.



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