



barcud



Self Evaluation

June 2022

Introduction

The Regulatory Framework applies to housing associations registered and regulated by the Welsh Ministers under Part 1 of the Housing Act 1996. The Regulatory Framework is built upon the principle of co-regulation. Co-regulation means the Regulator and housing associations taking responsibility together for ensuring that the sector and individual organisations are well regulated. This approach requires constructive relationships between the Regulator and housing associations, working on the basis of 'no surprises'.

The Regulator expects associations to:

- be open and honest about risks, issues and challenges they identify and how they plan to address these.
- raise relevant matters with the Regulator promptly.
- work with the Regulator constructively to resolve challenges.
- act voluntarily to address any material concerns identified through regulation.

A robust, evidence based and challenging self-evaluation is fundamental and integral to all associations' strategic corporate planning processes, providing an assessment of how the organisation is performing against its plans and whether it is delivering successful outcomes for tenants and service users and whether it complies with the regulatory standards. It is therefore a key element of the Regulatory Framework and assessment process.

At least once each year, every housing association must therefore produce and submit a self-evaluation which evaluates the quality of the organisation's governance, service delivery and financial viability in delivering its purpose and objectives. It must also include a summary of any material changes relating to those aspects since the last judgement was issued.

There is no prescribed format or process for carrying out a self-evaluation but, as a minimum, the submission must:

- include an account of how the Board knows the organisation complies with each regulatory standard including reference to key performance data and sources of assurance,
- assess compliance with the Code of Governance that the organisation has adopted,
- explain the principal evidence which has been relied upon in conducting the evaluation,
- demonstrate that the process of evaluation has been robust,
- explain how the needs and views of tenants have been understood and considered as part of the self-evaluation,
- identify key strategic risks and associated controls or signpost to other documentation where the key risks are articulated,
- include a continuous improvement plan which identifies any gaps or areas for improvement and shows how these will be addressed (this replaces the Regulatory Assurance Plan).

Background

Regulatory assessment and oversight has been light touch over the last 18 months due to the pandemic. At the same time, the regulatory standards and judgements have been under review, work on developing a new regulatory assessment model to provide increased rigour, consistency and proportionality in reaching judgements has also been ongoing. The last judgement Barcud received was an interim judgement in March 2021, where the association received a standard assessment for Governance and tenant services, and standard for financial viability.

Since the last judgement the focus for the association has been on merger integration, which was 86% complete in March 2022. This covered all departments and any outstanding actions have been moved to the Barcud operational plan for 2022/23. Another project was refinancing - completed in August 2022. Old, expensive loans were refinanced with a private placement of £50m in total from Aberdeen Standard Investments, meaning savings in interest costs and funding of the association's 5 year development programme. A new rolling credit facility was also implemented with Barclays of £20m. Both funding streams are linked to ESG performance indicators. Creuddyn, the business enterprise centre in Lampeter, opened in November 2021 and has been a huge success with all units full and a waiting list now established. The meeting and conference rooms are used regularly by the community.

Strategic Objectives

Our strategic objectives underpin everything we do and in order to achieve them we have to take into account compliance with Welsh Government Regulatory Standards.

- To provide 5,000 affordable, mixed tenure, high quality sustainable homes in Mid Wales by 2025.
- To be an excellent community landlord, which also offers support and care services.
- To be a tenant and resident focused social business, which involves customers at all levels and operates bilingually.
- To work in partnership with local authorities and the Welsh Government to prevent and tackle homelessness in all its forms.
- To be an employer of first choice that supports the local economy and communities.
- To be a sustainable, low carbon organisation.
- To be an organisation with robust governance and finances.

Regulatory Standards

The 'Standards of Performance' (to be known as Regulatory Standards) and any associated rules are set by the Welsh Ministers in accordance with Section 33A of the Housing Act 1996.

Below are the regulatory standards housing associations have to comply with. Compliance is assessed using a 3 tier assessment of fully, partial, or non-compliant.

Barcud has a 5 year corporate business plan which is updated annually and sets out the vision and strategic objectives for the group and how they are going to achieve them, also focusing on risk and assurance, value for money, governance and financial resources. This business plan is available bilingually to all stakeholders, funders, local government, Welsh government, tenants and staff amongst others on our website www.barcud.cymru.

The Board annually assess compliance with the Community Housing Cymru Code of Governance. The association is compliant with the Code of Governance. The assessment is internal and covers compliance, assurance, outcomes and further actions needed. The Board then review progress on the actions identified throughout the year. All other governance documents and policies are reviewed on a rolling basis, with scrutiny from employees through the employee forum and tenants through the Barcud Monitoring Group where relevant. These documents are approved by committees, where there is delegation from Board, or by the Board itself.

Work is ongoing to ensure that Barcud has good knowledge and data in relation to equality, diversity and inclusion (EDI) across all areas of its business including the communities it works in. The 2021 Census information will be published in the summer and will help greatly with that. Barcud is working with Tai Pawb on updating its EDI policy and strategy which will result in an action plan as to how we can improve in this area. Diversity statistics are available from the Ceredigion Local Authority area we work in and are attached as appendix 1 to this report, although these are limited to people on the housing register but will be compared to Census results when they are available. Barcud takes racism and hate crime in the communities it serves very seriously and works in partnership with the police and other 3rd sector parties to ensure no one suffers from such discrimination.

The Barcud board is made up of 12 people, 5 male and 5 female with 2 preferring not to say. Board members are appointed based on skills and knowledge needed and have annual appraisals and skill assessments in order to gain assurance the board can be effective.

Decision making is based on clear, concise and good quality information. Reports to Board or Committees are standardised and items taken into account such as links to:

- Strategic objectives
- Resources
- Risk
- Environmental impact
- Tenant/customers impact
- Equality, diversity and inclusion
- Value for Money/Social Value

The Leadership team meet with the tenant Barcud Monitoring Group (BMG) on a bi monthly basis to discuss strategic items and decision making. The BMG also attend a strategic Board meeting as part of self evaluation so they can give the Board an independent, tenant view on how the association is performing.

The association has a compliance register in order to maintain and monitor regulatory requirements and returns and operates on a no surprises relationship with the regulator, communicating any issues that arise.





**Assurance evidence - corporate business plan on website, code of governance compliance review and action plan, draft updated EDI policy, stat from Local authorities, Board & Committee minutes, Board appraisal documents, Board report templates, Barcud Monitoring Group minutes, compliance register.*

Barcud operates a risk management framework to identify and manage risks:



All risks have a backing document which shows the unmitigated risk score, the mitigated risk score, risk appetite, risk factors and effects, internal controls and assurance. It uses these factors to determine if the risk is controlled or uncontrolled. Barcud adopts a positive approach to risk management and will therefore not only look at the possibility of things going wrong but also be proactive and consider the benefits and opportunities to be gained. An emerging risk agenda item is included in all strategic Board meetings and risks are reviewed quarterly in Audit and Performance committee and strategic risks quarterly in operational Board.

A risk appetite score is set for all strategic/high risks. The appetite is based on the following four point scale to assess the risk appetite for each risk:

-  1 - Avoid/Minimalist
-  2 - Cautious
-  3 - Balanced
-  4 - Open

Avoid/Minimalist - As little as reasonably possible. Preference for the ultra-safe option. Potentially limited reward. Avoiding risk is the key objective.

Cautious - Always opt for safe options with low inherent risk, even if this gives limited potential reward.

Balanced - Preference for safer options with some inherent risk but the potential for greater rewards.

Open - Willing to consider all potential options and take greater than normal risks to achieve rewards.

The majority of Barcud's assurance framework is held in the Performance Management software Pentana. Barcud uses the 3 lines of defence model and examples are below, this is not an exhaustive list.

1. Operational Management Functions

- KPIs
- Financial reports
- Risk Management

2. Internal Compliance Functions

- Policies
- Self evaluation
- Satisfaction surveys

3. Objective challenge

- Internal audit
- Board
- Stakeholder feedback
- External Audit/Accreditations

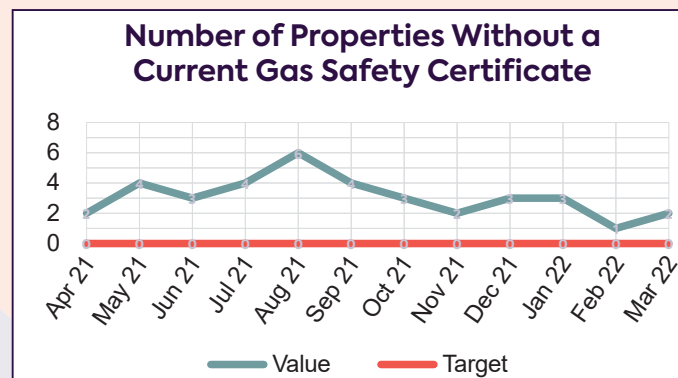
The association had a risk management internal audit in 2021/22 which received a reasonable assurance result.

The association has a business continuity plan in place, along with a policy for ICT disaster recovery.

**Assurance evidence – risk registers, risk management policy, pentana performance management software, board minutes, A&P minutes, assurance framework, internal audit report, feedback from training with Altair, BC policies, subsidiary risk registers.*

In terms of compliancy, a full programme of inspection and testing of heating systems, electrical wiring, asbestos, legionella management and fire risk assessments are undertaken to meet legislative and regulatory requirements. In addition, the association is well on course to meet the new Fitness for Human Habitation Regulations stemming from the new Renting Homes Act, specifically in relation to all properties heated with fossil fuelled appliances having CO detectors installed. Also, all of our properties will be on a five yearly electrical inspection programme by July 2023. These key compliancy areas are independently audited at least once in every three years and quarterly Health & Safety reports presented to each Audit & Performance Committee and to Board on a six monthly cycle.

Landlord Health and Safety Key Performance Indicators are monitored on a monthly basis and reported to Leadership Team, Audit and Performance Committee and Board on a regular basis. Annual cyclical servicing is run on an 11 month basis for compliance and any reasons for a property rolling over the 12 months is reported to board. If it's a tenancy issue the housing department are notified to assist. An example of the trend on gas servicing compliance for 2021/22 is below.



The peak is due to the pandemic and issues with entering tenants houses. This was an anomaly and is not expected to reach that level again.

Tenant profiling captures specific needs of tenants e.g. language, visual impairment. We produce large print versions of documents and the Tenant Newsletter. We have previously produced a recording of the Tenants Handbook, have Polish language Tenancy Agreement and access to a Polish translator for 1 to 1 discussions. We deal with advocates for specialist services and will signpost to specialist services. One advantage we have is that our respective teams are patch based and know their tenants' individual needs e.g. know if a tenant is autistic and requires a definite set time for an appointment for repairs. For Tenant Involvement meetings we offer transport, specialist transport, help with child care costs. A 'Home Forum' exists for those tenants who do not wish to join meetings. Internal transfers to more suitable accommodation also happen regularly for our tenants if they have requested such.

During 2021/22, the association sent out a STAR Survey to all its tenants in compliance with Welsh Governments wider rent settlement initiative to undertake a standardised tenant satisfaction survey. 42% of Barcud tenants completed the survey, higher than the 30% usual return rate. Below are the headline results:

	Benchmark	2021 Result
Satisfaction overall	81%	80%
Quality of home	81%	76%
Safety and security of home	85%	85%
Repairs and maintenance overall	74%	72%
Neighbourhood as a place to live	82%	80%
Value for money of rent	80%	78%
Value for money of service charge	65%	64%
Easy to deal with	82%	78%
Listens to views and acts on them	69%	58%
Dealing with anti-social behaviour	63%	53%
Taking part in decision making	58%	65%
Having a say in service management	55%	55%
Trust Barcud	78%	68%

Of the 13 returns Barcud:-

- Either records the same satisfaction level or is within 2% of ARP's benchmark in 7 of the categories.
- 7% higher on 'taking part in decision making' category.
- Up to 5% lower on 'quality of home' and 'easy to deal with'.
- Up to 11% lower on 'listens to views and acts on them', 'dealing with ASB' and 'trusts Barcud'.

The board also received an article on Tenant Satisfaction prepared by Denise Raine Director of Acuity, a leading provider of Tenant Satisfaction Surveys who noted that tenant satisfaction levels have fallen by up to 20% during the pandemic. Despite this Barcud will be reviewing services where we are below the benchmark and look for areas of improvement.

All Barcud's KPI performance is reported to the Barcud Monitoring Group regularly where it is scrutinised and feedback is received as to how we can improve services. Value for Money indicators are reported in the Annual report. The association is looking to improve its transparency on performance during 2022/23 and will be including performance information in the tenant newsletter and on the Barcud website.

**Assurance evidence – KPIs, H&S reports, board minutes, STAR survey, annual report, BMG minutes.*

Tenants are at the heart of everything Barcud does and tenant involvement is key in delivering all of our Strategic objectives. The Barcud Monitoring Group is an independent, constituted tenant involvement group, which Barcud funds annually. Their terms of reference state the objectives of the group are:

- To provide an accountable and representative structure.
- To influence the future of Barcud by actively pursuing involvement and consultation with tenants and the wider local community.
- To enable tenants to review the management and maintenance of Barcud properties
- To positively promote the work of the Monitoring Group within the wider area particularly with other community and support groups.

We have a tenant involvement strategy which encourages and enables tenants to get involved. From this stemmed a tenant involvement action plan and the objectives of the plan are:

- 1. To improve the housing management service by listening to and consulting with tenants and informing them of the difference their views have made.*
- 2. To develop a culture of involvement, accountability, openness and transparency so all service delivery is open to tenant input.*
- 3. To ensure tenants are fully able to get involved at their chosen level by providing training and resources.*
- 4. To ensure tenants are fully involved in agreeing the principles of investment priorities in the housing stock during Barcud's five-year capital investment programme and in monitoring its progress.*
- 5. To work with the wider community and partnership agencies in order to improve the quality of life for our tenants and leaseholders and the communities they live in.*

Throughout 2021/22, there have been over 146 activities that tenants have been involved in, this ranged from meetings with the Leadership Team and Operational Management Team, to void visits and sheltered scheme forums. The first face to face sheltered scheme forum since the Pandemic was held in May and feedback from tenants was extremely positive:

What do you enjoy about the Forum?

The camaraderie and good humour

The social atmosphere

Getting together and enjoying each other's company

The company and staff

Getting together with others, it was our first and we really enjoyed it

Meeting nice people

Meeting others from other sheltered schemes, being kept up to date with what's going on, and the different entertainment

Other comments

The staff were great

It is so good to see how the staff look after and attend to all the residents, making sure we enjoy

Much appreciation for all the hard work arranging the meetings, speakers, lovely cups of tea

Barcud hold an annual tenant conference and Tenant Liaison Forum meetings twice a year, where many topics are discussed and question and answer sessions are held with staff. Topics covered include rent and service charges and the Welsh Housing Quality Standards.

Members of the Barcud Monitoring Group review and monitor performance against KPIs and hold staff to account for any under performance they identify. There is also a policy review group who work with staff to ensure housing and tenant facing policies are fit for purpose. The value of this was recognised recently when the fire safety in sheltered schemes policy was reviewed, with tenant input being invaluable from the point of view of the people who live in the schemes.

As part of the self evaluation process, the BMG will attend the strategic Board and give an independent review as to how they think Barcud is performing as a housing association and against the regulatory standards.

Barcud has a fair and transparent mechanism for setting rents, with affordability at the forefront of decision making. All rent increases comply with the Welsh Government 5 year rent setting policy.

Barcud has signed up to the Community Housing Cymru sector wide affordability principles:

- **Affordable:** We will consider the total costs of renting homes and incomes to understand what is affordable for our tenants, and ensure that tenants have the greatest opportunity to sustain their tenancies and thrive.
- **Sustainable:** We will set rents that allow us to continue to provide high quality, safe, warm homes for the people who need them in the communities we serve.
- **Engage:** We will involve tenants to develop and review our approach to rent setting, and inform our decisions on rents.
- **Fair:** We will work to ensure that rents and other charges are set fairly and our homes and services represent value for money.
- **Accountable:** We will be open, transparent and accountable when we make decisions on rents.

When setting affordable rents Barcud takes into account the Joseph Rowntree Foundation model. This is designed on the basis that it is unaffordable for tenants on low incomes to spend more than a third of their income on housing costs. Barcud also utilises the Welsh Housemark affordability tool to assess the affordability of its potential rent increases. This affordability check includes service charges where applicable. All of the above is referenced in the Barcud rent policy which is reviewed annually with input from the Barcud Monitoring Group (BMG).

During assessment of the 2022/23 rent increases, officers and the BMG discussed the proposed changes to the affordable rent levels in Ceredigion and Powys. These changes were modelled in the CHC affordability tool to check they were within the 30% affordability rule when taking into account other household cost such as utilities and council tax. The BMG agreed the proposals and asked for further modelling to be done based on higher utility costs due to the external environment. A fabric first approach to capital work on existing properties was also discussed in order to reduce heating bills. Results from the recent STAR survey were also taken into account which covered a range of our tenants across Ceredigion and Powys. 42% of tenants completed the survey. The report states:

“it is good to see that the current perception of the rent value for money amongst tenants is relatively high, with 78% claiming to be satisfied in this regard, the majority of whom were ‘very satisfied’ (43%).

Indeed, perceptions of value for money rating were sufficiently strong that very few tenants even mentioned this issue when asked to rate what future improvements they would like to see.”

Following the guidance of the rent policy, with emphasis on affordability and the Joseph Rowntree model, it was decided to increase some affordable rent targets where the modelling indicated they were moderately under the 30% affordability level. It is worth noting that the affordable rent levels for both Ceredigion and Powys were not increased in 2021/22. If properties were already at the affordable target rent, their rent was frozen. This resulted in an overall average increase of 2.8% across all tenants, below the 3.1% allowed by Welsh Government. 1,339 tenants had their rents frozen.

The setting of the service charges is done as part of the association's budget setting process. The estimated charges are informed by the costs of the previous year, the costs to date, and any specific cost or service standard changes such as inflation. When setting service charges, Barcud complies with all relevant legislation and statutory requirements. For any new services that result in new charges, tenants will be consulted with beforehand. Feedback from the tenant STAR survey on service charges is below.

“The vast majority of the sample pay a service charge, and of these 64% were satisfied with it in terms of value for money, a result which is nevertheless consistent with the benchmark score of 65%.”

Barcud has a Value for Money Policy in place which is due for review, although the principles of the policy are still relevant and being used throughout the association – “VFM is the relationship between the value that is created from the money and resources available. It is achieved through adherence to the 3E’s – getting the business basics right by adopting practices that optimise economy, efficiency and effectiveness. A fourth E, Equity – spending fairly to ensure those in greatest needs are considered – is also a key element of VFM in Wales”.

Part of the VFM work in Barcud is through procurement, raising money for community benefits. This can be anything from asking for a % of a tender amount to be donated to the community benefit fund to specifying the number of local apprentices the contractor must employ during the term of the work. During 2021/22 Barcud had £17k in the community benefit pot, and used this money to:

- resurface community tennis courts,
- purchasing a running machine for a sheltered scheme
- community defibrillators
- £1.5k donated to food banks
- £1k for a community garden scheme

Standard template Board reports include a section on value for money in order for Board to consider any VFM implications on decision making.

Barcud measures itself on VFM performance using the CHC global accounts indicators and reports this performance to the Board, tenants and other stakeholders.

Result from 2020/21 are below:

	Barcud	Average
Operating costs per social housing unit	£2,440	£3,418
Management costs per social housing unit	£1,084	£1,308
Reactive Repair costs per social housing unit	£1,155	£1,138
Major repairs (component rep) per social housing unit	£1,560	£961
Bad debt per social housing unit	£12	£28
Weighted average cost of capital	4.92%	4.7%
Gross arrears	3.6%	4.9%
Total turnover per social housing unit	£6,131	£5,737
Rent void loss per social housing unit	£65	£96

**Assurance evidence - VFM policy, Board report template, Board minutes, Annual Report, tenders, global accounts, VFM graph.*

A detailed 5 year budget is prepared annually in consultation with staff in order to enable the association to achieve its aims and objectives. This is scrutinised and approved by Board and then fed into the 30 year financial business plan using relevant assumptions. Board and Audit and Performance committee receive management accounts which report financial performance against the annual budget, a 2 year forward cashflow, schedules on capital spend and developments and a treasury report that monitors compliance with all covenants required by funders. This and the 30 year financial business plan provides assurance to board members that sufficient funding is in place and the association is financially viable.

Annually the board receives a treasury report and strategy which covers treasury activity, liquidity, borrowing and financial performance on covenant compliance. As at the end of the financial year Barcud was compliant with all of its financial covenants.

The association has tightened the golden rules for covenant compliance and also introduced trigger points for increased risk management. Triggers outline movements towards golden rules and highlight the need for action.

After a risk management session earlier in the year Board agreed what needed to be stress tested in the 30 year financial business plan, in line with the risks identified.

- Rent freeze
- Increase in interest costs
- Reduction or removal of WG dowry
- Inflation increase
- Increase in costs of development and reduction in SHG
- Perfect storm

The above scenarios and results were reported to Board along with mitigations that could be put in place if these scenarios did happen. The stress testing showed Barcud has a robust financial plan in place. Despite this and in light of the external environment it was decided to do some further live stress testing and mitigation work with HQN and the Board in June.

As at 31st March 2022, all subsidiaries of the Barcud group reported a surplus.

Post merger, the two association's assets and liabilities registers have been amalgamated and reviewed and reported to the Audit and Performance committee. This is a process and will be continuously reviewed and updated.

The association has mixed tenure stock across Mid Wales in order to provide the communities it serves with suitable homes for people. The emphasis is always on affordable housing in line with our strategic objectives. The mix of properties is :

General Needs	3,671
Sheltered Accommodation	358
Intermediate Rent	79
Market Rent	20
Rent to Own	44
Leaseholders	186
Shared Ownership	3
Homebuy	3
Garages	656

During 2021/22, 30% of void properties were offered to Local Authorities for the provision of homelessness accommodation. The Care Society had 119 Adults and 18 children accessing emergency accommodation through their housing stock.

The association uses ProVal to assess the value of assets, when decisions need to be made for new developments or potential disposals. When making such decisions Board are also provided with additional information such as housing need.

All our offices are owned, as is our fleet.

All of Barcud's new build properties comply with Welsh Design Quality Requirements (WDQR) as a minimum and our latest developments are being built to near or at Passivhaus standards, with energy performance certificates (EPC) ratings above SAP92. All developments are building performance evaluated to ensure that the structure and fabric 'as built' complies with the performance standards as designed. Part of our new scheme feasibility process also assesses the attractiveness of the environment and the overall level of amenity and services on offer to ensure future sustainability and let-ability of the intended scheme.

In respect of our existing stock and in accordance with our Asset Management Strategy, 20% of the association's properties are surveyed each year to assess their condition against Welsh Housing Quality Standards (WHQS) and also, when void. As at 31/03/2022, we have 3,955 socially rented properties, of which 2,586 (64%) fully meet WHQS. The remaining 1,369 properties consist of 'Acceptable Fails', with 15.3% attributable to 'Timing of Remedy' issues and 8.9% to 'Resident Choice'. The Timing of Remedy issues relate almost exclusively to properties where SAP levels are either below SAP65 or where we are awaiting new EPCs following a delay in completing these new assessments due to Covid/no access. The association's recently approved Decarbonisation Strategy advocates a 'Fabric First' approach which is in line with current WHQS 2023 proposals. Our planned component replacement programme has been re-structured and now prioritises windows and doors, EWI and heating replacements and this approach has been supported and approved by our Tenants' Panel. The association favours Air Source Heat Pump (ASHP) installs, coupled with solar PV or High Heat Retention electric storage heating to help address the low SAP issue. Consultation continues with our tenants on affordable warmth concerns and we are in the process of developing an Affordable Warmth Policy to support our Decarbonisation Strategy as we recognise the importance of minimising energy costs for our residents whilst trying to reduce our overall carbon footprint.

During 2021/22 the association replaced and/or installed:

External Wall Installation	20
PVs	22
Air Source Heat Pumps	20
Other Heating	70

Doors & Windows	65
Roofs	53
Kitchens	132
Bathrooms	97

*Assurance evidence – pentana, WHQs report, decarbonisation strategy, KPIs, scheme feasibility reports, board minutes.

Continuous Development Plan 2022/23

RS1	c) Sets and delivers measurable, evidence based commitments across all areas of its business in relation to EDI, reflecting the diversity of the communities it works in.	
Actions	Review of EDI policy/strategy and implement action plan - Use census information to measure our tenants/board/staff compared to our communities.	Due By Mar 2023
Responsible	Director of Corporate Services / Director of Housing and Support	
RS3	a) Keeps tenants safe in their homes and promptly identifies and corrects under performance of non compliance on landlord health and safety matters.	
Actions	All electrical safety tests to be on a 5 year basis. Carbon monoxide alarms fitted where needed.	Due By Jul 2023 Dec 2022
Responsible	Director of Development and Asset Management	
RS3	c) Achieves and maintains a high level of tenant satisfaction with services.	
Actions	An internal working group has been set up with tenants to focus on service improvement in the following areas. Service charges, ASB, digital services, repairs, tenant involvement and communications and contact.	Due By Mar 2023
Responsible	Director of Housing & Support	
RS3	d) Makes landlord performance information available to tenants.	
Actions	Add performance information to tenants newsletters and website.	Due By Dec 2022
Responsible	Director of Corporate Services	
RS4	d) Can demonstrate diverse tenant views and expectations inform the development and review of housing and related services, and the response to any under-performance.	
Actions	Request tenants who are involved to complete an EDI form and monitor EDI at tenant events. Compare to demographics of area using Census information.	Due By Mar 2023
Responsible	Director of Housing & Support	
RS6	a) Determines its strategic approach to value for money, ensuring the approach relates to its social purpose and makes strategic and operational decisions in line with it.	
Actions	Review value for money policy and create a VFM framework and action plan.	Due By Dec 2022
Responsible	Director of Corporate Services	
RS6	b) Can demonstrate to its stakeholders and tenants, that it achieves value for money in delivering services.	
Actions	Include a VFM statement in the annual report.	Due By Mar 2023
Responsible	Director of Corporate Services	
RS8	a) Has an accurate and up to date understanding of its assets and liabilities.	
Actions	Further work needed on contract register. Review of asset management strategy.	Due By Dec 2022
Responsible	Director of Development and Asset Management	
RS9	a) ensures homes meet all applicable standards, rules and statutory guidance issued in connection with quality of accommodation, including WHQS.	
Actions	Affordable warmth strategy. Continue reduction of acceptable fails.	Due By Dec 2022
Responsible	Director of Development and Asset Management	