

Achieving and Maintaining the Carmarthenshire Homes' Standard Plus

Appendix E – CHS+ Compliance Policy

March 2020



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1. The purpose....

- 1.1. The purpose of this document is to confirm our approach in achieving and maintaining (and further improving) the Carmarthenshire Homes' Standard (CHS). It takes account of the guidance produced by the Welsh Government in 2015 in terms of compliance and verification.

2. The context....

- 2.1. Carmarthenshire has been committed to achieving the CHS by providing homes for council tenants that are modern, safe, fuel efficient, situated in well maintained neighbourhoods and are well managed.
- 2.2. The CHS is an amended version of the Welsh Housing Quality Standard that has been defined by the tenants themselves. In 2006, the Council started its ambitious programme to achieve the CHS by the end of 2015.
- 2.3. We are pleased to say that we have delivered this programme, on time, to homes where tenants have agreed to have the work carried out. Even though these programmes have been delivered, this does not mean the end of the CHS. There remains much more to do.
- 2.4. During 2015, we introduced the concept of the Carmarthenshire Homes Standard Plus (CHS+), building on the success of the CHS and extending to ensure we maintain and improve on what has been achieved.
- 2.5. We have acknowledged the importance of strategic asset management in providing the foundation for our investment plans, as well as the central role of supporting tenants and residents in everything we do, is critical to the delivery of the plan. The 2020/23 business plan covers two key themes that have been identified in terms of future investment. These are:

- 1. THEME 1- Supporting tenants and residents.**
- 2. THEME 2- Investing in our Homes' and the Environment.**
- 3. THEME 3 - Providing more homes.**

3. Our approach to achieving and maintaining the CHS+ in the future

3.1. The following table will confirm our approach in achieving and maintaining (and improving) the CHS+ in the future. Where appropriate, it will confirm policy decisions that have already been made e.g. through documents like our CHS+ Business Plan 2020-23. It will also identify any current gaps, and how they will be addressed, to deliver the standard in the future.

<p>What is our policy statement?</p>	<p>In 2015 we achieved the CHS+ to homes where tenants have agreed to have work completed - well before WG's target of December 2020. This is in line with our agreed assumptions that the standard of our homes will be to the CHS+; and replacement programmes will be based on condition, not time.</p> <p>Tenants tell us that getting repairs done on time and maintaining homes to a good standard is important to them. Maintaining the standard is now a statutory duty, and the Council has made a commitment to achieve and maintain the CHS, which states that all homes will be:</p> <ul style="list-style-type: none"> • in a good state of repair; • free from damp; • free from significant condensation; • structurally stable; • in safe and attractive environments; • suitable for the household; and • managed to the CHS+
<p>How have we developed the approach?</p>	<p>The commitment and support of our tenants' and Members' continues to be important to us to ensure that we maintain and improve on the CHS+ in the future.</p> <p><i>Tenant and residents' engagement and communication</i></p> <p>Tenant and community engagement has always underpinned the delivery of the CHS+, but we want to do more. We want to get better by engaging as widely as possible and maximising opportunities to help build stronger communities.</p> <p>We also believe we should give our tenants the opportunity to influence decisions about their homes, the area they live and ensure the services they receive achieve value for money. Our vision is: -</p> <p style="text-align: center;"><i>“To make it easy and inviting for tenants to get involved in shaping strategic decisions and improve services through meaningful involvement by ensuring residents have the relevant skills”.</i></p>

What are tenants telling us?

During the summer months we undertook a tenant satisfaction survey. In total, 2,087 tenants took part in the survey, which represented a 29% response rate overall. A quarter of the total number of responses was collected online (513), and 82 surveys were completed in Welsh (4%).

What were the headline results and how do they compare with others?

Tenant Satisfaction across the housing sector in Wales ¹				
Question?	Housing Assoc.	Voluntary Transfer	Retained Councils	CCC
Satisfaction with: service	90%	83%	78%	82%
repairs and maintenance	81%	78%	71%	75%
listening and acting on tenants' views	76%	73%	61%	64%

What happens next?

- Further in depth analyse of results to get better understanding of differences in satisfaction rates by age, by ward and property type;
- Revamping of our approach to the way we listen and act on tenant’s views;
- Using results to inform our service planning and developing and implementing actions to further improve rates.

Further Development and new opportunities

Retrofitting our existing housing stock with low carbon technology

As part of developing our decarbonisation plans, we are working with the Welsh School of Architecture at Cardiff University to install low carbon technologies on a small number of our homes. We have identified a small scheme for which we will receive support for the cost of technologies from the SPECIFIC 2 LCBE project which is part-funded by the European Regional Development Fund through the Wales European Funding Office.

The approach combines renewable energy supply, energy storage and energy demand reduction technologies creating a holistic approach to retrofitting. The solutions proposed are:

- External wall insulation (EWI);
- Loft insulation;
- LED lighting;
- Mechanical ventilation with heat recovery (MVHR);
- High efficiency gas boilers;
- Solar PV (location dependent on the orientation of each house); and

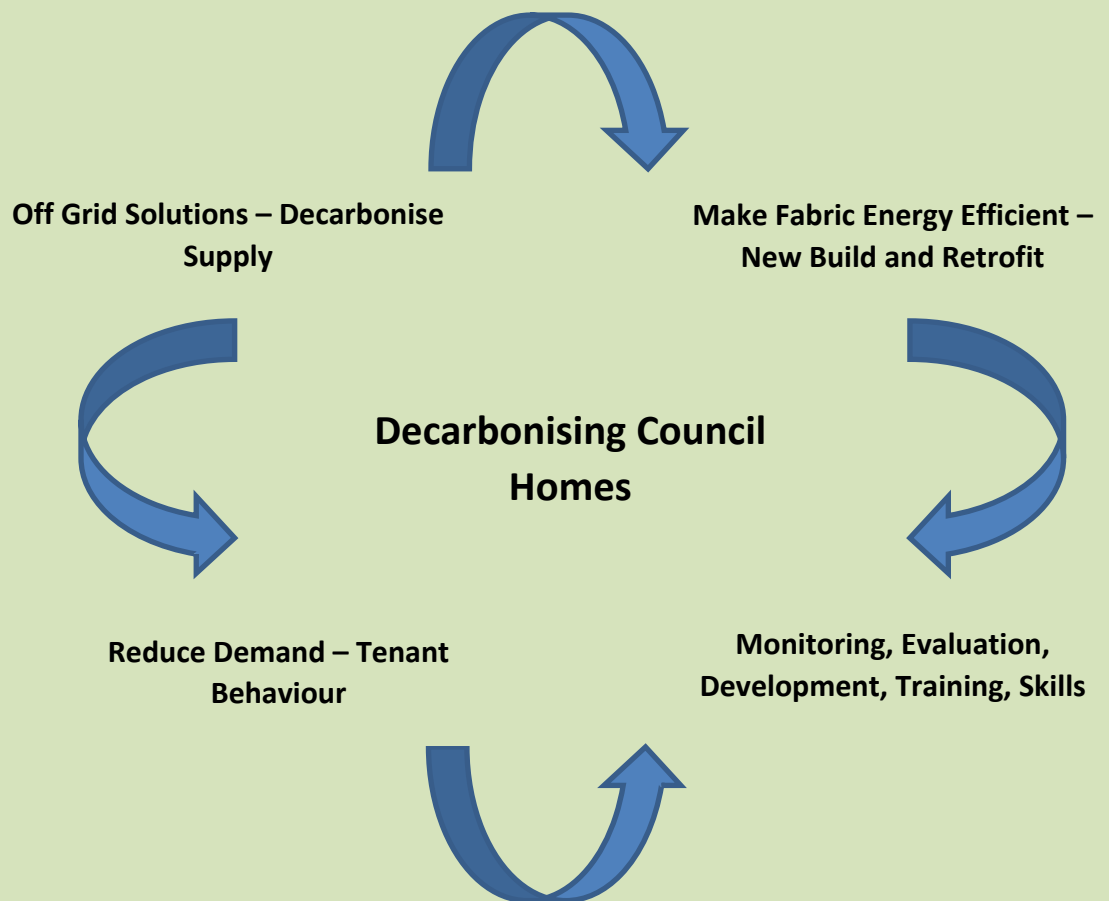
- Lithium ion batteries.

Where tenants have agreed to participate in this scheme, discreet monitoring equipment has been installed to measure the environmental conditions and energy use in the homes before and after the work has been carried out.

We will be analysing the results of the installation of low carbon technology in terms of costs, benefits to tenants and ease of use.

Homes as Power Stations – Decarbonising Council Homes

Aligning with the above work, we also want to maximise the impact of the Swansea Bay City Region Deal 'Delivering Homes as Power Stations' project. We see this as a huge opportunity for Carmarthenshire and we are currently developing a model that could contribute to reducing CO2 emissions, enable affordable warmth, improve health outcomes and reduce the burden on social care and healthcare whilst developing a local supply chain.



We believe adopting a partnership approach will offer us the greatest opportunity to deliver our ambitions, keep up with emerging and developing technology, provide the opportunity to monitor the impact on tenant’s bills and health and adjust our programmes accordingly. We will work in partnership to develop and deliver the Decarbonising Council Homes model:

Decarbonising Council Homes - How will the model work?

- **Make Fabric Energy Efficient** – we will ensure that our extensive new house build and retrofit programmes integrates new technologies to allow homes to generate, store and release energy;
- **Monitoring, Evaluation, Development, Training, Skills** – we will focus on smart technologies in relation to energy demand management and ensure that we incorporate leading research to monitor the effectiveness of emerging technologies. We will aim to attract new sector supply chains and high value manufacturing and construction operations to deliver the skills and services we need to meet our ambitious plans.
- **Reduce Demand – Tenant Behaviour** – we will help tenants to better understand their fuel use and living environment. We will work with tenants to provide training on the use of the new technologies installed in their homes and provide remote assistance for those that need it.
- **Off Grid Solutions – Decarbonise Supply** – we will explore our natural environment and harness off grid energy sources such as wind and water. To help to generate sustainable and affordable energy to homes and address fuel poverty.

To further develop the model and establish the appetite of the market we will carry out an Early Market Engagement (EME) exercise in 2020/21. This will inform us on how best to approach and deliver the project.

Approach to fire management

Our approach to reviewing fire risk assessments for our purpose-built blocks of flats, including sheltered schemes has been to assess the likelihood of fires occurring, and any person(s) who may be put at risk from a fire. When carrying out the assessment we have also taken into consideration that fires can be started accidentally, through carelessness or started deliberately.

For each block of flats, where we have identified improvements to be made and an action plan has been developed. This provides a record of present risks, together with an indication of the scope of the changes and/or improvements which need to be provided to minimise the risks present. The risk assessments are monitored by the CHS+ Working Group, as set out in our governance structure.

Radon Testing Programme

Following guidance issued by the Welsh Government, Public Health Wales and Public Health England (PHE), Carmarthenshire County Council are undertaking a programme of radon testing in all our properties located in areas where there is a higher probability of radon levels. All landlords are required to do this as standard practice.

Officers from the Council will contact tenants and visit their homes to install the detectors, one in the living room and one in a bedroom. Radon detectors are safe and simple to use and can be placed discreetly on cupboards / wardrobes / shelves etc.

The detectors will need to remain in place for a period of 3 months, and at the end of the test period will be collected by our officers and sent to PHE for analysis. We will contact tenants with the results and let them know if we need to act in their home to reduce radon levels to as low as possible.

Older people's future housing

The evidence of what is needed to meet older people's future housing and accommodation requirements suggests that a sophisticated mix of housing models and approaches will be required over the next 10-20 years. This range covers general needs housing, specialist housing (i.e. housing specifically for older people) and care-based provision (residential/ nursing care, hospital-based care).

Investing in sheltered housing

Demand for our sheltered housing remains high generally, but we need to ensure that the right type of support and facilities are in the right schemes. Some schemes are very popular whilst others less so because of things like their location and/or access to amenities.

During 2018/19 we assessed the current standards and condition of our sheltered housing schemes and started a programme of upgrading. As part of our programme we continue to challenge whether schemes will meet the expectations of future residents over the next 10 to 20 years.

Developing assisted living options for older people

We will consider the requirements and options to develop independent and supported living at Delta Lakes, Llanelli, for rent and for sale. This will include options for older people with learning disabilities and older people living with mental health conditions. The Delta Lakes development will contribute to our ambitious programme to deliver over 1000 new affordable homes over the next 10 years.

Assisting with regeneration plans

In 2018 the Council worked with residents, and other key stakeholders, to develop a masterplan for the potential regeneration of the Station Road area in the Tyisha ward, Llanelli. Station Road is located between Llanelli Town Centre and the proposed Well-Being village in Machynys.

Residents and stakeholders identified the following issues:

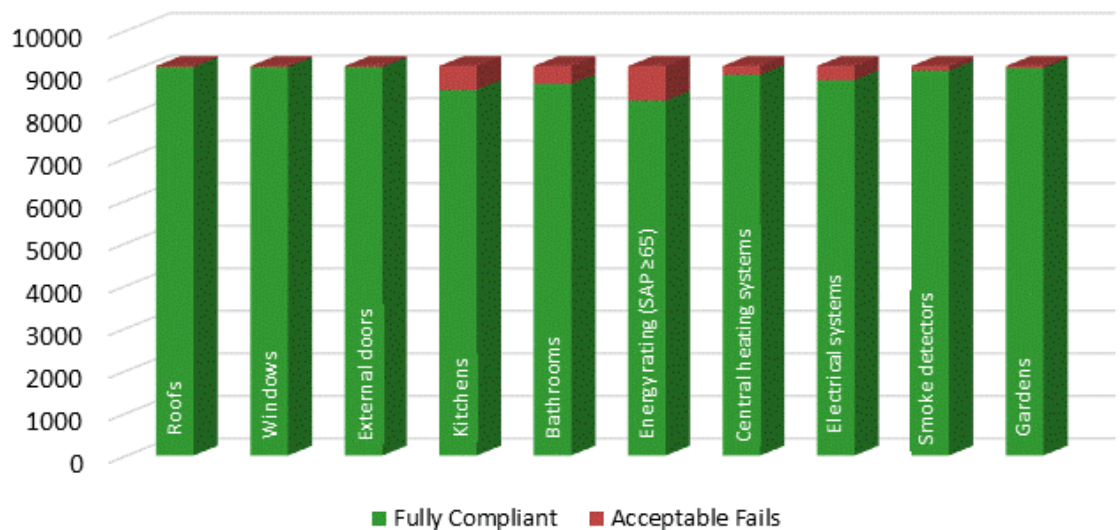
- Tackling drug taking/anti-social behaviour and crime;
- Improving the environment in general, including addressing the issues of traffic, providing better transport links, parking, litter and fly tipping;

- Addressing low demand and associated anti-social behaviour at current housing accommodation, the 4 Ty's, Clos Sant Paul and the private rented sector as a whole; and
- Creating more community facilities and opportunities for education, training and employment.

We have developed a transformational plan for the area. The main elements involve developing the area around the Railway Station to create a gateway into the town to include new housing, environmental and street scene enhancements. We have moved these plans forward and gained agreement from Executive Board to develop an action plan.

What has been achieved to date?

The following table sets out our achievement of meeting the CHS+ in 2015 by components, together with the annual programme to maintain compliance of the CHS+.



The previous CHS+ Business Plan 2019-2022 has achieved a number of notable successes over the last 12 months: -

We have:

- Spent over £15m to maintain the CHS+ in tenants' homes;
- Delivered nearly 1000 affordable homes in four years;
- Completed 530 adaptations, with over £1.9m being invested to ensure tenants' homes meet their needs;
- Conducted a STAR tenant satisfaction survey. A questionnaire was sent out to 5,000 tenants selected at random achieving an impressive 29% response rate;
- Introduced "our approach to tenant involvement" which sets out our vision for future tenant engagement and involvement in strategic decisions;
- Developed a three-year Community and Environment Programme of works to be carried out on estates, helping to improve the health and well-being of our tenants;
- Carried out over 30 community tidy up events;

- Adapted the planning for real model (an innovative approach to community engagement used in the Tyisha area in Llanelli), successfully engaging with the community, stakeholders and partners to produce themed action plans;
- Managed improvements and lettings of over 800 homes, including new homes added to our stock;
- Started to build over 30 Council new build homes at Dylan and Garreglwyd;
- Housed over 60 households who have specific needs through our Accessible Housing Register (AHR);
- Registered over 3000 applicants for our Choice Based Letting scheme, Canfod Cartref, giving tenants more choice, which will make tenancies more sustainable; and
- Successfully managed the transition of 1200 tenants onto the Universal Credit system.

What have been the wider benefits of delivering the CHS+?

Community Benefits

The Council is committed to:

- Contributing to the social, economic and environmental well-being of the wider community;
- Asking tenderers to deliver community benefits in our tendering activities through the delivery of the contracts or frameworks awarded;
- Maximising the value for every pound we spend, applying a community benefits approach to any tender valued over £1million; and
- Capturing and recording community benefits utilising WG's community benefits measurement tool.

For contracts completed in 2018/19, two contractors were used through the South West Wales Regional Contractors Framework. Approximately £800,000 of CHS+ works were carried out in total via the framework, achieving the following results:

- For every £1 spent, £1.61 was reinvested into the Welsh economy;
- 53% of the total expenditure was spent on businesses based in Wales
- £57,765 was contributed to the Welsh economy in the form of cash contributions or sponsorships
- £6,700 was contributed to the Welsh economy in the form of in-kind donations of labour, goods and services during the period covered by this submission
- people were hired during this period who were previously unemployed, and who will continue to be employed;
- Over 49 weeks of training was provided, including:
 - 3 apprenticeships started and over 21 weeks carried out;
 - 2 work experience / internship opportunities were started and completed with over 21 weeks completed in total;
 - 2 accredited training opportunities were completed with over 5 weeks in total; and;
 - 8 non-accredited training opportunities were completed with over 2 weeks in total.

How will we go about maintaining the CHS+ in the future?

Our agreed assumptions that the standard of our homes will be to the CHS+ and replacement programmes will be based on condition, not time.

Our on-going consultation has identified five key themes in this area:

- **Repairs and Maintenance** - proper and timely maintenance, consistent service, maintain homes to a high standard and continue to improve the housing stock;
- **Internal Works and Servicing** – heating, bathroom and kitchens, soundproofing in flats, removal of old plumbing and electrics and options of a newer kitchen;
- **External Works and the Environment** - roofs, removal of moss, rendering, tackling dampness, paths, solar panels, responding to requests for paths, provide a home that is secure, fencing, painting of outside of houses, garden walls and improve communal areas;
- **Void Homes and Safer Communities** – make void properties available for letting as quickly as possible, minimising rent loss and maximising the housing available, whilst striving to meet CHS+; and
- **Improving Standards** - improvements which result in tenants maximising their income/saving money on utilities, a standard that doesn't stand still and provides service improvement.

The investment required to address these themes have been built into the HRA Capital Programme 2020/2023:

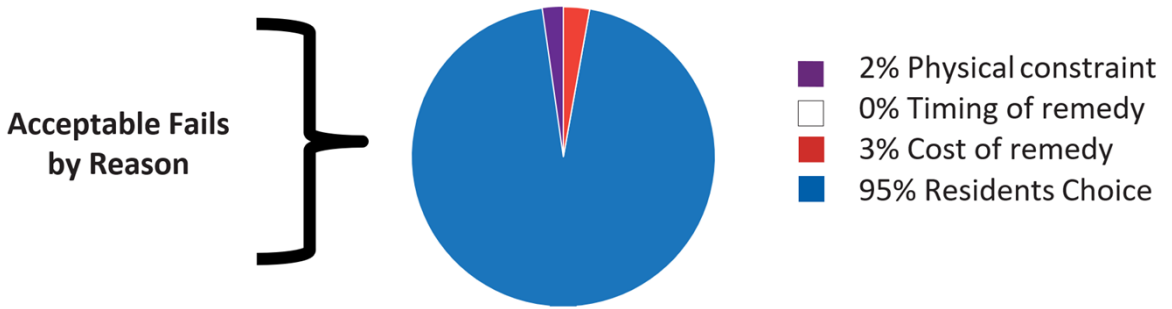
CAPITAL SPENDING TO: -	Budget 2020/21	Budget 2021/22	Budget 2022/23
	(£000s)	(£000s)	(£000s)
Maintain the standard:			
Internal works - kitchens, bathrooms, electrics, heating	1,263	1,248	1,300
EWI, Render and Fascia (inc. gardens)	2,756	2,500	2,500
Roofing	1,800	1,680	1,764
Structural works - Estates and boundary walls (inc. identified structural works)	1,435	785	170
Voids and Major Works to homes	3,000	2,500	2,000
External Works	180	150	150
Decants	150	150	150
Support Tenant and Residents:			
Sheltered Scheme Investment	3,020	2,270	2,270
Adaptations	1,500	1,500	1,500
Environmental works	380	380	380
Provide more affordable homes:			
Housing Development Programme	16,000	19,195	16,430
Decarbonisation:			
Works to deliver decarbonisation	1,671	1,458	1,425
Support the delivery of CHS+:			
Programme management	643	656	669
Stock condition information	100	100	100
Risk Reduction Measures	598	417	417
Sewerage treatment works & associated costs	184	220	160
TOTAL	34,680	35,209	31,385

CAPITAL FUNDING FROM: -	Budget 2020/21	Budget 2021/22	Budget 2022/23
	(£000s)	(£000s)	(£000s)
Welsh Government Grant - MRA	6,120	6,120	6,120
Welsh Government Grant - IHP & other	3,800	900	5,000
Direct Revenue Financing	10,000	10,000	13,281
External Borrowing	14,760	18,189	6,984
TOTAL	34,680	35,209	31,385

How will we deal with homes that do not currently meet the CHS+?

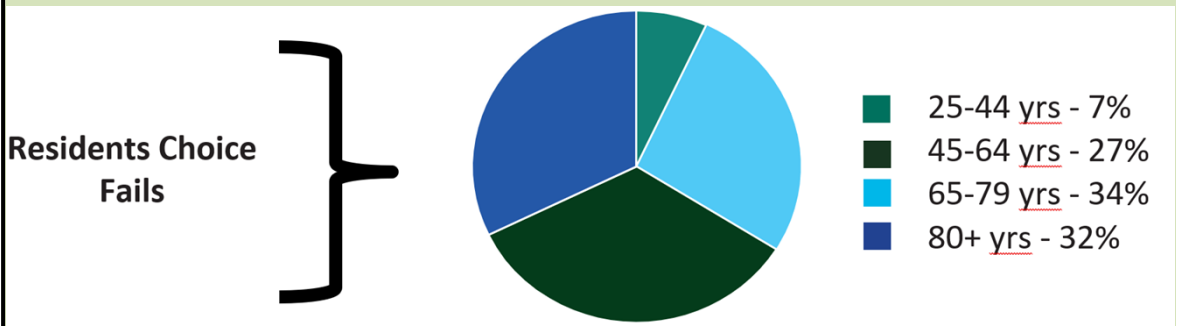
There are some homes that currently fail to meet the CHS+. These are known as “acceptable fails”.

Some tenants have chosen not to have the work done (Residents’ choice) because they were happy with their homes, have made their own improvements or some, particularly older tenants, do not want the disruption. This is, by far, the main reason why homes do not currently meet the standard.



We know that 95% of our acceptable fails are as a result of residents’ choice. The remaining 5% being the cost of the remedy or physical constraints.

We also know that 32% of the residents who chose not to have the CHS+ works completed are aged 80 or over and a further 34% are between the age of 65 and 79.



For homes where part or some of the work has previously been declined, we will contact tenants who have previously declined CHS+ works to discuss any issues they have and agree with them when works are to be programmed.

For empty homes where there is some or all of the CHS+ work to be completed we will make void homes available for letting as quickly as possible, striving to meet customers’ expectations. We will achieve this by:

- Completing individual options appraisals if homes are no longer fit for purpose to determine best course of action, including considering demolishing homes, or disposing of them;

- Making sure that homes are maintained to our standards and any repairs from previous tenants have been carried out before a new tenant moves in, together with making sure gardens are clear of rubbish and safe to use;
- Make void properties available for letting as quickly as possible, minimising rent loss and maximising the housing available, whilst striving to meet CHS+;
- Ensuring every new tenant receives relevant information about their new home including information on boiler inspections, asbestos advice, Energy Performance Certificates (EPCs), electrical tests, recycling and service charges if applicable; and
- Providing additional investment to bring the “back-log” of major works voids back into use.

We believe that it is in the best interest of tenants, and to protect our investment, that tenants will no longer have the option to decline electrical works including the installation of hard-wired smoke detectors and Carbon Monoxide (CO) detectors. We will achieve this by:

- Continuing our annual programme of safety checks on gas fires, and gas or oil boilers, and only replace boilers with energy-efficient condensing boilers, when defective and no longer economical to run; and
- Checking homes have the appropriate smoke alarms, heat detectors or carbon monoxide devices, and discussing with tenants how we can upgrade these;
- Gaining access to ensure that the necessary works are completed; and
- Installing servicing timers when we gain access (where a tenant repeatedly does not give us access), to help tenants understand and manage their responsibilities under their tenancy agreement and help us to protect the lives of tenants.

Have we any plans to improve the CHS +?

As has been stated our CHS+ Business Plan takes account of supporting tenant’ and residents in their home, increasing the supply of affordable of homes as well as maintaining the standard to existing homes.

We are looking to improve the existing standards to maintain and this will need to be carried out in partnership with tenants and members.

CHS was originally set by our tenants and it is very important that any changes are driven by them, within the financial resources that are available. Examples of areas that may be considered include:

- Reviewing specification of key components e.g. bathrooms/kitchens
- Increasing technology in the home to save money; and
- Developing a different standard for older people’s accommodation to suit future needs

How do we go about monitoring

As well as our reporting mechanisms to Welsh Government our CHS+ compliance is monitored and reported through a robust governance structure that includes: (Subject to change)

progress on the CHS+?

- A cross departmental Director led Housing and Regeneration Strategic Team
- Operational sub groups aligned to our three main themes
- A Project Working Group focusing on financial monitoring
- A Housing Services Advisory Panel consisting of tenants, members and officers; and
- Tenant Involvement through challenge panel, community events, social media, single issue meetings and tenant feedback.

We also have a Corporate and Departmental Performance Management Framework that monitors quarterly/ monthly performance on key CHS+ measures. Measures are also reported through our Scrutiny and Improvement Plan processes.

How do we prepare our financial plan to deliver our work programmes to maintain the standard?

As part of the development of the annual CHS+ business plan we;

- Assess variations in forecast expenditure and income, including likely rent increases and interest payments,
- Consider emerging pressures and opportunities in consultation with service managers and tenants e.g. relating to what matters to tenants, new legislation, demographic changes and asset management priorities,
- Carry out a cost certainty exercise over three, five and 30 years (three-year detailed component analysis); and
- Confirm level of investment possible in relation to our borrowing cap.

In order to make sure we are fully equipped to maintain the CHS (+) in the future we are now investing in a new HRA Business Planning model, developed by Capita Housing and Consultancy. The model is specifically designed for use with the new financing regime for local authorities with retained stock.

The model generates a full set of revenue and capital cash flows, based on the best currently available local information. It produces a range of summary tables and charts, offering flexibility in how we use it. With a relatively few numbers of input, the model will produce a full set of forecasts. More complex modelling can also be carried out if needed.

How do we manage the stock information to inform future planning to maintain the CHS+?

Stock Condition

Before implementing the CHS an internal asset management database was developed to produce the programme of works. This was populated through an 80% stock condition survey and information received from major works programmes at the time. The remaining property data was modelled giving a high level of accuracy to achieve the CHS.

Managing housing assets goes beyond just investing in good repair and improvements. Asset management is also about reviewing and potentially changing the asset base to end up with the right accommodation in the right location, supported by excellent, flexible services for our tenants. It must consider quality and value for money, particularly the whole life of a home and how running costs will affect tenants.

By applying an effective asset management strategy to our 9,000 plus homes, it will also enable us to meet our legal requirement of maintaining the CHS+ in the future.

Consequently, our approach is underpinned by the following principles:

- Carrying out regular stock condition surveys to assess condition, use and required investment;
- A planned maintenance programme achieving economies by replacing components e.g. kitchen, bathrooms etc. based on need, not time;
- A regular cyclical maintenance programme for certain components in a home e.g. heating appliances, electrical upgrades and external painting;
- A continual programme of works to meet Health and Safety requirements e.g. asbestos removal and structural repairs;
- A maintenance service to respond to unplanned failures in homes and to prevent deterioration in their condition e.g. boiler replacements;
- An efficient and effective voids repair service, helping to quicken the repairs process and save money by carrying out CHS+ works when a home becomes empty (or as soon afterwards), if the prospective tenant requests it;
- A programme of environmental estate improvements that is strategically targeted;
- A basic check to all homes on an annual basis through our existing visits;
- A more in-depth visit to homes where there are potential issues in terms of condition, tenancy or welfare issues;
- Continuing to invest in adapting homes to suit the needs of tenants;
- Understanding the future investment needs for our sheltered housing stock, linking in with our Care Home development programme;
- Completing individual options appraisals if homes are no longer fit for purpose to determine the best course of action, including considering demolishing homes, or disposing of them;
- Completing options appraisals on sites that may need changing/converting into homes that can better meet housing need; and
- Delivering the targets within the Affordable Homes Delivery Plan.

When considering the above we will:

- Engage with tenants and Members;
- As far as is possible, meet tenants' aspirations and priorities;
- Maximise our assets and minimise liabilities;
- Seek value for money in all investment decisions and contract procurement;
- Comply with current and future regulations;
- Create good neighbourhoods for council tenants and their neighbours; and
- Provide assurance to the council's auditors and regulators that its housing service is well managed.

We fully recognise that in order to achieve the above we must ensure that:

- The right structures, skills, resources and capacity are in place to manage future programmes, procurement and contract management effectively;
- Robust stock condition information, data and analysis is in place to produce programmes of investment that will appropriately maintain and improve standards, as well as services to tenants;
- Our data is further enhanced and regularly validated by feedback from all programmed and cyclical repairs, and maintenance activities; and
- We complete our cost certainty exercise for our overarching 30 year financial plan.

Over the next 12 months we will be specifically focusing on ensuring that asset management resources, both people and systems, are challenged to make sure they are in the right areas for the future. Our joined-up approach will enable us to:

- Commence a stock condition survey to verify our cost certainty business plan, identify gaps and provide independent verification;
- Understand why work has not been completed within the stock e.g. the tenant has requested that no work be carried out; and
- Review our Asset Management Systems and Strategy to ensure all stock is fit for both current and emerging needs.

How do we link Welsh Government reporting with our business and asset plans?

We submit a three-year Business Plan to the Welsh Government on an annual basis that reports progress on the delivery of the CHS (+). Underpinning our business plan will be our stock condition, asset management information and our 30-year financial projections.

We also provide quarterly monitoring reports on progress of the Business Plan to the Welsh Government as part of our Major Repairs Allowance (MRA) application, which is an annual grant of over £6 million to support investment in tenant homes.

Risk Management

Each year, as part of the HRA business planning process, we identify, assess and prioritise potential risks and consider the likelihood and impact of each. This exercise is carried out by each service delivery area. Once this has been done, we identify ways in which we can reduce or manage the potential risk and impact. These are recorded corporately and monitored regularly.

The greatest risks identified in delivering this plan are:

- Maintaining up to date asset information about our stock;
- Uncertainty of the impact of market conditions with regard to inflation, pricing and availability of workforce, to inform the 30-year cost certainty exercise; and

- The impact of balancing investment in maintaining the existing standard, introducing new measures to support decarbonisation and continuing to deliver our ambitions housing and regeneration development programme.

All risks are monitored by the CHS+ Working Group.

How will we go about verifying progress in the future?

Compliance and Acceptable Fails

Recording compliance and acceptable fails is not a simple collection of condition information for things like kitchens, bathrooms, electrics and so on. It is a combination of occupancy and property condition information. Surveying of homes, collating of information, how we manage our data, and the ability to report 100% accurate information, are all data-hungry activities.

An acceptable fail occurs when an individual component e.g. a kitchen or bathroom, has not been completed for one or more of the following reasons:

- Cost of remedy;
- Timing of remedy;
- Resident's choice; and
- Physical constraint

Energy Efficiency

We have had a number of different programmes running to improve the energy efficiency of homes. These programmes have helped save tenants money on their heating costs and improve the SAP rating of our homes. The average SAP across our stock is 65 out of 100.

Independent Verification

We believe that we report compliance accurately in achieving and maintaining the CHS+, and we will continue to do so. We will also back this up with further verification by:

- Demonstrating compliance by ensuring there is a clear separation of duties between CCC staff reporting compliance and those staff responsible for delivering the CHS+;
- Using internal staff in conjunction with external support, where necessary to undertake desktop reviews;
- Commencing a sample programme of stock condition visits every year;
- Asking tenants how they would like to be part of the process of verification;
- Continuing to use a range of methods to assess compliance. Some data is already independently collected, e.g. boiler inspections, EPCs and electrical tests; and
- Providing Home Information packs for all new tenants, informing them of boiler inspections, asbestos advice, Energy Performance Certificates, electrical tests and when any outstanding CHS+ work will be carried out.

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