

Housing Revenue Account Business Plan 2022-23

Carmarthenshire Housing Investment Programme

Appendix E – Compliance Policy



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1. The purpose....

- 1.1. The purpose of this document is to confirm our approach to achieving and maintaining (and further improving) the Carmarthenshire's housing stock. 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 providing homes for council tenants that are modern, safe, fuel efficient, situated in well maintained neighbourhoods and are well managed.
- 2.2. In 2006, the Council started its ambitious programme to achieve the Welsh Housing Quality Standard (WHQS) by the end of 2015. 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 to us investing in our housing stock. There remains much more to do.
- 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 2022/25 business plan covers five key themes that have been identified in terms of future investment. These are:

THEME 1 - Supporting tenants and residents

THEME 2 - Investing in our Homes' and the Environment

THEME 3 - Providing more homes

THEME 4 – Decarbonisation of our Housing Stock and Services

THEME 5 - Foundational Economy, Community Benefits and Procurement

3. Policy Statement....

- 3.1. 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 Welsh Housing Quality Standard (WHQS); and replacement programmes will be based on condition, not time.
- 3.2. Tenants tell us that getting repairs done on time and maintaining homes to a good standard is important to them. Maintaining the standard is a statutory duty, and the Council has made a commitment to this by ensuring that all homes will be:
 - in a good state of repair

- free from damp
- free from significant condensation
- structurally stable
- in safe and attractive environments
- suitable for the household

4. *Tenants Views...*

- 4.1. The commitment and support of our tenants’ and Members’ continues to be important to us to ensure that we maintain and improve the standards in the future
- 4.2. Tenant and community engagement have always underpinned the delivery of the housing investment programme, 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.
- 4.3. 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. A recent tenant satisfaction survey showed the following:

Tenant Satisfaction across the housing sector in Wales¹					
1,938 tenants took part in the survey- 26% response rate overall. A quarter of the total number of responses was collected online (660), and 47 surveys were completed in Welsh (2%)					
	Housing Assoc.	Voluntary Transfer	Retained Councils	Benchmark	CCC
service	Not yet available	Not yet available	Not available yet	77%	77%
repairs and maintenance	Not yet available	Not yet available	Not available yet	71%	66%
listening and acting on tenants’ views	Not yet available	Not yet available	Not available yet	60%	63%

- 4.4. We will evaluate our approach to the way we listen and act on tenant’s views and try to understand the reasons for differences in the satisfaction rates. This process will be repeated time and time again, so that we continue to improve the service in line with tenants’ expectations.

5. *Progress and Reporting...*

- 5.1. As of 31st March 2020, the Council was fully WHQS Compliant having met the standard during 2015 utilising a whole house delivery approach. Some of our housing stock does not meet the standard and are considered acceptable failures. The main reason was due to resident’s choice (95%). A small number of properties (5%) were not improved because of physical constraints or the cost of remedy.

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

WHQS Compliance by Component



5.3. Tenant refusals will be improved by having a rescheduling programme which targets properties when they either become void or whereby an existing tenant who previously refused the works decides to have the work completed.

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5.4. A small number of properties have fallen out of compliance due to the 'Cost of Remedy' of repairs. An options appraisal will be done on these properties and the Most Satisfactory Course of Action (MSCA) and Net Present Value (NPV) considered.

5.5. Future work programmes will be considered in line with the life cycles of components previously upgraded. However, we will be developing a further programme for the following:

- Continuing with our roofing & rendering programme
- Boiler replacements and servicing
- Maintaining the housing investment programme and standard
- Developing our decarbonisation strategy (SAP 92+)
- Improving 'our offer' to older people
- Building more homes through a new affordable Homes Delivery Plan

5.6. We have a robust Governance structure in place which can be found in the Business Plan (Appendix A-D). We report regularly to local members, scrutiny committees, full Council and the Housing Services Advisory Panel (made up of tenants, local members and Council Officers). Progress, good news stories and information is provided to tenants in a quarterly 'Tenant 2 Tenant' newsletter/ magazine and we often engage with TPAS Cymru.

6. Data Collection, Storage and Updating ...

- 6.1. Prior to 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 WHQS.
- 6.2. We believe that 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.
- 6.3. 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 housing stock in the future.
- 6.4. We fully recognise that in order to achieve the above we must ensure that:
 - The right structures, skills, resources, and capacity are in place and are regularly reviewed
 - Robust stock condition information, data and analysis is in place to drive investment
 - Our data is further enhanced and regularly validated by feedback from all programmed and cyclical repairs, and maintenance activities
 - We complete our cost certainty exercise for our overarching 30-year financial plan
- 6.5. We use two software systems for data collection and modelling. TOTALMobile, is used for job ordering of programmed works, contractor payment and store completion dates. We use the data to forecast future investment requirements as well as our overall 30-year business plan. Also, we use our Housing Management System (OHMS) to collate and store stock compliancy and other asset data such as adaptations. Both systems are legacy systems and we have purchased two new systems (CIVICA CX Assets will replace OHMS functionality and Service Connect will replace TOTALMobile). Both systems will complement each other. This will improve functionality and facilitate more efficient analysis and scenario modelling to inform future investment programmes.

7. Current Compliance Position...

- 7.1. Annually, Carmarthenshire County Council completes a WHQS return for the Welsh Government which indicates the condition status of the stock at the end of each financial year. Subject to acceptable fails, Carmarthenshire is 100% WHQS compliant. The table below indicates the most up to date stock compliance status:

CCC CHS+ Status	Total Stock (March 2020)	Total Stock %
Assets	9,122	-
Total Fully Compliant	8175	89.6
Total Acceptable Fails	947	10.4

Our SAP data is a combination of cloned data for similar properties or archetypes and surveyed data. We are currently reviewing this data as part of a Research programme with Cardiff University's Welsh School of Architecture

8. Interpretation and current recording of 'Acceptable Fails'...

8.1. We will assess elements of the standard as pass, fail or not applicable. The Council accepts four main reasons for an acceptable fail and follows Welsh Government guidance:

In Line with Welsh Government Guidance, certain aspects for categorising an 'acceptable fail' are open to officer interpretation and therefore each case is reviewed by the responsible officer who will then decide if a property fails to meet the criteria	
Tenants' choice or refusal	Where a tenant chooses or refuses works that prevents the council from maintaining or improving the house and is recorded as an acceptable fail. All such acceptable fails are reviewed and/ or rescheduled. The asset will be fully refurbished to the appropriate standard at the next available opportunity (void works or through tenants' change of mind). Tenants <u>do not</u> have a choice whether to have smoke or carbon monoxide detectors installed in their homes or to have their boilers serviced.
Physical Constraint	Physical constraint only accounts for a small percentage (2%) of our acceptable fails whilst this doesn't present a significant problem at this stage it could prevent us from maintaining the standard in future. These properties are clearly identified and measures have been put in place to mitigate this at the earliest possible opportunity.
Timing of Remedy	Although this currently does not present a problem for the council, we may in the future defer works to ensure our investment programmes remain efficient, we may also consider combining works to reduce disruption levels for our tenants.
Cost of Remedy	Future investment to support the standard will be based on an assessment of the building(s) and whether it is lettable. Consideration will be given to future lifecycle costs to maintain compliance. Where it is uneconomical to repair, we will carry out an MSCA assessment to determine its long-term viability.

9. Risk Reduction Measures

9.1. We will continue to respond to changes in legislation, regulations or other statutory guidance that will make our tenants homes safer. Ensuring that our tenants are safe and healthy within their homes and the environments that they live in is an utmost priority for the Council and we will adopt new, better standards in timely manner. Risk reduction measures that we have recently put in place are:

- Approach to Fire Safety management
- Radon Testing Programme
- Serge Protection Upgrade

10. Independent Verification....

10.1. We believe that we report compliance accurately in achieving and maintaining the WHQS, and we will continue to do so.

10.2. We will also back this up with further verification by:

- Demonstrate a clear separation of duties between those reporting compliances and those delivering and enhanced standard of work
- Using internal staff in conjunction with external support 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
- Use a range of methods to assess compliance including independent collection of data
- Complying with internal and external audit requirements

11. Annual Financial Statement....

11.1. Annually the Council reviews the Housing Revenue Account (HRA) Business Plan which sets out the investment needed to maintain the housing stock investment programmes. The Council has a robust 30-year business plan in place and since April 2015 has become self-financing having exited the Housing Revenue Account Subsidy System (HRAS).

11.2. Our capital investment programme is supported by funding from the Welsh Governments Major Repairs Allowance (MRA), contributions from revenue, capital receipts as well as prudential borrowing. All of these income streams are used to facilitate the capital investment required to sustain our stock as part of our 30-year business plan.

11.3. We will also pursue, where possible, other funding streams and grants to maximise our income that will support and complement the work programmes and/ or services outlined in the Business Plan.

12. Recording Community Benefits....

12.1. In light of the Pandemic, the Council is committed to stimulating our foundational economy through our housing investment programme and how this will benefit local communities to recover.

12.2. Where possible, we will use local contractors from the Minor Works Framework and South West Wales Regional Contract Framework (SWWRF). Not only will this provide value for money, as part of the framework agreement our contractors will provide:

- Employment including apprenticeship schemes
- Training
- Working with local school and colleges
- Non-core community benefits including regeneration schemes

- 12.3. We are also committed to developing the skills, training and job opportunities within the Council Services. This includes providing apprenticeships and graduate trainee programmes through Coleg Sir Gar and University of Wales Trinity Saint David.
- 12.4. We will measure all contracts awarded through the capital investment programme against the Value Wales Measurement Toolkit (or similar).