

Introduction

In providing homes and services we seek to follow the standards and expectations set out in the Regulatory Standards. We also seek to continue to provide good quality homes and customer services by following relevant legislation and good practice. This document sets out how we comply with the various aspects of the Regulatory Standards by highlighting our activities against the required outcomes as identified within the relevant standard.

Statement of Compliance by the Chair of the Board

As part of our co-regulatory commitment, we have reviewed our compliance with the regulatory standards to ensure that we are meeting the expectations of our Regulator, customers and other stakeholders. This includes reviewing our compliance against our legislative requirements and our Code of Governance.

Following a detailed governance review by KPMG during 2018, from January 2019 the board have established an assurance committee and an operations committee, who along with the main Board, will receive assurance on compliance throughout the reporting cycle.

The Board is confident that the appropriate assurance is in place and is being properly monitored and refreshed. The Board is also satisfied that effective processes are in place to evidence our compliance. This is our supporting document to evidence our compliance. Following this review, the Board are pleased to confirm compliance with the Governance and Financial Viability Standard.

Signed on behalf of the Board

Roy Irwin

Chair

The Economic Standards – Governance and Financial Viability

<p>Outcome - Governance:</p> <p>Registered providers shall ensure effective governance arrangements that deliver their aims, objectives and intended outcomes for tenants and potential tenants in an effective, transparent and accountable manner. Governance arrangements shall ensure registered providers adhere to all relevant law; comply with their governing documents and all regulatory requirements; are accountable to tenants, the regulator and relevant stakeholders; safeguard taxpayers' interests and the relevant stakeholders; Have an effective risk management and internal controls assurance framework; and protect social housing assets.</p>	<p>We do this by:</p> <p>We review our activities in relation to all relevant law. Reports highlighting how we comply with these laws are presented to the Board. These reports also highlight anticipated future requirements and outline planned actions to maintain compliance.</p> <p>Legal advice is sought where necessary to ensure that the Board can make fully informed and reliable decisions. We also engage external advice when appropriate.</p> <p>A compliance review against our Code of Governance (the European Confederation of Directors Associations ("EcoDa") Code of Governance) is undertaken and reported to Board.</p> <p>All reports to the Board and the Executive Team state any financial, vfm, risk and staffing implications.</p> <p>Action – to include compliance and regulatory risk implications in all board reports</p> <p>To supplement our compliance, we commissioned an independent governance review during 2018.</p> <p>Our Annual Accounts are published as part of our accountability to key stakeholders.</p> <p>We are led by a strong Board and Senior Management Team which match the skills required to meet the needs of our current Corporate Plan.</p> <p>Our Internal Auditors provide an annual statement of their opinion of our internal controls framework, including our progress with the implementation of improvement recommendations.</p> <p>The Board are provided with contextual information on changes to the external political and financial operating environment to help inform Boards' priorities and their management of risk.</p> <p>We maintain an Asset and Liability Register - reporting to the Board on the key aspects of this register.</p>
<p>Outcome - Financial Viability:</p>	

<p>Registered providers shall manage their resources effectively to ensure their viability is maintained while ensuring that social housing assets are not put at undue risk.</p>	<p>Financial viability is well managed and monitored with external assurance being received from our external auditors (Grant Thornton)</p> <p>We have a good relationship with our funders and the Board is updated regularly.</p> <p>Scenario planning and stress testing is a vital part of our business planning process, ensuring that we can respond to multiple adverse events whilst protecting our social housing portfolio.</p>
<p>Specific Expectations of the Regulator Registered providers shall adopt and comply with an appropriate code of governance. Governance arrangements should establish and maintain clear roles, responsibilities and accountabilities for the board, chair and chief executive and ensure appropriate probity arrangements are in place. Areas of non-compliance with their chosen code of governance should be explained. Registered providers should assess the effectiveness of their governance arrangements at least once a year</p>	<p>How we comply: The Board have adopted the European Confederation of Directors Associations (“EcoDa”) Code of Governance and report on compliance against the code to the Board.</p> <p>We are fully compliant with the latest version of the Code.</p> <p>During 2018 we carried out a full external review of Governance with KPMG and have been implementing the recommendations.</p> <p>The Board and the newly formed committees have their own terms of reference with the responsibilities of each chair being outlined in specific job descriptions.</p> <p>Declaration of interests is a standing agenda item on every Board and Committee meeting to ensure that decisions are made solely in the interests of Plexus/Omega.</p> <p>A Board Member effectiveness review is conducted on an annual basis.</p>
<p>Registered providers shall ensure that they manage their affairs with an appropriate degree of skill, independence, diligence, effectiveness, prudence and foresight.</p>	<p>Board membership is reviewed to ensure that the knowledge and skills of our Board align with our Corporate Priorities and can respond to the challenges we face.</p> <p>An Operations Committee has been established to provide oversight and scrutiny of our new development and growth plan.</p> <p>Minutes of meetings reflect the Boards’ challenge and debate.</p> <p>The Chair of the Board has recently carried out appraisals with all board members</p>

	<p>Action – to develop tailored training plans for Board members</p> <p>Each year the Board has a Strategy Day to discuss the direction and strategy of the organisation in light of the external environment and risks.</p> <p>The Board receives regular reports and briefings to inform them of our current risk profile and changes in our operating environment.</p>
<p>Registered providers shall communicate in a timely manner with the regulator on material issues that relate to non-compliance with the standards</p>	<p>We communicate appropriately with our Regulator. We submit returns to the Regulator within the required deadlines and maintain dialogue with the Regulator as required.</p>
<p>Registered providers shall ensure that they have an appropriate, robust and prudent business planning, risk and control framework</p>	<p>Our new 30-year plan is to be updated annually. Our business planning process involves robust testing of the plan based on a number of scenarios.</p> <p>Controls are in place and are regularly monitored internally and externally to mitigate the worst effects of the risks facing us.</p> <p>We will be strengthening our external assurance from both our internal and external auditors through the Assurance Committee</p> <p>Our Assurance Framework identifies all lines of assurance for our 'top risks' and supports our risk management by monitoring how well our controls are working is and is reviewed by the Board on a regular basis and has now been delegated to our Assurance Committee</p> <p>Compliance and data integrity testing is carried out by our Internal Auditors.</p>
<p>The framework shall ensure that there is access to sufficient liquidity at all times; financial forecasts are based on appropriate and reasonable assumptions; effective systems are in place to monitor and accurately report delivery of the registered provider's plans; financial and other implications of risks to the delivery of plans are considered; and that registered providers monitor, report on and comply with their funders' covenants.</p>	<p>Action - Treasury Management Strategy and Policy to be approved at the January Board meeting.</p> <p>Cashflow is monitored on a regular basis - allowing us to prepare for any major cash outflows and financing costs.</p> <p>Financial plans are regularly updated and reflect the external operating environment.</p> <p>There is a budgetary monitoring and reporting framework, with quarterly reporting to Board, including a formal forecast of the full year position so</p>

	<p>action can be taken if an area is over spent or under-performing.</p> <p>We have a risk appetite statement that is reviewed by Board against our current corporate and financial plans and the wider environment at least annually.</p> <p>Financial, and risk implications are considered as part of all reports to Board, and the Leadership Team.</p>
<p>The framework shall be approved by the registered provider's board and its effectiveness in achieving the required outcomes shall be reviewed at least once a year.</p>	<p>Our framework for risk and control are reviewed annually.</p> <p>The business plan and performance against it is reviewed by the Board.</p>
<p>In addition to the above, registered providers shall assess, manage and where appropriate address risks to ensure the long-term viability of the registered provider, including ensuring that social housing assets are protected. Registered providers shall do so by maintaining a thorough, accurate and up to date record of their assets and liabilities and particularly those liabilities that may have recourse to social housing assets; carrying out detailed and robust stress testing against identified risks and combinations of risks across a range of scenarios and putting appropriate mitigation strategies in place as a result; before taking on new liabilities, ensuring that they understand and manage the likely impact on current and future business and regulatory</p>	<p>We have an asset and liability register which has been approved and is reviewed by Board.</p> <p>Ongoing monitoring of the asset register and the risks arising from any liabilities is carried out regularly.</p> <p>Action – internal audit to carry out a review of the asset register and associated processes as part of its 2019 programme</p> <p>As part of our business planning process, we conduct stress testing on a range of scenarios,</p> <p>Action – to implement new business planning model by March 2019</p> <p>Our standard report cover ensures colleagues consider appropriate implications.</p> <p>Where appropriate the Board can seek independent external advice to help support their decision making.</p> <p>Exit strategies are considered for each project.</p>
<p>Registered providers shall ensure that any arrangements they enter into do not inappropriately advance the interests of third parties, or are arrangements which the regulator could reasonably assume were for such purposes.</p>	<p>We have a Code of conduct and Probity Policy in place. Key elements, such as gifts and hospitality and declarations of interest are recorded</p> <p>Members must also declare any new interests in an agenda item at every meeting. If an interest does exist, the Member will not be involved in any decision making regarding that item and, if necessary, will not take part in any discussion of that particular item.</p>

<p>Registered providers shall communicate with the regulator in an accurate and timely manner. This includes returns to the regulator, including an annual report on any losses from fraudulent activity, in a form determined by the regulator.</p>	<p>We are fully aware of our responsibilities to the Regulator and all returns are submitted within the set deadline. The Board is involved in the approval process for key returns.</p> <p>A report of any fraudulent activity is confirmed by the Board prior to submission to the Regulator.</p>
<p>Registered providers shall assess their compliance with the Governance and Financial Viability Standard at least once a year. Registered providers' boards shall certify in their annual accounts their compliance with this Governance and Financial Viability Standard.</p>	<p>This document confirms our compliance with the Governance and Financial Viability Standard and across the other regulatory standards, providing an overview of the assurance that Board receives to enable them to confirm and monitor their compliance.</p> <p>Compliance with the Governance and Viability Standard is confirmed in our annual accounts and signed off on behalf of the Board by the Chair of Board.</p>
<p>Registered providers which are parent companies shall, as appropriate, support or assist those of their subsidiaries that are registered providers with a view to ensuring compliance with regulatory requirements.</p>	<p>N/A</p>

The Economic Standards – Value for Money

<p>Outcome: Registered providers must clearly articulate their strategic objectives; have an approach agreed by their board to achieving VFM in meeting these objectives and demonstrate their delivery of value for money to stakeholders; articulate their strategy for delivering homes that meet a range of needs; and ensure that optimal benefit is derived from resources and assets and optimise economy, efficiency and effectiveness in the delivery of their strategic objectives.</p>	<p>We do this by: The Board have agreed new Business Plans for 2019-2022, with our high-level objectives aligned to achieving value for money.</p> <p>This includes ensuring that we are a well governed and financially viable organisation.</p> <p>It also sets out our three key VFM drivers, being our corporate plan, continuous improvement and regulation to support our three VFM pillars:</p> <ul style="list-style-type: none"> • Strong governance, scrutiny & performance management • Ensuring we maximise the Return on Assets • Clear measures, evidence and comparisons; including understanding of costs and outcomes <p>Finally we demonstrate our delivery of VFM through our Annual Accounts, including the new VFM Metrics.</p> <p>Action – Updated VFM strategy to be approved by the board in January 2019</p>
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<p>Specific Expectations of the Regulator Registered providers must demonstrate a robust approach to achieving VFM – this must include a robust approach to decision making and a rigorous appraisal of potential options for improving performance; regular and appropriate consideration by the board of potential VFM gains; consideration of VFM across their whole business and where they invest in non-social housing activity, they should consider whether this generates returns commensurate to the risk involved and justification where this is not the case; and that they have appropriate targets in place for measuring performance in achieving VFM in delivering their strategic objectives, and that they regularly monitor and report their performance against these targets</p>	<p>The Board have approved updated Business plans and have a forward plan that includes a new VFM strategy to be approved in March 2019</p> <p>This strategy will build on our existing value for moneywork and ensure value for money remains a key objective for the board</p> <p>Action – Regular VFM updates to committee during 2019</p>
<p>Registered providers must annually publish evidence in their accounts to enable stakeholders to understand the provider’s performance against its own VFM targets and any metrics set out by the regulator, and how that performance compares to peers; and measurable plans to address any areas of underperformance, including clearly stating any areas where improvements would not be appropriate and the rationale for this</p>	<p>The Board discussed the new VFM Standard at their Strategy Day in November 2018, responding to the consultation and discussing the new expectations.</p> <p>Our new Business Plan aligns our Key Performance Indicators to the new metrics and we will continue to publish our evidence as required in our statutory accounts.</p> <p>Targets are set annually to improve performance.</p>

The Economic Standards – Rent Standard

<p>Outcome: Registered providers shall charge rents in accordance with the government’s direction to the regulator of May 2015 and the Rent Standard Guidance.</p>	<p>Our rents are charged in accordance with the governments’ direction to the regulator.</p>
<p>Specific Expectations of the Regulator Registered providers shall ensure they meet the following requirements, which derive from the government’s direction to the regulator of May 2014, and the ‘key requirements’ set out in the Rent Standard Guidance that accompanies this standard.</p>	<p>Rents will also be set in line with our contractual arrangements with the local authority depending on the nature of the services being provided. Frequently these will now be aligning tenant rents to LHA levels. Any rent levels will always be agreed with the nominating authority.</p>
<p>Registered providers shall set rents for low cost rental accommodation with a view to achieving that Rents conform with the pattern produced by the rents formula set out in the Rent Guidance (formula rents) with a 5% upward tolerance on individual rents (10% for supported housing and sheltered housing) (‘the limit of the rent flexibility level’), but subject to the maximum rent levels specified in that Guidance (‘rent caps’); that weekly rent for accommodation increases each year by an amount which is no more than CPI + 1%; that weekly rent for accommodation which is above the limit of the rent flexibility level increases</p>	<p>Action – Updated rent policy to be approved at the January board meeting</p>

<p>each year by an amount which is less than CPI + 1%, until it reaches the limit of the rent flexibility level; that rent caps increase annually by CPI + 1.5%; and formula rents increases annually by CPI + 1%.</p>	
<p>Where accommodation is let on Affordable Rent terms, registered providers shall set rents with a view to rent for accommodation (inclusive of service charges) being set at a level which is no more than 80% of the estimated market rent for the accommodation (inclusive of service charges), based on a valuation in accordance with a method recognised by the Royal Institution of Chartered Surveyors; rent for accommodation increases each year by an amount which is no more than CPI + 1%; and rent for accommodation is re-set, based on a new valuation, each time the accommodation is let.</p>	
<p>Affordable rent terms can only be used in relation to accommodation provided pursuant to a housing supply delivery agreement entered into between a registered provider and the Homes and Communities Agency (HCA) or the Greater London Authority (GLA).</p>	
<p>Where the application of the Rent Standard would cause providers to be unable to meet other standards, particularly in respect of financial viability, including the risk that a reduction in overall rental income causes them to risk failing to meet existing commitments such as banking or lending covenants, the regulator may agree to waive specific requirements of the Rent Standard for a period of time.</p>	<p>See above</p>
<p>Registered providers shall provide clear information to tenants that explains how their rent and any service charge are set, and how they are changed, including reference to the CPI benchmark to which annual changes to rents should be linked (except where rents are controlled under different legislation</p>	<p>Customers receive comprehensive information about their rent and service charge and we inform customers of any changes in their rent as required.</p> <p>We work with our local authority partners and our customers to make sure that those customers receiving benefits have a smooth transition onto a new rental charge to prevent the accrual of arrears and continue to work with customers to mitigate the impact of universal credit</p>

The Consumer Standards – Tenant Involvement and Empowerment Standard

<p>Outcome – customer service, choice and complaints: Registered providers shall provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards; and have an approach to complaints that</p>	<p>We remain committed to listening to and involving customers and acting on feedback received.</p>
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<p>is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly.</p>	<p>We have a customer charter that sets out clearly our promises to customers and the level of service they can expect</p> <p>Customers can contact us 24 hrs a day though our 24/7 contact centre to report repairs and any other issues.</p> <p>Colleagues work flexibly where required to offer customers appointments out of normal office hours at our customer's convenience.</p> <p>We have a Complaint's Policy which commits us to respond fully to all complaints within 10 working days</p>
<p>Outcome – Involvement and empowerment: Registered providers shall ensure that tenants are given a wide range of opportunities to influence and be involved in the formulation of their landlord's housing related policies and strategic priorities; the making of decisions about how housing related services are delivered, including the setting of service standards; the scrutiny of their landlord's performance and the making of recommendations to their landlord about how performance might be improved; the management of their homes, where applicable; management of repair and maintenance services, such as commissioning and undertaking a range of repair tasks, as agreed with landlords, and the sharing in savings made, and agreeing local offers for service delivery .</p>	<p>We involved customers however it should be borne in mind due to the nature of the services we provide this is not always possible.</p> <p>We are also bound by the requirements of the local authorities we work with, for example the vast majority of the customers we provide a property for have come from the relevant local authorities homelessness route.</p> <p>Action – to develop a new customer engagement and involvement strategy</p>
<p>Outcome – customer service, choice and complaints: Registered providers shall treat all tenants with fairness and respect; and demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.</p>	<p>One of our values is to provide outstanding customer service. Our Corporate plan explains that our customers are our priority and we will ensure that we deliver our services in line with their current and on-going needs.</p>
<p>Specific Expectations of the Regulator Customer service, choice and complaints Registered providers shall provide tenants with accessible, relevant and timely information about how tenants can access services; the standards of housing services their tenants can expect; how they are performing against those standards; the service choices available to tenants, including any additional costs that are relevant to specific choices; progress of any repairs work; how tenants can communicate with them and provide feedback; the responsibilities of the tenant and provider; and arrangements for tenant involvement and scrutiny.</p>	<p>Customers receive a wide range of information at sign up and periodically throughout their tenancy - including how they can access specific services.</p> <p>Our tenancy pack that is provided and can be accessed on line provides info on how to access services</p> <p>Our website also holds this relevant information and offers several ways to get in touch with us.</p>

	<p>Customers can find out about the standards of service they should expect through our website.</p> <p>Appointments are scheduled to suit customers' needs. Repair appointments are confirmed by text to customers (landlines or mobile) and two further texts are sent to the customer the day before the repair and when the operative is on their way.</p>
<p>Providers shall offer a range of ways for tenants to express a complaint and set out clear service standards for responding to complaints, including complaints about performance against the standards, and details of what to do if they are unhappy with the outcome of a complaint. Providers shall inform tenants how they use complaints to improve their services. Registered providers shall publish information about complaints each year, including their number and nature, and the outcome of the complaints. Providers shall accept complaints made by advocates authorised to act on a tenant's/tenants' behalf</p>	<p>How we comply:</p> <p>We have an approved Complaints Policy and procedure</p> <p>Our aim is to provide great homes and services for customers, but we also recognise that there may be times when things go wrong.</p> <p>If this happens, we want to put things right and learn from any mistakes - so the issue doesn't happen again.</p> <p>Customers can make complaints to us in a number of ways - including at any point of contact and through our website.</p> <p>We will also accept complaints from advocates</p> <p>Once a complaint has been investigated, if they remain unhappy, customers can take their complaint to the next relevant stage - with the final stage being the Ombudsman.</p> <p>Information relating to complaints (including the number of complaints, themes and outcomes) is reported to the Board</p>
<p>Involvement and Empowerment Registered providers shall support their tenants to develop and implement opportunities for involvement and empowerment, including by supporting their tenants to exercise their Right to Manage or otherwise exercise housing management functions, where appropriate; supporting the formation and activities of tenant panels or equivalent groups and responding in a constructive and timely manner to them; the provision of timely and relevant performance information to support effective scrutiny by tenants of their landlord's performance in a form which registered providers seek to agree with their tenants. Such provision must include the publication of an annual report which should include information on repair and maintenance budgets; and providing</p>	<p>We involved customers where possible but it should be borne in mind due to the nature of the services we provide this is not always possible</p> <p>Action – to develop a new customer engagement and involvement strategy</p>

<p>support to tenants to build their capacity to be more effectively involved.</p>	
<p>Registered providers shall consult with tenants on the scope of local offers for service delivery. This shall include how performance will be monitored, reported to and scrutinised by tenants and arrangements for reviewing these on a periodic basis.</p>	<p>We have dedicated Portfolio Managers who are the main point of contact for specific localities.</p> <p>These Managers provide key housing management support activities – including supporting customers to sustain their tenancy.</p>
<p>Registered providers shall consult tenants at least once every three years on the best way of involving tenants in the governance and scrutiny of the organisation’s housing management service.</p>	<p>Action – to develop a new customer engagement and involvement strategy</p>
<p>Understanding and responding to diverse needs: Registered providers shall demonstrate how they respond to tenants’ needs in the way they provide services and communicate with tenants</p>	<p>We record information on our housing management system to help identify how to best communicate with certain customers.</p> <p>Our housing management system allows us to record multiple methods of communication and we can set one as default</p> <p>We use language line to help us communicate with customers whose first language is not English or who may need other interpretation services.</p> <p>We also identify customer need through vulnerability flags enabling us to amend our service as appropriate to the individual customer.</p> <p>Policies to help more vulnerable customers such as our Safeguarding Policy are in place and all frontline staff complete online safeguarding training</p> <p>Colleagues will make appointments outside of normal working hours in response to customers’ needs.</p>

The Consumer Standards – Home Standard

<p>Outcome – Quality of Accommodation: Registered providers shall ensure that tenant’ homes meet the standard set out in section five of the Government’s Decent Homes Standard; meet the standards of design and quality that applied when the home was built, and were required as a condition of publicly funded financial assistance if these standards are higher than the Decent Homes Standard; and in agreeing a local offer, ensure that it is set at a level not less than these Standards and</p>	<p>Quality of accommodation in leased portfolios is subject to our contractual arrangements with local authority partners.</p> <p>We will work closely with these Councils to ensure that properties being procured meet their requirements and typically exceed the Decent Homes standard.</p>
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<p>have regard to section six of the Government's Decent Homes Guidance.</p>	<p>Frequently accommodation will be assessed by our partner agencies before it is brought into management in order to ensure suitability.</p>
<p>Outcome – Repairs and Maintenance: Registered providers shall provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choices to, tenants, and has the objective of completing repairs and improvements right first time; Meet all applicable statutory requirements that provide for the Health and safety of the occupants in their homes</p>	<p>Our repairs and maintenance service is provided by Mears Housing Maintenance team that has a track record of delivering repairs to over half a million properties nationally.</p> <p>We meet all statutory health and safety requirements, with these services being provided by Mears Facilities Management who have a track record of providing these services to over 70 local authorities</p> <p>Quarterly reports are provided to the board to confirm health and safety compliance including gas servicing, electrical servicing, fire risk assessments, legionella, lift safety, asbestos, and repairs performance</p>
<p>Specific Expectations of the Regulator Quality of accommodation Registered providers may agree with the regulator a period of non-compliance with the Decent Homes Standard, where this is reasonable. Providers shall ensure their tenants are aware of the reasons for any period of non-compliance, their plan to achieve compliance and then report on progress delivering this plan.</p>	<p>All our homes comply with the decent Homes Standard. In addition properties being procured will typically exceed the Decent Homes standard</p>
<p>Repairs and maintenance Registered providers shall ensure a prudent, planned approach to repairs and maintenance of homes and communal areas. This should demonstrate an appropriate balance of planned and responsive repairs, and value for money. The approach should include: responsive and cyclical repairs, planned and capital work, work on empty properties, and adaptations.</p>	<p>Day to day repairs are reported by our customers through our MEARS 24/7 call centre and then carried out by MEARS operatives to an agreed timescale. In addition to this the majority of our stock is leased and therefore the planned / cyclical repairs are carried out by the owners. Whilst carrying out visits we will note any repairs and report back to the owner to rectify.</p> <p>Where we are purchasing properties and are the owner/long leaseholder these are flagged on our system so they are easily identified. On purchase we carry out work to bring property to standard and create an asset register detailing life expectancy of key components</p>
<p>Registered providers shall co-operate with relevant organisations to provide an adaptations service that meets tenants' needs.</p>	<p>Where we are managing leased accommodation adaptations will only be possible with the owner's consent, however we will work with the local authority and tenant to facilitate such an amendment where possible.</p> <p>The Tenant Handbook clarifies this matter for all residents</p>

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The Consumer Standards – Tenancy Standard

<p>Outcome – Allocations and mutual exchange: Registered providers shall let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of tenants and potential tenants. They shall demonstrate how their lettings make the best use of available housing; are compatible with the purpose of the housing; and contribute to local authorities' strategic housing function and sustainable communities.</p>	<p>Majority of our contractual leased accommodation schemes are let in partnership with local authority partners, with a clear lettings plan in place for provision of nominations via their Housing Needs Services.</p> <p>Allocations and Lettings Policy in place & approved by Board.</p>
<p>There should be a clear application, decision-making and appeals processes</p>	<p>Where applicable this will be determined by local lettings plan determined on a scheme by scheme basis</p>
<p>Registered providers shall enable their tenants to gain access to opportunities to exchange their tenancy with that of another tenant, by way of internet-based mutual exchange services.</p>	<p>Where accommodation provides temporary or emergency accommodation there is no ability for residents to enter into a mutual exchange arrangement, but where applicable this will be determined by local lettings plan determined on a scheme by scheme basis</p> <p>Action: Internet based mutual exchange service to be developed</p>
<p>Tenure Registered providers shall offer tenancies or terms of occupation which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock</p>	<p>Tenancy Policy outlines the various tenancies we use and why these are applicable for the type of housing.</p> <p>Normally the tenure type is stipulated in the individual contract in place with the local authority</p>
<p>Registered providers shall meet all applicable statutory and legal requirements in relation to the form and use of tenancy agreements or terms of occupation.</p>	<p>Independent legal advice is sought when considering amendments to our tenancy agreement.</p>
<p>Specific Expectations of the Regulator Allocations and mutual exchange Registered providers shall develop and deliver services to address under-occupation and overcrowding in their homes, within the resources available to them. These services should be focused on the needs of their tenants and will offer choices to them.</p>	<p>Where under / over occupation was occurring we would report back to the local authority, and see what available voids we have for that specific client we could offer to transfer where appropriate.</p>
<p>Registered providers' published policies shall include how they have made use of common housing registers, common allocations policies and local letting policies. Registered providers shall clearly set out, and be able to give reasons for, the criteria they use for excluding actual and potential tenants from</p>	<p>Due to the current nature of our work allocations are linked to the local authorities we work with.</p> <p>With our temporary & emergency accommodation there is limited availability for transfers or exchanges</p>

<p>consideration for allocations, mobility or mutual exchange schemes.</p>	<p>Action – to develop updated tenancy and allocations policies to set a framework for any future developments that fall outside of the above</p>
<p>Registered providers shall develop and deliver allocations processes in a way which supports their effective use by the full range of actual and potential tenants, including those with support needs, those who do not speak English as a first language and others who have difficulties with written English</p>	
<p>Registered providers shall record all lettings and sales as required by the Continuous Recordings of Lettings (CORE) system</p>	
<p>Registered providers shall provide tenants wishing to move with access to clear and relevant advice about their housing options.</p>	
<p>Registered providers shall subscribe to an internet based mutual exchange service (or pay the subscriptions of individual tenants who wish to exchange), allowing a tenant to register an interest in arranging a mutual exchange through the mutual exchange service without payment of a fee; the tenant to enter their current property details and the tenant's requirements for the mutual exchange property they hope to obtain; and the tenant to be provided with the property details of those properties where a match occurs.</p>	
<p>Registered providers shall ensure the provider of the internet based mutual exchange service to which they subscribe is a signatory to an agreement, such as HomeSwap Direct, under which tenants can access matches across all (or the greatest practicable number of) internet based mutual exchange services.</p>	
<p>Registered providers shall take reasonable steps to publicise the availability of any mutual exchange service(s) to which it subscribes to its tenants. Registered providers shall provide reasonable support in using the service to tenants who do not have access to the internet.</p>	
<p>Tenure Registered providers shall publish clear and accessible policies which outline their approach to tenancy management, including interventions to sustain tenancies and prevent unnecessary evictions, and tackling tenancy fraud, and set out the type of tenancies they will grant; where they grant tenancies for a fixed term, the length of those terms; the circumstances in which they will grant tenancies of a particular type; any exceptional circumstances in which they will grant fixed term tenancies for a term of less than five years in general needs housing following any probationary period; the circumstances in which they may or may not grant another tenancy on the expiry of the fixed term, in the same property</p>	<p>Board approved income collection policy in 2018 which sets out how we will sustain tenancies and prevent unnecessary evictions. Where we provide temporary accommodation we will work with the nominating local authority to attempt to sustain the tenancy</p>

<p>or in a different property; the way in which a tenant or prospective tenant may appeal against or complain about the length of fixed term tenancy offered and the type of tenancy offered, and against a decision not to grant another tenancy on the expiry of the fixed term; their policy on taking into account the needs of those households who are vulnerable by reason of age, disability or illness, and households with children, including through the provision of tenancies which provide a reasonable degree of stability, the advice and assistance they will give to tenants on finding alternative accommodation in the event that they decide not to grant another tenancy; and their policy on granting discretionary succession rights, taking account of the needs of vulnerable household members.</p>	
<p>Registered providers must grant general needs tenants a periodic secure or assured (excluding periodic assured shorthold) tenancy, or a tenancy for a minimum fixed term of five years, or exceptionally, a tenancy for a minimum fixed term of no less than two years, in addition to any probationary tenancy period</p>	<p>Where applicable we comply with this</p>
<p>Where registered providers use probationary tenancies, these shall be for a maximum of 12 months, or a maximum of 18 months where reasons for extending the probationary period have been given and where the tenant has the opportunity to request a review.</p>	<p>Where applicable we comply with this</p>
<p>Where registered providers choose to let homes on fixed term tenancies (including under Affordable Rent terms), they shall offer reasonable advice and assistance to those tenants where that tenancy ends</p>	<p>Our Portfolio Management Team provide support and assistance to those tenants when their tenancy is scheduled to end as appropriate</p>
<p>Registered providers shall make sure that the home continues to be occupied by the tenant they let the home to in accordance with the requirements of the relevant tenancy agreement, for the duration of the tenancy, allowing for regulatory requirements about participation in mutual exchange schemes</p>	<p>Our tenancy agreement gives customers the right to the quiet enjoyment of their home. The agreement is clear in terms of the rights and responsibilities of both landlord and the tenant.</p> <p>It outlines our work to ensure that our homes are not abused by customers through misuse or subletting. Our Portfolio Management Team carry out tenancy reviews to ensure that these remain occupied by the customer who signed the tenancy agreement.</p>
<p>Registered providers shall develop and provide services that will support tenants to maintain their tenancy and prevent unnecessary evictions.</p>	<p>We view eviction as a last resort and our Portfolio and Income Management teams are committed to helping customers to sustain a successful tenancy.</p> <p>Our Income Management Team offer support to our customers to reduce debt, maximise their income and complete Universal Credit applications.</p>

	We have a pre- eviction protocol in place that all staff must follow
Registered providers shall grant those who were social housing tenants on the day on which section 154 of the Localism Act 2011 comes into force, and have remained social housing tenants since that date, a tenancy with no less security where they choose to move to another social rented home, whether with the same or another landlord. (This requirement does not apply where tenants choose to move to accommodation let on Affordable Rent terms).	Due to the current nature of our stock and customers we do not have any such tenants Action – to develop updated tenancy and allocations policies to future proof our policies
Registered providers shall grant tenants who have been moved into alternative accommodation during any redevelopment or other works a tenancy with no less security of tenure on their return to settled accommodation.	Due to the current nature of our stock and customers we do not have any such tenants Action – to develop updated tenancy and allocations policies to future proof our policies

The Consumer Standards – Neighbourhood and Community

Outcome – Neighbourhood management: Registered providers shall keep the neighbourhood and communal areas associated with the homes that they own clean and safe. They shall work in partnership with their tenants and other providers and public bodies where it is effective to do so.	We aim to create neighbourhoods that people can live in and enjoy life. We aim to provide accommodation and neighbourhoods that customers can be proud of and in return, invest in and respect their homes and neighbours.
Outcome – Local area co-operation: Registered providers shall co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties.	Portfolio managers conduct regular estate inspections. We work with our local authority partners, Police, local fire authorities, other providers and agencies to address concerns across our neighbourhoods.
Outcome - Anti-Social Behaviour Registered providers shall work in partnership with other agencies to prevent and tackle anti-social behaviour (ASB) in the neighbourhoods where they own homes.	ASB Policy was revised and approved by Board in 2018 & procedures and training provided for all operational staff Harassment & Hate Crime Policy & DV Policy also produced in 2018 to support our residents and equip our operational staff
Specific Expectations of the Regulator Neighbourhood management Registered providers shall consult with tenants in developing a published policy for maintaining and improving the neighbourhoods associated with their homes. This applies where the registered provider	We have a Tenancy Management Policy which set out how we will maintain neighbourhoods and communal areas.

<p>has a responsibility (either exclusively or in part) for the condition of that neighbourhood. The policy shall include any communal areas associated with the registered provider's homes.</p>	
<p>Local area co-operation Registered providers, having taken account of their presence and impact within the areas where they own properties, shall identify and publish the roles they are able to play within the areas where they have properties; and co-operate with local partnership arrangements and strategic housing functions of local authorities where they are able to assist them in achieving their objectives.</p>	
<p>Anti-Social Behaviour Registered providers shall publish a policy on how they work with relevant partners to prevent and tackle anti-social behaviour (ASB) in areas where they own properties.</p>	<p>ASB Policy was revised and approved by Board in 2018 & procedures and training provided for all operational staff</p>
<p>In their work to prevent and address ASB, registered providers shall demonstrate that tenants are made aware of their responsibilities and rights in relation to ASB; strong leadership, commitment and accountability on preventing and tackling ASB that reflects a shared understanding of responsibilities with other local agencies; a strong focus exists on preventative measures tailored towards the needs of tenants and their families; prompt, appropriate and decisive action is taken to deal with ASB before it escalates, which focuses on resolving the problem having regard to the full range of tools and legal powers available; all tenants and residents can easily report ASB, are kept informed about the status of their case where responsibility rests with the organisation and are appropriately signposted where it does not; and provision of support to victims and witnesses.</p>	<p>Harassment & Hate Crime Policy & DV Policy also produced in 2018 to support our residents and equip our operational staff</p> <p>Resident's responsibilities regarding ASB are set out in Tenants Handbook which is provided at the start of every tenancy.</p> <p>Monitoring of ASB is done through our housing management system and then reported to Board.</p>

Future Improvements

The Board recognises that continual improvement is necessary and has identified as part of this self-assessment process the following improvements for 2019:

Action 1 – to include compliance and regulatory risk implications in all board reports

Action 2 – to develop tailored training and development plans for Board members

Action 3 - Treasury Management framework to be considered at the January Board meeting.

Action 4 – internal audit to carry out a review of the asset register and associated processes as part of its 2019 programme

Action 5 – to implement new business planning model by March 2019

Action 6 – Updated VFM framework to be considered by the board in January 2019

Action 7 – Regular operational VFM updates to be provided during 2019

Action 8 – Updated rent policy to be considered by the board in January 2019

Action 9 – to develop a new customer engagement and involvement strategy by September 2019

Action 10 - Investigate Internet based mutual exchange services for adoption from June 2019

Action 11 – to develop updated tenancy and allocations policies to set a framework for any future developments by June 2019