# Assessment of compliance with regulatory standards



### April 2024

As part of our annual self-evaluation, we are expected to assess whether we believe we comply with each of the Welsh Government's Regulatory Standards.

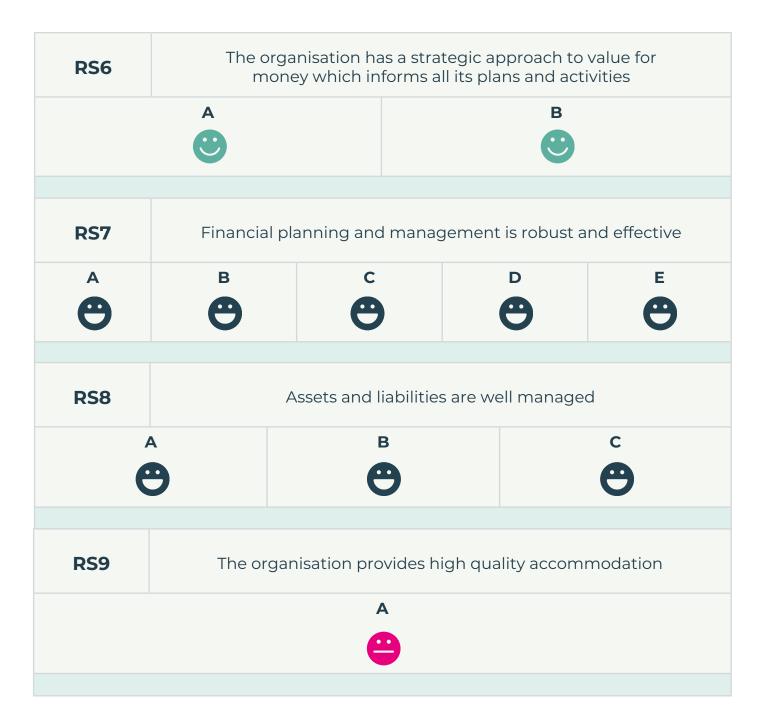
Each Standard has a fairly wide scope and each has several sub-elements. Our Assessment considers each element and has a level of compliance against each according to the assessment levels shown in the Key below.

#### Key to assessment levels



The table below shows an overview of the overall level of compliance for each standard. Then we give more detail for each Standard to explain our assessment. In the body of the assessment, text in pink indicates those areas of improvement leading to the assessment level.

|     | Does United Welsh comply with the standards?  |   |
|-----|---|---|
| RS1 | The organisation has effective strategic leadership and governance arrangements which enable it to achieve its purpose and objectives |   |
|     | Summary of assessment levels by element   |   |
| Å   | B C D E F G   |   |
| RS2 | Robust risk management and assurance arrangements are in plac   | е |
| (   | В с<br>В Э  |   |
| RS3 | High quality services are delivered to tenants  |   |
| A   | B C D   |   |
| RS4 | Tenants are empowered and supported to influence the design and delivery of services  |   |
| A   | B C D   |   |
| RS5 | Rents and service charges are affordable for current and future   |   |
|     | A   |   |
|     |   |   |



| RS1 | The organisation has effective strategic leadership and governance arrangements which enable it to achieve its purpose and objectives  |          |
|-----|--|----------|
| A   | Has a strategy which reflects its vision, culture and values and sets out how the organisation will achieve its core purpose as a social landlord  | •        |
|     | We have a Strategy for 2023-27, which had a comprehensive refresh in 2023/24 and was approved by the Board in March 2023.  It sets out our mission, our values, guiding principles and the challenges we face. It then goes on to describe our three key themes and how we aim to deliver on those themes. |          |
| В   | Complies with its governing documents and meets the requirements of an appropriate Code of Governance  | <b>©</b> |
|     | We have a complete set of governing documents for each entity within the United Welsh Group. United Welsh, as a registered social landlord, has rules which were last reviewed in 2009 and although they remain largely in line with the current Model Rules, they are undergoing a review.                |          |
|     | The two subsidiaries are limited companies and are registered at Companies House. They are not registered social landlords. They each have model Articles of Association.  |          |
|     | All three entities have Standing Orders and Terms of Reference, which are kept under regular review. Our internal auditors (Astari) review aspects of governance annually. Their reports are presented to the Audit and Risk Committee, with the 2023/24 review reporting Substantial Assurance.           |          |
|     | We apply the CHC Code of Governance and maintain a watching brief on the NHF Code of Governance. How the elements of each are applied or complied with are reviewed annually in March, with results reported to the Remuneration and Governance Committee.   |          |
|     | Two areas for improvement were reported this year:   |          |
|     | <ul> <li>the Board gaining a fuller understanding of the profile of the<br/>workforce, and</li> </ul>  |          |
|     | <ul> <li>a better understanding of their responsibilities for safeguarding.</li> </ul>   |          |

C

Sets and delivers measurable, evidence-based commitments across all areas of its business in relation to equality, diversity and inclusion (including anti-racism and tackling hate crime) reflecting the diversity of the communities it works in and with



Our commitment to EDI is expressed in our Equality, Diversity and Inclusion Policy Statement, with more detail in our EDI Policy. Both are reviewed and agreed by the Board annually.

The Board has an EDI Champion, who is also a member of our EDI Best Practice Forum. Good practice across the organisation is led by the Executive Team working through the EDI Forum. An EDI channel on Microsoft Teams is open to all staff to contribute.

Commitment is evidenced by a range of activities, including monitoring, implementing action plans and awareness raising events and training.

In January 2024, we published our Anti-Racist Action Plan, which consolidates actions for the sector from Welsh Government's plan and the Tai Pawb Deeds not Words plan. It details our planned actions for Representation, Service Provision and Communication and Engagement.

In 2023/24, we shared almost 40 stories and pieces of educational content about personal identity experiences and cultural events. These stories have related to most protected characteristics, raising awareness and celebrating the diversity of the people and communities we work with.

We organised for the Welsh housing sector to be represented at the Pride Cymru march in June 2023, with staff from Tai Pawb and Cardiff Community Housing Association joining us in the parade.

In early 2024, we ran a series of events for Neurodiversity Celebration Week. The theme of the week was 'Bring Your Full Self to Work'. We celebrated the talents, skills and insights that the neurodiverse community has to offer, while breaking down any misconceptions around developmental conditions and learning difficulties such as autism, ADHD, dyslexia, dyscalculia, dyspraxia, Tourette's and more.

United Welsh was a finalist at the Chartered Institute of Housing Welsh Housing Awards for the "Championing Equality, Diversity and Inclusion" category.

We monitor both the gender and minority ethnic pay gap of our workforce.

The gender pay gap up to March 2024 based on median hourly pay was:

- United Welsh: 8.6% (2023: 9.5%)
- Group: -8.1% (-2.8%)

The minority ethnic pay gap based on median hourly rate was:

- United Welsh: 16.15% (2023: 13%)
- Group: 6.9% (2023: 14%)

We participate in the Get Into Housing project as part of a consortium of six Welsh housing associations to create opportunities to increase the diversity of our workforce. Work placements are offered in a variety of meaningful roles across the organisation, with the intention of providing pathways into permanent employment in housing. Two people from the 2023 cohort have stayed with us in permanent employment.

We have an EDI project group reviewing data collection, and how that data is used, to better support decision-making and shaping services.

#### D

Has a diverse Board, reflecting the communities the RSL works in and with, and has the skills and knowledge required to be effective



The mix of skills and experience of the Board is reviewed annually and discussed by the Remuneration and Governance Committee against the context of our Strategy, and challenges / opportunities that are likely to come our way over the next few years. The results helped inform a recruitment campaign for new Board members.

The non-executive Board members bring a range of skills and experience including financial management, risk management, construction, development planning, project management, working with disabled people, working in the third sector, working in the health sector, information technology, and people management. The executive Board members provide in-depth knowledge and experience of the housing sector, the operating environment in Wales and the people and culture at United Welsh

All Board members participate in an annual appraisal of the Board's effectiveness, completing a questionnaire designed around the principles set out in The Right Stuff.

As at March 2024, Board membership is 11 (out of a possible total of 12).

- We have six female Board members and five male, so the balance on gender is broadly equal
- The average age is 52; no-one is over 65. Nine are between 45 and 64, and two are between 30 and 44. There is no-one under 30
- Nine Board members classify themselves as White; two as Black/African/Caribbean
- · No Board members consider themselves to be disabled
- Eight Board members identify as Christian, and three as having no religion or belief

## Makes logical decisions based on clear, good quality information which includes assessment of risk and, where appropriate, the views of tenants



Board papers are sent out in advance of meetings, usually one week before the meeting.

Any decision item has a supporting paper setting out the relevant background, and information supporting the recommendation.

In addition, a cover paper is provided which contains a high-level consideration of how our Guiding Principles have been adhered to or applied in this instance. The Guiding Principles include:

- Strong governance, financial resilience and risk management identifying risks attached to this decision and how they will be managed.
- Listen and engage how we have listened to customer voice in arriving at the Recommendation put before the Board.

The contact details of the author are included so that Board members can contact the author if they would like clarification before a meeting.

| F | Enables and supports tenants to influence strategic decision making  | 0 |
|---|--|---|
|   | We use a range of mechanisms to stay in touch with the views and priorities of tenants, including telephone surveys, online surveys and focus groups, and in person visits by senior staff to our estates to meet tenants face-to-face. This has enabled a more responsive feedback mechanism and supported a more diverse group of tenants to make their views known if they choose to. |   |
|   | Particular surveys are also made available both through social media and on our website in order to enable participation by a wider group.   |   |
|   | Our independent tenant satisfaction survey showed that 70% of customers were satisfied that we listen to their views and act upon them (2023: 65%). Whilst this is an improvement year-on-year, we plan to do more to support tenants to influence strategic decision-making (more detail may be found in the Customer Involvement Impact Report).                                       |   |
|   | We published the 2022/23 Customer Involvement Impact Report<br>on our website and social media channels to inform people about<br>our approach to customer involvement, including case studies<br>and progress achieved during the year.   |   |
|   | 486 residents participated in a consultation about the cost of rent and service charges, and how the cost of living is affecting them. The results helped to inform our rent setting policy for the year, and how to focus additional support for residents who are struggling. The outcomes of the survey were communicated to all residents by post in March 2024.                     |   |
| G | Complies with all relevant legislation, regulatory requirements and statutory guidance and communicates in a timely manner with the regulator, including on material issues that relate to actual or potential non-compliance  | • |
|   | Policies and procedures are reviewed regularly, and those reviews are the responsibility of particular teams.  |   |
|   | Staff keep up to date via webinars, email updates from legal firms, and attending conferences and networking with others in the sector via Community Housing Cymru.  |   |
|   | We also complete contractual due diligence work with third party providers to ensure compliance.   |   |
|   | 2023/24 saw the introduction of WHQS23 and we are working to implement its provisions within the required timescales.  |   |

The principal area of concern was the position surrounding potential non-compliance with the new Renting Homes (Wales) Act regarding the delivery of Electrical Installation Conditions Reports (EICRs) to tenants, with consequent potential breaches of loan covenants.

We maintain regular contact with our Regulatory Manager, with communication and notifications channelled through the Company Secretary for consistency and completeness. Regular meetings are held between the Regulatory Manager, Group Chief Executive and Company Secretary to ensure the Regulator is up to date with United Welsh activity.

#### Robust risk management and assurance arrangements are in place RS2 Has an effective framework for risk management, internal controls and assurance that enables it to successfully identify and manage existing and emerging risks which threaten A delivery of its strategy or compliance with legislative or regulatory requirements The Risk Management Policy is reviewed annually and approved by the Board after detailed scrutiny by the Audit and Risk Committee. We have regular internal audit reviews on risk management and assurance, which cover some aspect of risk management annually. All internal audit review reports are presented to the Audit and Risk Committee. The latest internal audit review of Risk Management and Assurance was in October 2023, and gave Substantial Assurance. The Executive Team considers the strategic risks and risk map monthly, making adjustments as necessary in response to the changing environment. The more detailed risk register contains information on levels of assurance as well as controls and mitigations applying to particular risks. Celtic Offsite as a separate business unit has its own risk register. The Celtic Offsite register is reviewed monthly, by the Celtic Offsite Core Group, and quarterly by the Directors of Celtic Horizons Ltd. Tai Ffres, as a new youth housing service, has its own risk management and governance framework which takes account of wider strategic issues within the organisation, as well as finance, operational and governance risks within the Tai Ffres project.

The Tai Ffres Board continues to operate well in terms of providing guidance and direction for the service, ensuring it adheres to the principles and values agreed within the strategic project plan. As Tai Ffres has recently moved into operational delivery, the role of the board has been reviewed and the terms of reference are in the process of being updated.

#### B Does not put social housing assets or tenants at undue risk



As Health and Safety (H&S) failure is recognised as a major risk, there is a separate framework of risk registers and oversight covering the main areas of:

- · Landlord H&S,
- · Employer H&S (United Welsh),
- · Employer H&S (Celtic Horizons),
- · All H&S for Celtic Offsite
- Safeguarding matters.

One Health, Safety, Wellbeing and Safeguarding Panel provides oversight across the Group. Each of the risk areas listed above has its own specialist monitoring group, which reports to the main Health, Safety, Wellbeing and Safeguarding Panel. The Panel meets quarterly and includes all members of the Executive Team.

The Employer Health and Safety Forum at United Welsh has been re-launched and meets on a monthly basis, covering health, safety and wellbeing of people employed by United Welsh. A Health and Safety Partner role has been established to provide direct advice on Health and Safety matters.

Staff Health and Safety was subject to an independent audit in 2022/23, which gave an opinion of Reasonable Assurance. The recommendations highlighted the importance of consistent reporting of accidents, incidents and near misses. This has been implemented.

We invest significant resources in training core staff and in recording the training against individual roles. Key roles have mandatory training requirements assigned to them. Landlord H&S compliance activity is subject to regular independent reviews to provide assurance to the Board. The last such review was completed early in 2023/24 and highlighted that policies, procedures and the contracts governing delivery of the repairs service were not up to date with all relevant legislation. Independent checking of compliance work was also recommended. Implementation of these recommendations are close to being completed.

In considering new business ventures or areas of activity, risks across the Group are taken into consideration, taking appropriate professional advice, with particular emphasis on protecting the social assets within United Welsh.

Stress testing of financial plans is regularly carried out (see section RS7 below).

### C Maintains accessible and up-to-date business continuity, contingency and disaster recovery plans



The two primary plans are the Extreme Weather Plan and the Business Continuity Plan. The BC Plan is general in nature, with outlines of suggested actions for different scenarios. The EWP is specific to weather-related events. Each is updated regularly and is available on the staff intranet.

In 2023/24 an audit review of Business Continuity was carried out and indicated the Board could place Reasonable Assurance on the processes in place. Work is to be done to update the plan and carry out walk through scenario testing.

The structure we have in place for managing disruption to business continuity is that of Gold and Silver strategic and operational groups.

We also have detailed IT disaster recovery planning in place. The IT DR process is moving to the cloud and will be redesigned to take account of the new arrangements. This will increase the availability and reliability of our systems.

Given the increasing risks relating to cybersecurity we are implementing new software to help identify attacks, and have created a new full-time role covering cyber security and infrastructure.

| RS3 | High quality services are delivered to tenants   |  |
|-----|--|--|
| A   | Keeps tenants safe in their homes and promptly identifies and corrects any under-performance or non-compliance on landlord health and safety matters   |  |
|     | Compliance checks and work are carried out through Celtic Horizons, drawing on the expertise of Mears PLC. They carry out their own monitoring checks to ensure they meet their contractual responsibilities.  In addition, following an independent review of all processes in relation to H&S compliance, independent checking of compliance commissioned by United Welsh is being implemented. A role at United Welsh to cover monitoring of compliance and disrepair has been established. At an operational level, gas and electrical safety matters are discussed fortnightly between United Welsh and Celtic Horizons. The Executive Team monitors compliance levels monthly. |  |
|     | As at the end of March 2024, compliance levels were:   |  |
|     | · Gas: 99.9% (2023: 99.94%)  |  |
|     | · Electric: 99.72% (2023: 99.7%)   |  |
|     | · Asbestos and water hygiene: 100%   |  |
|     | 308 properties require a fire risk assessment, none of which were outstanding. Eight properties had remedial action which had not been completed within the recommended time scale (2023: 28 were overdue)   |  |
|     | There were 111 open cases relating to damp and mould   |  |
|     | There were 16 open disrepair claims.   |  |
|     | We are working on designing better integrated reporting on<br>Landlord Compliance to improve the visibility of data, and to<br>enhance ownership of remedial works required.   |  |
|     | Customer satisfaction levels  2023/24  2022/23  Welsh Government 2023 median   |  |
|     | We provide a home that is safe and secure 88% 85%  |  |

104 properties were due to have works related to building safety during 2023/24, with a budget of £1.1m. This programme covers items such as fitting composite doors and fire separation work. At the end of the year 155 properties had been completed, with a spend of £1.2m.

In Living Well, our housing service for older people, personcentered Fire Risk Assessments are completed at each sign up and reviewed annually with tenants, ensuring they are safe in their property. This was developed following the release of the guidance for fire safety in specialist housing settings.

The Thrive Housing Partnership team (which manages properties where we have a relationship with managing partners), undertakes project reviews to ensure that managing agents are managing buildings safely, and are compliant with all health and safety / fire safety requirements. If a managing agent is not compliant, then clear action plans are put in place with timescales.

Estate and building inspections and fire safety checks are completed at our Living Well schemes and supported accommodation / hostels weekly.

#### B Delivers services which meet the diverse needs of tenants



United Welsh provides a broad range of services and / or accommodation to a variety of customer or client groups.

In terms of accommodation, this includes general needs, supported schemes, older persons, hostels, and Extra Care. Other services include floating support, activities to encourage intergenerational connection, activities to reduce potential loneliness and isolation especially for older people, school holiday activities, food bank support and opportunities for jobs and training.

#### **New accommodation**

During the period, we delivered 218 new homes for social rent for general needs, older people, supported housing and Shared Ownership spread across the Caerphilly, Cardiff, Blaenau Gwent and Vale of Glamorgan local authority areas. Our upcoming sites are publicised on our website.

38% of completed properties were to EPC-A standard, the remainder being either s106 properties or acquisition of "off-the-shelf" properties through the Transitional Accommodation Capital Programme (TACP) which aims to boost housing for homeless people.

28 of the new properties were provided for the Tai Ffres project, which provides a new housing and support service created with young people, for young people. In addition to their new homes, the young people receive asset-based coaching to support them. The referral pathway with Cardiff Council appears to be working well and we are already seeing great outcomes for the young people living in the accommodation.

We took handover of the completed former Brynmawr Clinic in 2023, a bespoke provision for young women with complex mental health needs who are transitioning from children's mental health services into adult mental health services. The key aim is being able to provide a transition setting to avoid admission into adult mental health settings, and to facilitate a move into independent accommodation within the community. The project allowed us to review our service delivery at Brynteg Road (also a specialist mental health provision) and we were able to restructure the team and service delivery to create the Acorn Project, providing 10 bed spaces across two accommodation settings. This service is delivered in partnership with a dedicated clinical team from Aneurin Bevan University Health Board.

In 2023 we also opened Min y Coed in partnership with Cardiff Council. Min y Coed provides 17 one and two-bedroom apartments for temporary homeless accommodation for families.

We continued to work with Newport Council to develop two projects for young people leaving care, and worked with Caerphilly Council to develop a Wet Project. Both are due to be completed in 2024. We also opened two new housing schemes specifically for older people: Ty yn y Pwll, Caerphilly and Cei'r Dwyrain, Barry.

#### Other services

Some bespoke commissioned services are provided by teams within our Thrive department, catering for a wide range of needs including intensive 24/7 support. Specialist services for people with complex mental health issues are provided by the Bespoke Repatriation Service and the Acorn Project. Both of those services are delivered by working in partnership with Aneurin Bevan University Health Board.

Having a diverse staff group, e.g. at Oak House and Min y Coed, is important due to the diverse client group, so we are able to rely on the language skills of staff to support residents more effectively.

At Oak House, there is now increased accessibility for people with disabilities, couples, dogs, and other high needs.

Staff across Thrive are offered the opportunity to wear rainbow lanyards to show our commitment to providing an environment where LGBTQ+ tenants, colleagues and service users can bring their whole selves.

The Connect service provides a range of activities to support older people to combat isolation and to achieve good health and wellbeing. Where possible, the activities are provided free of charge through a combination of local resources, and by obtaining external funding such as the National Lottery Community Fund.

Activities in 2023/24 included:

- · Establishing a men's group at Llys Nant y Mynydd
- Exercise and relaxation classes to help keep everyone mobile and bring people together
- · Dementia Cafés to help bring memories back to life
- Activities for learning and socialising with local schools to bring joy and happiness
- · Summer celebrations to mark the Jubilee.

During October 2023, Connect participants were asked to take part in a survey regarding the service. In total, 107 people who engage with Connect took part. Some key observations from the survey were:

- **97.2%** of respondents either strongly agreed or agreed that Connect had a positive impact on their wellbeing
- **92.5%** of respondents either strongly agreed or agreed that Connect had provided more opportunities to socialise with friends and neighbours
- **74.8**% of respondents either strongly agreed or agreed that Connect activities were led by residents
- **74.7**% of respondents either strongly agreed or agreed that they felt they had the opportunity to influence what activities take place.

Many of our 'general services' are delivered to a range of tenants of all ages, disabilities and those with varying levels of support.

In recent years, more service areas have introduced 'triage' approaches, to allow us to provide more intense support to those tenants who require it most. Examples include our Money Advice service and the introduction of Tenant Sustainability Officers. Over 70% of cases supported by the Tenant Sustainability Officers have seen a reduction in arrears. In 2023/24, none were taken forward to eviction.

We employ a range of communication channels so that customers can choose what suits them best. This includes TED, our tenant app, where tenants can access digital services including online rent payments, self-diagnosis repairs and jobs and training support. We also offer telephone, email, webchat, social media and hard copy communication. Our website signposts people on different ways to contact us.

Through the use of the Language Line service, we can communicate effectively with tenants where English is their second language. Language Line also provides a sign language service for those who are hard of hearing.

We have refreshed our Welsh Language Scheme, which is set out on our website. For staff, we have also provided new guidance on communication standards using Welsh and information about how to learn or improve their Welsh, including a list of which staff are fluent in Welsh.

The work on improving our collection and use of EDI data, together with knowledge of the communities within which we work, will better support us to provide services that tenants need.

### Achieves and maintains high levels of tenant satisfaction with services



We have invested significant resources in the collection of tenant satisfaction data through an independent, expert third party, Acuity. Acuity conducts a minimum of 75 telephone surveys per month from a randomised sample of tenants. The question set for our main survey includes all the relevant questions required by Welsh Government (and Housemark) and allows in-depth analysis of results and comments. Furthermore, we are able to benchmark key performance indicators. In addition to the overall perception surveys, we conduct regular targeted transactional surveys on our anti-social behaviour service and repairs services.

The annual results for 2023/24 from the independent surveys for customer satisfaction are:

| Customer satisfaction levels                   | 2023/24 | 2022/23 | Welsh<br>Government<br>2023 median |
|--|---------|---------|------------------------------------|
| With the service provided overall              | 82%     | 78%     | 80%                                |
| The way we deal with repairs and maintenance   | 77%     | 73%     | 73%                                |
| Overall quality of their home                  | 83%     | 80%     | 81%                                |
| With their neighbourhood as a place to live    | 84%     | 81%     | 82%                                |
| The way we deal with anti-<br>social behaviour | 68%     | 64%     | 61%                                |

The 2023-27 Strategy includes aims of achieving at least second quartile performance for selected measures as compared with other RSLs in Wales.

While most have achieved above median when compared with 2023 sector medians, we plan to focus on those which have not. We also await the 2024 sector medians as comparators.

For Tai Ffres, an evaluation framework including aims, objectives and outcomes are co-produced with the project board and youth board, to ensure that we are measuring what matters to the service and young people.

For the Bespoke Repatriation Service, monthly meetings are held to reflect on the recovery star framework agreed with Aneurin Bevan University Health Board, and to consider feedback on the service.

#### D Makes landlord performance information available to tenants



We send out an annual summary of performance to all tenants once we have published the Annual Report for a particular financial year. Both the summary and Annual Report are available on our website and promoted on our social media at the time of publishing.

Key performance data is also available on our website, with headlines on the homepage and more detail on a dedicated performance page.

#### Tenants are empowered and supported to influence RS4 the design and delivery of services Creates a culture which values and promotes tenant A involvement A new Customer Involvement Strategy was approved by the Board in September 2022. This has been shared across the business, encouraging the involvement of customers at early stages of any business change. The strategy is due for an update in 2024 to make sure it aligns with the United Welsh Strategy 2023/27. The Customer Involvement team provides support for the business with customer involvement, rather than the team doing all the involvement activity. One key tool to assist the organisation in improving customer experience is our commitment to the use of User Centered Design (UCD). Training in the principles and implementation of user-centered design is continuing to be rolled out among key staff, to embed the value of thinking about the customer when initiating change. A programme of active engagement between the newly established Senior Leadership Team and the Executive Team is planned for summer 2024, which will seek to enhance understanding and focus on customer experience. The UCD approach was used during 2023/24 specifically by the Living Well team, to gain insight and feedback in relation to the service we provide. We have also ensured that we hold engagement activities at scheme level with this group of customers to consult on important issues such as changes to door entry systems, and security in schemes due to the forthcoming digital switch-over. The development of customer involvement within Tai Ffres is entering into its next iteration. Young people have been involved in shaping the service and young people have now moved into the properties. Our plan, when we have a sufficient number, is to engage those young people living in our accommodation to gain feedback in terms of the service provision, asking what has worked well and what could be improved.

We also manage services within Thrive where the service delivered is completely based on what is needed by the individual at any one time. This means that on a weekly basis, consultation meetings are held with individuals to discuss exactly what their support will look like in the coming week. This is directly influenced and guided by the individual based on their needs at the time and can fluctuate and be responsive 24 hours a day, seven days a week (for example, in the Bespoke Repatriation Service).

B

Enables tenants to understand the organisation's approach to tenant involvement, how they can get involved and how the organisation will listen to and act on tenants' feedback and learns from complaints



Opportunities for tenants to become involved with the activities of United Welsh at a local level include:

- · Community investment team activities
- · Community engagement activities.

As and when appropriate, we consult local communities to seek their views on how we might assist in improving their local neighbourhood or environment.

For example, we worked with Dinas Powys Community Council on a proposed play park on our land on Caerleon Road, Dinas Powys. We also worked with the local community at Dinas Powys to reinvigorate an allotment and, in partnership with local Councillors, we worked to provide new street lighting for a dark footpath.

The Customer Involvement Impact Report details how we plan to develop this further, by for example, establishing a customer panel and expanding volunteering.

We recognise and value feedback and learning from complaints. We have the following methods for capturing such information:

- Monthly Acuity Surveys include the ability for respondents to comment
- Complaints and compliments reporting process
- Transactional surveys following repairs
- Topic specific consultations such as the Rent, Service Charges and Cost of Living survey.

Details of how to make a complaint and how it will be dealt with are available on our website.

During 2023/24, 265 complaints were received and 236 complaints were closed. Of the closed complaints, we upheld 75. Around 50% of complaints related to repairs.

We are working on recording complaints on a new platform which will give greater visibility across the business and enable trend analysis.

## Provides opportunities for tenants to be involved, can demonstrate that tenants are satisfied with them and can demonstrate the difference involvement is making



By developing the Customer Involvement strategy, we identified a range of methods for involving our customers. These include:

- · Data driven insight
- · Inclusive involvement
- · Digital engagement
- Volunteering
- Focus groups / user panels
- · Co-production of some projects
- Special interest groups / task and finish groups.

We switched to digital engagement, using our social media channels to reach out to tenants on specific topics. While limiting the potential tenants who could become engaged, we did have some successes and held engaging and challenging conversations with tenants on a variety of subjects including rent setting and service charges.

Examples of tenants being involved in 2023/24 include:

- Rent setting The review of rent setting for 2020/21 was an early example of involving tenants in an online discussion.
   We broadened the reach for the 2022/23 rent review by placing a consultation on our website. We continued with this approach for the consultation prior to setting rents for 2024/25.
- Extensive consultations about service charges what's included and how much those services cost

- Recruitment Tenants were part of the recruitment process to appoint a new Group Chief Executive, and are often involved in other recruitment, particularly for roles in the Living Well team
- Changes to Living Well homes Tenants at Living Well schemes have been discussing the changes to door entry systems and security in schemes due to the forthcoming digital switch-over
- Rewilding Discussions about areas that could be rewilded on certain estates to make the most of green spaces.

The Customer Involvement Impact Report highlights how we plan to involve customers more.

For each new client in the Bespoke Repatriation Service (BRS) we hold a networking day. A large part of this is driven by the individual themselves where they direct their risk management and crisis support plans.

In the BRS / Acorn Project, activities are led by people using the services, so they are not restricted by 'allowable' activities. This means individuals can try new hobbies and activities to support their health and wellbeing. An example of this is a group of tenants wanting to go on holiday to Tenby and this being supported by staff.

| Customer satisfaction levels  | 2023/24 | 2022/23 | Welsh<br>Government<br>2023 median |
|---|---------|---------|------------------------------------|
| We listen to their views and act upon them                          | 70%     | 65%     | 65%                                |
| Opportunities given to participate in the decision-making processes | 70%     | 71%     | 60%                                |
| Given a say in how services are managed                             | 67%     | 65%     | 61%                                |

Can demonstrate diverse tenant views and expectations inform the development and review of housing and related services, and the response to any under-performance

D

Our satisfaction surveys are targeted to tenants living in different geographical areas across our housing stock, and a variety of tenant characteristics. Our satisfaction surveys are targeted to tenants living in different geographical areas across our housing stock, and a variety of tenant characteristics. Further work is underway to make better use of this data to provide insight which will directly influence the shaping of services.

Please refer to the <u>Customer Involvement Impact Report</u> for information on how customers have helped shape services, such as a new Men's Group at Llys Nant y Mynydd, and changes to standards of homes available for re-let.

Please also see previous sections regarding an individual approach to service provision for delivering the BRS and Acorn Project within Thrive.

| RS5 | Rents and service charges are affordable for current and future tenants  |   |
|-----|--|---|
| A   | Ensures all applicable rules and statutory guidance (including the current rent agreement) are complied with.  | • |
|     | For 2024/25, existing properties will have their rents increased by an average overall of 6.7%, which is equivalent to the maximum rent uplift under the rent settlement agreement.  |   |
|     | The rent reduction phasing has been completed. Our objective is that, regardless of location, the rent and service charge combined will not exceed 33% of net income. We calculate income for this purpose as being National Living Wage adjusted for tax and NI. Any remaining property rents that fall above the affordable level have been frozen and we expect all rents to be affordable in time. |   |
|     | In relation to new developments, rents for individual properties are set based on their location and property size, with the base one-bedroom flat being set at a level such that rent and service charge combined should not exceed 33% of net income as set out above.   |   |
|     | We have an agreed rent model for Tai Ffres based on the size<br>of accommodation, but each rent is set significantly lower than<br>general needs to ensure it provides a financially viable solution<br>for young people.  |   |
|     | Arrears levels continue to be stable, with arrears across all stock as at the end of March 2024 amounting to £1.4m, which is 3.23% of rent collectable.  |   |

| RS6 | The organisation has a strategic approach to value for money which informs all its plans and activities   |   |
|-----|---|---|
| A   | Determines its strategic approach to value for money,<br>ensuring the approach relates to its social purpose, and makes<br>strategic and operational decisions in line with it  | • |
|     | Our approach to Value for Money (VFM) is encapsulated in our published VFM statement, with more detail in our internal policy. The VFM statement is updated annually.   |   |
|     | Financial VFM benchmarking is presented to the Executive Team monthly (using the Global Accounts metrics). Variances are used to highlight where costs may need further investigation.  |   |
|     | Board decisions are presented against a particular strategic outcome, with a discussion of resource requirements and customer impact where relevant.  |   |
|     | We have a Procurement Policy with robust procurement procedures, and use procurement frameworks as appropriate, e.g. development contractors are drawn from Constructionline. We are still developing our approach to obtaining a higher level of community benefits through our procurement.   |   |
|     | An independent report in 2022/23, reviewing the provision of asset management services through Celtic Horizons, concluded that the arrangements for core services provided value for money. However certain types of work, which were largely subcontracted by Celtic Horizons, have been brought back in to United Welsh to manage directly, thus saving the partnership overhead cost.  |   |
|     | Following the move of the Learning and Development Business Partner to a central role within the People Team and the updating of the Learning and Development Procedure, staff are now encouraged to be more strategic and future-focused with their training needs and bookings, and are asked to liaise with the Learning and Development Business Partner before booking any training to ensure that we achieve value for money across the organisation. |   |

#### В

## Can demonstrate to stakeholders, including tenants, that it achieves value for money in delivering its strategy and services



The published VFM statement shows metrics that demonstrate how we delivered VFM for the financial year. We ask tenants as part of the independent survey whether they believe their rent and service charges provide value for money.

| Customer satisfaction levels            | 2023/24 | 2022/23 | Welsh<br>Government<br>2023 median |
|---|---------|---------|------------------------------------|
| Rent provides value for money           | 86%     | 83%     | 82%                                |
| Service charges provide value for money | 68%     | 65%     | 68%                                |

United Welsh subsidises certain elements of service charge costs, such as the fire safety works, as we have taken them into the main budgets and will not recharge them.

We also cap service charges under our Rent Setting policy so that the total of rent and service charge to a tenant does not exceed the affordability levels we have determined. However, there is some work to do in this area to increase the number of customers who are satisfied that service charges provide good value for money.

We have started community biodiversity work to benefit native wildlife, plants and flowers, while also reducing the pace of cost increases for grounds maintenance services.

United Welsh is currently holding more cash than originally planned, and there would usually be a cost of carry associated to this. However, due to the current economic climate and underlying interest rates increasing, this has allowed efficient investment of cash to maximise returns at rates that are higher than the cost of funds, and effectively remove the cost of carry.

As part of some of our commissioned work with Aneurin Bevan University Health Board, we report on cost savings for the health board, thus fulfilling our aim of providing value for partner organisations.

| RS7 | Financial planning and management is robust and effective   |   |
|-----|---|---|
| A   | Sets financial plans which enable it to deliver its strategy and achieve its social purpose, and there is appropriate reporting to the Board against these plans  | • |
|     | 30-year financial forecasts are prepared annually and presented to the Board.  The latest business plan was approved by Board in July 2023. This incorporated a five-year summary highlighting trends for key metrics and covenant forecasts for the 30-year period to demonstrate compliance with lender covenants. The 30-year business plan reflects the latest budget and forecast as a starting point.  The business plan is updated for any strategic, economic, regulatory or legislative changes. The business plan reflects aspirations, for example in relation to affordable rents, the decarbonisation agenda, and the development of new homes. Any changes in strategy are discussed and estimates of resource implications are fed into financial planning.  In November 2023, a set of Golden Rules was discussed by Audit and Risk Committee and approved by the Board. These are now monitored through the quarterly management accounts prepared for the Board.  Actual results and updated forecasts are prepared monthly for the Executive Team and then each quarter for the Board, with explanations on why variances have arisen and what corrective actions are to be taken, where appropriate. These are presented against the context of key metrics such as operating margin, and interest cover. The monthly management accounts also monitor KPIs, and any changes are investigated and reported.  These monthly / quarterly reports include the financial performance of the subsidiaries, again with forecasts and variance analysis. |   |
| В   | Is financially viable in the short, medium and longer-term, and maintains sufficient funding and liquidity to support this  | • |
|     | The Treasury team work to a Treasury policy which is reviewed by a nationally recognised firm of treasury advisors. The policy is considered in detail annually by the Audit and Risk Committee before being presented for approval by Board.   |   |

Liquidity is monitored monthly via a long term cash flow and formal monitoring of liquidity covers at least 18 months' worth of capital commitments.

Liquidity monitoring ensures there is sufficient cash to cover the next one-month Net Cash Requirement (subject to a minimum balance of £10m), and sufficient liquidity to cover at least 18 months of Net Cash Requirement.

Net Cash Requirement is defined as the net total of all contractually committed cash inflows and all contractually committed cash outflows. Future Low Cost Home Ownership (LCHO) income, Shared Ownership income and 50% of Market Sales income will be included in cash inflows.

Short term daily cash flows are prepared for at least the next four weeks and updated weekly. Long term monthly cash flows are prepared for at least the next three years and updated monthly.

Any changes to the development programme are also picked up in preparing this cash flow. It is very much a 'live' document and the cash flow provides monthly information over the next three to four years.

Regular cash flow meetings take place between the Development and Treasury teams to review information on cash flow and security, with both teams working in collaboration. The cash flow is used to inform decisions relating to loan draw downs and a loan profile is produced as part of this cash flow report.

As well as regular reporting of cash flows to the Board, a three-year cash flow is produced for scrutiny by the Audit and Risk Committee as part of the annual update of the Treasury Strategy. Once the Committee is content with it, the Treasury Strategy is presented to the Board for approval.

## Monitors, reports on and complies with all covenants it has agreed with funders

C



Covenants are monitored on a quarterly basis and reported to the Board. There have not been any material changes to covenants over the last year. A number of Waivers and Carve Outs were agreed with Lenders in relation to the electric safety issue and Renting Homes (Wales) Act by 31st March 2024, with additional ones to follow by the end of April 2024.

|   | While there is no breach in financial covenants expected, it was felt necessary to request these from Lenders for prudency and in line with the sector.  All the terms of the covenants are kept under review for changes in circumstances. For example, in recent years we have renegotiated to take account of the introduction of SONIA (replacing LIBOR as the standard interest rate measure) and to replace market value with historic cost as the base for the Gearing covenant. |   |
|---|---|---|
| D | Identifies and effectively manages risks to the delivery of financial plans including appropriate stress testing, scenario planning and use of internal thresholds  | 9 |
|   | Stress testing of financial plans is carried out regularly both in the form of 'reasonably possible' scenario testing and the 'test to destruction' type of test. This enables the organisation to discover our boundaries and supports the setting of thresholds or alarm levels; for example the upper level on arrears.  |   |
|   | Provisional suggestions of stress testing scenarios are presented to the Audit and Risk Committee for a discussion on risk and impact, with any recommended changes being incorporated into the business plan. Additionally, the stress testing has been reviewed by Treasury advisors in order to assess whether there are other economic factors which need to be taken into consideration. Again, recommendations were incorporated into the scenario testing undertaken.            |   |
|   | The next scenario testing will be carried out as part of the July 2024 Business Plan. A stress testing exercise is next scheduled for September / October 2024.   |   |
| E | Has an effective treasury management strategy and associated processes  | • |
|   | We have a comprehensive Treasury Management policy, which is reviewed annually under the guidance of our treasury advisers. Our in-house treasury team monitors that we comply with its provisions and implement the Treasury Strategy agreed by the Board.   |   |
|   | Detailed scrutiny of Treasury matters is carried out by the Audit and Risk Committee. Prior to updating the Treasury Strategy, advice is sought from treasury advisors so that the strategy can fully reflect any economic or treasury related changes.   |   |

An internal audit review of treasury stated that treasury management is 'one of the most robust we have seen at any RSL we have audited'.

The Revolving Credit Facility was due to expire within 18 months and as a result, was renewed and extended to seven years. It is now secured until 2029. The facility amount was also increased to £45m to ensure there is adequate liquidity available for future development plans. In establishing new business ventures, cash flows and meeting lender requirements on intra-group cash flows are always considered carefully. Nationally recognised legal and tax advisors are used when considering any new venture both for advice and to mitigate risk.

| RS8 | Assets and liabilities are well managed   |   |
|-----|---|---|
| A   | Has an accurate and up to date understanding of its assets and liabilities  | 0 |
|     | We maintain a schedule of the main asset and liability groups, showing what they are and where records detailing them are to be found. The schedule is scrutinised annually by the Audit and Risk Committee.  The Asset and Liability Register was reviewed by internal audit when initially set up and was recognised as a 'best practice' example and used as a template by the auditors. |   |
|     |   |   |
| В   | Maximises the use of assets to achieve its social purpose and the objectives of the organisation  | • |
| В   | • •   | • |

- Our Living Well schemes (sheltered and Extra Care) host activities such as the intergenerational choir. Caerphilly Miners come in to deliver activities, as well as Keep Wales Tidy and local schools. Pre-pandemic, we also had local toddler groups using communal space within our Extra Care schemes.
- Art projects delivered at Oak House and Min y Coed help both residents and support local students.
- Three flats at Living Well schemes are leased as a Cariad home, meaning they are available for the health board to use for step down accommodation for older people leaving hospital, preparing them to return to their own homes.
- The offer of free medium-term use of 44 Church Street to Promo Cymru (a local social enterprise).
- A commercial unit in Cardiff Bay was let to Barod, who provide support to individuals affected by alcohol and drugs.
- 20 Church Street, Ebbw Vale, is used as a Housing Hub in partnership with Blaenau Gwent Council.
- Plas Hyfryd (Extra Care) hosts a telecare centre run by Caerphilly Council
- We have three properties built for specified purposes for partner organisations – Coed y Cwm Autistic Day Centre; Bargoed Health Centre and Hanbury Chapel, which is used as a local community hub by Caerphilly Council.

We have been heavily involved in the re-design of homelessness services in Cardiff, which has led to significant physical and management alterations to a host of large-scale properties including Baileys Court and Adams Court in the city centre.

Furthermore, we routinely partner with local authorities to develop new schemes which address homelessness pressures, often building bespoke accommodation units.

We are open to developing mixed tenure schemes to provide cross-subsidy for open market sales into the provision of more affordable housing. We completed a site at Watford Road in Caerphilly a few years ago and have two more significant sites in our development pipeline.

We manage our general stock to minimise the length of time any property is empty. We monitor void turnaround performance on a monthly basis and operational lettings teams monitor availability weekly. The Executive Team and the Board receive quarterly updates.

The average turnaround time for letting a property in 2023/24 was 62.43 days. At the end of March, we had 125 properties available for letting.

Our investment in the Celtic Offsite business unit in Celtic Horizons Ltd is predicated on the intention to gift aid surpluses from Celtic Offsite to United Welsh to help fund our retrofit programme.

While Celtic Offsite made a modest surplus in 2023/24, for the first time since it was established as a business three years ago, it was deemed prudent to retain that surplus within Celtic Horizons Ltd. Celtic Offsite also provides services to other RSLs as part of its social purpose.

The surplus from Harmoni Homes Ltd, the other subsidiary company, is also gift aided to United Welsh to contribute to our social housing activity.

## C Uses accurate information about assets and liabilities to inform strategic and financial decisions



Financial reporting is drawn from our primary finance system (Open Accounts) with forecasting carried out on well-established spreadsheets. Detailed examination of variances is undertaken on a monthly basis.

Information for development viabilities and decisions on additions to the development programme is taken from our development monitoring software (Pamwin) which records everything at project level and is updated by our Development surveyors. The Treasury team also monitors the Pamwin information to support forecasting for funding requirements. All new development appraisals are reviewed by the Treasury team. Regular meetings between Finance and Development take place to ensure development spend is accurately reflected in the security information and in cash flows. Comprehensive loan / security and cash flow information is supplied at these meetings.

A new system (AssetCore) for recording properties, title information and loan security information has been implemented over the past 12 months. Up until recently, such information was held in spreadsheets maintained by the Treasury team and Governance team. Title information is checked annually to data supplied by the Land Registry.

The information outputs from these systems are periodically checked by both external and internal auditors for completeness and accuracy.

#### RS9 The organisation provides high quality accommodation Ensures publicly funded homes meet all applicable standards, rules and statutory guidance issued in connection with quality A of accommodation, including the current Welsh Housing **Quality Standard Existing homes** Energy efficiency and decarbonisation works, supported by ORP grant funding, are now an integral part of our stock investment and planned maintenance programmes. This work has been moved to being managed directly by the Assets team at United Welsh. 176 properties benefited from retrofit measures in 2023-24. Stock condition surveys now incorporate retrofit assessment surveys which places us in a favourable position to meet the requirement for the completion of Whole House Assessment Surveys, which is a requirement of WHQS 2023. We're currently reviewing our approach to damp and mould remediation and a project team has been established to consider the end-to-end process. This is to ensure that a newly designed process enables issues to be dealt with more quickly, and that we can maintain visibility of all defects until they are resolved to the satisfaction of the tenant. We also have a programme of refurbishments in progress at Living Well schemes (sheltered accommodation). We are currently reviewing and updating our Asset Management strategy to incorporate the requirements of WHQS 2023. **New homes** The Board adopted high level net zero principles in February 2020, which were developed into our Towards Net Zero Carbon Plan in September 2020. Part of that plan is that new-build grant-funded homes will be EPC-A and off gas by 2025. 38% of homes completed in the period were to EPC-A, using non-fossil fuel energy sources. The remainder were either s106 properties, off the shelf acquisitions from housebuilders or existing / refurbishment schemes. While the energy performance of these additional homes is not EPC-A, they are achieving high energy efficiency ratings. The EPC-A properties were our directly delivered schemes, some of which used Celtic

Offsite to manufacture and erect the timber frame structures.

Celtic Offsite was set up in 2021 using a Welsh Government loan. It has been awarded three prestigious International Organization for Standardization (ISO) certifications: ISO 9001 for quality management, ISO 14001 for environmental management and ISO 45001 for Health and Safety management. Celtic Offsite has also achieved PEFC certification for the chain of custody of forest-based products and was awarded Gold by the Structural Timber Association in their latest audit.