









## The Sovereign Housing Group – Compliance with Regulatory Code 2008/09



Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
<b>1. Viable</b>					
1.1	HAs must operate viable businesses with adequate recourse to financial resources to meet their current and future business and financial commitments:	(a) The association's business plan demonstrates its priorities and strategy for achieving its objectives, including commitments to residents, lenders and rent restructuring requirements.	<b>Group Overview</b> <ul style="list-style-type: none"> <li>The Group has a sophisticated approach to business planning which is co-ordinated and managed centrally by the Group Treasury and Business Planning Team, which is part of the finance team. During the year the decision was made to replace the existing business planning models with the Brixx system. The new system is more robust than that previously used and provides the consolidation tools required to manage a complex Group. The implementation was carried out in conjunction with Tribal and the models are now fully operational.</li> <li>Preparation of the business plans is a joint responsibility shared between the Parent and Partner members in accordance with a detailed SLA. Consistent assumptions across the Group are used in preparing the plans which are stress tested to ensure the Group's strategic objectives are achieved whilst complying with lenders requirements.</li> <li>The business plan process is enshrined within the Intragroup Agreement and the Group Business Planning Policy adopted by all Partner members. In this context all business plans require Parental agreement, following consideration by Partner member boards and approval is required to any significant amendments.</li> <li>The business plans are prepared to give 5 and 30 year scenarios, together with a detailed annual budget and expressed as Income and Expenditure Account, Cash Flow and Balance Sheet with commentary.</li> <li>The underlying assumptions in the plans are regularly reviewed (currently on a monthly basis by Directors and quarterly by the Board due to the volatility of the markets) taking account of the changing economic climate and operational results. This allows us to monitor financial capacity and the ability to support and subsidise new investments.</li> <li>Specific assumptions tested include: <ul style="list-style-type: none"> <li>Stock Investment Programme.</li> <li>Future Development Programme.</li> <li>Allowance for Risk Management.</li> <li>Variations in economic assumptions.</li> <li>Interest rate assumptions based on treasury plans.</li> </ul> </li> <li>Assumptions for the maintenance of newly developed properties are included in development scheme viability appraisals and in the business plan at the same level of marginal costs, based on expected replacement programmes and dates. Assumptions for new properties are reviewed annually and agreed by the appropriate Partner member boards.</li> <li>Results are modelled individually for each Partner member to demonstrate compliance with loan covenants and business plan capacity since each organisation has its own direct funding relationships. The approved combined models then comprise the Group business plan capacity model.</li> <li>The Group has in place sufficient loan facilities to meet its committed development programme.</li> </ul>		<ul style="list-style-type: none"> <li>The Group is in the process of planning the issue of a capital bond to secure future funding requirements across the Group and to enable sustained delivery of the development programme. In addition, the Group continues to research the availability and pricing of more traditional finance.</li> <li>The bond will be raised on behalf of SHA, but with an on-lending facility for the Group.</li> <li>In order to issue a bond a rating is necessary and this is at an advanced stage. In addition, the documentation and security processes are underway so that the Group is in a position to go to the market by September 2009. Evaluation of potential schemes to determine viability and timescales is taking place to support the final decision on whether to proceed with the issue.</li> <li>In the meantime the programme to charge security to counterparties where the Group has standalone swaps is continuing in order to remove the risk of cash collateral calls.</li> <li>The WHP business plan has been incorporated in the Brixx model utilising the Group's economic assumptions as part of the preparation for their joining the Group. In accordance with the new Intragroup Agreement all WHP central functions moved to SHG with effect from 1 July 2009. This includes treasury management, business planning and audit and risk.</li> </ul>
1.1.1	Based on a coherent and robust business plan	(b) The Association's business planning is informed by asset management information, which is reviewed regularly	<b>Stock condition</b> <ul style="list-style-type: none"> <li>Business plan projections across the Group include full maintenance provision and appropriate scheduling of major repairs. Each Partner member within the Group maintains a database system of property stock condition data, which is independently verified and regularly updated. This is used to inform a 30 year Forward Maintenance Plan (FMP) and in particular to enable the publication of a detailed 5-year programme of the required works. The FMP is a major component of the Group business plans and is subject to a rolling annual programme of review. The stock condition data held by each subsidiary also allows 'uneconomic' properties to be identified, (properties where the ongoing cost of maintenance exceeds the net redevelopment value).</li> </ul> <b>Asset Management</b>		<ul style="list-style-type: none"> <li>On 1 April 2009 WHP joined the Sovereign Development Consortium and from 1 July 2009 has adopted the component standards for new properties used by the Group in the evaluation of projects and for business plan purposes.</li> <li>At the same time as the amalgamation of SHG and WHP, Kingfisher and HVHS, WHP's two major subsidiaries, also amalgamated. This amalgamation</li> </ul>




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			<ul style="list-style-type: none"> <li>Each subsidiary has an active Asset Management Strategy (AMS) where redevelopment schemes are rigorously evaluated against a variety of standards before being modelled in business plans. The approach uses a range of business indicators to identify the priority projects for disposal, regeneration and reinvestment. Each of SHA, VHA and THA has sites where stock is now being decommissioned and re-developed. SHA and THA also have major refurbishment programmes underway on a number of sites. Investment in these activities is supported by an appropriate business case, which includes an optional appraisal and sensitivity analysis. The financial impact of any redevelopment is included within the business plan projections, and reviewed on an annual basis.</li> </ul> <p><b>Decent Homes Standard (DHS)</b></p> <ul style="list-style-type: none"> <li>All Partner members were DHS compliant in 2007/08 and will remain fully compliant by 2010, with the exception of THA's Somerford Estate which is being redeveloped and has a three year extension to achievement of the DHS. The extension is being regularly monitored by the TSA. The first part of the Somerford redevelopment programme, Cleveland Place, is due for completion in August 2009. Further phases will be authorised within THA's business plan constraints.</li> </ul> <p><b>Sales</b></p> <ul style="list-style-type: none"> <li>No member of the Group relies on asset sales to maintain required levels of asset management to cover costs or meet loan covenants. In 2008/09 SHA disposed of its site at Bardown near Chieveley and will be using the receipt to fund other AMS projects to ensure the programme is self financing. Redevelopment schemes at Play Platt and St Donats in Newbury were completed and occupied in October 2008, creating 17 rented and 26 shared ownership properties. Schemes earmarked for re-development are subject to a decanting programme and any vacancies let on a shorthold basis to maximise the use of the stock.</li> </ul> <p><b>Asset management information.</b></p> <ul style="list-style-type: none"> <li>RC 3.4.2 (C) outlines in further detail subsidiary compliance with DHS, how stock condition information is collected and reviewed, and maintenance standards.</li> </ul>		<p>should remove the partial requirement of HVHS to make small numbers of asset sales to ensure its asset management programme can be funded.</p> <ul style="list-style-type: none"> <li>The Group has embarked on a project to harmonise the standard of its properties and services across the Group. Currently all business plans contain asset management forecasts which will raise standards above DHS though not yet on a standardised basis. The database systems maintained by the subsidiaries allow each to model scenarios so that each subsidiary can formulate its own plans to reach this higher standard while remaining within viability constraints.</li> <li>Following the amalgamation of SHG with WHP, SHA will be exploring and planning for intergroup stock rationalisation during 2010/11.</li> </ul>
1.1.2	Fulfilling their loan-agreement covenants	c) Accounts and returns are submitted on time and demonstrate that the Association is, and will continue to be, solvent	<ul style="list-style-type: none"> <li>Annual statutory accounts are prepared for each Partner member and for the Group and filed within the required timescales. FVAs (electronic accounts) have also been submitted to the Regulator. 2008/09 accounts incorporate the changes required under SORP 2008, (primarily relating to the treatment of first tranche shared ownership sales), and include a charge for impairment that reflects current conditions in the property market. The Group auditors have examined commitments and available funding and are able to confirm that the Accounts are prepared on a going concern basis.</li> <li>On a longer timescale 30 year plans for the Group and individual Partner members are submitted in the form of the Capacity Model to the TSA and as 30 year business plans to the Group's funders. The plans demonstrate compliance with all financial covenants and the continuing viability of the Group. Returns to funders are submitted within the timescales specified in each individual loan agreement.</li> <li>This year the TSA has agreed to extend the deadline submission of the capacity model from 30 June 2009 to 1 September 2009. This is to allow the capacity model to include WHP details. The Group amalgamated with WHP on 1 July 2009 but the later submission date will allow full recognition of the fair value accounting numbers that result from applying SHG's accounting policies to WHP's accounts.</li> </ul>		<ul style="list-style-type: none"> <li>The Group has enhanced its internal reporting systems to ensure that the potential effects of having to switch tenure from shared ownership to rental on newly developed schemes is continually monitored to A) anticipate both first tranche sale deficits and B) any potential impairment. This is projected through to the input on loan covenants to ensure continued compliance.</li> <li>In the light of the continuing uncertainty over future levels of inflation the Group uses its business plan model to test possible scenarios in future rent and cost increases/decreases to manage ongoing viability.</li> <li>The Group has developed a joint post amalgamation plan and details of proposed savings from the amalgamation have been submitted to and approved by the TSA.</li> <li>A new finance system is currently being implemented to 'go live' in April 2010 giving consistency in reporting and to allow the Group to benchmark more effectively and to deliver future efficiencies.</li> </ul>



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		(d) Financial policies and procedures are evident. They ensure that the governing body has sufficient and timely financial information to inform decision-making processes	<ul style="list-style-type: none"> <li>Financial policies and procedures are well established across the Group. Progress and performance continues to be monitored through the finance management team which has replaced the lead finance team. In addition, the Group established a new Group Treasury Committee in 2008 to ensure that adequate time, expertise and attention is provided to treasury planning on both a strategic and tactical level. This has enabled the Group to act swiftly and appropriately to protect the business in an uncertain and volatile economic environment. The Terms of Reference for the Group Treasury Committee were reviewed and updated in May 2009 in anticipation of the amalgamation.</li> <li>The Group's Standing Orders and Financial Regulations, including delegated authorities, were fully updated in 2007. The Group operates a detailed capital appraisal system (Proval) and complementary development cash forecasting system (Sequel) that uses the same assumptions that are used for business plans. Scheme approval authorities are detailed in the Financial Regulations.</li> <li>This year all appraisals that involve a mix of tenures require an exit strategy to be shown in respect of all sale properties so that the effects of being unable to sell properties is displayed, understood and managed proactively. In practice all schemes, where costs have exceeded the revised valuation, have been let on an intermediate rent basis, with a view to convert to shared ownership when the housing market recovers.</li> <li>Also this year the Group has introduced a five year budget that provides better medium term information. Many of the activities being undertaken now; expansion of Group services to service an expanding Group, most larger development schemes, and on-going improvement of services; have an impact beyond the timescales and scope of annual budgets and partner members need to understand how centrally allocated costs are likely to develop and change and to understand what services are provided. The five year budget allows both Group and Partner member boards to plan more effectively.</li> <li>The Group has a significant, externally contracted, internal audit programme that looks at compliance with policies and procedures and reports to the boards through the Group Audit and Risk Committee.</li> <li>In line with the NHF's guidance on 'Excellence in Governance' the Group Finance Director has certified to boards that, in his opinion, financial systems and reporting are adequate to allow the business to be managed safely and prudently.</li> </ul>		<ul style="list-style-type: none"> <li>Standing Orders and Financial Regulations have been updated to reflect the amalgamation with WHP, and the changed economic environment. These have already been approved by the Shadow SHG Board for the new Group and will be ratified in August 2009 after going live. A more thorough review will be undertaken post-amalgamation to incorporate current best practice and any requirements stemming from the TSA's standards and outputs from the broader governance review scheduled for Q4 2009/10.</li> <li>Accounting policies, procedures and appraisal systems are currently being aligned across the enlarged Group.</li> <li>The new finance system is due to be implemented from 01/04/10 and will bring a number of benefits including more consistent reporting and a sophisticated ordering and payment system supported by document imaging.</li> <li>The Group Finance Director is now responsible for the IT and Company Secretariat functions and is developing a new Finance Strategy to take into account the recent amalgamation with WHP</li> </ul>
<b>2. Properly Governed</b>					
2.1	Housing associations must operate according to the law and their constitutions:	a) The association demonstrates its independence by conducting its affairs without undue reference to or influence by any other body, unless it is part of a group structure where operating arrangements between group members are documented.	<ul style="list-style-type: none"> <li>Parent and Partner member relationships are governed by standard Intragroup Agreements (IGA). In addition an increasing number of Service Level Agreements (SLAs) are being entered into both for central services and inter-subsidary services. As a result of the amalgamation with WHP a revised IGA has been drafted and agreed by all boards. This is a single agreement that has been signed by all Partner members post amalgamation.</li> <li>The Group Chief Executive, the Managing Directors and the Group Company Secretary provide ongoing support and guidance to Partner member and Parent boards. In addition, there are lead directors assigned to support and assist the three Group-wide committees (Audit &amp; Risk (GARC), Remuneration &amp; Governance (GRGC) and Treasury (GTC)).</li> </ul>		<ul style="list-style-type: none"> <li>The newly recruited VHA Chair Designate is expected to be appointed at the September 2009 AGM.</li> <li>In May 2009 the Group Board agreed to recruit two new resident members to the SHG Board. Recruitment will take place in the autumn across all residents of the</li> </ul>


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			<ul style="list-style-type: none"> <li>During 2008/09, recruitment activities predominantly supported the creation of the new shadow Group and Partner member boards. Board members from the two existing parent boards (WHP &amp; SHG) and the two subsidiaries were invited to apply to either board. Sufficient candidates were identified through this process to establish the two shadow boards, which have been meeting regularly since January 2009.</li> <li>A new Group membership and recruitment process was developed to recruit a Chair for the VHA Board. A suitable candidate was identified and has joined the VHA Board in a Chair Designate capacity pending the retirement of the current Chair at the September 2009 AGM.</li> <li>The 12 new board members recruited in 2007/08 have undergone induction and other training and have been integrated into the boards and committees upon which they serve. There are a couple of vacancies for independent board members to the various boards in the Group but recruitment is being deferred until the governance review is undertaken post-amalgamation.</li> <li>While resident board members were successfully recruited last year, additional vacancies have occurred and recruitment activities to fill these vacancies are currently being planned by SHA and THA.</li> </ul>		<p>Group on a skills based approach.</p> <ul style="list-style-type: none"> <li>A succession planning process is underway for the Chairs of SHA and THA who are due to retire in 2010 and 2011 respectively.</li> <li>A new board members' training programme was agreed by the GRGC at its May 2009 meeting. This will be reviewed as the year progresses and amended if necessary as a result of the annual board appraisal process and the post-amalgamation governance review.</li> <li>The Group Board Membership and Recruitment Policy was considered by the GRGC in May 2009 (following the publication of the new NHF Code of Governance) and will be adopted across the Group.</li> <li>The Group Member Code of Conduct will be reviewed in the light of the new NHF guidance, once it has been published later in the year. All board members will be required to acknowledge in writing their agreement to adopt it.</li> </ul>
2.1.1	Maintaining their independence unless they are a subsidiary of another housing association	b) Membership policies and governing body composition do not compromise the association's independence	<ul style="list-style-type: none"> <li>A Group wide policy on board membership and recruitment exists that reflects individual Partner members' varying composition and needs but providing a consistent approach to recruitment and board support activities to ensure that the requisite standard is maintained.</li> <li>The new Parent Board is structured so that it has a majority of independent members. A new shareholding policy for the amalgamated Parent was approved in March 2009. This limits shareholding to the Board's members.</li> <li>Each Partner member board has one Parent board member co-optee and, in turn, co-opts one if its own members onto the Parent Board. All Parent member boards have nomination rights on Group committees and key working groups, such as the Group Equalities Forum.</li> <li>Membership of the Partner member boards is in line with their rules.</li> </ul>		
2.1.2	Complying with all statutory and regulatory requirements	c) Individual governing body members act in a personal capacity and not as nominees/ representatives of any body, unless the constitution so provides	<ul style="list-style-type: none"> <li>The board member agreement for services used throughout the Group complies with the Regulatory Code and prescribes in detail the required skills and duties of board members. It is supported by both the recently revised Board Membership and Recruitment Policy and the Board Member Code of Conduct.</li> <li>Board Member induction includes a section on the duties of a board member, facilitated by an independent adviser, to ensure that clarity exists around duties and responsibilities.</li> </ul>		<ul style="list-style-type: none"> <li>Induction training has been organised during July &amp; August for both new members and those that are joining from WHP as Group and Parent member board members.</li> </ul>
2.2	Housing Associations should be headed by an effective Board with a sufficient range of expertise - supported by appropriate governance and executive arrangements – that will give capable leadership and control	<p>a) Effective governance arrangements can be framed around the following questions</p> <ul style="list-style-type: none"> <li>To what extent does the governing body perform its key governance roles well?</li> <li>To what extent does the governing body work well together</li> <li>To what extent does the governing body comprise appropriate people?</li> </ul>	<ul style="list-style-type: none"> <li>Robust recruitment activities during 2007/08 have been followed up by mandatory induction training and other individual training events where necessary, to help develop members' knowledge and skills base. In addition, individual and Group-wide away days have been held to help develop the boards into more cohesive units, being able to operate co-operatively as a team rather than as a group of individuals. Areas of individual weakness around skills or confidence have been identified and suitable support in terms of training, coaching or attendance at conferences has been organised.</li> <li>Following the amalgamation with WHP, collective and individual appraisals are being arranged for completion by September 2009. This process will help assess effectiveness, help review the effect of payment one year on from adoption as well as inform training and governance activities for the coming year.</li> <li>A number of pre-amalgamation events have been held including: <ul style="list-style-type: none"> <li>KHV away day with presentations from the Group Chief Executive, Head of Corporate Strategy</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>The group structure will be reviewed within 12 months with a view to further rationalisation of 2nd and 3rd tier subsidiaries.</li> <li>A full governance review will be undertaken post amalgamation to ensure continued compliance with this requirement</li> <li>A new Group wide appraisal process, that is similar to that previously undertaken by WHP, has been agreed and will be completed</li> </ul>



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			<p>and Communications and Group Company Secretary.</p> <p>➤ Group wide away day with presentations from external speakers, including Peter Marsh to promote strategic thinking at both Group and Partner member level and to help inform future strategic planning.</p>		<p>by September 2009. This will allow for meaningful comparison post-amalgamation and will inform the broader governance review. Any issues arising from appraisal will be incorporated into a governance action plan and individual plans as appropriate.</p>																																																																																																			
		<p>b) The governing body is diverse, reflecting the communities the association serves, and has a range of skills, experience and up-to-date knowledge</p>	<ul style="list-style-type: none"><li>The Group has taken a pro-active approach to diversity using a variety of means when recruiting, to attract applicants from under represented groups. The recent recruitment for the VHA Chair has been positive in helping address under representation in the categories or gender and age on both the VHA and SHG Board. Monitoring of the applicants was undertaken with a return rate of 94%. At short-listing, half the candidates were female, one from a BME group, one a non-Christian and two well below the average age of the Group's existing board members.</li><li>The following table provides a breakdown of the current Board Member profile:</li></ul> <table><thead><tr><th></th><th colspan="2">SHG</th><th colspan="2">SHA</th><th colspan="2">THA</th><th colspan="2">VHA</th></tr><tr><th></th><th>No</th><th></th><th>No</th><th></th><th>No</th><th></th><th>No</th><th></th></tr></thead><tbody><tr><td>Male</td><td>8</td><td>66%</td><td>6</td><td>60%</td><td>7</td><td>70%</td><td>7</td><td>64%</td></tr><tr><td>Female</td><td>4</td><td>34%</td><td>4</td><td>40%</td><td>3</td><td>30%</td><td>4</td><td>36%</td></tr><tr><td>White: British</td><td>11</td><td>92%</td><td>7</td><td>70%</td><td>9</td><td>90%</td><td>11</td><td>100%</td></tr><tr><td>White: Irish</td><td></td><td></td><td>1</td><td>10%</td><td></td><td></td><td></td><td></td></tr><tr><td>Other White</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Background</td><td>1</td><td>8%</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Mixed: White and Black Caribbean</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Black and Black British: Caribbean</td><td></td><td></td><td>1</td><td>10%</td><td></td><td></td><td></td><td></td></tr><tr><td>Other</td><td></td><td></td><td>1</td><td>10%</td><td>1</td><td>10%</td><td></td><td></td></tr></tbody></table> <ul style="list-style-type: none"><li>A robust recruitment process was established for selecting the new Parent and KHV Boards. A clear skills and experience matrix was agreed and candidates were assessed against this to ensure the best quality outcome.</li></ul>		SHG		SHA		THA		VHA			No		No		No		No		Male	8	66%	6	60%	7	70%	7	64%	Female	4	34%	4	40%	3	30%	4	36%	White: British	11	92%	7	70%	9	90%	11	100%	White: Irish			1	10%					Other White									Background	1	8%							Mixed: White and Black Caribbean									Black and Black British: Caribbean			1	10%					Other			1	10%	1	10%				<ul style="list-style-type: none"><li>Revised and standardised E&amp;D monitoring forms have been agreed for residents, staff, and board members. Monitoring of all board members and shareholders across the Group will be undertaken this financial year using the new data and this will be used to help target future recruitment activities</li></ul>
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		<p>c) Organisational and management structures reflect the association's business objectives</p>	<ul style="list-style-type: none"><li>One of the conditions of the TSA approval to the amalgamation with WHP was that the Group should undertake a full review of second and third tier subsidiaries by July 2011. Preparatory work on this is already underway and an initial options appraisal will be considered by the Parent Board in Q3 2009/10.</li><li>The Senior Management structure for the new Group was agreed by all boards in November 2008. The post of Group Resources Director was dis-established and the new post of Group HR Director created. The membership of the Group Management Team as at 1 July 2009 is:-<ul style="list-style-type: none"><li>➤ Group Chief Executive</li><li>➤ Group Finance Director</li><li>➤ Group Development Director</li><li>➤ Group HR Director</li><li>➤ Managing Director - KHV</li><li>➤ Managing Director – SHA</li><li>➤ Managing Director – THA</li><li>➤ Managing Director – VHA</li></ul></li><li>This structure combines strong central support with locally based customer service providers.</li><li>THA's structure has been reviewed post inspection. The Property Services Team has been completely restructured from 31 March 2009, with more duties transferred to SHA under a service level agreement in order to avoid duplication in administering contracts. The new team concentrates on improved customer care and has agreed key performance indicators to monitor the agreement.</li><li>A new decision making managers' group has been formed within THA. Its objective is to improve managerial effectiveness and prepare for succession planning purposes. All members of this group have undergone a management development programme.</li><li>A number of HR initiatives have been developed in 2008/09; These include:<ul style="list-style-type: none"><li>➤ A performance management framework</li><li>➤ The development and roll-out of the Management Development programme – additional modules have been added covering change management, delegation skills and basic project management</li></ul></li></ul>		<ul style="list-style-type: none"><li>The organisational structure review commenced in July 2009 for conclusion by July 2011.</li><li>The Parent Board has requested that a further review of management structures is undertaken prior to 1 April 2010 to ensure that across the Group the necessary resources are in place to deliver the Strategic Plan.</li></ul>																																																																																																			

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			skills. ➤ A proposed leadership development programme is to be developed.		
		d) The governing body meets regularly. It ensures that the association acts within the terms of its constitution and relevant legislation	<ul style="list-style-type: none"> <li>All boards meet at least 4 times a year with additional special meetings when required. They also hold away days to consider strategy and performance. Additionally the Parent Board has also met specifically to consider due diligence and other issues relating to the amalgamation with WHP.</li> <li>The Group's committees meet at least quarterly. Extra meetings have been held in the past year by the GARC and the GTC to look at issues resulting from the due diligence on WHP, from the turmoil in the financial markets and the potential impact on the Group's treasury position.</li> <li>Terms of Reference for all Group committees have recently been reviewed and agreed.</li> <li>All governance and company secretarial issues are managed centrally by the Group Company Secretary to ensure consistency and compliance across the Group.</li> </ul>		<ul style="list-style-type: none"> <li>Post-amalgamation, the meeting schedules of all Partner members will be aligned to ensure appropriate timings exist for consideration of key issues by all boards and committees. In addition, the broader governance review and in-depth review of the Standing Orders and Financial Regulations will consider these issues. This process will be supported and monitored by the Group Company Secretary.</li> </ul>
2.3	Housing associations must maintain the highest standards of probity in all their dealings:	a) A code of conduct for the governing body and staff, together with a payments and benefits policy, is in place. Sound procurement practices are in place and contractual arrangements or partnerships with other bodies are clearly defined and documented.	<ul style="list-style-type: none"> <li>Both board member and staff codes of conduct are mandatory. Both of these will be reviewed this year as part of the post-amalgamation governance review process.</li> <li>A new expenses policy for staff was considered by the GRGC in May 2009. A new policy for board members is being drafted for approval in the autumn 2009.</li> <li>All members of the Group use a mixture of partnering and traditional procurement methods. Over the past two years Partner members have joined in a number of Group procurement projects e.g. kitchens, and are working towards closer collaboration in the future in a number of areas.</li> <li>As requested by the Audit Commission, <b>THA</b> has reviewed all contracts. The main partnering contract for responsive and void repairs with Mears has been terminated with effect from 1 April 2009 and transferred to Sovereign Response. THA has a service level agreement in place with SHA to deliver all major works, planned and cyclical programmes on THA's behalf using, wherever possible, SHA's existing partnership arrangements that are subject to an annual contract review. Better value has been achieved through the lower cost per job of £125 (fixed price) with Sovereign Response, compared with £138 (average price) with Mears and £1,900 void cost instead of £1,937.</li> </ul>		<ul style="list-style-type: none"> <li>A new Group wide expenses policy for board and committee members will be introduced during 2009/10.</li> <li>The planned review of the Group's Standing Orders and Financial Regulations will include procurement practices, and OJEU requirements. As part of the Group's E&amp;D strategy, further work is being undertaken to ensure a robust approach is taken to ensuring that the Group's contracting partners subscribe to the same E&amp;D standards.</li> </ul>
2.3.1	Acting to maintain the good reputation of the sector, and not bring it into disrepute	b) The association maintains a key dialogue about its strategic objectives with its key stakeholders	<p><b>Group Overview</b></p> <ul style="list-style-type: none"> <li>The Group undertook a full review of its Strategic Plan in 2008 and made a number of changes based on feedback from residents and key stakeholders. A summary of this strategy was circulated to local authority partners and other external stakeholders.</li> <li>Across the Group, key staff are engaged with stakeholders in strategic meetings and forums. These include the Regional Housing Board (SE), the NHF Board and both the NHF SE and SW Executive Committees and the NHF national advisory panel for home ownership.</li> <li>All Partner members in the Group continue to build on their relationships with local authorities. Regular meetings are held with senior staff in key local authority areas as follows:</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>West Berkshire – MD is a member of the LSP Management Board to review role, purpose, governance structure and objectives.</li> <li>West Berkshire – Working in partnership to deliver the CDRP strategic assessment of crime and ASB assessment.</li> <li>Wokingham – Divisional Director supporting the delivery of working in partnership following a Housing Strategy Day</li> <li>Devon Strategic Housing Partnership – joined this group with a view to becoming more active in Devon wide initiatives and improve local networks</li> <li>Member of the Bristol Housing Partnership working with other associations in the area to develop properties on their behalf and to be active participants in Bristol's <b>Lead, Influence. Follow or Exit</b> project.</li> <li>SHA holds regular meetings with its key local authority partners, notably West Berkshire, Basingstoke, Reading, Bristol; South Gloucestershire, Plymouth and Exeter.</li> <li>SHA continues to be represented on all working groups in respect of Choice Based Lettings, many schemes are now operational in the areas where SHA works and the association has been actively involved in the setting up, implementation and assessment of the process.</li> </ul>		<ul style="list-style-type: none"> <li>Due to significant changes in our external environment and resident feedback via the Status Survey a further interim strategic review will be undertaken in 2009.</li> <li>All Group members will continue to develop links with local authority partners and be active participants in the Single Conversation with the Housing and Communities Agency.</li> </ul>
2.3.2	Fostering positive relations with stakeholders				
2.3.3	Conducting their business so they are accessible, accountable and transparent to residents and stakeholders				
2.3.4	Only entering into relationships with other organisations when the rights and obligations are clear to all				

Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
			<b>THA</b> <ul style="list-style-type: none"> <li>With the proposed Hampshire stock transfer to KHV, THA's strategy is to work only in Dorset in future, the MD is therefore playing a key role in the work of the regular Dorset Chief Housing Officer meetings and attending other consultation and strategic events in Dorset.</li> <li>THA has also attended ad hoc meetings with Christchurch Borough Council (CBC) on the LDF process and has given feedback on proposals for a new Dorset-wide choice based lettings scheme.</li> <li>THA continues to concentrate on the redevelopment of its Somerford estate see RC 3.7(C).</li> <li>CBC has started to hold RSL focus group meetings following their recent Inspection report and THA is attending these and has stated its interest in working with CBC on strategic development.</li> </ul> <b>VHA</b> <ul style="list-style-type: none"> <li>The stock transfer from SHA to VHA of 840 homes was successfully completed in April 2008 and satisfaction from the 2008 STATUS survey showed overall satisfaction for the transferred tenants increasing from below 70% to 81%.</li> <li>VHA regained its preferred development status with Aylesbury Vale District Council earlier in 2009 and is committed to an ongoing dialogue over development opportunities and future management arrangements.</li> <li>The Managing Director is a member of the Vale Partnership. This is the LSP for the local authority where most of the association's stock is situated. The partnership already has a strategic plan in place, and is beginning to focus on two particular areas of concern, social cohesion and employment and training opportunities. VHA participates in both these groups.</li> <li>VHA also participates in the Vale Community Safety Partnership, bringing together partners to co-ordinate plans in a number of areas ranging from tackling anti-social behaviour and crime reduction to providing alcohol referral projects. One of the latest initiatives is to continue to support and co-ordinate local engagement to prevent violent extremism.</li> <li>The MD of VHA is a member of the Oxfordshire Housing Partnership. As part of the strategic work of this group VHA is working with local authorities and RSLs in the Oxfordshire sub region to deliver a common Choice Based Lettings Scheme. The system is due to go live in July 2009. (NB how residents influence our strategy is outlined in RC 2.5)</li> </ul>		
2.4	Housing associations must protect public investment;	a) Any material changes in activities are considered by the governing body, contained in the business plan and – where necessary – reported to the Corporation	<ul style="list-style-type: none"> <li>The Group operates a process whereby each Partner member produces a budget and business plan each year which is then ratified by the Parent Board. Once approved the Partner members operate within the agreed parameters and are required to obtain further agreement prior to committing to variations.</li> <li>If consideration was to be given to a non social housing activity it would require approval through this process and would then be reported to the TSA as appropriate.</li> <li>As referred to in last year's compliance statement, SHA has completed the refurbishment of its offices at Berkshire House and has bought the housing management and client side of Property Services together. The contract for the new Bristol Office has been agreed and construction is underway. It is expected to be complete and ready for occupation by August 2009.</li> </ul>		<ul style="list-style-type: none"> <li>Following completion of the amalgamation of SHG with WHP a review of the Group's strategy is to be carried out. In conjunction with this, consideration will be given to the optimum corporate structure required to support achievement of the Group's objectives. Any changes to the structure proposed will be reported to the TSA as appropriate.</li> <li>The Group is compiling a comprehensive Office strategy and will ensure all offices are DDA compliant (Refer to note 3.2 (C)).</li> <li>SHA is actively marketing its surplus office accommodation in Basingstoke (WHP), Newbury and Bristol. Due to difficult market conditions in the short-term the association will be looking to let on a short-term lease and in the meantime to use the space for storage and archiving.</li> </ul>
2.4.1	Using their social housing assets only for social housing purposes	b) Public funding invested in the association is protected by, and non-social housing activities are managed within, the association's risk	<ul style="list-style-type: none"> <li>All existing and new activities continue to be managed through the Group Risk Management process.</li> <li>The majority of the Group's development work has been carried out through Section 106 planning agreements in partnership with major volume house builders. The business has set aside £5m of development capacity, and this is monitored by the GARC, for potential contractor/developer failure.</li> </ul>		<ul style="list-style-type: none"> <li>The Group continues to have effectively no non-social housing activities, since it has avoided the outright sales market.</li> </ul>

Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
2.4.2	Ensuring that their social housing assets are not placed at risk by non-social housing activities	management framework	<p>Individual contracts also have mechanisms for varying levels of retention to be held. The Group also uses a company called Exor to financially vet all suppliers including contractors architects and developers. We continue to monitor the Group's exposure to individual construction companies and the development portfolio is delivered by a wide range of contractors to mitigate the risk of contractor failure.</p> <ul style="list-style-type: none"> <li>The credit crunch has required the Group to make significant changes in the way it evaluates and approves new development schemes. The monitoring of spare borrowing capacity and a provision for risk against capacity for all schemes is now being monitored and approved against agreed and currently available borrowings. Schemes are only approved to the extent that currently agreed borrowing is available. Schemes are evaluated on the basis that for mixed tenure schemes shared ownership sales may not be possible so that cash is reserved against the scheme on the basis that shared ownership units may need to be converted to rent.</li> <li>Development reporting now includes, as standard, these exit strategies and housing markets are monitored closely using the Hometrack system which was purchased by the Group in 2008.</li> <li>The Group Management Team (GMT) has introduced a 'Market Intelligence' agenda item as standard for its meeting so that the Group stays in touch with movements in the development, housing and financial markets.</li> <li>Accountancy changes resulting from the introduction of SORP 2008 have altered the way shared ownership transactions are reported. Few loan agreements anticipated these changes, so monitoring has also been introduced to ensure that these accounting changes do not expose the Group to covenant breaches.</li> <li>During the year, three internal audits by the Group's internal auditors, Mazars LLP, were undertaken, comprising Scheme Appraisal and Capacity Management, Development Procurement and Contract Management and Shared Ownership Sales and Marketing. All of these audits demonstrated 'Substantial' assurance as to the quality and operation of internal controls.</li> <li>Loan covenant compliance is continuously monitored and an external audit of loan agreements has been carried out to identify any non-financial or procedural items in the agreements that might offer funders the opportunity to find default and re-price.</li> <li>The Group has changed its business plan modelling tool from the TradeRisks model to the Brixx model during the year to enhance its capacity for scenario modelling.</li> <li>This new capacity has already been used extensively to evaluate the potential effects of deflation and inflation and higher borrowing costs on Group activities, to ensure commitments are contained within levels agreed with the GTC and GARC. Levels are considered quarterly and reviewed formally annually.</li> <li>The Group reported last year that following floods in 2007 in Berkshire and Oxfordshire the SHA insurance material damage aggregate had increased from £250,000 to £1m. The Group successfully re-tendered its insurance arrangements for SHA and THA in 2008/09 and as well as achieving cost savings SHA have managed to reduce the aggregate to £500,000.</li> <li>Additionally a Minimum Funding Level reserve of £19m has been established which is not committed to development but is held back against financial or operational risks or potential contractor failure.</li> </ul>		<ul style="list-style-type: none"> <li>The Group has a small number of market rented properties many of which are temporary housing having been identified by the asset management programme as requiring redevelopment.</li> <li>There are no plans to change this position. Following the amalgamation with WHP its outright sales subsidiary Kingfisher Homes (Wessex) Ltd has effectively ceased to trade, and the activities of its commercial property arm (Halcyon Property Services Ltd) will be examined to determine its future course.</li> <li>The Sovereign Development Consortium (SDC) continues to operate with only its small number of framework contractors and payments for work are made only against externally certified certificates.</li> <li>The impact of SORP 2008 and impairment which will be covered in more detail in SORP 2010 exposes social housing grant to abatement. The Group's introduction of its exit strategy work for project appraisal is designed to minimise and manage the impact of impairment and will be continued until the property market improves.</li> <li>WHP's insurance arrangements will also be reviewed to try to bring them within the Group's coverage and to ensure that no additional exposures arise.</li> <li>In July 2009 the enlarged Group now has an extensive portfolio of supported housing and care services; with over 2,400 sheltered homes, four registered care homes, a wide range of directly managed specialist housing and floating support services, as well as a substantial telecare business.</li> <li>In order to ensure that the Group is strongly positioned to deal with the threats and opportunities arising from this sector, a full strategic review of care and support services is to be undertaken in 2009/10. This will consider: - the built environment, service, viability, skills and customer feedback. In response to the changing environment for regulating care SHA is reviewing the future of its residential care home for the elderly.</li> </ul>
2.5	Housing associations must seek and be responsive to residents'	a) The association is effectively accountable to its stakeholders. Current information about its activities	RC 2.3.2 outlines the Group's involvement with its stakeholders. The information below outlines how The Group responds specifically to resident's views and priorities.		<p><b>Group</b></p> <ul style="list-style-type: none"> <li>All resident information is being reviewed in line with the rebranding</li> </ul>




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	views and priorities:	is widely available to residents and other interested parties.	<p>The Group Resident Engagement Strategy (RES) was approved in January 2009. This strategy focuses on resident engagement within the governance framework with an emphasis on service development and scrutiny across the Group at a strategic level. It is linked to service development and performance with neighbourhoods or community engagement, which takes place within subsidiaries across the Group. The RES was developed in full consultation with residents, including a number of workshops and meetings. One outcome of the consultation was the establishment of the Group Residents’ Forum.</p> <p><b>The Status Survey</b></p> <ul style="list-style-type: none"><li>In November and December 2008 a Status Survey was carried out across the Group. This was finalised and published in April 2009. Members across the group collaborated in agreeing the questions and methodology used, allowing for intergroup comparisons and benchmarking. The outcome of the survey has been published in the Summer 09 Newsletters.</li><li>SHA’s and THA’s previous survey was undertaken in 2006 whilst VHA’s was undertaken in 2008. The previous THA and SHA surveys were undertaken face to face and across 1,600 residents. The most recent was a postal survey, which involved a much larger sample size; 5,300 in total where a 40% response rate was achieved. It is therefore considered that the 2008 survey is a very robust and accurate reflection of residents’ views. It is also encouraging that although postal surveys have an adverse variance of up to 7%, (as advised by Priority Research who undertook the survey independently of ourselves), the Group achieved improved performance in most areas. These return rates represent a sample of 20% of general needs, 38% of homeowners and 54% of supported housing residents.</li><li>The overall satisfaction level amongst tenants with the service that they received was very good - 82% against the sector average of 81%, with only 12% expressing dissatisfaction, the remainder being ‘don’t knows’. VHA received high levels of satisfaction at 88%. The overall satisfaction level of SHA was 80%. This is an improvement on 2006 which was 78%. VHA’s level of satisfaction was 77%, an improvement on the previous survey for both THA and SHA owned stock.</li></ul> <p><b>Key headlines from the Survey are</b></p> <table><tr><th>Activity</th><th>Satisfaction</th></tr><tr><td>The general condition of any communal areas</td><td>88%</td></tr><tr><td>The overall quality of your home</td><td>85%</td></tr><tr><td>This neighbourhood as a place to live</td><td>85%</td></tr><tr><td>The general condition of any shared facilities</td><td>81%</td></tr><tr><td>The general condition of this property</td><td>81%</td></tr><tr><td>The value for money for your rent</td><td>78%</td></tr></table> <p>Satisfaction with taking residents views into account was variable between the Group, between 61% for VHA, 59% for THA and 55% for SHA, all within the second quartile benchmarks.</p> <p><b>The top group priorities for the future were</b></p> <table><tr><th>Activity</th><th>High Priority</th></tr><tr><td>Carrying out maintenance and repairs to the home</td><td>82%</td></tr><tr><td>Ongoing improvement programmes, kitchens/bathrooms/windows etc.</td><td>69%</td></tr><tr><td>Providing more affordable housing</td><td>69%</td></tr><tr><td>Supporting residents with special needs</td><td>66%</td></tr><tr><td>Tackling anti social behaviour</td><td>59%</td></tr><tr><td>Maintaining your neighbourhood (such as grass cutting, cleaning)</td><td>56%</td></tr></table> <p><b>TSA National conversation</b></p> <ul style="list-style-type: none"><li>All members of the group have participated in the National Conversation at local and national events. Participants have included resident board members, staff and residents. Additionally survey forms were sent to everyone on the Groups’ involved residents’ data base.</li></ul> <p><b>Resident Involvement for each subsidiary 2.5.1 and 2.5.2 and 2.5.3</b> Whilst members of the Group are working closely together, during 2008/09 each member undertook the following specific activities:</p> <p><b>SHA</b></p> <ul style="list-style-type: none"><li>SHA continues to work with residents and stakeholders to find out about residents’ priorities, needs and</li></ul>	Activity	Satisfaction	The general condition of any communal areas	88%	The overall quality of your home	85%	This neighbourhood as a place to live	85%	The general condition of any shared facilities	81%	The general condition of this property	81%	The value for money for your rent	78%	Activity	High Priority	Carrying out maintenance and repairs to the home	82%	Ongoing improvement programmes, kitchens/bathrooms/windows etc.	69%	Providing more affordable housing	69%	Supporting residents with special needs	66%	Tackling anti social behaviour	59%	Maintaining your neighbourhood (such as grass cutting, cleaning)	56%		<p>and Orion project. This includes leaflets, handbooks, other documentation and the website.</p> <ul style="list-style-type: none"><li>The outcome of the Status Survey is being reported to SHG’s and Partner member’s boards.</li><li>Action plans are being developed to ensure the Groups strategic direction continues to meet residents’ needs and aspirations, and addresses the key areas of dissatisfaction and future priorities. This will address feedback from residents who transferred from Orbit HA.</li><li>Although a very small proportion of tenants were dissatisfied with services the Group will be focusing on these areas and also looking to improve satisfaction ratings generally, from neither or don’t know, to fairly and very satisfied, aiming to get more ‘very satisfied’ residents in future surveys.</li></ul> <p><b>SHA’s</b> Resident Involvement team is undertaking the following actions in 2009/10:</p> <ul style="list-style-type: none"><li>Training needs and assessments being carried out for all involved residents to tailor training for their development to support SHA, its residents groups or the local community</li><li>SHA aims to feed back to residents who attend activities within two weeks of the event. Although involvement activity is not always formal, the impact of involvement still needs to be communicated. SHA shall therefore publish involvement activity outcomes online and in publications.</li><li>Through the use of the website, SHA will update past activity with specific outputs so that residents who have attended or are interested in certain events can view a summary of what was achieved</li><li>SHA has set up free training and development opportunities with Newbury College and are looking to make links with other colleges across its operating areas. It is offering a variety of flexible courses that will provide opportunities for residents to improve their quality of life, qualifications and job prospects.</li><li>In Spring 2009 SHA created the post of Employment and Training Links Co-ordinator. The postholder’s key role will be to scope, develop and deliver a Sovereign employment and</li></ul>
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			<p>aspirations, offering a wide range of support opportunities for residents to get involved in shaping, delivering and reviewing our services. This approach is in line with our strategic objective: <i>"Making sure our homes and services improve the quality of life in people's neighbourhoods"</i>.</p> <ul style="list-style-type: none"> <li>In March 2008 SHA approved the Resident Involvement Strategy. This was updated in February 2009 to ensure residents needs and aspirations are demonstrably at the heart of the business. The Association based the revised 2009-11 strategy on a solid foundation of consultation, developed in partnership with Tenant Participatory Advisory Service (TPAS), best practice research and regulation to make sure that SHA is fully accountable and responsive to customer requirements. The revised strategy also took into account residents' feedback that the strategy should be more innovative and adaptable in its approach, reflecting not only the wide geographical and demographic variance across SHA but also tailoring its services to individual needs. SHA incorporated the suggestions into action points within the new Resident Involvement Strategy, these include: <ul style="list-style-type: none"> <li>➤ Develop an 'Involved Residents Network' to support active residents to share experiences, ideas and knowledge about their involvement;</li> <li>➤ Undertake a 'training needs assessment' for each involved resident, ensuring tailored training is offered, enabling them to support SHA involvement activities, work within the local community or their residents' group;</li> <li>➤ Provide an interactive online calendar of opportunities, publicising future and past events, as well as through filtering involvement by area of interest, date or location.</li> </ul> </li> </ul> <p><b>Neighbourhood Feedback Events</b></p> <ul style="list-style-type: none"> <li>Between April and October 2008 Property Services held five Neighbourhood Feedback Events, involving over 500 residents. The purpose of these events was to develop a model of engagement that focused on particular areas identified through a process of analysis. This analysis took into account density of properties within a given area, high incidences of repair jobs raised per property, low customer satisfaction and complaint levels. All of the Neighbourhood Feedback Events proved very successful and led to a number of improvements in customer satisfaction: <ul style="list-style-type: none"> <li>➤ A total of 256 households physically took part in the events with 104 repairs being completed on the days and a further 198 jobs were raised.</li> <li>➤ 50 residents requested that they would like to get more involved with improving services with Sovereign</li> <li>➤ 89 residents requested that they would like to be put forward for the residents reward scheme</li> </ul> </li> <li>The results indicated that on average 1.18 repairs were raised per household and that a third of the repairs were completed on the day.</li> </ul> <p><b>Improving neighbourhoods in 2009</b></p> <ul style="list-style-type: none"> <li>In 2008/09 1,224 estate walkabouts were completed by housing officers, involving 1,711 residents from a range of neighbourhoods. These walkabouts resulted in a number of estate issues being resolved and repair orders being initiated.</li> <li>SHA supported 25 local groups and activities, ranging from small local neighbourhood events, such as youth engagement programmes in partnership with the police in Trowbridge to supporting a local art project in a regeneration area in Bristol, helping to engage local children in creative workshops.</li> <li>SHA worked closely with Plymouth Racial Equality Council to financially support its Housing and Respect agenda. The support specifically help fund a case worker to provide reactive assistance in dealing with racial incidents affecting residents.</li> <li>SHA are in the process of delivering a programme of social and environmental improvements to its homes at Barne Barton in Plymouth, in full consultation with residents. Work is underway and due to complete in September 2009.</li> </ul> <p><b>Improving services in 2009</b></p> <ul style="list-style-type: none"> <li>Through the course of the year 4,028 residents completed service surveys which have helped SHA shape its services to meet their needs.</li> <li>10 policies and procedures were reviewed with direct input from residents, including Service Improvement Panels, focus groups and surveys.</li> <li>Ongoing consultations to help improve services were carried out throughout the year by SHA staff.</li> </ul> <p><b>Financial Inclusion</b></p> <ul style="list-style-type: none"> <li>Helping residents to become financially included has become increasingly important. To this end, over the past year SHA has worked closely with a number of different agencies and with residents through service improvement panels, to come up with a range of practical initiatives to support residents to</li> </ul>		<p>training links strategy and action plan which will enable residents to benefit from sustainable training and employment opportunities within the business and its areas of influence, as well as in the areas where they live. Activity will initially be focused in Plymouth, Bristol and West Berkshire, linking in with neighbourhood investment projects and working with local authorities to help deliver their worklessness strategies.</p> <ul style="list-style-type: none"> <li>The Group is involving its residents in a comprehensive response to the TSA on the development of the National Standards and will be engaging with Local Standards as they emerge.</li> </ul>

Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
			<p>manage their finances and prevent them getting into debt. Examples include:</p> <ul style="list-style-type: none"> <li>➤ Promoting the National Housing Federation contents insurance scheme</li> <li>➤ Taking a proactive approach to rent and service charge debts through early interventions, use of money advice leaflets, financial planning booklets, use of online benefit calculators and participating in housing benefit verification</li> <li>➤ The development of reverse staircasing to assist shared owners in financial difficulties</li> <li>➤ Financially supporting debt advice and support agencies as well as credit unions and Citizens Advice Bureaux.</li> <li>➤ Working with other associations in respect of debt management e.g. Selwood HA in West Wiltshire.</li> <li>➤ Providing information on energy efficiency ratings for new lettings.</li> </ul> <p><b>THA</b></p> <p><b>Review of Resident Involvement</b></p> <ul style="list-style-type: none"> <li>• In response to the Audit Commission's Inspection recommendation that <b>THA</b> improve its customer service and resident involvement service, THA has developed new and innovative ways to involve more residents that are representative of the resident population. Specifically, it has conducted a full review of resident involvement, through a steering group comprising residents and staff. The steering group set up a campaign called 'Give us a Clue' to research into a new structure, and residents were involved throughout THA's areas of operation. This campaign has been identified as good practice on the Housing Quality Network (HQN) website.</li> <li>• The findings of this consultation exercise were included in a full review of THA's approach to resident involvement which resulted in the following main actions being agreed: <ul style="list-style-type: none"> <li>➤ The establishment of a formal higher level tenants panel to monitor and drive improvements to services.</li> <li>➤ The adoption of a global Resident Involvement monitoring system from good practice recommended by the Audit Commission.</li> <li>➤ Involved residents have increased to over 170.</li> <li>➤ All staff teams now have Resident Involvement targets.</li> <li>➤ In August 2008 the website was revised to produce clearer information for residents on all services.</li> </ul> </li> </ul> <p><b>Outcomes</b></p> <ul style="list-style-type: none"> <li>• THA has seen a 15% increase in the number of residents involved with the many initiatives,</li> <li>• Overall satisfaction with THA as a landlord has improved (see above re Status Survey).</li> <li>• THA also improved services to leaseholders in 2008/09 by: <ul style="list-style-type: none"> <li>➤ Ensuring all new leaseholders are visited by staff to establish a relationship with THA.</li> <li>➤ Social events with leaseholders have been held to help develop relationships.</li> <li>➤ Annual insurance certificates are now issued.</li> <li>➤ A Plain English guide to leases, including a summary of the rights and responsibilities of leaseholders, has been published.</li> <li>➤ An annual gas servicing programme is about to be introduced for leaseholders to ensure health &amp; safety and at their request.</li> </ul> </li> </ul> <p>Additionally the THA leaseholders' panel has been involved in:</p> <ul style="list-style-type: none"> <li>• Drafting and published in interim, Plain English approved, leaseholders' handbook</li> <li>• Revising the Leasehold Services policy, Service Charge policy and a new format for the service charge statements to ensure that they are clear and easy to read.</li> <li>• Drawing up a new set of performance indicators for reporting to leaseholders.</li> </ul> <p>THA has;</p> <ul style="list-style-type: none"> <li>• Continued with high level estate visits where over 450 residents had the opportunity to meet the Managing Director and her team. The feedback from residents on these visits has informed changes to various areas of service, including communal cleaning and grounds maintenance, responsive repairs, ASB and disabled adaptations.</li> <li>• Supported various community groups to the sum of £4,000. These have included £1,000 to Christchurch's extended schools programme to provide diversionary activities during the school holidays where over 1,000 of our residents' children had the opportunity to benefit from this; multi-agency community unity day included working with the local youth; inclusion support project with children who would otherwise have been excluded and smaller grants to various local community organisations,</li> </ul>		




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			<p>including a cooking project which benefited local young people aged between 16 and 18 who are not in education, training or employment.</p> <p>Additionally residents have been involved in service improvements as follows:</p> <ul style="list-style-type: none"> <li>Two residents from THA and three from the VHA were trained by TPAS to carry out resident-led inspections. In August 2008 these residents carried out a two day inspection of the repairs and maintenance services of their opposite organisations. A full written report was received from the residents outlining recommendations. These recommendations were used to inform the decision to change from Mears to Sovereign Response with an in-house call centre. Feedback was given to the resident inspectors on how their recommendations were taken up.</li> <li>A steering group comprising staff and residents was set up to guide and oversee the transfer of the responsive maintenance contract to Sovereign Response. A communication plan was informed by this group to make sure all residents were kept up to date with progress and what to expect from the new contract. From this, residents were kept informed at every stage and because of this the transmission went very smoothly with least disruption to residents and no major complaints or problems</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA has a range of way in which information to residents is provided, this includes; <ul style="list-style-type: none"> <li>Quarterly Open House newsletter</li> <li>Annual report</li> <li>Website</li> <li>Range of leaflets</li> <li>AGM</li> <li>Residents' forums</li> <li>Leaseholders meeting</li> </ul> </li> <li>A challenge day gave residents the opportunity to ask the Group Chief Executive and subsidiary MD's questions in an open forum about issues ranging from changes to the TSA to issues about parking and property allocation. Additionally residents have been involved in the following projects in 2008/09: <ul style="list-style-type: none"> <li>CIH event</li> <li>Homeswapper</li> <li>Local RSL conferences</li> <li>Networking events with local RSL's</li> <li>In 2008/09 VHA supported 19 organisations with community grants.</li> </ul> </li> <li>In 2008/09 VHA residents have been involved in the following activities:- <ul style="list-style-type: none"> <li>Consultation involvement on ASB; complaints service; moving in surveys; Value for Money; complaints policy</li> <li>Arranging a drop-in surgery</li> <li>Participating in the Disability in Focus Group</li> <li>Following up suggestions from the Affordable Warmth Group</li> <li>Implementing outcomes from the Maintenance Matters Group</li> <li>Engaging with tenants through local forums</li> <li>Holding local surgeries with the elderly residents as part of VHA's cohesion work</li> <li>Financially assisted and partook in training events with the Abingdon Citizens' Advice Bureau as part of VHAs financial inclusion work in the community</li> </ul> </li> <li>Additionally VHA through its Disability Access Group has taken the lead in expanding its role to provide a district wide Disability Access Group within Vale of the White Horse DC.</li> </ul> <p><b>Community activities</b></p> <ul style="list-style-type: none"> <li>VHA has undertaken a number of activities designed to build relationships within the community, including new areas of operation in Witney and South Oxfordshire. These include: <ul style="list-style-type: none"> <li>Being instrumental in co-ordinating a new local community magazine bringing together local media students, tenants and other stakeholders such as the local Town Council with the aim to build and improve relationships within communities. The resultant newsletter, Abingdon Matters, publishes information on local events and area news.</li> <li>Extended the existing estate walkabout process in order to involve more tenants in estate affairs and improve overall neighbourhood satisfaction.</li> <li>Consultation with the local community about plans to redevelop some of VHA's sheltered housing</li> </ul> </li> </ul>		





Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
			provision. ➤ Involvement in local hotspots where ASB is an issue for local residents, organising youth diversion activities. ➤ Joining up the work of the Disability Access Group with the local authority to extend VHA's influence over local community initiatives e.g. toilet provision and shop access for the disabled ➤ Encourage the Green agenda through working with local community groups and schools to encourage recycling e.g. Swap Shops ➤ Extending the pride in neighbourhoods through commissioning a garden competition for tenants throughout VHA's wider operating area covering the whole of Oxfordshire. ➤ Continuing the associations work with the elderly community in providing them with regular social and wellbeing events to suit their needs.		
2.5.1	Reflecting these interests in their business strategy	b) Residents, housing applicants and others have ready access to an effective complaints and compensation policy, administered effectively. Independent Housing Ombudsman recommendations are actioned.	<b>Complaints</b> <ul style="list-style-type: none"> <li>In 2008/09 the Group in consultation with residents, reviewed and re-launched its complaints policy, training all staff on the procedure. The Group continues to use complaints as an opportunity to improve services and as a result of feedback in 2008/09, a number of local policy and procedural changes including: <ul style="list-style-type: none"> <li>➤ Retraining staff on issues of car parking and succession;</li> <li>➤ Better targeting of gas no access procedures;</li> <li>➤ Improved quality audit of maintenance works;</li> <li>➤ Joint site visits and follow up check visits with residents to monitor cleaning or grounds maintenance services.</li> <li>➤ Prepaid satisfaction surveys regarding cleaning, to be done at the time cleaning takes place to enable THA to have an up to date view of quality and tackle any delivery issues.</li> <li>➤ New procedures were introduced for requests to disclose personal information held about residents, to accord with the Data Protection Act.</li> <li>➤ Improved communication with residents in respect of gas repairs.</li> <li>➤ Improved information to leaseholders about lease obligations in respect of fair wear and tear and items left in properties to avoid compensation claims from owners when leases expire and properties are handed back.</li> <li>➤ Enhanced Inspections of leasehold properties to ensure repairs and defects are reported promptly.</li> <li>➤ The property offer letter and the information provided about housing benefit have been updated at sign-up to avoid residents losing housing benefit at the start of a tenancy</li> </ul> </li> </ul> <b>Satisfaction with complaints</b> <ul style="list-style-type: none"> <li><b>SHG's</b> complaints procedure is aligned with SHA's, although the relatively small number of complaints reflects the small number of customer facing services provided at Group level. In 2008/09 SHG received 30 complaints, an increase of only 7% over 2007/08, when 28 were received. The Status Survey carried out in November 2008 indicated that 68% of residents were satisfied with the Group's complaints procedure.</li> <li>The information below shows complaints data by subsidiary. The low number progressing to Stage 2 and 3 indicates that the vast majority of complaints are resolved at an early stage.</li> </ul> <b>SHA</b> <ul style="list-style-type: none"> <li>In 2008/09 we received 377 compliments and 383 complaints, an increase of 40% in complaints compared with 2007/08. This increase is in part due to SHA encouraging feedback and recording all complaints, email, verbal, by letter etc. The increase also coincided with the re-launch of the complaints procedure. Of the 377 complaints, 205 were upheld at an average cost per complaint of £26.14. Less than 2% of complaints progressed to Stage 2 in 2008/09 and only 0.5% of cases progressed to Stage 3. Two complaints panels were held by SHA. One complaint was found to be justified by the panel regarding a training request for an involved resident and the other, how SHA had dealt with anti social behaviour, was found to be not justified. This prompted a review of resident training and how resources are allocated to ensure it was equitable and transparent.</li> </ul> <b>THA</b> <ul style="list-style-type: none"> <li>90 complaints were received in 2008/09, a decrease of 29 compared with 2007/08. Of these, 23 were upheld at an average cost per complaint of £36.41. 6% of complaints progressed to Stage 2 in 2008/09 and only one case progressed to Stage 3. The complaint was referred to the Housing Ombudsman in 2008/09, and related to the allocation of a neighbouring property and a transfer application. The Housing</li> </ul>		<b>SHA</b> <ul style="list-style-type: none"> <li>SHA will be addressing the root cause of the increase in complaints, learning from mistakes and amending policies, procedures and behaviours accordingly. An action plan will be developed that also addresses the issues arising from the Status Survey.</li> </ul>




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			<p>Ombudsman found no maladministration and that THA had acted in accordance with its transfer policy. The Ombudsman also found that THA had dealt with complaints of antisocial behaviour in accordance with its antisocial behaviour policy.</p> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>78 complaints were received in 2008/09. Of these 21 were upheld at an average cost per complaint of £12.17. 5% of complaints progressed to Stage 2 in 2008/09 and no cases progressed to Stage 3.</li> </ul>		<p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA's Compensation policy is to be reviewed in 2009/10.</li> </ul>
2.5.2	Giving residents and other stakeholders opportunities to comment on their performance	c) The association considers a range of methods and opportunities to consult and obtain feedback from residents. It seeks to make an agreement, developed in partnership with residents, setting out how they will be involved, consulted and informed and how this will be resourced, measured, monitored and reviewed.	<p>The Group works closely with residents to enable them to sit at the heart of the business at a strategic level and ensure accountability across key service areas. Involvement opportunities in 2008/09 included consultation and collaboration on Group communication, Group policy and procedure review, Sovereign Development Consortium and Group equality and diversity review. Additionally resident involvement is embedded within SHG's peer review process. See attached document on performance review and continuous improvement for further details.</p> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>The Resident Involvement Strategy and the action plan outlines the commitment made to residents to inform them how SHA will provide feedback and enable them to be part of the improvement agenda for the association.</li> <li>SHA has produced a 'Guide to Getting Involved' which outlines over 23 different ways for residents to engage with SHA to help improve services.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has reviewed its whole approach to Residents Involvement, as detailed at 2.5(a) above. In addition it has increased the use of residents' panels in response to residents' preference for this method of consultation and feedback.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA offers a range of resident involvement methods including surveys, resident editorial team, maintenance matters group, affordable warmth steering group, disability access group and leaseholder meetings. It has also established a residents group in Witney to address specific needs of the newly transferred residents.</li> <li>All tenant forums have signed up to a new Constitution and Code of Conduct and changed the focus of the meetings to be more interactive with clear direction from residents on specific issues.</li> </ul>		<ul style="list-style-type: none"> <li>The 2008 Status Survey identified the ways in which residents prefer to be contacted. This information will be used, together with other feedback, to enhance communication and feedback at a local level.</li> <li>In 2009/10 the Group will be updating its website to ensure it is increasingly user friendly and interactive. It will be tailored to meet the needs of residents, staff, senior management and stakeholders, involving them in the process of design and delivery.</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA has identified the need to improve opportunities for residents to be part of the decision-making process; to be more accountable, transparent and open to scrutiny. As part of the 'Guide to Getting Involved', SHA has set out a range of ways that residents can be more involved in how SHA does things, for example: <ul style="list-style-type: none"> <li>support for resident board members;</li> <li>focus groups to explore services, which are delivered as part of policy reviews;</li> <li>by taking part in a selection panel for maintenance products, components or contractors; and</li> <li>inspecting services</li> </ul> </li> <li>In 2009/10 this approach will be rolled out across SHA and training provided to all front line officers in ways to get involved.</li> <li><b>THA</b> The actions arising are given at 2.5(a) above.</li> <li><b>VHA</b> are rolling out PDA's to operatives to gather satisfaction information at the point of work complete and improve resident databases</li> <li>A gap analysis of Resident Involvement interaction is to take place and where applicable new groups will be targeted.</li> </ul>





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2.5.3	Enabling residents to play their part in decision-making	d) Where they so wish, residents are supported, enabling them to obtain the knowledge and skills to play an effective part in investment in, and management of, their homes and neighbourhoods. They are encouraged and supported to explore options.	<b>SHA</b> <ul style="list-style-type: none"> <li>Through a wide range of resident involvement activities SHA actively supports residents to develop skills, knowledge and experience. Over the last year this has included; <ul style="list-style-type: none"> <li>Financial support to individual residents for course fees, transport, care and support needs and childcare.</li> <li>Piloting a lifelong learning partnership with Newbury College and Bristol Colleges.</li> <li>Supported Neighbourhood Investment projects in Newbury, Plymouth and Bristol.</li> </ul> </li> <li>Over the past year SHA also supported a wide range of community and voluntary groups through its Community Fund Grant including: <ul style="list-style-type: none"> <li>Support to 25 local groups and activities, ranging from small local neighbourhood events, such as youth engagement programmes in partnership with the police in Trowbridge to supporting a local art project in a regeneration areas in Bristol helping to engage local children in creative workshops.</li> <li>SHA worked closely with Plymouth Racial Equality Council to financially support their Housing for Respect agenda. The support specifically help fund a case worker to provide reactive assistance in dealing with racial incidents affecting our residents.</li> <li>Help for a residents group to participate in an IT laptop project and help to support a film project called Pass It On by West Berkshire Council.</li> </ul> </li> </ul> <b>SHAs new and emerging communities.</b> <ul style="list-style-type: none"> <li>Where new large scale communities are being built, neighbourhood investment staff now work alongside housing management to ensure that residents moving into the new homes are encouraged to become involved in the way that the area is managed and how services are provided to them to ensure that they become connected to the surrounding community, infrastructure and services.</li> <li>At Wichelstowe in Swindon, where the credit crunch has forced private developers to delay building, work has been done to ensure that those residents moving into completed affordable homes do not feel isolated and can start to build an identity, even though they could potentially be surrounded by building sites for the next few years. Funding has been provided to a community group that is supporting the area and they will be providing services which meet the needs of residents, particularly activities like toddler groups and computer clubs, which will bring people together.</li> <li>At Beechfields in Torquay and Hanham Hall in Bristol (see RC3.7d for further details), staff are working to develop management models which will reflect the environmental standards of these large new developments. The very nature of the schemes means that long term stewardship of the communities is vital in order to maintain low carbon impact. Residents will be encouraged to monitor energy consumption and establish communal ways to live such as car sharing, composting, food production and local buying which minimise their eco footprint. The way in which the homes function and are managed will require a certain level of 'buy-in' so work is being done now to ensure that systems are in place to allow this to happen seamlessly. At Hanham Hall, in the long-term, a 'trust' will own and manage the two developments, and Sovereign is leading on the establishment of this body alongside Barratts, the developers and the HCA.</li> </ul> <b>THA</b> <ul style="list-style-type: none"> <li>THA has revised its resident expenses policy to clarify what type of expenses are payable and to pay claims earlier to avoid financial hardship. Residents are also required to provide feedback to other residents if they claim expenses to attend training or other events.</li> <li>THA has sent residents, at their request, on training courses for committee and chairing skills; life skills courses in cooking and decorating; and budgeting and green issues.</li> <li>At the annual residents and leaseholders conference 15 THA residents were offered taster sessions on the following: <ul style="list-style-type: none"> <li>Cooking on a shoe-string</li> <li>Basic computer skills</li> <li>Managing your money</li> <li>Negotiating skills</li> </ul> </li> <li>In January 2009 five residents attended Mears' decorating workshop. A comprehensive skills day was undertaken by the residents including the following: <ul style="list-style-type: none"> <li>Different types of equipment and their uses.</li> <li>Using fillers and emulsion.</li> <li>Types of paint and their finish.</li> <li>Cutting in and masking tape.</li> <li>Roller and brush technique.</li> </ul> </li> </ul>	●	
2.5.4	Providing opportunities for residents to explore, and play their part, in how services are managed and provided				


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			<ul style="list-style-type: none"> <li>These sessions were intended to give residents skills and confidence to keep their homes in good decorative order.</li> <li>In March THA worked with Dorset Adult Education to provide 12 residents with training on 'Planning an Event' under the skills for life initiative. The residents trained are able to use the skills learned both in a community and personal capacity. This training was at no cost to the association as it was Government funded for people under GCSE level. A similar course is booked for July 2009 to assist with financial inclusion called 'Managing Your Money'.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA has provided training and information to tenant forums on a range of subjects including community transport and upkeep of footpaths and roads, to enable them to better influence improvements.</li> <li>VHA promoted and organised events for 16 residents and attended two National Conversation events.</li> <li>In 2008/09 VHA spent £1,600 on community grants for people wanting to make a difference to communities including youth diversion activities, Grovelands shopper bus, environment improvements.</li> <li>VHA has increased grant application level by 33% per project.</li> <li>VHA residents are invited to take part in estate walkabouts. These are advertised in Open House and we piloted direct mail in one area to increase attendance</li> </ul>		<p><b>VHA</b></p> <ul style="list-style-type: none"> <li>As part of its new resident involvement database VHA will be gathering training needs information per resident and will use this to form part of the revised resident involvement strategy. VHA will also be undertaking focus group training.</li> </ul>
2.6	Housing associations must deal with the Corporation in open and co-operative manner, notifying any anticipated or actual breach of the Code or anything that might significantly affect association's ability to fulfil their obligations under the Code.	a) Any areas where the need for improvement is identified are considered by the governing body and actions agreed with the Corporation	<p><b>SHG</b></p> <ul style="list-style-type: none"> <li>Regular meetings have been held with the TSA and the HCA since they were established to develop positive working relationships as well as to keep them informed about group structure, developments relating to WHP and the SDC, and the financial impacts of the credit crunch, etc.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA informed the Housing Corporation of a breach of the Regulatory Code in relation to disposal of leases and SHG informed the HC immediately and obtained retrospective consents for all the affected properties. To reduce the risk of this breach being repeated SHG has completed a series of actions. New solicitors were appointed and training on property disposals and consents was organised for all managers across the Group. THA also appointed new solicitors.</li> <li>THA has reported to the TSA on progress with the Decent Homes extension granted by the Housing Corporation on August 2007 in respect of 192 properties on the Somerford estate.</li> </ul>		<p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has completed its Inspection Action Plan and has sent details and met with the TSA to discuss progress. This section remains on amber as the Inspection Action Plan has yet to be signed off by the TSA.</li> </ul>
		b) Annual and other returns are made promptly to the Corporation	<ul style="list-style-type: none"> <li>All returns are submitted on time, responsibility for filing being centralised with the Group Company Secretariat.</li> </ul>		
2.7	Housing associations must demonstrate, when carrying out all their functions, their commitment to equal opportunity. They must work towards the elimination of discrimination and demonstrate an equitable approach to the rights and responsibilities of all individuals. They must promote good relations between people of different racial groups.	a) The association is fair in its dealings with people, communities and organisations with which it has relationships and takes into account the diverse nature of their cultures and backgrounds.	<p><b>Group Overview</b></p> <ul style="list-style-type: none"> <li>In May 2008 the Parent Board approved a new Equality and Diversity Strategy and Gender Equality Statement with corresponding actions, to ensure specific compliance with Circular 10/07 and GPN 8. A Group Equalities Forum (GEF) has been created to specifically challenge and review performance against the Group Equality and Diversity Action Plan. The GEF has representation from board members and key members of staff. All Partner members have been charged with implementing their parts of the Strategy under the overall guidance of the GEF which is chaired by the Group Chief Executive.</li> <li>Additionally a Group Disability Forum made up of residents from each of the subsidiaries has been set up to advise and influence issues in relation to disability.</li> <li>Each Partner member within the Group has a Board Champion for Equality and Diversity who is also a member of the GEF.</li> <li>Significant progress has been achieved particularly in the following areas:- <ul style="list-style-type: none"> <li>➤ Introduction of Equality Impact Assessments (EIA's) when considering all new policies across the Group.</li> <li>➤ Roll out of new training courses on Equality and Diversity for board members and staff, including specialist training on EIA's.</li> <li>➤ Agreement on a standard format for collecting Equality and Diversity information from residents, staff and board members.</li> <li>➤ Agreement on standard performance monitoring reports in respect of resident services and staff recruitment and retention.</li> </ul> </li> <li>Each Partner member has their own Equality Action Plan and these are being monitored by their Local Equalities Group, which also have resident input. The GEF has overall responsibility for monitoring</li> </ul>		<ul style="list-style-type: none"> <li>Monitoring of shareholders, board members, staff and residents is to be expanded and enhanced using newly agreed form.</li> <li>Links to the new Group Residents Forum (GRF) are to be established and E&amp;D training provided.</li> <li>Awareness of the Single Equality Bill is being disseminated throughout the Group to ensure that Board members and staff are aware of the future implications.</li> <li>At THA, terms of reference for the E&amp;D Forum have been agreed and recruitment of residents is underway, as is a communication plan and a resident led advocacy scheme to support any, but particularly vulnerable residents, to access services positively.</li> <li>The outcome of Equality Impact Assessments will be assessed on an</li> </ul>







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			<p>progress against these various Action Plans.</p> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>Since Inspection, THA has prioritised the collation of fully comprehensive data on the individual needs of residents, including information on sexual orientation and religion. A temporary resident profile research officer has been employed to ensure that the data is collected in a much shorter timescale than originally planned.</li> <li>70% of THA residents have completed a questionnaire in response to two postal surveys and other data collection methods. This is a very important project for THA and renewed efforts are being made to obtain the remainder of the information, involving all front line staff, actions include: <ul style="list-style-type: none"> <li>The use of all resident forum meetings to explain the reasons behind the surveys, and to get more questionnaires completed;</li> <li>Using home visits and cold calling when officers are in the vicinity.</li> <li>All visitors to reception are also asked to complete the questionnaire.</li> <li>Evening sessions when staff volunteers phone residents.</li> </ul> </li> <li>Full analysis of the data will take place in August 2009, however initial work shows that THA has a: <ul style="list-style-type: none"> <li>High disabled demographic profile.</li> <li>The majority of residents are white / British.</li> <li>The main language spoken by residents is English.</li> <li>There are more females than males.</li> <li>Most residents are of a Christian religion.</li> <li>The majority are heterosexual.</li> </ul> </li> <li>Services to disabled residents have been much improved since Inspection. A disabled service user forum has been established to scrutinise the approach to aids &amp; adaptations and to drive through changes. THA has improved information to disabled residents on their legal rights.</li> <li>THA now attends Dorset Social Services Occupational Therapist (OT) meetings and this has speeded up the processing of DFG and THA applications for Aids &amp; Adaptations (A&amp;A).</li> <li>THA visits residents jointly with the OTs to assess individual needs. A register is kept of all A&amp;A requests which are monitored against timescales. A&amp;A works are now discussed with residents by the contractor before the work is done to ensure that all of their needs are met. A&amp;A are advertised to the attention of targeted groups of residents and this has encouraged greater take-up.</li> <li>THA has redesigned the literature sent to residents on disabled adaptations with more emphasis on residents' statutory rights under relevant legislation, in conjunction with the disabled service user forum. As residents are involved in shaping the disabled adaptations service this is now more tailored to meet their needs.</li> </ul>		<p>ongoing basis and will influence policy and procedural changes as necessary.</p> <ul style="list-style-type: none"> <li>Customer profile data will continue to be developed, analysed and used to shape services.</li> </ul>
		b) The governing body has adopted an equality and diversity policy that covers all aspects of equalities and includes race, religion, gender, marital status, sexual orientation, disability or age.	<ul style="list-style-type: none"> <li>See 2.7a above.</li> <li>SHG's Equality and Diversity Strategy includes all diversity groups.</li> <li>All board papers produced for management board highlight specific issues relating to Equality and Diversity.</li> </ul>		SHG's monitoring of shareholders, board members, staff and residents is being expanded and enhanced using the newly agreed data collection format.
		Specifically in relation to black and minority ethnic (BME) people, the policy incorporates targets associations should set in the following areas:			
		1. <i>Lettings</i> : are proportionate to BME housing need or census data where this information is deficient, in the area where the association has homes. An association specialising in particular client groups establishes different targets based on ethnicity data available for such groups.	<p><b>SHA</b></p> <ul style="list-style-type: none"> <li>Lettings are monitored through the E&amp;D Forum to ensure that lettings data in relation to BME housing need is understood and reflects discussion with LA's over local needs.</li> <li>SHA lettings to BME households continue to be above the benchmark of 8.79% (this is a weighted target, based upon the census) at 11.12% with Exeter, Plymouth, Bristol and Reading being significantly above benchmark. Performance in West Berks, Basingstoke and Deane and East Devon has been below benchmark. It should be noted that Choice Based Lettings (CBL) processes have had a different impact and outturn which make targets difficult to manage.</li> </ul>		<ul style="list-style-type: none"> <li>All members of the Group will continue to monitor lettings using CORE to identify diversity of applicants. The impact of CBL on lettings will be assessed and Group members will be raising any issues of under representation with particular nominating local</li> </ul>




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			<ul style="list-style-type: none"> <li>22% of all lettings went to households with some form of disability, with 3.5% being allocated to people needing wheelchair accommodation.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>For the first time in 2008/09 THA monitored lettings by the number of BME tenants allocated a property. THA can now identify not only the number of lettings made to BME households, where at least one of the tenants is BME, but also the actual number of BME tenants these lettings represent.</li> <li>During 2008/9 3.6% of THA's lettings were to people from BME backgrounds, with 25% being to those residents with a disability and 4.6% who needed wheelchair accommodation. Lettings targets were exceeded in four of the six local authority areas where THA works</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>During 2008/09 5.8% of VHA's new lets were to people from BME backgrounds. This meant they were two lets short of meeting the target. It was decided that the target of 6.5% should remain the same as VHA's new local authority partner, Aylesbury Vale, has a similar BME profile.</li> <li>19.4% of lettings went to people with a disability and 2.6% to those needed wheelchair accommodation.</li> </ul>		<p>authorities.</p> <ul style="list-style-type: none"> <li><b>THA</b> will set new BME and other E&amp;D related lettings targets once it has completed the resident demographic profile exercise. Lettings will then be monitored and reported against these new targets.</li> <li>Dorset CC has started a BME profile exercise, to give a breakdown by local authority area, which will also feed into THA's targets once completed.</li> </ul>
		2. <i>Tenant satisfaction</i> is at least as high as for non-BME tenants	<ul style="list-style-type: none"> <li>The 2008 Status Survey noted that the sample size was small in respect of the BME return and therefore care should be taken in interpreting results. Nevertheless the survey revealed that BME residents were less satisfied with services (75.3% satisfaction) compared to overall SHG satisfaction rates of 82%.</li> <li>The Status Survey showed people with a long term illness or disability are more satisfied with services with satisfaction levels at 84.4%.</li> </ul>		<ul style="list-style-type: none"> <li>The Group is concerned about the lower levels of satisfaction amongst BME residents and will be taking action to understand and address issues of concern, targeting areas where dissatisfaction is most prevalent taking into account the demographic profiling information.</li> <li>Satisfaction levels will continue to be monitored. The introduction of quarterly Status Surveys during 2009/10 will be one means of doing this.</li> </ul>
		3. <i>Dealing effectively with racial harassment</i> : the association establishes targets for reporting, victim support and satisfaction, and action taken against perpetrators	<p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA has enhanced board and senior management monitoring of incidences of racial harassment and has developed increased scrutiny of case management at a senior level.</li> <li>SHA continues to manage racial harassment within a Hate Crime framework, monitoring cases and providing support to residents alongside action against perpetrators. Enhanced security options are available to protect victims of racial and domestic violence in their home, in particular participating in "safer spaces" initiatives with local authorities.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has revised the performance information to its Board e.g. to give closer monitoring of ASB timescales.</li> <li>THA has a victim support procedure in place with a budget which includes practical assistance such as enhanced security measures.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA has a clear racial harassment procedure and recorded two incidents of racially motivated harassment which were both resolved.</li> </ul>		<ul style="list-style-type: none"> <li><b>VHA</b> is taking action to understand the low return of 8% in respect of our satisfaction forms and will devise a plan to increase responses particularly from BME residents.</li> </ul>
		4. <i>Governing body membership</i> : the proportion of BME new appointments and re-appointments to the governing body is the same as under Lettings above.	<ul style="list-style-type: none"> <li>Governing body membership reflects the BME profile of its area of operation. In practice this means that there is BME board membership on the Boards of SHG, SHA and THA. (see data in 2.2b above)</li> </ul>		<ul style="list-style-type: none"> <li>The Group will continue to strive to attract members from BME and other diverse backgrounds advertising widely for members.</li> </ul>



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		5. <i>Staffing</i> : new appointments and promotions achieve the same levels of representation, at all levels of the organisation, as under the application of the 'Lettings' criteria	<p>For the Group as a whole the ethnic composition of the staff broadly reflects the communities that it serves. The detailed breakdown is outlined below.</p> <p><b>SHG</b></p> <ul style="list-style-type: none"> <li>10.13% of staff are from BME groups (6.33% have not declared their ethnic origin). Of 24 appointments made in the year, 9.09% of appointments were from BME group (12.5% of applicants did not declare their ethnic origin).</li> <li>From the 24 appointments made in the year, 75% were female, 58.33% were under 40 years old and 4.17% appointed were aged 55 or above. 8.33% of appointments declared a disability.</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>7.47% of staff are from BME groups which is slightly below census (6.04% of employees have not declared their ethnic origin). Of 41 appointments made in the year, 2.70% of appointments were from BME groups (9.76% of applicants did not declare their ethnic origin). 43.90% were female, 37.5% were under 40 years old and 5% appointed were aged 55 or above (2.43% of applicants did not declare their age/DOB). 0% of appointments declared a disability. In response to the statistics above SHA took positive action to recruit BME staff, through targeted advertising. This recruitment is currently ongoing.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>7.69% of staff are from BME groups (0% of employees have not declared their ethnic origin). Of the eight appointments made in the year, 0% were from a BME group, 62.5% were female applicants, 50% were under 40 years old and 12.5% were aged 55 or above. 0% of appointments declared a disability.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>1.6% of staff are from BME groups (1.6% of employees have not declared their Ethnic Origin). Of the 18 appointments made in the year, 0% were from a BME group, 44% were female, 56% were under 40 years of age and 5% were aged over 55. 0% of appointments declared a disability.</li> </ul>		<ul style="list-style-type: none"> <li>The GEF will continue to monitor recruitment and turnover statistics during the year and will take action where appropriate.</li> <li>In offices with low staff turnover SHA is looking to engage the services of local agencies to advise and assist in service delivery e.g. in respect of working with the local Somali population in Bristol.</li> </ul>
		6. <i>Representation in tenants/residents associations</i> : reflects the ethnic mix of the association's tenants in the relevant area	<p>Sovereign is committed to providing opportunities for involvement to residents across the Group.</p> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>Within this context SHA carefully monitor and reviews its activities, encouraging under represented groups. <ul style="list-style-type: none"> <li>➤ 20% of residents who consider themselves to have a disability participated in activities last year which exceeds the SHA profile</li> <li>➤ 7% of involved residents are from a black and minority ethnic (BME) background.</li> </ul> </li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has 3% BME involvement against the previous target of 2%, representing an upward trend.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>5% of VHA residents who attended resident forums were from a BME background.</li> </ul>		
		7. <i>Employment performance of suppliers, contractors and consultants</i> : as a criterion for award of work or contracts and a condition of doing business, associations should pass on requirements in respect of staffing, customer satisfaction and dealing with racial harassment to their consultants, contractors and suppliers.	<p><b>SHG</b></p> <ul style="list-style-type: none"> <li>The Group requires suppliers, consultants and contractors to be accredited through a specialist company called Exor. This company not only assesses financial viability but ensures that the Group's policies on equalities and diversity are applied. In addition E&amp;D is a standard item for discussion on the agenda of all meetings with contractors.</li> <li>Additionally Partner members have frameworks for contractors and employers agents which have specific KPIs and annual reviews which address BME issues relating to employment and dealing with racial harassment.</li> </ul>		
2.8	Housing Associations must operate a framework that effectively identifies and manages risk:	a) The association's risk management framework highlights key risks and how they are to be managed	<ul style="list-style-type: none"> <li>The Group developed a new Corporate Strategy during 2008/09 and a new Risk Map was compiled based on this strategy and approved by the GARC and adopted by all boards.</li> <li>The Clearview system – which is a strategic management system, has been introduced, providing a much clearer link between strategic actions and risk. All senior staff have been trained in its use.</li> <li>Each risk is referenced to a corporate objective in the Strategy and a 'Risk Owner' identified. The Risk Owner is the person who has responsibility for its controls operated by the Group to mitigate the Risk.</li> </ul>		<ul style="list-style-type: none"> <li>The Group intends to use its risk scoring system to evaluate major development and operational projects so that a comprehensive and dynamic view of Risk Exposure</li> </ul>



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			<ul style="list-style-type: none"> <li>For the first time this year risks are scored for Impact and Probability and a composite score attributed to the risk. This allows risks to be ranked in order of severity and for 'key risks to be identified. Not surprisingly in the light of the uncertain economic climate key risks to the Group are primarily financial.</li> <li>The internal audit programme is targeted at 'key risk 'controls and areas where controls require strengthening.</li> <li>Each quarter the GARC now receives a summary of all risks together with a report from the Risk Owner of each key risk, (usually the top 10) certifying that controls are being maintained or enhanced as agreed. This procedure was introduced in 2008/09.</li> <li>Membership of the GARC was reviewed and changed during the year in line with new guidelines for boards and committees. The new committee has received training in the year including the relationship between risks and internal audit and in using internal audit to test and improve risk control.</li> <li>The Committee uses the Risk Scoring to inform its decisions on Capacity Reserved against Risk, and in agreeing Minimum Funding Levels with the Group Treasury Committee (see Future action for comments on Risk Appetite).</li> <li>Each subsidiary reviews the risk map at management and officer level.</li> </ul>		can be developed. This will be used to inform the setting of a Risk Appetite for the Group.
	Identifying all major risks that might prevent them achieving their objectives	b) The governing body regularly reviews activities and policies and all new business decisions and there is a clear case for the proposed or existing direction of the association	<ul style="list-style-type: none"> <li>The Group has a formal approach to strategic planning which is detailed in a Protocol which forms part of the Intragroup Agreement (IGA).</li> <li>A Steering Group is established to manage the process and Away Days arranged for all Group boards and GMT to set a framework and parameters.</li> <li>The Combined Strategy Team is actively involved in the preparation of the detail and members of staff are consulted during the process before the revised strategy is put forward to boards for consideration.</li> <li>An interim strategy review was undertaken during 2008/9 and a new plan adopted by the Group in September 2008.</li> <li>The Strategic Plan is the basis for the 30 year Business Plan which is provided to the TSA and the Group's funders. This Business Plan provides the main operational controls against which the Group measures its performance. The Group Business Plan is supported by various operational plans that are the responsibility of individual named Directors. These action plans are regularly reviewed by the Managing Directors through team meetings and one-to-one's and monitored by the GMT.</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>As with previous strategies, Partner members are required to produce their own action plans, identifying how they will support the Group objectives. Sovereign HA's Management Board held an away day on 29 October 2008 to review the Group Strategy in detail and to consider the main goals and activities SHA should be carrying out over the next three years to support the delivery of the Group's strategic aims. The revised strategic Action Plan was approved by SHA's Board in December 2008.</li> <li>The delivery of the Action Plan is reviewed by the SHA management team quarterly, and updates, which identify progress towards meeting agreed targets, are also provided to SHA's Board on a quarterly basis.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>The THA strategy and action plan is derived from the Group Strategic Plan 2008-11. Additionally THA's Board closely monitors progress on the Somerford redevelopment and makes all expenditure decisions.</li> <li>THA's Board has monitored progress against the Audit Commission Inspection Action Plan approving all of the detailed actions arising from the plan relating to <ul style="list-style-type: none"> <li>THA's approach to gas servicing;</li> <li>asbestos information for residents and contractors;</li> <li>10 year electrical testing programme;</li> <li>reviewing a range and measurement of customer service standards &amp; THA's approach to E&amp;D;</li> <li>management of aids and adaptations service;</li> <li>the management of maintenance contracts;</li> <li>void property lettings standard out of hours hotline,</li> <li>value for money and</li> <li>Quarterly Board performance information.</li> </ul> </li> <li>THA's new operational management structure was approved by the GMT in March and implemented in May 2009.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>The VHA is working through its action plan, approved in November 2007. The main themes are to sustain the existing high service levels; improve governance; review the future provision of retirement</li> </ul>		<ul style="list-style-type: none"> <li>On an annual basis the Strategic Plan is reviewed and updated as appropriate to ensure that it responds to changes in the external environment, and that these changes are properly quantified in the Group Business Plans.</li> <li>WHP is viewed as a very good strategic fit with SHG and complements its existing strategy. To support the amalgamation the Business Plan, incorporating WHP, has been reworked and submitted to the TSA along with a detailed action plan and proposed savings resulting from the amalgamation. On the basis of this information the TSA have approved the amalgamation.</li> <li>The Wessex/Sovereign Integration Action Plan will go to the Group Board for approval on 6 August 2009. It will then be submitted to the TSA.</li> <li>An updated Group Strategy will be produced for approval by the Boards' in November 2009. The new Group Residents Forum will be involved in this review.</li> <li><b>THA's</b> Value for Money (VFM) report on service cost and performance was submitted to its Board in September 2008. THA is taking the lead in producing a VFM strategy for the Group. The draft strategy is under consultation, with a target to be reviewed by GMT in August 2009 and Group boards in October 2009.</li> </ul>





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			homes and services to the elderly; to achieve the transfer of 840 homes from SHA and increase satisfaction rates; to raise the profile in the local community and to expand development potential. <ul style="list-style-type: none"> <li>VHA's Board has received regular updates on the progress in delivering these aims and objectives. All objectives have substantially been met.</li> </ul>		
	With the necessary arrangements to manage risks and mitigate	c) Approved terms of reference for the governing body and other committees and delegated authorities for staff are in place	<ul style="list-style-type: none"> <li>Revised Standing Orders and Financial Regulations are in place and have been updated to reflect the amalgamation with WHP. These include a comprehensive delegations matrix which specifies the level of delegated authority to the Partner member boards, Group committees and Group Management Team.</li> </ul>		<ul style="list-style-type: none"> <li>A full review of the Standing Orders and delegations will be undertaken in Q4 2009 to tie in with the implementation of the new finance system.</li> </ul>
		d) There are internal controls systems. The effectiveness is regularly reviewed by the governing body and reported in the annual report.	<ul style="list-style-type: none"> <li>Internal controls are defined in Standing Orders and the Group Financial Regulations and supplemented by the Policies and Procedures of the Group.</li> <li>The Group has appointed a single internal auditor for the Group from 2008/09 so that controls and effectiveness across the Group are being measured by a common standard. The internal audit programme tests the effectiveness of the internal controls and the results of these audits and agreed actions are formally acknowledged by the boards and reviewed by the GARC each quarter.</li> <li>Each Group Management Team (GMT) Director produces an Assurance Statement each year for the area under their control and the Group Chief Executive provides an overarching statement. These statements are considered by the GARC with statements from the internal auditors and GTC and Management letters from the external auditors before the GARC produces its annual statement for the Group's boards. These statements are contained in supporting documentation to demonstrate compliance with Circular 07/07.</li> <li>These statements are complemented by the key risk owners certification which the Committee receives quarterly, (see 2.8 a).</li> <li>In line with the recommendation in the National Housing Federation Code of Governance – 'Excellence in Governance' 2009 the Group Finance Director provided boards with assurance on the adequacy of financial and management reports. This assurance is provided in the Annual Statement of the Group Finance Director.</li> <li>A Fraud Register is maintained and reviewed by the GARC each quarter. There have been no reported instances of fraud in 2008/09.</li> </ul> <p>(NB see also RC1.1 and 1.1.2(D) regarding financial controls which address risk management issues).</p>		<ul style="list-style-type: none"> <li>WHP currently uses the same internal auditors, Mazars LLP, as the Group. The 2 audit programmes for 2009/10 have already been aligned to allow the quality of each area of internal control to be assessed consistently across the enlarged Group.</li> <li>Both the Group and WHP use the same risk advisers, Hargreaves Risk and Strategy (HRS). HRS has established lists of best practice controls against individual risks. The Assistant Director of Audit and Risk will work with Group staff during 2009/10 to audit the quality of the enlarged Group's controls against the best practice lost and to identify and close gaps.</li> </ul>
<b>3. Properly Managed</b>					
3.1	Housing associations must set rents move towards target social rents and are, on average, below those in the private sector for similar properties and which reflect size, property value and local earnings	a) Rents are set in accordance with the rent restructuring formula	<ul style="list-style-type: none"> <li>All Partner member rents are set in accordance with the rent restructuring formula; however, in some cases combined rent &amp; service charge increases were restricted where it was felt that the application of the full increase would cause undue hardship following a high September 2008 RPI.</li> </ul>		
		b) All residents have information about their landlord's rent policy and rent levels across the association's stock and in the relevant local authority areas. All residents have information about their service charges including costs that their charges cover, how charges are budgeted and increases calculated.	<ul style="list-style-type: none"> <li>All Partner members send residents an annual letter containing details of rent increases together with information on service charges where applicable. A strategy is in place to allow optimum service charge recovery over a five year period. However it is recognised that even applying the full rate of convergence permitted under the rent restructuring rules, it will not be possible to get all properties to target rent within the timescales.</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>Phase 2 of the service charge project has progressed as planned. This year information was presented in a more visual format using graphs, and service charge information has been provided to residents in houses for the first time. SHA processes have been improved to match cost and income on fixed service charges. The gap between service cost and income has reduced again in 2008/09. In 2008/09 SHA's cleaning and grounds maintenance contracts were reviewed with a view to minimise costs to residents.</li> </ul>		

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			<b>THA</b> <ul style="list-style-type: none"> <li>THA was unable to transfer the service charge data onto Academy, the housing management IT system, to improve the efficiency of the process. However it was still able to provide residents with comparative information on their rent level, by local authority and property type. The gap between service cost and income has reduced again in 2008/09 and all service charges are detailed to residents, with charges and refunds being applied as part of the annual review process</li> </ul>		
3.2	Housing associations must have management arrangements, resources, skills and systems which are appropriate to their circumstances, scale and scope of operation, and ensure that their activities:	a) The governing body receives regular reports on all areas of the association's performance. The association benchmarks its performance against other associations and organisations.	<p><b>Please note this section is supported by a separate document outlining SHG's approach to Service Delivery Performance and Continuous Improvement as requested in the Guidance Note for the SACS submission 2009. The narrative below details how performance is managed at the strategic level.</b></p> <ul style="list-style-type: none"> <li>The Group has made significant progress during the year in delivering its Group Strategic Plan 2008-11 (GSP), with regular updates provided to the Parent Board.</li> <li>Arising from the revised group Standing Orders, the Group has established a Group Operations Forum. Chaired by SHA's Managing Director and comprising the other Managing Directors of the Group supported by the Group Performance Director.</li> <li>Its role is to               <ol style="list-style-type: none"> <li>Establish a service 'vision' for the Group</li> <li>Co-ordinate customer services activities across the Group</li> <li>Share best practice between the associations.</li> <li>To routinely identify best practice in customer service, and to work with the Performance Team in producing standardised policy and practice, to ensure greater operating efficiency.</li> </ol> </li> <li>The latter aims are being delivered through the Orion Project. See 3.3 below and supporting documentation.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA revised its quarterly performance reports to its board in September 2008, following consultation with board members about what information was of most value and usefulness to them. The new report includes full benchmarking and trends information and a traffic light system to identify variance against target.</li> <li>Annual reports have also been provided to THA's Board giving more detailed information on planned maintenance, complaints, allocations and lettings, evictions, and staffing.</li> </ul>		<ul style="list-style-type: none"> <li>The Group will continue to refine its approach to performance monitoring in the light key business drivers including TSA and local authority requirements</li> </ul>
3.2.1	Are adequately monitored	b) All lettings and sales are recorded in the Continuous Recording of letting system (CORE)	<ul style="list-style-type: none"> <li>SHG undertakes sales for all Group members and details are recorded on CORE.</li> <li>SHA, THA and VHA record all lettings on CORE digital.</li> </ul>		
3.2.2	Are undertaken efficiently and effectively	c) Services can be demonstrated to be relevant and accessible to customers.	<ul style="list-style-type: none"> <li>All members of the Group have achieved Quality Housing Service (QHS) accreditation.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>QHS accreditation was achieved by THA in 2008/09. The accreditation says that the following services, which cover from the moment a person seeking housing makes first contact with an association, to the time that they terminate their tenancy, are delivered to an excellent quality standard:               <ul style="list-style-type: none"> <li>Opening and reception</li> <li>Telephone service</li> <li>Information and documentation</li> <li>Maintenance</li> <li>Rents</li> <li>Complaints</li> <li>Estate services (including ASB)</li> <li>Resident participation</li> <li>Equality &amp; diversity</li> </ul> </li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>Additionally VHA has Charter Mark accreditation for excellence in service delivery.</li> </ul>		<ul style="list-style-type: none"> <li>In 2009/10 Sovereign will be embarking on and delivering a number of group wide projects to further improve access and customer care. In particular the introduction of a new branded interactive website that will offer 24/7 repair reporting and monitoring of hits on the website. The Group will also be making better use of resident profiling information, tailoring services to specific needs.</li> <li>On joining the Group, KHV is now included in the emergency call service.</li> <li>The enlarged Group including WHP has an extensive portfolio of older persons housing with over 2,400</li> </ul>


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			<ul style="list-style-type: none"> <li>All documents are available in audio and large print and other languages. Other accessibility features such as hearing loops and translation services are widely publicised and offered to residents.</li> <li>As part of the 'Orion' project (see attached document) the Group has developed its own service standards specifically addressing Access and Customer Care as a distinct function. Within this VHA has developed standards to address: <ul style="list-style-type: none"> <li>Office strategy and facilities (see also 2.4).</li> <li>Accessibility to services, including DDA compliance.</li> <li>Customer access and customer care standards.</li> <li>The website (see also RC 2.5).</li> <li>Tailored communication with customers taking into account their needs and preferences.</li> </ul> </li> </ul> <p><b>Repairs Service</b></p> <ul style="list-style-type: none"> <li>SHA has rolled out the mobile working and dynamic scheduling system in the Bristol area.</li> <li>THA has transferred its responsive repairs and voids contract from Mears to Sovereign Response (SHA's DLO), with full resident involvement in the process. THA has also refurbished the ex-United Reformed Church (URC) on the Somerford estate as offices for Sovereign Response. It is intended that the URC will be completely accessible to residents on Somerford, which represents a large bulk of THA's stock.</li> <li>THA's new estate inspections enable residents to approach staff about any problems or estate issues, without the need to contact the office.</li> </ul> <p><b>Supported housing</b></p> <ul style="list-style-type: none"> <li>SHA provides emergency alarm call handling on behalf of the Group. SHA ensures that all emergency alarm calls are answered, and that 98.5% of these are answered within 60 seconds. In 2008/09 98.8% of these calls were answered within 30 seconds.</li> <li>In respect of supported housing for older and vulnerable residents, the management service is delivered through a tailored approach to meet the specific requirements of people with support needs. For SHA 97.8% of all new residents who required a support plan had one within four weeks of moving in and 99.8% had their plans reviewed on time (nine months).</li> </ul>		<p>sheltered homes, together with two care homes and a range of supported specialist housing. Given the importance of these services, a full service review is planned following the amalgamation to cover care, supported housing and elderly persons services across the group, considering:</p> <ul style="list-style-type: none"> <li>The medium term future for each service;</li> <li>What services need to be expanded or contracted; what additional services might be required;</li> <li>How the services should be provided and by whom.</li> </ul> <ul style="list-style-type: none"> <li>Please refer to note 2.4 (a)</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA is devising an office strategy by December 2009 with the aim of moving to other offices in Christchurch in 2010/11, 12 months before the office lease expires, in order to provide more accessible offices.</li> </ul>
3.2.3	Are backed by proper systems of assurance for internal control	d) There are clear contractual arrangements, and reporting and review mechanisms for the use of partners or agents	<p><b>SDC</b></p> <ul style="list-style-type: none"> <li>The contractors and employer's agent's frameworks are fully OJEU compliant with specific provisions for call off and regular reviews.</li> <li>All contract documentation is standardised with clear contract management procedures.</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA works with a small number of managing agents. SHA aims to achieve consistency in service delivery, monitoring and performance between agency-managed and directly-managed schemes to ensure that residents are receiving consistent service delivery, subject to funding and local authority requirements.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA works with only one partner, Raglan HA which provides services for one scheme. Services are provided within the context of a management agreement which was fully reviewed in 2009.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA has only one management contract in place, providing local support to vulnerable tenants. There are currently 20 tenants receiving this service.</li> </ul>		
3.3	Housing associations must aim to deliver continuous improvements and value for money in their services:	a) Service provision is subject to challenge and change. The wishes of residents and others are balanced against available resources within a clear and transparent framework, according to the principles of Best Value. Progress in working towards improvements against a range of national and local performance indicators will be publicised by the association.	<ul style="list-style-type: none"> <li>All subsidiaries within the Group are participating in the Orion project. The details of this and how residents are involved is outlined in the accompanying document on Service Delivery Performance as requested in the Guidance Note for the SACS submission 2009.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>In addition to the above THA have undertaken a review of service cost alongside service performance, compared with the rest of the Group and reported the results to THA's Board.</li> <li>THA Residents have been involved in the following service reviews: <ul style="list-style-type: none"> <li>Void standard</li> <li>Disabled Aids &amp; Adaptations</li> <li>Leaseholders' debt management</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>A detailed amalgamation Action Plan is due to be presented to the SHG Board on 6 August for approval. This will then be submitted to the TSA so that the promises in the Business Case can be monitored effectively.</li> <li>All members of the Group will be reviewing the outcome of the Status Survey, responding to key areas of concern and highlighting priorities for</li> </ul>





Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
			<ul style="list-style-type: none"> <li>➤ Selection of contractors</li> <li>➤ Somerford estate refurbishment</li> <li>• The THA void standard was improved through the introduction of decoration vouchers and a better standard of garden</li> <li>• Leaseholders' debt management was improved by using clearer, letters and a less harsh and more customer-focused process.</li> <li>• The collection of rechargeable repairs was reviewed in 2008/09 and a procedure set up for collecting these which is closely monitored and publicised.</li> <li>• THA reviewed the procurement of all major works contracts in 2008/09 by reaching agreement to enter into a service level agreement with SHA for SHA to deliver a full Property Services Function (with the exception of aids and adaptations) using SHA's existing contractors wherever possible, to reduce the administrative burden, duplication and achieve economies of scales and other efficiencies.</li> <li>• THA has recently developed a new Residents Forum to enable residents to scrutinise and monitor performance.</li> </ul>		the future for incorporation in the revised Strategic Plan.
3.3.1	Using Best Value techniques, challenging what they do and how they do it, making comparisons with others, consulting people affected by their services and establishing whether they are providing the service either directly or through a third party, at competitive standards and prices.	b) Housing services and supporting functions are reviewed to ensure continued relevance	<ul style="list-style-type: none"> <li>• All services and support functions are being reviewed through the Orion project (see above).</li> </ul>		
3.4	Housing associations must develop and manage good-quality homes that seek to meet people's needs and preferences now and in the future, ensuring that:	a) Permanent housing is sustainable, demonstrated by a commitment to effective protection of the environment and prudent use of natural resources	<p><b>Sovereign Development Consortium (SDC)</b></p> <ul style="list-style-type: none"> <li>• The current members of the SDC are KHV, SHA; THA; VHA, Saxon Weald; Housing Solutions; Solon; Advance; Ability and Brunelcare.</li> <li>• SDC has developed its own action plan within the framework of the HCA's Construction Commitments principles (which has replaced the Clients Charter) This ensures continuous improvement in the following areas: <ul style="list-style-type: none"> <li>➤ Procurement and Integration</li> <li>➤ Commitment to People</li> <li>➤ Client Leadership</li> <li>➤ Sustainability</li> <li>➤ Design Quality</li> <li>➤ Health and Safety</li> </ul> </li> <li>• This approach is recognised by the HCA as an example of best practice.</li> <li>• All members of the Group act as client to SHG in commissioning and approving new developments. All schemes are subject to managerial and officer scrutiny prior to approval. The aim is to ensure the Group develops homes and communities where people want to live, which are sustainable and offer value for money. As part of this a development checklist has been developed which is completed and considered prior to any scheme development. This document addresses a series of prompts to assist planning and covers issues related to: scheme mix; service charges; site layout, green technology etc.</li> <li>• Prior to letting complex or large schemes a lettings and management plan is completed. This addresses site design, layout services, charges site type, mix implications, lettings plans, management companies, and grounds maintenance.</li> <li>• For major schemes where Group members own the land and have significant influence over the design and components of the scheme, the local community and prospective residents are consulted throughout the process.</li> </ul>		<ul style="list-style-type: none"> <li>• <b>SHG</b> will continue to share its Construction Commitments action plan on request.</li> <li>• A Group wide environmental policy is to be produced and implemented in 2009/10. And each subsidiary will be establishing its own Green Team.</li> <li>• Various environmental initiatives are being trialled including solar panels for hot water and air source heat pumps at various schemes and further improvements to communal lighting.</li> </ul>
3.4.1	The homes their	b) Housing stock is maintained in a	<ul style="list-style-type: none"> <li>• The Group continues to ensure its homes are of a high standard. The 2008 Status Survey showed that</li> </ul>		






Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
	residents live in are well maintained and in a lettable condition	lettable condition that exceeds statutory minimum requirements	<p>85% of all residents were satisfied with the overall quality of their home and 81% were satisfied with the general condition of the property.</p> <ul style="list-style-type: none"> <li>All subsidiaries are on target to remain DHS compliant and are undertaking the following activities to ensure they remain so: and that their homes meet residents requirements and in 2008/09 the following activities have been undertaken:</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA's Forward Maintenance Plan (FMP) is based on up to date, accurate and validated rolling five-year programme stock condition surveys. 20% of all stock is surveyed each year through SHA's in-house and dedicated Stock Condition Surveyors who are accredited Home Energy Assessors and qualified to P402 and P405. This allows them to deliver maximum efficiency across the process by simultaneously collecting and producing the Energy Performance Certificate (EPC), collecting asbestos information and condition data in one appointment. Data is input on site using mobile devices which is uploaded electronically into a master Codeman stock condition database.</li> <li>SHA's current stock investment approach to deliver 'Warmth, Security and Home Comfort' is the result of a full and targeted residents feedback survey completed in 2006/07. Associated programmes of work are in place, ongoing and delivering new windows, doors, insulation, boilers and heating systems, all designed to reduce residents energy costs and provide added security. For 2009/10, SHA is seeking extensive feedback again from residents to further inform the FMP. Aligned with residents wishes and expectations is the SHA programme for installing alternative energy systems, and in a number of cases, these systems are integrated with University monitoring and study programmes. Additionally the Void Standard has been reviewed in full consultation with residents.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has rationalised its stock during 2008/09 through the sale of Linden Court, a sheltered scheme in Eastleigh, to Saxon Weald HAL. The sale proceeds have been reinvested in the redevelopment of Cheviot Court on the Somerford estate.</li> <li>THA reviewed and improved its void (relet) standard following the Audit Commission's Inspection recommendations, particularly in relation to decoration and general finish, and in full consultation with residents.</li> <li>THA reviewed its gas programme in 2008/09 to achieve 100% over 11 months and introduced a 12 month service improvement plan, to improve THA's approach to gas safety. It has also reviewed its approach to asbestos to provide residents with information about where asbestos can be found in their homes.</li> <li>As a result of the analysis of repair costs, THA changed the way it delivered responsive and void repairs including changing its contractor from 1 April 2009 to provide residents with a more cost effective service.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>Given VHA has already achieved Decent Homes Compliance and its current investment strategy concentrates on a long term programme of upgrading kitchens and bathrooms throughout the stock in line with the current stock condition results.</li> <li>During 2008/09 VHA took over the responsibility for 840 properties in Oxfordshire from SHA. Although most of the stock is less than ten years old, resources were devoted to improving thermal efficiency and replacing a number of failed heating systems.</li> </ul>		<ul style="list-style-type: none"> <li><b>SHA</b> are actively engaged with the Orion project to progress a number of key actions that will move the delivery of repairs towards excellence. A key action is the provision of 2 hour appointment slots and an extended hours service, all being worked up now with a plan to implement across all regions during 2010/11.</li> <li><b>VHA</b> will update its stock condition survey information to have 20% complete by September 2009. PDA's are being rolled out to all surveyors for the collection of Stock Condition and HHSRS (Housing Health and Safety Rating) data</li> <li>The local void standard will be reviewed by the Tenant Forums and Maintenance Matters Group to ensure resident input.</li> </ul>
3.4.2	Maintenance is carried out effectively and responsively and in ways which that reflect residents' preferences	c) Progress in achieving the Decent Homes Standard is monitored	<ul style="list-style-type: none"> <li>All boards monitor compliance with the DHS on a quarterly basis. Details of compliance are outlined below:</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>Using the condition data and analysing repair trends, component replacement programmes are determined and works carried out against a theoretical life cycle, with decisions to procure made on a "just in time" remaining life basis. This approach has delivered a stock condition profile that is now 99.6% Decent Homes compliant with an average SAP rating of 65.3, an improvement the 2007/08 rating of 64.8.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>Progress against achieving the Decent Homes Standard is monitored on a monthly basis and reported</li> </ul>		





Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
			<p>to the THA Board each quarter. In 2008/09 the properties meeting the standard improved from 92% to 96.9%. In 2008/09 THA's average SAP rating was 66.1, an improvement on the 2007/08 rating of 63.9.</p> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA undertook its last stock condition survey in 2004 and is undertaking a new survey in 2009/10. From that date, the proposal is to design a rolling five year programme, similar to that adopted at SHA. VHA has trained staff who are accredited Home Energy Assessors and qualified to P402 and P405. In 2008/09 99.9% of all properties met the DHS.</li> <li>The average SAP for 2007/08 was 75 with a target of 76 for 2008/09. The methodology for producing SAP changed from a 1-120 scale to 1-100 scale resulting in the 2008/09 average SAP being 67.7. However the records provided to Elmhurst Energy, who carried out the independent conversion on VHA's behalf ,shows the pre conversion figure to be in excess of 76.</li> </ul>		
3.4.3	Necessary investment in the future of their stock is made a key priority	d) There is a responsive repair service that meets legal and contractual obligations and is efficient and effective. It has published service standards and is sensitive to the needs of vulnerable residents	<ul style="list-style-type: none"> <li>The 2008 Status Survey shows satisfaction with repairs across the Group is 77% which is just above top quartile benchmark. Partner members deliver the following services:</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA has developed its repair service. Residents are able to report a repair using a variety of methods, but the majority choose the Freephone number to speak directly to the dedicated repairs call centre staff. Through friendly and efficient diagnosis, the call centre staff provide a job number and offer either an a.m., p.m. or Missed School Run appointment at the "point of call". For the majority of the repairs, including emergency out of hours, it is the in-house maintenance contractor, Sovereign Response that delivers the work that is required.</li> <li>SHA has invested significantly in developing a mobile working solution which provides the tradesperson with each individual job detail and its respective appointment all transferred wirelessly to a PDA. More than 42,000 repairs were completed by SHA in 2008/09, and 94% of those were completed within priority target time (93% in 2007/08).</li> <li>During the year SHA performance on repairs completed within target either stayed the same or improved as follows: <ul style="list-style-type: none"> <li>Emergency repairs: 98% for both 2007/08 and 2008/09</li> <li>Urgent repairs: 91% in 2007/08 to 93% in 2008/09</li> <li>Routine repairs: 93 in both 2007/08 and 2008/09</li> </ul> </li> <li>SHA's landscaping and grounds maintenance contract was reviewed in 2008/09 and following an OJEU compliant process new contracts were allocated. Residents were involved in the process. In the Bristol area a new contract was awarded to Blue Sky Development and Regeneration, a social enterprise company employing ex-offenders with a view to getting them back into the workforce.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>In 2008/09 there was a concern that although there was a high level of tenant satisfaction with the repairs service, value for money was not being achieved The pilot contract arrangements with Mears was therefore reviewed. It was decided to transfer the service to Sovereign Response, with the added benefit that the operatives have been retained through TUPE arrangements and know the stock and the residents. Residents were fully involved in the decision to transfer.</li> <li>During the year THA improved performance on repairs completed within target as follows: <ul style="list-style-type: none"> <li>Emergency repairs: 95.1% in 2007/08 to 98.9% in 2008/09</li> <li>Urgent repairs: 75% in 2007/08 to 98.7% in 2008/09</li> <li>Routine repairs: 90.9% in 2007/08 to 98.5% in 2008/09</li> </ul> </li> <li>THA also introduced stock investment satisfaction monitoring and achieved 93.4%</li> <li>A new customer satisfaction and quality audit process has been introduced by THA's new Property Services Team following consultation with the residents' panel, contractors and SHA's call centre and Property Management Team covering: <ul style="list-style-type: none"> <li>Calls logged at the call centre</li> <li>Response reports</li> <li>Voids</li> <li>Planned and cyclical works</li> <li>Grounds maintenance</li> <li>Heating services</li> <li>Communal cleaning</li> </ul> </li> <li>The Sovereign Response Mobilisation Project has been completed successfully, with residents reporting a seamless transition and service improvement, particularly with regard to appointments</li> </ul>		<ul style="list-style-type: none"> <li><b>THA's</b> flag system on Academy for vulnerable residents will be revised once the results of the demographic profile are known.</li> </ul>

Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
			<b>VHA</b> <ul style="list-style-type: none"> <li><b>VHA</b> deliver a responsive maintenance service through a direct workforce and the costs are in the upper quartile within the Housemark benchmark. It has reviewed its repairs handbook. Performance is improving in all areas including repair times that are either upper or second quartile and satisfaction is 85% against benchmark of 76%.</li> </ul>		<ul style="list-style-type: none"> <li>In 2009/10 <b>VHA</b> is to complete its Resident Profiling project and review maintenance procedure to ensure vulnerable residents can be identified and enhanced service delivered where appropriate.</li> </ul>
3.4.4	Standards of new development provision are met	e) All equipment and building components meet required legislative and regulatory standards	<ul style="list-style-type: none"> <li>All Partner members have in place appropriate service level agreements and/or formal maintenance contracts which contain strict details as to the required service standard, regulatory, legislative or otherwise (as appropriate) that will provide the correct maintenance of all equipment, components and M&amp;E assets. The manager appointed to monitor contract performance ensures that these standards are met through a series of service progress meetings, targeted audit and control processes and general monitoring.</li> <li>Across SHG Gas appliance safety checks are carried out to an 11-month service cycle, with all instances of “no-access” being progressed through a robust “no-access” process.</li> </ul> <p>Performance is as follows:</p> <b>SHA</b> <ul style="list-style-type: none"> <li>In 2008/09 access was achieved for 99.6% of SHA’s properties at year end, an improvement on the previous year which was 95%.</li> </ul> <b>THA</b> <ul style="list-style-type: none"> <li>In 2008/09 access was achieved for 99.3% of THA properties at year end an improvement on the previous year (99.17%).</li> <li>THA has introduced a ten year rolling programme of electrical testing.</li> </ul> <b>VHA</b> <ul style="list-style-type: none"> <li>In 2008/09 access was achieved for almost 100% of VHA properties at year end. This good performance is achieved through a combination of specialist ‘interrupter’ timers for persistent offenders, repeating letter and mail drops, telephone calls and door knocking out of hours. In the event of continued resistance to provide access by the resident then legal proceedings are instigated without delay.</li> </ul>		
		f) New developments comply with ‘rethinking construction’ principles, as advised by the Corporation	<ul style="list-style-type: none"> <li>The Group has an exemplary record of good working practice in the SDC with a strong contractor framework and framework of employer’s agents. All have access to standard documents developed through working in partnership and sharing best practice and lessons learned via the SDC extranet. In the last year the SDC have added an external door supplier to their strategic supply chain agreements as well as setting up a service level agreement with architects.</li> <li>Through working together as a consortium the combined savings of the RSL members is approximately £1m, not including savings on products procured via the supply chain.</li> </ul>		
		g) Sinking fund payments made by leaseholders are held in accordance with any relevant leases.	<ul style="list-style-type: none"> <li>For all subsidiaries sinking fund payments made by leaseholders are held in accordance with lease provisions and are kept in separate interest bearing accounts. For new schemes SHG determines whether sinking funds are needed prior to sale and this information is included in the handover matrix from development. <i>See also 3.1 b.</i></li> <li>In 2008/09 <b>THA</b> revised its annual service charges statement and improved the way that interest is calculated.</li> </ul>		
3.5	Housing associations must provide good-quality housing services for residents and prospective residents:	a) Services are shaped around customers’ needs	<ul style="list-style-type: none"> <li>All members of the group strive to ensure services are customer focused. For customer involvement in service reviews see RC 3.3.</li> </ul> <b>SHA</b> <ul style="list-style-type: none"> <li>SHA continues to work constructively with local authorities in respect of the introduction of Choice Based Lettings schemes (CBL). The coverage of CBL has now increased to include Somerset and Wiltshire, with a Devon wide scheme being introduced in Autumn 2009.</li> <li>SHA continues to negotiate local lettings plans in areas where tenancy sustainability and community</li> </ul>		



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			<p>cohesion would be at risk if lettings were not proactively managed. This has been particularly successful in Devonport in Plymouth and Bristol where child density and age profile have been carefully managed.</p> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has been consulted by Christchurch Borough Council (CBC) on the proposal to adopt a new Dorset-wide choice based lettings scheme by 2010, and is content that its views have been taken into account. A second local lettings plan has been agreed with CBC on the Somerford estate.</li> <li>THA has reviewed the success of introducing probationary tenancies. Only 15 out of 158 were extended and only one eviction took place, which shows that probationary tenancies are helping to sustain tenancies.</li> <li>THA staff received legal training on mental capacity and THA no longer uses mandatory grounds of possession for rent arrears on probationary or assured shorthold tenancies in accordance with the HC's good practice note on tenure.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>In September 2008 VHA received a consultant's report on the future of its sheltered housing. The Ridgeway survey made a number of recommendations and these are being progressed.</li> <li>The Maintenance Matters Group has been an influential forum in shaping services around residents needs. Group members have approved a re-specification of kitchens, selected door contractor and specification, selected external painting contractors and specified new vinyl flooring for use in kitchens and bathrooms.</li> <li>VHA underwent a Resident Inspection conducted by THA residents. Suggestions included the use of freephone telephone numbers, installing Omfax onto the housing management system, and consideration of collecting data on repairs completed first time to assess value for money.</li> <li>VHA consulted a variety of residents to help shape and influence the service standard for Resident Involvement under the Orion Project.</li> </ul>		
3.5.1	By seeking to offer a choice of home, while giving reasonable preference to those in priority housing need	b) Housing Corporation Resident Charters are provided to applicants and residents	<ul style="list-style-type: none"> <li>All members of the Group continue to provide Resident Charters to applicants and new residents.</li> </ul>		
3.5.2	By offering the most secure form of tenure compatible with the purpose of the housing and the sustainability of the community;	c) Legal repossession of a property is sought as a last resort	<ul style="list-style-type: none"> <li>All members of the Group continue to prevent homelessness, seeking to sustain tenancies where possible beginning with early interventions in all cases of potential or threatened homelessness, using eviction as last resort.</li> <li>All polices and procedures are focused on sustaining tenancies, through the following activities: <ul style="list-style-type: none"> <li>Pre-tenancy assessment, to ensure the tenancy is financially sustainable and relevant support is available. This includes identifying whether the applicant may be eligible for housing benefit and assisting with any claims.</li> <li>Creation of probationary tenancies for all new lettings.</li> <li>Settling-in visits.</li> <li>Tenancy audit.</li> <li>Participation in mobility schemes.</li> <li>Participation in domestic violence sanctuary schemes.</li> <li>Hold a pre-court panel to ensure consistency and fairness in respect of court action.</li> <li>All evictions are signed off by a director to ensure all avenues have been explored prior to eviction.</li> </ul> </li> <li>Analysis is undertaken on the reasons behind tenancy failure to learn lessons from these and prevent future re-occurrence.</li> <li>All group members work closely with Citizens' Advice Bureaux and organisations offering financial advice and support, funding these organisations where appropriate. Money advice information is published in resident newsletters on a regular basis including credit union details and contents insurance information.</li> <li>All subsidiaries work to minimise evictions. <ul style="list-style-type: none"> <li>SHA in 2008/09 had in total 40 evictions, 32 of these were for rent arrears, the remainder was for anti social behaviour this represents a slight increase on the previous year.</li> <li>THA in 2008/09 carried out nine evictions compared to 15 in 2007/08.</li> </ul> </li> </ul>		





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			<p>➤ VHA in 2008/09 had in total 25 evictions, 24 of these were for rent arrears, the remainder was for anti social behaviour.</p> <p>Specific actions undertaken by the subsidiaries to sustain tenancies include:</p> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>In West Berkshire SHA is piloting a pre eviction panel. This multi agency approach has been developed in partnership with the Citizens' Advice Bureau &amp; West Berkshire Council, linked to their prevention of homelessness strategy, and has been successful in avoiding the loss of tenancies in the most extreme cases</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>In 2008/09 THA held a Money Advice drop-in event where all residents who needed any assistance could call in to seek expert help from various agencies such as Citizens' Advice and Coastal Credit Union. It has undertaken in house training in benefits, budgeting and holding a welfare training day to ensure that all officers are up to date on legislation and changes to the benefits and welfare systems. Additionally THA subscribes to HB Notes, an on-line facility that provides advice and assistance about Housing Benefit and other benefits including suggested letters for residents to use to challenge decisions made by a Housing Benefit department.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>In addition to the above VHA facilitates tenant's friends to promote mutual support and assistance.</li> <li>VHA directly employed a Tenant Support Officer to work with residents and other agencies to maximise the take up of housing benefits and ensure high levels of financial inclusion.</li> </ul>		<ul style="list-style-type: none"> <li>In 2009/10 <b>THA</b> will be investigating the possibility of a self funding, in-house money advice worker who can offer support and advice to any of its residents regardless of where they live. THA will also set up an eviction protocol.</li> </ul>
3.5.3	With agreements that clearly set out residents' and landlords' rights and obligations;	d) Strategies are in place to tackle anti-social behaviour	<ul style="list-style-type: none"> <li>All members of the group are signed up to the Respect Standard for housing management.</li> <li>The 2008 Status Survey shows that 14% of residents experienced ASB compared to the benchmark of 15%. Whilst most residents were satisfied with the advice provided by staff, they are less satisfied with how the ASB report was dealt with and the outcome of the report.</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA works closely with a legal adviser to provide surgery type support and training for staff at all offices to assist in the management and resolution of serious ASB cases, with notable success in a number of cases where severe nuisance has been identified. This includes mediation training for staff and access to mediation services. Residents are able to report ASB through the website and the 24 hour Care Centre service to ensure a speedy response to issues.</li> <li>SHA currently works in partnership with various anti-social behaviour units throughout the South West including Plymouth, Exeter and Torbay to tackle ASB from a multi agency approach which is proving very successful. SHA are also attending regular anti social behaviour meetings with local partners in Plymouth, Torbay and Exeter discussing good practice and how to improve the service.</li> </ul> <p><b>SHA's Neighbourhood Wardens</b></p> <ul style="list-style-type: none"> <li>In West Berkshire three Neighbourhood Warden Schemes provide a uniformed patrolling presence in the community. The aim of the Wardens is to reduce crime and the fear of crime, address environmental issues, engage in positive ways with young people, provide reassurance to the elderly and vulnerable, and promote community cohesion. The teams are each co-located in their respective local Police Stations, which allows them to work seamlessly with Police Officers and Police Community Support Officers (PCSOs).</li> <li>Further investment is being made, in partnership with local authorities in West Berkshire, to develop the schemes, taking proactive action in the development of youth activities to deter unreasonable behaviour. Additionally SHA have continued to work closely through the local Crime &amp; Disorder reduction Partnership in West Berkshire, where the association takes a leading role through the Strategic Assessment &amp; Partnership Planning process, with further success in reducing crime &amp; ASB. SHA are also rolling out the citizenship programme with local schools in Berkshire.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>In 2008/09 THA improved its ASB strategy by: <ul style="list-style-type: none"> <li>➤ Introduction of an ASB out-of-hours telephone hotline.</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>As part of the Orion Project action plan and in response to the Status Survey a review of the way Group members performance manage and report on ASB is underway, with the intention to drive service improvements and resident satisfaction in the delivery of support and intervention at all levels of ASB.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA will be targeting staff resources to the areas with the highest incidences of ASB, now that these are mapped out.</li> </ul>






Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
			<ul style="list-style-type: none"> <li>➤ Mapping out the areas with the highest incidents of ASB</li> <li>➤ Undertaking Restorative justice</li> <li>➤ Community events with other agencies</li> <li>➤ Good neighbour agreements</li> <li>➤ Purchasing noise recording equipment</li> <li>➤ ASB panel looks at new initiatives</li> </ul> <ul style="list-style-type: none"> <li>As a result, THA responded within timescale with 86% of ASB cases and of those residents who submitted satisfaction surveys, 80% said that they were satisfied with the outcome. The Status survey reflected this since those who were satisfied with how their report was handled was above the Group average.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>The status survey shows VHA has a low number of ASB cases (8%) and policies and procedures are in place for tackling and preventing anti-social behaviour.</li> <li>VHA works in partnership with Oxford Crime and Nuisance Team, the Police and other RP's to ensure a joined up approach to anti-social behaviour.</li> </ul>		<ul style="list-style-type: none"> <li>THA plans to work with schools to raise awareness of issues around ASB.</li> <li>THA's ASB panel, comprising staff and residents, is being developed to look at ASB performance.</li> <li>Further work is being undertaken to understand resident expectations and ASB satisfaction levels.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA will be employing a Communities Project Co-ordinator to work with housing officers and residents to prevent ASB.</li> </ul>
3.5.4	By being responsive to the individual characteristics and circumstances of residents;	e) Residents who exercise a purchase right receive timely written information about their property	During 2008/09 SHA, THA and VHA received four applications each in respect of right-to-buy and one application for right to acquire. All were processed in accordance with timescales, but none proceeded further.		
3.5.5	By using lettings policies that are fair and reflect the diversity of their client groups;	f) Vulnerable and marginalised residents are provided with appropriate responsive housing services. Support and care arrangements (including liaison with other agencies) are in place, where appropriate.	<p>All members of the Group actively support and contribute to pre-tenancy assessments to identify applicants who may require support to maintain their tenancies. The aim is for support plans to be in place and active before tenancies start. SHA and THA maintenance staff have PDAs to help identify vulnerable residents which allows them to meet their specific needs.</p> <p><b>Disabled adaptations</b></p> <ul style="list-style-type: none"> <li>SHG and its Partner members are committed to providing a high quality and efficient disabled adaptation procurement and management service that addresses the key needs of its residents and the requirements of the Disability Discrimination Act 1995. The purpose of this is to maintain people as long as possible in their own homes. All requests for aids and adaptations are jointly assessed by subsidiaries and their social services partners by way of a home visit to ensure each resident's full needs are assessed and provided for. Although the Group aims to make the maximum use possible of Local Authority 'Disabled Facilities' grants, Partner members also fund, on demand, works up to £2,500, subject to means testing. This may include anything from over bath showers to grab rails. Works over £500 are subject to an Occupational Therapist assessment and recommendation.</li> <li>In 2008/09 SHA spent £200,000 on disabled adaptations, completing 555 projects. For 2009/10 SHA increased its budget, although expenditure will be kept under close review, depending on future rent increases/decreases and the impact on budget. THA completed 93 adaptations in 2008/09 at a total cost of £61,914. VHA spent £34,000 on the completion of 158 minor adaptations during the year. It also completed a further 88 projects, funded through Disability Funding arrangements with the local authority.</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA has two Supporting People contracts in Plymouth and West Berkshire to provide housing-related support to vulnerable residents in sheltered housing. Both contracts require full compliance with the Quality Assessment Framework. SHA has been accredited with full compliance in both areas.</li> <li>SHA also has strong links and, in part, funds a number of specialist support agencies that provide more intensive support for vulnerable residents. Working in partnership with other agencies SHA were active participants and leads in introducing a Vulnerable Peoples Protocol (VPP) in Basingstoke and Deane and West Berkshire. This provides a procedure for the identification of vulnerable applicants ensuring early identification of support needs and the creation of support plans pre-offer. It also offers a referral system for those in need of floating support.</li> <li>For information about SHA's pre- eviction panel see 3.5.6(C).</li> <li>SHA will continue to use the Rough Sleepers Initiative (RSI) project in Bristol, acquired from Orbit Housing Association in 2008, to enable the Local Authority to meet its objective of continued sustainment of rough sleeping in single figures, by delivering early interventions, holistic approaches</li> </ul>		<ul style="list-style-type: none"> <li><b>SHA</b> is sharing the VPP with other interested local authorities, notably in Exeter.</li> </ul>
3.5.6	By providing high standards of customer care				



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			<p>with a view to help rough sleepers moved through planned pathways into long term sustainable tenancies.</p> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has a victim and witness support package and budget. THA works closely with Dorset Supporting People, THA's key SP funder In 2008/09, to introduce a menu of services for sheltered housing residents in 2008/09. Based on four levels of support, in 2009/10 residents will be able to select their preferred level of service to be provided by THA's in house sheltered housing team rather than THA offering and providing a one size fits all service.</li> </ul> <p><b>VHA.</b></p> <ul style="list-style-type: none"> <li>VHA has entered into disabled adaptations protocols with all Oxfordshire local authorities and increased its facility by £100,000 for grant aided adaptations where there is likelihood that the local authority would be unable to fund adaptations beyond the current limits.</li> <li>VHA has a Supporting People contract in place with one local authority, representing almost 1,000 residents. Vale is the only RSL in Oxfordshire to provide a 24/7 in house service to its vulnerable tenants. The VHA model is being adopted by Oxfordshire County Council in its new tendering arrangements to secure future Supporting People arrangements across the County from 2010.</li> </ul>		<ul style="list-style-type: none"> <li><b>VHA</b> will be introducing PDAs for operatives to improve quality of information on vulnerability.</li> </ul>
3.6	Housing associations must work with local authorities to enable the latter to fulfil their duties:	a) Lettings and sales policies are flexible, non-discriminatory and responsive to demand, while contributing to the need to be inclusive and the need to ensure sustainable communities	<p>All members of the Group work to ensure sustainable tenancies and communities (see3.5.6(c) for further details). Partner members will consider and implement local lettings plans based on the identified needs of a neighbourhood, including the neighbourhood profile, aspirations of residents and views of partners. Members ensure support plans are in place and updated on a regular basis to ensure people are sustained in their tenancies for as long as possible.</p> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA is actively involved in the consultation exercise concerning the introduction of the sub regional CBL schemes, in Devon and the Homes West area. SHA was also active in respect of the introduction of the Somerset wide and Bristol schemes which are now live.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA is actively involved in the consultation exercise underway to introduce a Dorset county wide Choice Based Lettings scheme by April 2010 and has provided feedback to the draft allocations policy for the new scheme.</li> <li>THA has introduced another Local Lettings Plan for the next phase of the redevelopment of the Somerford estate, which will see the provision of much needed family sized accommodation through a conversion programme. This local lettings plan includes a child density target to ensure a sustainable community is created</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>90% of VHA new lets are from Choice Based Lettings schemes. VHA is active in consultation in respect of an Oxfordshire wide CBL scheme.</li> </ul>		<ul style="list-style-type: none"> <li><b>SHA</b> will continue to work with the local authorities to ensure CBL schemes are fully implemented. In the light of the increase of CBL schemes SHA is reviewing its approach to transfers within its stock. This will be subject to resident consultation.</li> <li>In 2009/10 <b>THA</b> will work closely with its key local authority partner, Christchurch Borough Council, to ensure the new Dorset wide CBL scheme improves access and choice to vacancies.</li> <li><b>VHA</b> The Oxfordshire sub regional Choice Based Lettings Scheme will be live by July 2009 and give greater access to housing for disabled applicants</li> </ul>
3.6.1	To the homeless and people in priority housing need	b) Associations are able to demonstrate their co-operation with local authorities in homelessness strategies, and in the delivery of local authorities' homelessness functions.	<p>All members of the Group co-operate with local authorities to help them meet their statutory functions. VHA and THA's approach to homelessness is contained in their allocation policies.</p> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA has drafted a Homelessness Action plan which addresses five key pledges. <ol style="list-style-type: none"> <li>SHA will foster good partnership working with local authorities and other agencies, contributing in helping them meeting the Government's targets.</li> <li>SHA will aim to achieve sustainable and mixed communities where people want to live.</li> <li>SHA will aim to prevent homelessness, seeking to sustain tenancies where possible, beginning with early interventions in all cases of potential or threatened homelessness, using evictions as last resort.</li> <li>SHA will make best use of existing stock.</li> </ol> </li> <li>SHA will aim to develop schemes responding to housing need within the context of the Regional Housing Strategies and Local Area Agreements, within the context of the Single Conversation.</li> </ul>		<ul style="list-style-type: none"> <li><b>SHA</b> The Homelessness Action Plan is to be considered by the Board in Q2 with a view to publishing in 2009/10.</li> </ul>

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			<b>THA</b> <ul style="list-style-type: none"> <li>THA introduced important changes to its allocations policy to reflect its charitable status. A key aim of this policy is to work closely with all relevant local authorities to support them in fulfilling their statutory duties to homeless households and in meeting targets to reduce the number of families being temporarily housed in bed and breakfast accommodation.</li> <li>As a result of improvements to THA's leasing operation, a successful and viable leasing scheme was delivered in 2 local authority areas in 2008/09. With 101 properties in management, THA can demonstrate it is actively working with local authority partners to deliver their homeless functions and manage their use of Bed &amp; Breakfast and other short term temporary accommodation.</li> <li>In 2008/09 THA introduced regular meetings with CBC to discuss the impact of its Somerford redevelopment plans and undertook joint visits to residents living on the Somerford estate to ensure a joined up approach to the decanting and allocation process.</li> </ul> <b>VHA</b> <ul style="list-style-type: none"> <li>The Choice Based Lettings partnership agreement ensures that VHA and other RP's are working with local authorities to deliver their strategic aims particularly around homelessness and allocations.</li> </ul>		
3.6.2	To the vulnerable and those covered by the Government's Supporting People policy	c) When requested to do so by the local authority and to such an extent as is reasonable in the circumstances, associations provide a proportion of their stock to local authority nominations and temporary accommodation to the homeless.	<b>SHA</b> <ul style="list-style-type: none"> <li>78.3% of all SHA's lettings were let to local authority nominations in 2008/09.</li> </ul> <b>THA</b> <ul style="list-style-type: none"> <li>THA has nomination agreements with all but one of its 10 local authority partners that provide for at least 75% of lettings through local authority nominations. The other local authority has declined to enter into a nomination agreement.</li> </ul> <b>VHA</b> <ul style="list-style-type: none"> <li>70% of VHA lettings are through the District Council nomination and a maximum of 15% are classified as homeless. VHA uses permanent stock as temporary accommodation for the homeless on request, providing this does not exceed 20% of all lettings.</li> </ul>		
		d) Criteria are adopted following consultation with local authorities for accepting or rejecting nominees and other applicants for housing	<ul style="list-style-type: none"> <li>All members of the group continue to work within the context of local authority nomination agreements, CBL schemes and their own lettings and allocation policies, which include clear rejection criteria. In cases where a letting is refused the associations work closely with the local authority to ensure any decision is fair, transparent and justified.</li> </ul>		
		e) Applicants are excluded from consideration for housing only when their unacceptable behaviour is serious enough to make them unsuitable to be a tenants and only in circumstances that they are not unlawfully discriminating	<ul style="list-style-type: none"> <li>All SHG subsidiaries are compliant with Housing Corporation circular 02/07 Tenancy Management: Eligibility and Evictions.</li> <li>All members of the Group actively support and contribute to pre-tenancy assessments to identify residents who may require support in maintaining their tenancies, including help with their behaviour. In a very small number of cases Partner members may reject a nomination. When this occurs it is in full consultation with the Local Authority.</li> </ul>		<ul style="list-style-type: none"> <li>In 2009/10 the Group will be exploring the use of Family Intervention Tenancies.</li> </ul>
		f) Lettings policies: <ul style="list-style-type: none"> <li>are responsive to local authority housing duties</li> <li>take account of the need to give reasonable priority to transfer applicants from other associations</li> <li>are responsive to national, regional and local mobility and exchange schemes</li> <li>are demonstrably fair and effectively controlled</li> </ul>	<ul style="list-style-type: none"> <li>All members of the Group support local authorities in meeting their statutory duties and are active partners in helping shape and implement Choice Based Lettings schemes.</li> <li>All subsidiaries actively promote mobility and are signed up to the Homeswapper scheme. This new service is widely publicised through the website, newsletters and information in receptions.</li> </ul>		<b>SHA</b> <ul style="list-style-type: none"> <li>In the light of the introduction of CBL schemes SHA is currently reviewing the efficiency and effectiveness of SHAs transfer policy, consulting with tenants in respect of its retention</li> </ul>
3.7	Housing associations	a) New homes meet long-term priority	<ul style="list-style-type: none"> <li>All members of the Group are working closely with Local Authorities to respond to the priorities outlined</li> </ul>		<ul style="list-style-type: none"> <li>As the Single Conversation develops</li> </ul>

Ref	Regulatory Code	Regulatory Guidance	Sources of Compliance	Compliant (Y/N)	Future action
	must demonstrate that their strategies and policies are responsive to their economic and social environment and link into regional and local housing strategies	needs in the area in which they are developed	<p>in their Housing Strategies and Local Area Agreements. Partner members will be looking to promote an increase in the supply of affordable housing, including social rented, intermediate renting and shared ownership, subject to financial capacity and ability to sell the schemes.</p> <ul style="list-style-type: none"> <li>The Group is an active participant in the Single Conversation, helping to align the competing agendas from a variety of organisations to ensure all Partner members are all pulling in the same direction.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>The Somerford redevelopment at THA helps to address the priority needs identified by CBC by including family housing and intermediate tenure.</li> </ul>		<p>the Group will work to ensure the right linkages are made to the Sustainable Communities Strategy and the Local Strategic Partnerships (at both tiers of local government), the Local Development Frameworks (LDFs), the Local Area Agreement (LAA) as the shorter term delivery plan for the SCS and to Local and Sub Regional Housing Strategies.</p> <ul style="list-style-type: none"> <li>In determining the Group's development priorities account will be taken of the housing needs of the local authorities and the local housing market.</li> </ul>
		b) The association co-operates and contributes to local authorities' strategic enabling role.	<p><b>(See also 2.3.4 for further details)</b></p> <p>All members of the group contribute to the local authorities enabling role as outlined below:</p> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA continues to maintain close working relationships with enabling officers in areas where the association has a development programme, attending regular liaison meetings and annual performance reviews where held, e.g. Bristol and South Gloucestershire.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA contributes to CBC's RSL Focus Group by discussing strategic housing issues in Christchurch, sharing operational site issues and best practice.</li> </ul> <p><b>VHA</b></p> <ul style="list-style-type: none"> <li>VHA is a member of the Oxfordshire Rural Housing Partnership to deliver affordable housing in rural communities. Through this a contribution is made to a Rural Enabler employed by the local authority. VHA is also a member of the Oxfordshire Strategic Housing Partnership.</li> </ul>		As above
		c) Associations will be able to demonstrate their contribution to the objectives of neighbourhood renewal and regeneration either directly or through partnership, particularly when working in deprived areas.	<ul style="list-style-type: none"> <li>All members of the Group are involved in estate regeneration, with major projects focused on deprived areas in the Somerford Estate, Christchurch (THA), and New Deal for Communities regeneration projects in Barton Hill, Bristol and Devonport in Plymouth (SHA).</li> </ul> <p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA has adopted a neighbourhood investment model which enables it to identify 'at risk' neighbourhoods where additional investment and resources need to be applied. This allows for an assessment of both internal and external data and will often mirror areas where other statutory agencies are involved in focussed activity.</li> <li>The use of the 'Egan Wheel' principles when working in neighbourhoods also means that every area is automatically assessed to find out what other activities are taking place, before any work is planned. An example is Greenham in West Berkshire where SHA is taking the lead on an LSP project. Greenham was identified as a priority area for SHA as well as being identified by the local authority as a target area for focussed 'locality working'.</li> <li>SHA remains active in delivering new homes and communities in two New Deal for Communities areas in Barton Hill, Bristol and in Devonport, Plymouth.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA is continuing with the redevelopment of its Somerford estate and the first phase of the redevelopment is due for completion in September. Proposals for other phases are being discussed with CBC as they are being worked up.</li> <li>Involvement by residents on one of the phases has caused a research project to be instigated on the need for a replacement sheltered scheme on Somerford, before proceeding with that phase. Advice from the Somerford Partnership and a local resident survey on the provision of community facilities has influenced the Board decision on the future of another phase. Feedback from residents living in two of</li> </ul>		

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			the roads in Somerford has also influenced the timing of works to their properties.		
		d) The association demonstrates a commitment to sustainable development and works towards incorporating economic, social and environmental objectives in its activities.	<p><b>SHA</b></p> <ul style="list-style-type: none"> <li>SHA has adopted the 'Egan Wheel' model for neighbourhood working which takes a range of factors into consideration, when assessing the sustainability of a community. These include;- <ul style="list-style-type: none"> <li>➤ governance</li> <li>➤ economy</li> <li>➤ equity</li> <li>➤ environmental</li> <li>➤ services</li> <li>➤ transport and connectivity</li> <li>➤ housing and the built environment</li> <li>➤ social and cultural</li> </ul> </li> <li>Local residents and partners are encouraged to get involved in assessing sustainability using these 'spokes' which encourages cross sector, as opposed to 'silo' working, as well as gaining resident input and ownership.</li> <li>In Torquay, the Beechfields development hopes to achieve Code for Sustainable Homes Level 5 in terms of the physical homes being built. In addition, SHA is focussing on the long term sustainability of the new community. A Neighbourhood Officer is already working with local agencies and residents to understand what issues may arise once residents move into their homes and how to help them to maintain the eco credentials of the community.</li> <li>The Group is also working in partnership with Barratt Homes and the HCA on the first CSH Level 6 project at Hanham Hall Hospital in South Gloucestershire. This will be the first project to be delivered through the Government's Carbon Challenge initiative. As a key partner on the scheme, SHA will be delivering the 65 affordable homes over the course of the next four years, which will form part of a new community also comprising 130 open market sale homes and the refurbishment of the Grade II* listed hospital building into new office and community facilities.</li> <li>In addition to each of the new homes being built to CSH Level 6, which will achieve significant sustainability and reduced energy efficiencies both across the site and within each of our residents' homes, SHA is taking an active lead in setting up the Community/Development Trust proposed on the site.</li> <li>It is proposed that the ownership of the public realm will be vested to the Community/Development Trust, which will be fully owned and governed by the residents of the new homes, and who can in turn determine how the management of their estate evolves into the future. This will enable the local community to directly influence the long term stewardship of the site.</li> </ul> <p><b>THA</b></p> <ul style="list-style-type: none"> <li>THA has reviewed opportunities to provide support for local labour in construction schemes and ROK, the contractor on THA's Cheviot Court redevelopment now have a grounds maintenance worker and bricklayer from the local neighbourhood.</li> </ul>	