



# Regulatory Standards Annual Compliance Self-Assessment Year Ending March 2018

## Introduction

In providing homes and services to around 16,000 people across Greater Manchester, Irwell Valley seeks to follow the standards and expectations set out in the Regulatory Standards. We also seek to continue to provide high quality homes and service to our customers and potential customers by following relevant legislation and good practice. This document sets out how we comply with the various aspects of the Regulatory Standards by highlighting our activities against the required outcomes as identified within the relevant standard. Evidence through e.g. external assurance and key documents is also highlighted for each area. Copies of these documents are available on request.

## Statement of Compliance by the Chair of the Board

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

During 2017/18, the Board was supported by two Irwell Valley delegated Committees, Resident's Scrutiny Panel, and subsidiary Boards, who along with the main Board, receive assurance on compliance throughout the reporting cycle. Since February 2018, the Board has also been supported by a Development Committee to scrutinise our growth and development activities. In addition, Irwell Valley's Combined Assurance Framework also identifies assurance across all of our 'top risks' to show how risk is being effectively managed. Assurance continues to be derived from our three lines of defence – ranging from operational policies and processes through to assurance being provided by external providers, including our External Auditors and our Health and Safety Advisor. The Combined Assurance Framework gives confidence to Board that appropriate assurance is in place and is being properly monitored and refreshed. The Board is satisfied that effective processes are in place to evidence our compliance. This is our supporting document to evidence our compliance. Following the annual compliance review, the Board confirmed compliance with the Governance and Financial Viability Standard.

Signed on behalf of the Board



John McHale  
Chair  
Irwell Valley Housing Association Ltd

## Regulatory Standards Compliance Overview

### Economic Standards

Standard	Compliant Yes/No	External Assurance <b>gained from...</b>
Governance and Financial Viability	✓	Independent Legal Advice; Board/Committee Oversight; Internal Audit; Independent Reviews; Accreditations (e.g. ISO OHSAS); Regulatory Oversight; External Consultants; External Audit; Customer Scrutiny
Value for Money	✓	
Rent	✓	

### Consumer Standards

Standard	Compliant Yes/No	External Assurance <b>gained from ...</b>
Tenant Involvement and Empowerment	✓	Independent Legal Advice; Board/Committee Oversight; Internal Audit; Independent Reviews; Accreditations (e.g. ISO OHSAS); Regulatory Oversight; External Consultants; External Audit; Customer Scrutiny
Home	✓	
Tenancy	✓	
Neighbourhood and Community	✓	

## Regulatory Standards Compliance in Detail

### The Economic Standards – Governance and Financial Viability

#### Outcome - Governance:

Registered providers shall ensure effective governance arrangements that deliver their aims, objectives and intended outcomes for tenants and potential tenants in an effective, transparent and accountable manner. Governance arrangements shall ensure registered providers adhere to all relevant law; comply with their governing documents and all regulatory requirements; are accountable to tenants, the regulator and relevant stakeholders; safeguard taxpayers' interests and the relevant stakeholders; Have an effective risk management and internal controls assurance framework; and protect social housing assets.

#### We do this by:

We review our activities in relation to all relevant law (e.g housing management, HR, data protection etc) on an annual basis. Reports highlighting how we comply with these laws are presented to Directors with an overview report being presented to Audit Committee to provide reasonable assurance that we are working within our legal requirements. These reports also highlight anticipated future requirements and outline planned actions to maintain compliance.

Legal advice is sought where necessary to ensure that Members can make fully informed and reliable decisions (during 2017/18, legal advice relating to the group structure has helped to inform decisions made by the Board). We also engage external advice when appropriate, including a Health and Advisor and employment specialists. A Data Protection specialist has been appointed to increase our knowledge in this area.

A compliance review against our Code of Governance (the National Housing Association's Code 'Code of Governance' 2015 version) and the associated Code of Conduct is undertaken each year and reported to Board. All reports to Board, committees and the Executive Team state any compliance, regulatory, risk and value for money implications.

To supplement our compliance, we regularly commission independent governance reviews with the latest full review conducted in July 2015. A full external review will be carried out in 2018.

A Customer Annual Report and our Annual Accounts are published as part of our accountability to key stakeholders. We also have a Residents' Scrutiny Panel (RSP) who scrutinise front line service areas the organisation to provide challenge and recommendations for improvements. The outcome of reviews are reported to Audit Committee.

Irwell Valley is led by a strong Board and Senior Management Team which match the skills required to meet the needs of our current Corporate Plan. We have a G1 and V1 status with our Regulator.

External assurance is gained annually on our management and mitigation of risk and a letter of assurance is provided to Members as part of this process from our Risk and Strategy Consultants. They also work with the Association to set the risk appetite that allows the Association to achieve its Corporate Priorities whilst protecting existing assets.

We work closely with our Risk and Strategy Consultants to review controls against 'best practice'. Risk management is supported by a quarterly Combined Assurance Framework reported to Audit Committee, who oversee key assurance functions on behalf of the Board.

Our Internal Auditors provide an annual statement of their opinion of our internal controls framework, including our progress with the implementation of improvement recommendations. The Board are provided with contextual information on the external political and financial operating environment to help inform Boards' priorities and their management of risk.

Irwell Valley has a strong track record of risk management and the protection of our assets. We maintain an Asset and Liability Register - reporting to Audit Committee and Board on the key aspects of our register.

#### Key documents/ evidence:

- Corporate Plan
- Legislation compliance assurance reports to Directors with an annual assurance report to Audit Committee
- Code of Conduct for Members
- Board Member Services Agreement
- Code of Governance / Code of Conduct compliance assurance reports
- Terms of Reference for Board and Committees
- Inter-Group Agreement
- Rules and articles for all organisations within the IV Group
- Standing Orders for Irwell Valley and all subsidiaries
- Latest regulatory viability and governance grading (currently G1 and V1)
- Customer Annual Report 2017/18
- Regulatory Returns (Statistical Data Return; Financial Forecast Return; Financial Viability Return; Quarterly Surveys; Annual Fraud Report)
- Audit Management letter
- Risk Management Policy (including Risk Appetite)
- Annual Risk Management Review and letter of assurance by Hargreaves Risk and Strategy (HRS)
- Strategic Risks and Sector Update Reports to Board
- Annual Scenario Planning and Stress Testing (as contained in the Long Term Financial Plan Approval Report)
- Three Year Internal Audit Strategy
- Annual Internal Audit Assurance Report 2017/18
- Annual Internal Audit Plan 2017/18
- Internal Audit Reports (including Compliance and Data Integrity Testing Report)

- Annual Internal Controls Assurance Report
- Combined Assurance Framework and Update Reports
- Asset and Liability Register and Update Reports
- Review of Compliance with Insurance Policies Report
- VFM Strategy
- Annual Accounts
- Integrity Policy
- Anti-Fraud Policy
- Whistleblowing Policy
- Public Register 2017/18 and Public Register Report (including Annual Fraud Report and Annual Return to the HCA)
- Key Performance Indicators
- SDR Approval Report
- Outcome of Board Appraisal Process Report
- Board Effectiveness Report (including skills gap analysis)
- Annual Report by the Chair of Audit Committee
- Health and Safety Annual External Audit Report
- Health and Safety Committee Minutes
- Health and Safety Policy and supporting policies
- Health and Safety and Compliance Annual Report to Board
- Pay Policy
- Shareholder Policy
- Recruitment and Selection of Colleagues Policy
- Recruitment, Renewal and Selection of Board Members Policy
- Data Protection Policy

Sources of external assurance include: Independent Legal Advice; Board/Committee Oversight; Internal Audit; Independent Reviews; Accreditations (e.g. ISO OHSAS); Regulatory Oversight; External Consultants; External Audit; Customer Scrutiny

#### Outcome - Financial Viability:

Registered providers shall manage their resources effectively to ensure their viability is maintained while ensuring that social housing assets are not put at undue risk.

#### We do this by:

Financial viability is well managed and monitored with external assurance being received from our treasury advisors (Savills) and our external auditors (RSM UK Ltd.) We have a good relationship with our lenders and closely monitor our loan covenants to ensure our continued compliance with these requirements – which is reported to Board. The Association has very minimal risk from diversification activities and our assets and liabilities are closely monitored. Our market rent investment portfolio is regularly appraised and monitored by the Board with regard to our Charitable Investment Policy with external assurance being provided (most recently by Savills).

The financial capacity of the organisation is assessed at least annually which is linked to our risk appetite. Scenario planning and stress testing is a vital part of our business planning process, ensuring that we can respond to multiple adverse events whilst protecting our social housing assets.

#### Key documents/ evidence:

- Long Term Financial Plan and Report to Board (inc. Scenario Planning and Stress Testing)
- Annual Accounts 2017/18
- External Audit Findings Report
- Treasury Management Strategy
- Treasury Management Policy
- Review of Treasury Policy
- Annual Treasury Strategy Review
- Quarterly Treasury Reports
- External Review of Financial Forecasting Return by HRS
- Internal Audit Report of Treasury Management January 2016
- Budget Principles Report to Board
- Budget, Cash Flow and Balance Sheet Report to Board
- Capitalisation and Depreciation Policy
- Charitable Investment Policy
- Bad and Doubtful Debt Policy
- Quarterly Financial Overview Report (including covenant compliance) to Board
- Review of Auditors Performance and Re-appointment
- Review of Subsidiaries Annual Accounts
- Quarterly Procurement Update Report
- Supporting People Funding Review

- Quarterly Adamas Update Report to Board
- Review of Disposals Report to Audit
- Charitable Investment Performance Report
- Development Update Reports

### Specific Expectations of the Regulator

Registered providers shall adopt and comply with an appropriate code of governance. Governance arrangements should establish and maintain clear roles, responsibilities and accountabilities for the board, chair and chief executive and ensure appropriate probity arrangements are in place. Areas of non-compliance with their chosen code of governance should be explained. Registered providers should assess the effectiveness of their governance arrangements at least once a year

#### How we comply:

The Board have adopted the NHF's Code of Governance and report on compliance against the code annually using the NHF checklist as a guide. We are fully compliant with the latest version of the Code (April 2015). We also annually check our compliance against the latest NHF Code of Conduct (2012). During 2015/16 we carried out a full external review of Governance with Altair and since then several related reviews have taken place providing robust assurance on our governance arrangements. A full review is planned for 2018.

The Board and all delegated committees have their own terms of reference with the responsibilities of each chair being outlined in specific job descriptions. Our Board members sign up to a service agreement which requires them to work in the interests of Irwell Valley and its customers. An approved Integrity Policy is in place, requiring all new and existing Members and colleagues to declare any interest or disclose any connections on an annual basis. Additionally, disclosure of interests is a standing agenda item on every Board and Committee meeting to ensure that decisions are made solely in the interests of Irwell Valley.

A Board effectiveness review is conducted on an annual basis.

Registered providers shall ensure that they manage their affairs with an appropriate degree of skill, independence, diligence, effectiveness, prudence and foresight.

#### How we comply:

Board membership is reviewed to ensure that the knowledge and skills of our Board align with our Corporate Priorities and can respond to the challenges faced by Irwell Valley. An annual effectiveness review takes place alongside a skills audit to highlight any areas where skills/ knowledge need strengthening. Board recruitment is guided by the skills audit – for example, during 2017/18 a board member was recruited to strengthen skills in relation to asset management and development. A Development Committee has been established to provide oversight and scrutiny of our new development and growth plan.

Minutes of meetings reflect the Boards' challenge and debate. Each year the Board have two Strategy Days to discuss the direction and strategy of the organisation in light of the external environment and risks. External speakers are invited to help Members gain independent in-depth understanding of the current and future operating environment in relation to the decisions that they need to make. Members receive regular reports and briefings to inform them of our current risk profile and changes in our operating environment.

Members' commitment and competency is monitored through an induction period and an appraisal process in line with Code of Governance expectations. A training plan for the Board and separate personal development plans for individual Members are in place.

Registered providers shall communicate in a timely manner with the regulator on material issues that relate to non-compliance with the standards

#### How we comply:

Irwell Valley communicates appropriately with our Regulator. We submit returns to the Regulator within the required deadlines and maintain dialogue with the Regulator as required.

Registered providers shall ensure that they have an appropriate, robust and prudent business planning, risk and control framework

#### How we comply:

Our 30-year plan is updated at least annually. Our business planning process involves robust testing of the plan based on scenarios which have been identified by the Board and external consultants (Hargreaves Risk and Strategy). External assurance is received from several sources providing Board with evidence that business planning decisions are being made on the basis of reliable information and setting out the level of risk that the Association is able to take. Controls are in place and are regularly monitored internally and externally to mitigate the worst effects of the risks facing Irwell Valley.

External assurance is received from our:

- Treasury Advisors (Savills)
- External Auditors (RSM)
- Internal Auditors (Mazars)
- Risk and Strategy Consultants (Hargreaves Risk and Strategy).

The latest internal audit of Treasury Management at Irwell Valley (January 2016) rated this area as having 'substantial' assurance.

Our Combined Assurance Framework identifies all lines of assurance for our 'top risks' and supports our risk management by monitoring how well our controls are working is reviewed on a quarterly basis by the Audit Committee. Areas of increasing / decreasing assurance are identified, discussed and planned for. Areas of decreasing assurance or other priority areas help direct our strategic and annual audit plans.

Compliance and data integrity testing is carried out by our Internal Auditors.

The framework shall ensure that there is access to sufficient liquidity at all times; financial forecasts are based on appropriate and reasonable assumptions; effective systems are in place to monitor and accurately report delivery of the registered provider's plans; financial and other implications of risks to the delivery of plans are considered; and that registered providers monitor, report on and comply with their funders' covenants.

#### How we comply:

Our Treasury Management Strategy and Policy are reviewed annually with our treasury advisors. Cashflow is monitored on a weekly basis - allowing us to prepare for any major cash outflows and financing costs. Quarterly treasury reports are reported to Board. We currently have access to an undrawn but secured loan facility. We understand when we need to access future funding to achieve our Corporate Plan, based on the cash flow forecasts.

We take advice from both our treasury advisors and our risk consultants to ensure that our business planning assumptions are based on meaningful and reliable information. Board Members approve these assumptions on an annual basis. Financial plans are regularly updated and reflect the external operating environment. Board receive an annual and quarterly treasury update report summarising treasury activity for the period and future forecast interest rates and treasury cashflows. This report informs of any exceptions to the areas highlighted in our Treasury Management Policy in relation to the key areas of control.

A half yearly review of the Treasury Strategy is carried out and any recommendations for changes to funding rates and conditions are requested for approval. Supplementing these reports is a budgetary monitoring and reporting framework, with regular budget performance reporting with budget holders and quarterly reporting to Board, including a formal forecast of the full year position at month 6 so action can be taken if an area is over spent or under-performing. Strong controls are in place with regard to spend to budgets with external assurance received that these controls are working effectively through internal and external audit. In addition, Development Update Reports are presented to Board and development appraisals are scrutinised more closely by the Development Committee.

We have a risk appetite statement that is reviewed by Board against our current corporate and financial plans and the wider environment at least annually. The risk appetite has stated financial limits that can be measured and monitored to ensure that the Association works within its capacity. HRS review our Business Plan annually to provide external assurance and a shadow credit grade, helping the Board understand it's level of risk and consider their appetite for new opportunities.

Financial, regulatory and risk implications are considered as part of all reports to Board, Committees and the Leadership Team.

Covenant compliance is monitored and how we comply with loan covenants is reported to Board on a quarterly basis. External assurance is received from our external auditors on an annual basis and from our treasury advisors at least twice a year when our Treasury Strategy is reviewed and updated. Further to the impact of FRS102, the covenants are now in the progress of being re-negotiated to ensure that they reflect the changes in accounting treatment.

The framework shall be approved by the registered provider's board and its effectiveness in achieving the required outcomes shall be reviewed at least once a year.

#### How we comply:

Our framework for treasury, risk and control are reviewed annually with external assurance provided on each. The business plan and performance against it is reviewed by the Board at least annually.

In addition to the above, registered providers shall assess, manage and where appropriate address risks to ensure the long-term viability of the registered provider, including ensuring that social housing assets are protected. Registered providers shall do so by maintaining a thorough, accurate and up to date record of their assets and liabilities and particularly those liabilities that may have recourse to social housing assets; carrying out detailed and robust stress testing against identified risks and combinations of risks across a range of scenarios and putting appropriate mitigation strategies in place as a result; before taking on new liabilities, ensuring that they understand and manage the likely impact on current and future business and regulatory compliance.

#### How we comply:

Irwell Valley has an asset and liability register which has been approved and is reviewed by Board. Ongoing monitoring of the register and the risks arising from any liabilities is carried out quarterly. Colleagues have been trained on the updating and upkeep of the register to ensure that this remains a 'live' document.

An internal audit of our asset management including our Asset and Liability Register gave this area of the business a clean bill of health during September 2016. A further review of our Asset and Liability Register will be carried out in 2018. The liabilities for the Irwell Valley Group have been mapped.

As part of our business planning process, Irwell Valley conducts stress testing on a range of scenarios - with external assurance over the process provided by HRS. The business plan is reviewed against these results and amended if required to protect the organisation from the worst of these risks. The risk appetite is set in relation to stress testing results and metrics are used to measure our performance.

To support this framework, mitigation strategies have been identified that could be taken should a risk event affect the viability of the organisation.

Irwell Valley has an approval process in place and our standard report cover ensures colleagues consider appropriate implications. Where appropriate, Board will receive independent external advice to help support their decision making and exit strategies are considered.

Registered providers shall ensure that any arrangements they enter into do not inappropriately advance the interests of third parties, or are arrangements which the regulator could reasonably assume were for such purposes.

#### How we comply

Irwell Valley has an Integrity Policy in place. Key elements, such as gifts and hospitality and declarations of interest are recorded and reported annually to our Audit Committee. Members must also declare any interests in an agenda item at every meeting. If an interest does exist, the Member will not be

involved in any decision making regarding that item and, if necessary, will not take part in any discussion of that particular item. Arrangements also exist for colleagues involved in decision making processes.

Arrangements with third parties are governed by our Integrity Policy, our Financial Standing Orders and Regulations and our Procurement Strategy and related procedures - including tendering procedures. All of these areas are monitored internally and receive regular external oversight by our Internal and External Auditors to make sure that this framework is being followed. Our relationship with Irwell Valley (Adamas) Ltd reduces our requirement for alternative contracts, reducing our costs and our need to procure external services.

Registered providers shall communicate with the regulator in an accurate and timely manner. This includes returns to the regulator, including an annual report on any losses from fraudulent activity, in a form determined by the regulator.

#### How we comply:

The Association is fully aware of its responsibilities to the Regulator and all returns are submitted within the set deadline. The processes for regulatory returns will be reviewed during 2018. Board and other committees are involved in the approval process for these returns and the Company Secretary oversees the timely submission of the required information. A report of any fraudulent activity, as informed to Audit Committee throughout the year, is confirmed annually to Audit Committee prior to submission to the Regulator.

Registered providers shall assess their compliance with the Governance and Financial Viability Standard at least once a year. Registered providers' boards shall certify in their annual accounts their compliance with this Governance and Financial Viability Standard.

#### How we comply:

This document confirms our compliance with the Governance and Financial Viability Standard and across the other regulatory standards, providing an overview of the assurance that Board receives to enable them to confirm and monitor their compliance. Compliance with the Governance and Viability Standard is confirmed in our annual accounts and signed off on behalf of the Board by the Chair of Board.

Registered providers which are parent companies shall, as appropriate, support or assist those of their subsidiaries that are registered providers with a view to ensuring compliance with regulatory requirements.

#### How we comply:

The Terms of Reference for the Irwell Valley Board places responsibility on the Board for “establishing the strategic direction, and effective management, control, accountability and good conduct of the Irwell Valley Group”. Board Members from Irwell Valley are also Directors of subsidiary companies to help oversee their activities and report back to the main Board. The relationship between the Irwell Valley Board and the subsidiaries in the group forms part of external governance reviews. An Inter-Group Agreement is in place for the Group. At this current time, the subsidiaries in the group are non-stock holding. Irwell Valley completes any required returns to the relevant regulatory bodies on behalf of the subsidiary organisations.

## The Economic Standards – Value for Money

### Outcome:

Registered providers must clearly articulate their strategic objectives; have an approach agreed by their board to achieving VFM in meeting these objectives and demonstrate their delivery of value for money to stakeholders; articulate their strategy for delivering homes that meet a range of needs; and ensure that optimal benefit is derived from resources and assets and optimise economy, efficiency and effectiveness in the delivery of their strategic objectives.

### We do this by:

Irwell Valley already has a track record of delivering on this and for several years we have used performance to achieve VFM outcomes. The Board have agreed a new Corporate Plan for 2018/19 – 2020/21, with our high-level objectives aligned to achieving value for money. This includes ensuring that Irwell Valley is a well governed and financially viable organisation. The Board have also set objectives to ensure that we contribute to overall housing supply whilst maintaining the best use of our own homes and ensuring that we understand who our customers are and deliver services that meet their needs. This includes an ambitious digital strategy.

Our VFM Strategy sets out how we will achieve VFM. Our strategic objective is to develop our services to customers, invest in new and existing stock, and develop our people, whilst ensuring that we remain financially strong. To achieve this we will:

- maximise our potential to develop new homes in our core operating areas.
- invest in our properties to ensure they are viable, affordable, attractive and safe.
- be one of the highest performing RP's with a Headline cost in the lowest quartile (as per Global accounts 2016/17 the consolidated lower quartile headline cost was £2,930 per unit)
- achieve an Operating Margin of 32% in large part by focusing on incremental improvements in operational efficiency.

We demonstrate our delivery of VFM through our Annual Accounts, Customer Annual Report and now through our VFM Metrics.

During the past few years we have redeveloped some of our homes to maximise their return and meet the demands of our existing and future customers, including changing the use of our homes and converting studios into one-bedroom homes. Going forward, the Board have approved an increased budget to maintain our existing homes over the life of our long-term financial plan to ensure that we meet the needs of our existing customers and maximise our assets whilst still achieving our growth ambitions. We have also committed to improving some of our high-rise homes through the fitting of sprinkler systems. We will also be reviewing our Asset Management Strategy and interrogate further our return on investment to inform our strategy going forward.

### Key documents/ evidence:

- VFM Strategy
- VFM Action Plan
- VFM Update Reports
- VFM Metrics 2017/18 (within the Annual Accounts)
- Internal Audit Reports:

- Procurement Review

- Key Performance Indicators Year End 2017/18
- Asset Management Strategy
- Treasury Management Strategy
- Business Case for In-house Gas Servicing and Repair
- Procurement Strategy
- Procurement Update Reports
- Financial Standing Orders and Regulations
- Unit Cost Analysis
- Long Term Financial Plan
- Growth and Development Strategy
- Charitable Investment Policy
- Charitable Investment Update Report

Sources of external assurance include: [External Consultants](#); [Internal Audit](#); [Customer Scrutiny](#); [Regulatory Oversight](#); [Independent Reviews](#); [External Audit](#); [Board/Committee Oversight](#).

#### Specific Expectations of the Regulator

Registered providers must demonstrate a robust approach to achieving VFM – this must include a robust approach to decision making and a rigorous appraisal of potential options for improving performance; regular and appropriate consideration by the board of potential VFM gains; consideration of VFM across their whole business and where they invest in non-social housing activity, they should consider whether this generates returns commensurate to the risk involved and justification where this is not the case; and that they have appropriate targets in place for measuring performance in achieving VFM in delivering their strategic objectives, and that they regularly monitor and report their performance against these targets

#### How we comply:

The Board have appraised their ability to achieve growth ambitions and we now have an ambitious growth and development strategy supported by our business plan. This includes a development plan that is now underway with new starts on site during 2018/19. We are also appraising the organisation's effectiveness through a programme of lean reviews (for our finance and income management functions). Additionally, we have undertaken a review of customer service and experience to ensure that we continue to offer the right services to customers.

The Board receive reports regarding our charitable investments which appraise the costs and benefits of our investment properties. External assurance is in place to ensure Board have an independent view on the appraisals. In addition to the above, Audit Committee regularly receive update reports against VFM targets. We have a VFM Strategy and set annual targets for improvements. Achievement against targets is monitored by the Audit Committee on a regular basis on behalf of the Board.

Registered providers must annually publish evidence in their accounts to enable stakeholders to understand the provider's performance against its own VFM targets and any metrics set out by the regulator, and how that performance compares to peers; and measurable plans to address any areas of underperformance, including clearly stating any areas where improvements would not be appropriate and the rationale for this

#### How we comply

The Board have discussed the new VFM Standard at their Strategy Day in November 2017, responding to the consultation and discussing the new expectations. We have aligned our Performance Indicators to the new metrics and published our evidence as required in our 2017/18 Annual Accounts. Targets are set annually to improve performance.

## The Economic Standards – Rent Standard\*

(\*Please note: parts of the Rent Standard are now out of date as a result of the rent reductions announced by the Government through the summer budget 2015 and brought into legislation through the Welfare Reform and Work Act. Compliance here is being assessed against the Rent Standard post the summer budget now that the first year of rent reduction has been initiated.)

Outcome:

Registered providers shall charge rents in accordance with the government's direction to the regulator of May 2015 and the Rent Standard Guidance.

**We do this by:**

Our Rent Policy follows the formula to comply with the 1% rent reduction as per the Welfare Reform and Work Act. External assurance is sought through data integrity testing carried out by our Internal Auditors.

**Key documents/ evidence:**

- Rent Policy
- Rent Policy leaflet
- Rent Performance 2017/18
- Rent and Service Charge Arrears Internal Audit Report January 2016
- Internal Audit Data Integrity Compliance May 2017

Sources of external assurance include: [Internal Audit](#); [Independent Legal Advice](#); [Regulatory Oversight](#); [Board/Committee Oversight](#).

Specific Expectations of the Regulator

Registered providers shall ensure they meet the following requirements, which derive from the government's direction to the regulator of May 2014, and the 'key requirements' set out in the Rent Standard Guidance that accompanies this standard.

**How we comply**

Data integrity exercises are carried out by our Internal Auditors.

Registered providers shall set rents for low cost rental accommodation with a view to achieving that Rents conform with the pattern produced by the rents formula set out in the Rent Guidance (formula rents) with a 5% upward tolerance on individual rents (10% for supported housing and sheltered housing) ('the limit of the rent flexibility level'), but subject to the maximum rent levels specified in that Guidance ('rent caps'); that weekly rent for accommodation increases each year by an amount which is no more than CPI + 1%; that weekly rent for accommodation which is above the limit of the rent flexibility level increases each year by an amount which is less than CPI + 1%, until it reaches the limit of the rent flexibility level; that rent caps increase annually by CPI +1.5%; and formula rents increases annually By CPI +1%.

#### How we comply:

Legal advice was sought to ensure that we apply the requirements of rent reduction appropriately. We have a rent Policy which is reviewed annually to make sure that changes to rents reflect the current rent guidance and the rent decrease. Compliance testing takes place to make sure that the controls in place to manage out rent charges are working effectively.

Where accommodation is let on Affordable Rent terms, registered providers shall set rents with a view to rent for accommodation (inclusive of service charges) being set at a level which is no more than 80% of the estimated market rent for the accommodation (inclusive of service charges), based on a valuation in accordance with a method recognised by the Royal Institution of Chartered Surveyors; rent for accommodation increases each year by an amount which is no more than CPI + 1%; and rent for accommodation is re-set, based on a new valuation, each time the accommodation is let.

#### How we comply:

Through agreement with the Regulator, we currently have 86 homes on affordable rent tenancies. Our Rent Policy outlines how we set our rents for these properties in line with the guidance as laid out in the Rent Standard. We have also reduced rents as appropriate for these homes.

Affordable rent terms can only be used in relation to accommodation provided pursuant to a housing supply delivery agreement entered into between a registered provider and the Homes and Communities Agency (HCA) or the Greater London Authority (GLA).

#### How we comply:

Irwell Valley has an agreement with the HCA for our 86 affordable rent homes.

The Rent Standard shall not apply to rental accommodation let by registered providers to a social housing tenant household during a financial year where the household income was £60,000 or more in the tax year which ended in the financial year preceding the financial year in which the Rent Standard will not apply. The requirement to charge higher rent to higher income social housing customers remains voluntary.

#### How we comply:

Irwell Valley modelled the potential benefits and impacts of implementing a higher rent to higher income customers and chose not to implement this policy.

Where the application of the Rent Standard would cause providers to be unable to meet other standards, particularly in respect of financial viability, including the risk that a reduction in overall rental income causes them to risk failing to meet existing commitments such as banking or lending covenants, the regulator may agree to waive specific requirements of the Rent Standard for a period of time.

#### How we comply:

Irwell Valley has been able to meet the challenges presented by the rent decrease and the resulting reduction in income as shown through our subsequent business plans.

Registered providers shall provide clear information to tenants that explains how their rent and any service charge are set, and how they are changed, including reference to the CPI benchmark to which annual changes to rents should be linked (except where rents are controlled under different legislation)

**How we comply:**

Customers receive comprehensive information about their rent and service charge and we inform customers of any changes in their rent as required. We regularly review our service charges with customers as well as the information we send to make sure that this is communicated in an effective way. We work with our local authority partners and our customers to make sure that those customers receiving benefits have a smooth transition onto a new rental charge to prevent the accrual of arrears. We plan to carry out an Internal Audit of Section 20 Consultation processes during 2018 to ensure that these processes are consistent across the organisation.

## The Consumer Standards – Tenant Involvement and Empowerment Standard

Outcome – customer service, choice and complaints:

Registered providers shall provide choices, information and communication that is appropriate to the diverse needs of their tenants in the delivery of all standards; and have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly.

We do this by:

We remain committed to listening to and involving customers and acting on feedback received. During the year we have worked with our customers to write and launch a new Customer Involvement Strategy. We are also increasing our digital services and have made this commitment through our Corporate Plan - building on the digital services already available. We have dedicated roles in the organisation to improve communication and customer engagement. A new brand will be introduced during 2018/19 - including the creation of one contact number to make it easy for customers and prospective customers to get in touch. We will be reviewing all our communications to make sure these are as accessible as possible.

Customers can contact us 24 hrs a day through our website and by contacting our emergency out of hours service - for essential services such as ASB and repairs. Colleagues work flexibly where required to offer customers appointments out of normal office hours at our customer's convenience. We know that a high percentage of our customers are in employment and that this is an essential service.

We have a specialist focus group representing the diversity of our customers – this group helps advise us on access, communication and information needs.

As part of our review of customer engagement, an internal audit of our complaints process was undertaken to identify improvements - this is one of the steps we are taking to ensure that customers can raise concerns and be listened to. A new Complaint's Policy and training for colleagues has been introduced as a result. Audit Committee have received an assurance report detailing the actions taken, while the RSP will have continued oversight of complaints and our response.

Outcome – Involvement and empowerment:

Registered providers shall ensure that tenants are given a wide range of opportunities to influence and be involved in the formulation of their landlord's housing related policies and strategic priorities; the making of decisions about how housing related services are delivered, including the setting of service standards; the scrutiny of their landlord's performance and the making of recommendations to their landlord about how performance might be improved; the management of their homes, where applicable; management of repair and maintenance services, such as commissioning and undertaking a range of repair tasks, as agreed with landlords, and the sharing in savings made, and agreeing local offers for service delivery .

We do this by:

We provide opportunities for customers to be involved, both at a strategic and operational level - with two customers sitting on the Board.

The Terms of Reference for our Resident Scrutiny Panel (RSP) has been reviewed during the year, with full training provided. The RSP report their findings to our Audit Committee – with a review of our Repairs Service is taking place during 2018/19.

Our Customer Involvement Strategy sets out how customers can influence and scrutinise our services – including the creation of a network of customers who can engage with us in a way that suits them.

The RSP offers opportunity for customers to be involved in scrutinising our performance who report directly to our Audit Committee. They will carry out two scrutiny reviews a year - areas chosen by the RSP members. Our Customer Involvement Strategy outlines other opportunities to get involved and influence service delivery. We also have a customer suggestion scheme for VFM. We make a customer annual report available on our website each year.

We support the management of a small number of homes in Salford that are run by a Tenant Management Organisation.

We encourage all our customers to take responsibility for their actions and their homes. This includes taking responsibility for minor repairs. We have developed in-house “how to” videos to help customers to undertake minor repairs themselves.

Developing a new customer offer is part of our Corporate Plan.

Outcome – customer service, choice and complaints:

Registered providers shall treat all tenants with fairness and respect; and demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.

We do this by:

Treating customers how they want to be treated - with dignity, respect and trust is one of our corporate values. Providing excellent customer service is at the heart of what we do – offering tailored support to help customers sustain their tenancies. We are building on this through the priorities within our Corporate Plan.

We have an Equality and Diversity Framework in place, which is currently being updated in conjunction with members of our Colleague Forum. We have a process for assessing the equality impact of our policies and our strategies to make sure that these do not adversely affect different groups of people. We take advice from an Equality and Diversity advisor, when required.

Key documents/ evidence:

- Residents’ Scrutiny Panel Feedback Reports
- Residents’ Scrutiny Panel Minutes
- Key Performance Indicators
- Customer Satisfaction Reports
- Complaints Complaint’s Progress Report to Audit Committee (June 2018)
- Mystery Shopping Reports
- Equality Impact Assessments

- 'Did You Know?' newsletter
- Equality and Diversity Framework
- Customer Involvement Strategy
- Access and Customer Care Policy
- Customer Annual Report 2017/18
- Annual Customer Experience Update Report to Board 2017/18

Sources of external assurance include: [Accreditations](#); [Internal Audit](#); [Customer Scrutiny](#); [Regulatory Oversight](#); [Independent Reviews](#); [External Consultants](#); [Board/Committee Oversight](#).

## Specific Expectations of the Regulator

### Customer service, choice and complaints

Registered providers shall provide tenants with accessible, relevant and timely information about how tenants can access services; the standards of housing services their tenants can expect; how they are performing against those standards; the service choices available to tenants, including any additional costs that are relevant to specific choices; progress of any repairs work; how tenants can communicate with them and provide feedback; the responsibilities of the tenant and provider; and arrangements for tenant involvement and scrutiny.

### How we comply

Customers receive a wide range of information at sign up and periodically throughout their tenancy - including how they can access specific services. Our website also holds this relevant information and offers several ways to get in touch with us. We send out a quarterly news sheet with rent statements - containing useful information for customers. We use social media to regularly communicate information, services and events with customers.

Customers can find out about the standards of service they should expect through our website. RSP monitor performance against these service standards.

Where service charges apply, customers have an opportunity to review their service charge with colleagues, including choosing the level of service, frequency and considering the costs in terms of value for money.

Appointments are scheduled to suit customers' needs. Repair appointments are confirmed by text to customers (landlines or mobile) and two further texts are sent to the customer the day before the repair and when the operative is on their way.

Our website details how customers can feedback to us. Landlord and tenant responsibilities are set out in customers' tenancy agreements and on our website.

Our Customer Involvement Strategy sets out how customers can get involved and scrutinise services at different levels of involvement. This is also available on our website or through contact with us.

Providers shall offer a range of ways for tenants to express a complaint and set out clear service standards for responding to complaints, including complaints about performance against the standards, and details of what to do if they are unhappy with the outcome of a complaint. Providers shall inform tenants how they use complaints to improve their services. Registered providers shall publish information about complaints each year, including their number and nature, and the outcome of the complaints. Providers shall accept complaints made by advocates authorised to act on a tenant's/tenants' behalf

#### How we comply:

We have an approved Complaints Policy and procedure following a thorough review during 2017/18. Our aim is to provide great homes and services for customers, but we also recognise that there may be times when things go wrong. If this happens, we want to put things right and learn from any mistakes - so the issue doesn't happen again. To help us do this we invite customers to raise their concerns with us. Customers can make complaints to us in a number of ways - including at any point of contact and through our website. We will also accept complaints from advocates. Once a complaint has been investigated, if they remain unhappy, customers can take their complaint to the next relevant stage - with the final stage being the Housing Ombudsman. Information relating to complaints (including the number of complaints, themes and outcomes) is reported to the Board, Resident Scrutiny Panel and customers.

#### Involvement and Empowerment

Registered providers shall support their tenants to develop and implement opportunities for involvement and empowerment, including by supporting their tenants to exercise their Right to Manage or otherwise exercise housing management functions, where appropriate; supporting the formation and activities of tenant panels or equivalent groups and responding in a constructive and timely manner to them; the provision of timely and relevant performance information to support effective scrutiny by tenants of their landlord's performance in a form which registered providers seek to agree with their tenants. Such provision must include the publication of an annual report which should include information on repair and maintenance budgets; and providing support to tenants to build their capacity to be more effectively involved.

#### How we comply:

We support customers to get involved in housing management decisions and we consult customers on their service charges. There are a variety of ways for customers to get involved in the activities and decision-making processes at Irwell Valley. Two of our Board members are residents, we have a scrutiny panel in place – to scrutinise our services and provide a customer perspective on service provision. Other activities such as mystery customers also form part of our engagement strategy. We publish a Customer Annual Report with information and key documents being published on the website and via social media.

Registered providers shall consult with tenants on the scope of local offers for service delivery. This shall include how performance will be monitored, reported to and scrutinised by tenants and arrangements for reviewing these on a periodic basis.

#### How we comply:

We have dedicated Neighbourhood Managers who are the main point of contact for specific localities. These Neighbourhood Managers provide key housing management support activities – including supporting customers to sustain their tenancy. We are currently reviewing our 'customer offer' as part of our new Corporate Plan. The RSP have reviewed our Customer Care Standards.

Registered providers shall consult tenants at least once every three years on the best way of involving tenants in the governance and scrutiny of the organisation's housing management service.

**How we comply:**

The last review took place in 2017 with our RSP – our new Customer Involvement Framework was developed as a result.

**Understanding and responding to diverse needs:**

Registered providers shall demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants

**How we comply:**

We record information on our housing management database to help identify how to best communicate with certain customers. We also engage services that can help us communicate with customers whose first language is not English or who may need other interpretation services. We also have colleagues who can communicate in other languages. We pass relevant information onto our contractors, as appropriate so that services can be adapted. We also identify customer need through vulnerability flags enabling us to amend our service as appropriate to the individual customer.

Policies to help more vulnerable customers such as our Hoarding Policy and Safeguarding Policy are in place. During 2018/19 we will be providing further training on our Safeguarding Policy.

Colleagues will make appointments outside of normal working hours in response to customers' needs. Our Communications and Marketing Team are working on improving all of our communications following a re-branding exercise to make sure that these are attractive and accessible to our customers. We have also started to use videos as an additional communication tool for some corporate information.

## The Consumer Standards – Home Standard

### Outcome – Quality of Accommodation:

Registered providers shall ensure that tenant' homes meet the standard set out in section five of the Government's Decent Homes Standard; meet the standards of design and quality that applied when the home was built, and were required as a condition of publicly funded financial assistance if these standards are higher than the Decent Homes Standard; and in agreeing a local offer, ensure that it is set at a level not less than these Standards and have regard to section six of the Government's Decent Homes Guidance.

### We do this by:

We continue to report zero non-decent homes. We have focussed on reducing the number of responsive repairs we carry out through investing in our stock and increasing our improvement programme. We are undertaking a full stock condition survey across all our homes and communal areas to further understand and plan for our assets and ensure that improvement plans continue to be based on meaningful data. This process has received external assurance that the stock condition work has followed robust methodology. In addition, our Asset Management and Environmental Strategy was also externally reviewed (September 2016) providing further assurance to Members.

Standards of design and quality are maintained as required. Our surveyors are qualified to the relevant level and fully trained to project manage improvement programmes, including oversee relevant health and safety requirements both during and post the programme.

We know that repairs and maintenance is the service that is most important to our customers. We contact our customers when their homes are due to be improved to understand any specific household needs.

### Outcome – Repairs and Maintenance:

Registered providers shall provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choices to, tenants, and has the objective of completing repairs and improvements right first time; Meet all applicable statutory requirements that provide for the Health and safety of the occupants in their homes

### We do this by:

Since December 2012 Irwell Valley (Adamas) Ltd (IVA) have provided the majority our day-to-day repairs, some of our planned work and repairs to our empty homes. IVA is a wholly owned subsidiary, overseen by an experienced Board who report to the group parent Board. There is no duplication of management costs due to managers working on both the client and contractor side. An in-house Gas Team was also introduced during July 2017 with the aim of achieving further efficiencies.

We know that our customers want us to complete repairs right first time and we monitor this area of service through our performance measures which are reported to Board on a quarterly basis. 87% of repairs completed right first time during 2017/18 (representing a slight decrease in comparison with 90.3% in the previous year). Operatives continue to receive support and training to help complete repairs right first time to increase knowledge and technical skills across a range of trades.

We will continue to survey our homes to ensure that we have accurate data to plan the improvement of our homes. Using the stock condition data, the Board have approved a significantly increased investment budget over the life of our new business plan (approved June 2018) to ensure that we are maintaining our assets to generate appropriate return. We plan that non-urgent repairs are batched, such as fencing repairs, to carry out these repairs in the most cost-effective way.

We take these landlord responsibilities very seriously and we have a dedicated Health and Safety Compliance Team focused on ensuring that we meet all our statutory requirements for health and safety - including gas, fire, water hygiene, lift and electrical safety. Each of these areas are identified on our risk map with key controls being identified for each area.

Compliance is monitored by our Health and Safety Committee and our Board. The Health and Safety Committee monitor health and safety related performance indicators, with Board directly overseeing gas performance information. Audit Committee review the assurance gained on our compliance work through quarterly assurance reports.

To provide assurance that we are meeting relevant statutory requirements for health and safety, we engage external organisations qualified to oversee and confirm the reliability of our compliance work - including a Health and Safety Advisor to provide expert advice across the organisation and scrutinise the association's health and safety related policies and procedures. This includes an Annual Compliance Audit undertaken by the Health and Safety Advisor with follow-up actions overseen by the Health and Safety Committee. Random spot checks are also carried out by our Health and Safety Advisor to check safety standards across the organisation. During the year we have also increased our health and safety resource employing a full time health and safety advisor in-house. We also maintained our OHSAS 18001 (health and safety) accreditation (externally audited in May 2018). Going forward we have identified IT system requirements to provide additional controls for the reporting and monitoring of health and safety compliance.

In response to the Grenfell Tower fire, we identified all homes with cladding and homes over a certain height / floor level and provided the required information back to DCLG. We also reviewed all documentation relating to the cladding and building refurbishment and we believe that the cladding installed on our high-rise homes is not the same as that used on Grenfell Tower and has a very low risk of fire spread. To provide additional reassurance - we immediately commissioned an independent investigation of the cladding and associated works (including fire stops/ breaks) and reviewed our Fire Risk Assessments for our tower blocks.

Following the Grenfell Tower fire, we carried out a number of immediate actions to try to reassure customers including:

- writing directly to our customers
- providing information through social media and our website
- holding drop-in sessions and public meetings for customers to discuss any concerns or raise any queries with colleagues, our Fire Risk Assessor and local councillors
- completing tenancy review visits with all customers in our high-rise homes – including identifying any repairs.

#### Key documents/ evidence:

- Key Performance Indicators
- Corporate Dashboard
- Asset Management and Environmental Strategy

- Repairs and Maintenance Policy
- Health and Safety Update Report to Board for 2017/18
- Health and Safety Policy and relevant supporting policies
- Quarterly Adamas Update Reports
- Fire Safety Update Reports
- Minutes of Public Meetings with Customers Held to Discuss Fire Safety
- Health and Safety Meeting Minutes
- Internal Audit Reports
- Combined Assurance Framework Update Reports

Sources of external assurance include: [Accreditations](#); [Internal Audit](#); [Customer Scrutiny](#); [Regulatory Oversight](#); [Independent Reviews](#); [Independent legal Advice](#); [External Consultants](#); [Board/Committee Oversight](#).

### Specific Expectations of the Regulator

#### Quality of accommodation

Registered providers may agree with the regulator a period of non-compliance with the Decent Homes Standard, where this is reasonable. Providers shall ensure their tenants are aware of the reasons for any period of non-compliance, their plan to achieve compliance and then report on progress delivering this plan.

#### How we comply:

All our homes comply with the decent Homes Standard.

#### Repairs and maintenance

Registered providers shall ensure a prudent, planned approach to repairs and maintenance of homes and communal areas. This should demonstrate an appropriate balance of planned and responsive repairs, and value for money. The approach should include: responsive and cyclical repairs, planned and capital work, work on empty properties, and adaptations.

#### How we comply:

We are undertaking a 100% full stock condition survey of all our homes and other assets. Using this data, we have identified that to maintain the efficiency and attractiveness of our new Business Plan 2018/19. This investment will help Irwell Valley to achieve its target of 70/30 in favour of planned maintenance. Over the past few years we have increased IVA's role in planned activity so that they are now completing most of this work - keeping profits in-house for re-investment.

Our strategy is to drive down the cost of responsive repairs through investing in our assets, using high quality components and regularly reviewing supply chains. Independent reviews of repair costs are carried out. We procure through frameworks (where this provides the best value) and run several programmes concurrently to ensure savings.

We are currently working on a new empty homes standard that balances the needs of customers and the efficiency of our homes.

Registered providers shall co-operate with relevant organisations to provide an adaptations service that meets tenants' needs.

**How we comply:**

We carry out minor adaptations of £1,000 or less for our customers. For adaptations above this amount, we have agreed contracts with all our local authority partners to contribute 20% to the cost of any adaptations they carry out on behalf of our customers.

## The Consumer Standards – Tenancy Standard

Outcome – Allocations and mutual exchange:

Registered providers shall let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of tenants and potential tenants. They shall demonstrate how their lettings make the best use of available housing; are compatible with the purpose of the housing; and contribute to local authorities' strategic housing function and sustainable communities.

**We do this by:**

We are reviewing our empty homes standard and allow more time for homes to be brought up to this standard before a customer moves in.

Our Asset Management Strategy supports the best use of our homes, with investment aimed at bringing homes back into use, future proofing these and increasing their environmental sustainability and their attractiveness, including:

- Environmental and communal upgrades to our high-rise apartments;
- Conversion of unpopular studios to one bed apartments: and,
- The consideration of the future use of our homes resulting in the conversion of supported housing to general needs homes and the sale of other empty assets that are no longer viable

Our Neighbourhood Teams work together to ensure that the right customer is ready for the available home – ensuring that we make the best use of these homes, particularly if adaptations are present. Through interaction with our customers we can be made aware of any vulnerabilities/needs that may be present which we will use to ensure that the right letting is made to the right person and that extra support can be provided where required.

We have good relationships with our local authority partners and support choice-based lettings schemes and nomination rights across different local authority areas in which we work e.g. members of Pinpoint; members of Bolton and Manchester's Choice Based Letting schemes and we receive nominations from Salford and Trafford. We meet our duties in relation to these to support our partners to deliver their statutory requirements. We have historically had a successful relationship with Manchester City Council to bring empty homes back into use through purchase on the open market in areas of need. We offer at least 10% of our lettings to internal transferring customers to help alleviate issues with customers under / over occupying their home. We also attend and contribute to local strategic housing partnership meetings.

There should be a clear application, decision-making and appeals processes

**We do this by:**

We let our homes on a points-based system that is clearly outlined in our Lettings and Allocations Policy, with information on our website and a customer leaflet. Prospective customers apply online. Customers are encouraged to discuss any decisions with our Lettings Team who will aim to resolve any issues. Our complaints/issue process is available for our applicants and existing customers if we are not able to resolve an issue at this stage.

Registered providers shall enable their tenants to gain access to opportunities to exchange their tenancy with that of another tenant, by way of internet-based mutual exchange services.

**We do this by:**

We are members of House Exchange the UK's leading not for profit database of people looking to mutually exchange their home. This is signposted to customers at the point of contact, through our website and through our dedicated transfer leaflet.

**Tenure**

Registered providers shall offer tenancies or terms of occupation which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock

**We do this by:**

Our approved Tenancy Policy outlines the various tenancies we use and why these are applicable for the type of housing. We also use licences where appropriate in some housing depending on the nature of the service and the support being provided. Resident and landlord responsibilities are clearly set out in our tenancy agreement/licence document. To support neighbourhood sustainability and protect our existing customers, we use starter tenancies where applicable. These allow us to closely monitor and support our customers through the first year of their tenancy and, if all other approaches have failed, end the tenancy in the most efficient way if the customer is not ready to sustain a tenancy with us.

Registered providers shall meet all applicable statutory and legal requirements in relation to the form and use of tenancy agreements or terms of occupation.

**We do this by:**

Independent legal advice is regularly sought when considering amendments to our tenancy agreement. During 2017 our tenancy agreement had a review with legal advice providing assurance on this document.

**Key documents/ evidence:**

- Tenancy Policy
- Allocations and Empty Home Policy
- Homelessness Strategy
- Homelessness Action Plan Update Report
- Financial Inclusion Strategy
- Transfer Leaflet
- Tenancy Agreement
- Complaints Policy
- Key Performance Indications Year End 2017/18
- Internal Audit Report – Empty Homes Management

Sources of external assurance include: [Accreditations](#); [Internal Audit](#); [Customer Scrutiny](#); [Regulatory Oversight](#); [Independent Legal Advice](#); [Board/Committee Oversight](#).

## Specific Expectations of the Regulator

### Allocations and mutual exchange

Registered providers shall develop and deliver services to address under-occupation and overcrowding in their homes, within the resources available to them. These services should be focused on the needs of their tenants and will offer choices to them.

#### How we comply:

Our Allocations and Empty Homes Policy clearly outline how customers can move to a more suitable home. We offer at least 10% of our lettings to transfers to help this process. We also signpost our customers to other providers of housing where we are unable to help. As members of House Exchange our customers can also find suitable tenants to exchange homes with outside of Irwell Valley.

Registered providers' published policies shall include how they have made use of common housing registers, common allocations policies and local letting policies. Registered providers shall clearly set out, and be able to give reasons for, the criteria they use for excluding actual and potential tenants from consideration for allocations, mobility or mutual exchange schemes.

#### How we comply:

Our Allocations and Empty Homes Policy clearly sets out how customers can apply for a home with us and we allocate our homes. Our Transfer leaflet also helps existing customers find out how they can move to a more suitable home. Relevant information can also be found on our website, including the criteria that customers would need to meet where this is applicable.

Registered providers shall develop and deliver allocations processes in a way which supports their effective use by the full range of actual and potential tenants, including those with support needs, those who do not speak English as a first language and others who have difficulties with written English

#### How we comply:

As with all our customer facing policies, our Allocations and Empty Homes Policy has an up-to-date Equality Impact Assessment. We also have an Equality and Diversity Framework, which outlines how we aim to ensure equality of opportunity across our services and throughout our organisation. Colleagues can access translation and interpretation services as well as identified colleagues who are available for translation.

Registered providers shall record all lettings and sales as required by the Continuous Recordings of Lettings (CORE) system

**How we comply:**

Irwell Valley provides and collects information on all our lets and participates in CORE. All lets are uploaded digitally with colleagues trained to update CORE as required.

Registered providers shall provide tenants wishing to move with access to clear and relevant advice about their housing options.

**How we comply:**

Our Lettings and Allocations Policy outlines how we deal with customer's requests to transfer, we also provide customers with information at point of contact and we have a dedicated customer leaflet for customers wishing to transfer or exchange. Customers are signposted to other agencies who can also offer suitable accommodation.

Registered providers shall subscribe to an internet based mutual exchange service (or pay the subscriptions of individual tenants who wish to exchange), allowing a tenant to register an interest in arranging a mutual exchange through the mutual exchange service without payment of a fee; the tenant to enter their current property details and the tenant's requirements for the mutual exchange property they hope to obtain; and the tenant to be provided with the property details of those properties where a match occurs.

**How we comply:**

Irwell Valley subscribes to House Exchange the UK's leading not for profit database of people looking to mutually exchange their home. We will help customers to access the relevant information. House Exchange allows customers to gain access to the relevant homes for them. Customers can access this information direct through House Exchange.

Registered providers shall ensure the provider of the internet based mutual exchange service to which they subscribe is a signatory to an agreement, such as HomeSwap Direct, under which tenants can access matches across all (or the greatest practicable number of) internet based mutual exchange services.

**How we comply:**

Irwell Valley subscribes to House Exchange the UK's leading not-for-profit internet based mutual exchange scheme.

Registered providers shall take reasonable steps to publicise the availability of any mutual exchange service(s) to which it subscribes to its tenants.

**How we comply:**

This information is set out in our Allocations and Empty Homes Policy; Transfer leaflet and through our website.

Registered providers shall provide reasonable support in using the service to tenants who do not have access to the internet.

#### How we comply:

Customers without internet access can access House Exchange through our internet kiosks or in our various community facilities. We can also offer support to our customers to access this information.

#### Tenure

Registered providers shall publish clear and accessible policies which outline their approach to tenancy management, including interventions to sustain tenancies and prevent unnecessary evictions, and tackling tenancy fraud, and set out the type of tenancies they will grant; where they grant tenancies for a fixed term, the length of those terms; the circumstances in which they will grant tenancies of a particular type; any exceptional circumstances in which they will grant fixed term tenancies for a term of less than five years in general needs housing following any probationary period; the circumstances in which they may or may not grant another tenancy on the expiry of the fixed term, in the same property or in a different property; the way in which a tenant or prospective tenant may appeal against or complain about the length of fixed term tenancy offered and the type of tenancy offered, and against a decision not to grant another tenancy on the expiry of the fixed term; their policy on taking into account the needs of those households who are vulnerable by reason of age, disability or illness, and households with children, including through the provision of tenancies which provide a reasonable degree of stability; the advice and assistance they will give to tenants on finding alternative accommodation in the event that they decide not to grant another tenancy; and their policy on granting discretionary succession rights, taking account of the needs of vulnerable household members.

#### How we comply:

Our Tenancy Policy clearly sets out the type of tenancies that we will grant; our use of starter tenancies; how we support customers to sustain their tenancy and for preventing and tackling tenancy fraud. The policy allows Irwell Valley to issue fixed term tenancies for a period of five years and outlines how we will review whether we will issue a new fixed term tenancy on expiry of the fixed term and that we will offer reasonable advice and assistance to customers who are not granted another fixed term tenancy. To date, the Association has not issued any fixed term tenancies.

The Policy states that a customer can appeal any decision with our Lettings and Income Manager and if they are unhappy with the outcome of their complaint they can follow our complaint's process.

The policy follows the principles within our Equality and Diversity Framework regarding issuing and reviewing fixed term tenancies and that we will also consider the needs of the household in particular where there are vulnerabilities present.

Successions are granted in accordance with customer's specific tenancy agreement.

Registered providers must grant general needs tenants a periodic secure or assured (excluding periodic assured shorthold) tenancy, or a tenancy for a minimum fixed term of five years, or exceptionally, a tenancy for a minimum fixed term of no less than two years, in addition to any probationary tenancy period

#### How we comply:

This is reflected in our Tenancy Policy

Where registered providers use probationary tenancies, these shall be for a maximum of 12 months, or a maximum of 18 months where reasons for extending the probationary period have been given and where the tenant has the opportunity to request a review.

#### How we comply:

Starter tenancies are issued in accordance with our Tenancy Policy and are for a maximum of 12 months with the ability to extend the period if required. Customers can request a review of any decision to end or extend a starter tenancy.

Where registered providers choose to let homes on fixed term tenancies (including under Affordable Rent terms), they shall offer reasonable advice and assistance to those tenants where that tenancy ends

#### How we comply:

Our Tenancy Policy states that Irwell Valley will offer reasonable advice and assistance to customers who are not granted another fixed term tenancy

Registered providers shall make sure that the home continues to be occupied by the tenant they let the home to in accordance with the requirements of the relevant tenancy agreement, for the duration of the tenancy, allowing for regulatory requirements about participation in mutual exchange schemes.

#### How we comply:

Our tenancy agreement gives customers the right to the quiet enjoyment of their home. The agreement is clear in terms of the rights and responsibilities of both landlord and the tenant. Our Tenancy Policy outlines our work to ensure that our homes are not abused by customers through misuse or subletting. Our Neighbourhoods Team carry out tenancy reviews to ensure that these remain occupied by the customer who signed the tenancy agreement. We subscribe to the National Anti-Fraud Network (NAFN) Data Intelligence services which is available to help support our colleagues to investigate tenancy fraud. Customers can report any concerns to us direct or they can complete a tenancy fraud report form on our website (anonymously if preferred). Tenancy Fraud training was refreshed during 2017.

Registered providers shall develop and provide services that will support tenants to maintain their tenancy and prevent unnecessary evictions.

#### How we comply:

We view eviction as a last resort and our Neighbourhoods and our Income Management teams are committed to helping customers to sustain a successful tenancy. We use starter tenancies to protect our customers and our assets from anti-social customers and to provide early intervention on tenancy management. We rate our tenancies to allow our Neighbourhood Teams to provide tenancy support in the most effective way, focusing our resources on the most vulnerable of our customers. Our Income Management Team offer support to our customers to reduce debt, maximise their income and complete Universal Credit applications.

Registered providers shall grant those who were social housing tenants on the day on which section 154 of the Localism Act 2011 comes into force, and have remained social housing tenants since that date, a tenancy with no less security where they choose to move to another social rented home, whether with the same or another landlord. (This requirement does not apply where tenants choose to move to accommodation let on Affordable Rent terms).

**How we comply:**

Our Tenancy Policy reflects this requirement and independent legal advice has been sought in relation to this policy to gain assurance over its provisions.

Registered providers shall grant tenants who have been moved into alternative accommodation during any redevelopment or other works a tenancy with no less security of tenure on their return to settled accommodation.

**How we comply:**

This requirement is stated within our Tenancy Policy.

## The Consumer Standards – Neighbourhood and Community

### Outcome – Neighbourhood management:

Registered providers shall keep the neighbourhood and communal areas associated with the homes that they own clean and safe. They shall work in partnership with their tenants and other providers and public bodies where it is effective to do so.

### We do this by:

We aim to create neighbourhoods that people can live in and enjoy life. Over the past few years we have supported this vision by investing in our neighbourhoods to improve and promote community cohesion and address specific neighbourhood concerns. Neighbourhood focal points such as the bandstand at Haughton Green and the water wheel project in Radcliffe are examples of neighbourhood improvements that have helped the local community to come together, socialise and tackle specific anti-social behaviour issues in the area.

We aim to provide accommodation and neighbourhoods that customers can be proud of and in return, invest in and respect their homes and neighbours.

Neighbourhood managers conduct regular estate inspections. In addition, estate tours are also advertised to customers and other stakeholders (e.g. MPs) where we can discuss issues relating to the neighbourhood and repairs. Other issues such as inappropriate waste disposal or fly tipping are also discussed. We advertise these inspections through social media so that any interested customers can come along. Colleagues have recently had risk assessment training with our insurers to help prevent future hazards. We also have a Neighbourhood Support Team who carry out a wide variety of neighbourhood tasks to make sure our neighbourhoods remain safe and clean.

We work with our local authority partners, Police, local fire authorities, other providers and agencies to address concerns across our neighbourhoods. We continue to be active participants of the GM Providers Group to help inform strategy across Greater Manchester to guide and influence the priorities of the Mayor of Greater Manchester and the devolution agenda to the benefit of all our customers and the neighbourhoods in which we work.

### Outcome – Local area co-operation:

Registered providers shall co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties.

### We do this by:

We have a good relationship and reputation with our partners and work together to improve our neighbourhoods. An example of joined up working is through a joint partnership with Citizens Advice Bureau (CAB) - the Denton Outreach surgery. This is part funded by us and aims to improve the economic well-being of customer who may be having financial difficulties. Over 400 clients have attended the weekly drop in sessions, with over 46% of the clients being those from Irwell Valley. Over 70% of the issues that clients sought assistance on were benefit, tax credit and debt advice. Other more focused operational initiatives include regular recycling initiatives supporting the “Keep Britain Tidy campaigns”; Beat sweeps; work in schools; children’s activities and fun days.

At a local level, the Irwell Valley Foundation supports neighbourhood initiatives through the administration of grants from a £2m investment fund aimed at meeting community needs. Initiatives are varied, and examples range from supporting holiday activities for children to the refurbishment and re-launch of our Sunshine Café in Sale.

We are involved in initiatives designed to tackle worklessness. Examples include offering voluntary opportunities at the Sunshine Café, through to our Back to Work and Education and Training Grants. We offer a number of apprenticeship opportunities with one of our former apprentices winning the regional heat of the apprentice of the year.

#### Outcome - Anti-Social Behaviour

Registered providers shall work in partnership with other agencies to prevent and tackle anti-social behaviour (ASB) in the neighbourhoods where they own homes.

#### We do this by:

Customers can contact us through a variety of methods, 24hrs a day to discuss or report ASB issues. We work in partnership with other agencies and have numerous examples of this leading to positive outcomes, such as injunctions and issuing fines for fly-tipping. We attend and are active in relevant Crime and Disorder Reduction Partnerships and we are signatories to the Respect Agenda.

We promote positive behaviour and reinforce the rights and responsibilities of customers. Where possible, our new customers sign a starter tenancy, which we use to protect our existing customers and to closely monitor the conduct of new ones. We provide support to new customers to help them to understand their rights and responsibilities and these are clearly discussed with customers at sign up and through their first year in their home, supported by a Neighbourhood Charter. We also rate our tenancies on a traffic light system. We do this to identify those customers most in need of support - so we can work with them to maintain a successful tenancy. To further support our customers, and to work with our partner agencies, we also have a Safeguarding and a Hoarding Policy. Relevant colleagues have been trained on these procedures to enable them to highlight and respond to any concerns. Colleagues have also been trained on dealing with Hate Crime.

#### Key documents/ evidence:

- Neighbourhood Management Policy
- Positive Behaviour Quarterly Update Report
- Customer Experience Annual Report to Board
- KPI Report
- Chief Executive's Update Report
- Safeguarding Policy
- Hoarding Policy
- ASB leaflet
- Irwell Valley Foundation Annual Report 2017/18

Sources of external assurance include: [Accreditations](#); [Internal Audit](#); [Customer Scrutiny](#); [Regulatory Oversight](#); [Independent Legal Advice](#); [Board/Committee Oversight](#).

## Specific Expectations of the Regulator

### Neighbourhood management

Registered providers shall consult with tenants in developing a published policy for maintaining and improving the neighbourhoods associated with their homes. This applies where the registered provider has a responsibility (either exclusively or in part) for the condition of that neighbourhood. The policy shall include any communal areas associated with the registered provider's homes.

#### How we comply:

We have a Neighbourhood Policy which set out how we will maintain neighbourhoods and communal areas. Customers are invited to join us on regular neighbourhood tours to help identify any issues. They can also feedback concerns or comments direct to their Neighbourhood Team, through either our website, the Irwell Valley App or social media. Part of our new Corporate Plan is to work with our customers and colleagues to launch a new 'customer offer'.

### Local area co-operation

Registered providers, having taken account of their presence and impact within the areas where they own properties, shall identify and publish the roles they are able to play within the areas where they have properties; and co-operate with local partnership arrangements and strategic housing functions of local authorities where they are able to assist them in achieving their objectives.

#### How we comply:

We have community cohesion document which details how we decide the roles that we play in an area – this document will be refreshed as part of the implementation of our Corporate Plan.

We co-operate with our local authority partners and other stakeholders as necessary. This includes participating in joined up service standards and initiatives, such as bringing empty homes back into use and joint allocation schemes. We are also active members in various strategic partnerships within the local authority areas in which we operate.

### Anti-Social Behaviour

Registered providers shall publish a policy on how they work with relevant partners to prevent and tackle anti-social behaviour (ASB) in areas where they own properties.

#### How we comply:

Our Neighbourhood Policy outlines how we work with relevant partners to prevent and tackle anti-social behaviour. We have a customer leaflet available to provide essential information. This is available on request or can be downloaded from our website.

In their work to prevent and address ASB, registered providers shall demonstrate that tenants are made aware of their responsibilities and rights in relation to ASB; strong leadership, commitment and accountability on preventing and tackling ASB that reflects a shared understanding of responsibilities with other local agencies; a strong focus exists on preventative measures tailored towards the needs of tenants and their families; prompt, appropriate and decisive action is taken to deal with ASB before it escalates, which focuses on resolving the problem having regard to the full range of tools and legal powers available; all tenants and residents can easily report ASB, are kept informed about the status of their case where responsibility rests with the organisation and are appropriately signposted where it does not; and provision of support to victims and witnesses.

#### How we comply:

We have a very strong rights and responsibilities culture and we promote this from the very start of customer's tenancies through starter tenancy management and from regular contact with the Neighbourhood Manager. Customer's rights and responsibilities are clearly outlined in their Conditions of Tenancy document.

We are signatories of the Respect Agenda and work very closely with our partner agencies to prevent and tackle ASB. We monitor the type of cases received and our performance in handling these. A full review of our ASB Policy and Procedure has been carried out in 2018, inclusion of Hate Crime and a separate Policy and Procedure for dealing with Domestic Abuse will also be considered in 2018. IT systems are being improved to better enable Neighbourhood Managers to manage ASB cases whilst in the Neighbourhoods to speed up our response timescales.

We issue starter tenancies to protect our existing customers and to closely monitor and support new tenancies. We assess our tenancies to identify those customers that need extra support from us to help them to manage their tenancy. Our policies help colleagues support our very vulnerable customers.

We advise our customers to speak to us at an early stage. Colleagues are trained in dealing with ASB and they are supported by more specialist colleagues and through an ASB legal advice service. We log complaints and have procedures and timescales for response depending on the nature of the complaint. To support victims and resolve ASB we use several of tools including mediation, our own noise monitoring equipment, specialist CCTV companies, professional witnesses and specialist organisations, including Witness Support.

ASB can be reported through a variety of methods including through our website and through an out of hours emergency number. We acknowledge ASB cases and inform customers who will be dealing with their case within strict time deadlines. Where we are unable to help we will signpost customers to the relevant agency.

## Future Improvements

The Board recognises that continual improvement is necessary to challenge and continue to move Irwell Valley forward. The following improvements have been identified for 2018/19:

### Governance and Financial Viability

- Carry out a new full governance review.
- Identify a new Finance System.
- Carry out a Lean Review of Finance and Statutory Returns.
- Continue to implement our Data Protection Improvement Plan.

### Value for Money

- Progress our programme of Lean Reviews across the business.
- Implement our new Corporate Plan including projects to identify the most efficient ways of working and the digitisation of services.
- Continue to support our Colleague Forum and The Hive to help identify innovative improvements to both customers and colleagues.
- Review our Asset Management Strategy and introduce a Sustainability Strategy.
- Progress our Growth and Development Strategy as planned.

### Rent

- Review the process for updating standing data and other data integrity measures.
- Carry out an Internal Audit of our Section 20 Consultation Process.
- Continue to help customers maximise their income and afford their rent.

### Tenant Involvement and Empowerment

- Review how we communicate with our customers to ensure it is clear what they can expect from us.
- Monitor the outcomes of our new Complaint's Policy.
- Continue to review our 'offer' with customers and colleagues.

### Home

- Continue to work with our Local Authority partners, MHCLG, the Regulator and our customers to review fire safety arrangements, in particular, to our homes our high-rise homes – make any necessary changes and continue to gain assurance for customers.
- Identify how to best utilise the increased asset management budget as per our 30 year plan.

### Tenancy

- Tailor our services to further support our customers in sustaining their tenancies.

### Neighbourhoods and Community

- Provide Safeguarding training to our colleagues.
- Refresh our strategy for working in communities and with other local partners.