

SELF-EVALUATION-DEVELOPING A MODERN REGULATORY FRAMEWORK FOR HOUSING ASSOCIATIONS IN WALES-FIRST CHOICE DELIVERY OUTCOMES

First Choice Housing Association Ltd (FCHA) was founded in 1988 ensuring that people with learning disabilities have the right to a normal life in the community, reaching their full potential. We are the only all-Wales RSL solely providing homes solely for vulnerable adults to enable our tenants to live independently. As at July 2016, First Choice provides 696 supported living bed-spaces across Wales including properties for respite or emergency intervention services. We work in 18 local authorities alongside 30 domiciliary care agencies (DCA's) with Local Authorities having 100% nomination rights for all vacant bed spaces. Our self-evaluation is led by Board and embedded in our strategic business planning process keeping abreast of ever changing legislative requirements and the impact on the external environment.

Providing all Wales coverage for housing, maintenance and development functions is a challenge but through revised lean working practices we now administer annual on-line housing management review of all properties, the results of which, along with additional housing management information are shared with senior representatives from our local authority and domiciliary care agency partners. Our Maintenance team inspect each property every two years and undertake five yearly stock condition and WHQ'S compliance surveys. They meet annually with key maintenance contractors, most of whom are either locally based SME's or specialist contractors.

To improve services to our tenants, we provide training to DCA staff to enable them to maximise the support provider service charges and maintaining our properties. We provide training on handover of new properties including how to use specialist and safety equipment in addition to training for tenants on an ongoing basis on their rights and responsibilities under the tenancy agreement.

Tenant participation is a challenge for First Choice as tenants have a wide range of learning disabilities often combined with physical disabilities and behaviours that challenge. All Wales coverage creates difficulties in reaching tenants in all areas but despite these challenges First Choice believe that we have led the field in effective tenant participation for people with learning disabilities, having won several awards over the past few years, including 'Service User Involvement in Housing Related Support' at the TPAS Cymru awards and the Communication and Publication award for our tenant newsletter at the Welsh Housing Awards 2016. Good tenant attendance at events is achieved by identifying the most appropriate venues with 21 tenant events reaching 223 tenants throughout 15/16 including the AGM, tenant discos, bowling events, Fun Day, tenant councils, quality visits and newsletter groups. Analysis has shown that tenant attendance at these events is representative of all equality groups within the association's tenant population. All communication with tenants is in an appropriate accessible format and is reviewed following each tenant survey to take on board communication preferences. The nature of our tenants' disabilities has posed significant issues in engaging tenant board members, therefore to ensure tenants have a voice we have created tenant councils in order to seek opinions thereby creating a two way link between Board and tenants. These councils were reviewed in Spring 2016 and have been reinvigorated as the "Ivor Choice Club" to increase engagement and ensure they continue to represent the views of tenants. An independent tenant representative enhances the quality and independence of dialogue between tenants and Board.

To date, development has been driven by availability of Social Housing Grant (SHG), however with threats to future availability of SHG, we strive to provide homes using private finance. We manage development geographically and work in partnership with local authority partners where we can achieve the rent levels required to service our borrowing and maintain a reasonable surplus, which is re-invested into the development of more homes. We are pursuing alternative models of accommodation provision particularly in relation to leased in opportunities from a variety of sources including local authorities, DCAs and private landlords.

All properties are tailored and future proofed to meet the needs of tenants. The high specification required by our client group, e.g. specialist baths, hoists, under-floor heating all increase the cost of properties and result in higher maintenance costs. In recognition of the increased cost of our bespoke

properties, we use a “Business Decision Model” which identifies and minimises risk at development stage and limits the adverse gap between the cost to First Choice and market value. This model drives future privately funded development to ensure a sustainable business. Key financial benefits for First Choice are local authority responsibilities for payment of void rent, the majority of tenants’ rents are paid by housing benefit and thus we suffer minimal rent arrears and few bad debts. We also fall outside of WG’s policy for social housing rents, thereby enabling us to charge rents appropriate to the costs of our properties. In the current climate of welfare reform we are keeping up to date with any changes that may have an adverse effect on our tenants, which includes the review of the supporting people programme, transition to personal independence payments (PIP), the roll out of universal credit and proposed changes to caps on LHA rates which include supported housing. We are liaising with CHC who are lobbying awareness with the minister the impact this change will have to vulnerable people living in a supported housing setting with responses expected in July 2016.

Good relationships with our local authority partners are very important to First Choice and meetings are held on a regular basis. We endeavour to meet with housing strategy staff and social services commissioners, but relationships between these teams vary across Wales, a situation which we strive to improve. We undertake annual research into accommodation needs for people with learning disabilities, which points to a huge unmet need across Wales, both now and in the future. A key concern is how that unmet need can be met in an environment where SHG and revenue funding for support is much reduced.

First Choice participates actively in many events held by NHF, CIH and CHC. We have robust performance management systems including a balanced scorecard presented at the quarterly scrutiny committee. We undertake external stakeholder surveys and validate our findings through a skilled independent advocate who obtains face-to-face feedback from tenants regarding our services. We are conscious of the need to reduce office costs and management overheads and evidence value for money. IT systems in particular are significant for a small association and we have achieved significant cost savings and efficiencies by writing in house databases, tailored to our needs. We have introduced bespoke purchase invoice, development, housing and maintenance databases which have provide significant efficiencies and improved data accuracy and reporting.

Future strategy is considered annually at a strategy day attended by board members and Directorate and three years ago a diversification strategy was considered, prioritised and agreed to deliver wider social objectives for the provision of supported housing for ex-service personnel. This is funded through alternate income streams including private finance and MOD LIBOR grant funding. Board and directorate have taken the diversification agenda forward carefully, considering risk ensuring that the core business has not been neglected in favour of new areas of business.

Our self-evaluation journey has led us to scrutinise how we meet the needs of our tenants and focused more attention on continuous improvement in all areas of service delivery. We have and will continue to make significant efforts to attain meaningful feedback from our tenants, staff and stakeholders particularly in the validation of judgements we make about our own performance as part of our self- evaluation to ensure our views reflect those of our service users. Tenants, Board and Directorate have worked collaboratively to arrive at the judgements outlined within our Self Evaluation



1.0 GOVERNANCE AND FINANCIAL MANAGEMENT

1.1 Delivery Outcome -We place the people who want to use our services at the heart of our work –putting the citizen first

We know our current and potential service users and tailor our services and activities accordingly. By undertaking tenant profiling we tailor our communication strategy to ensure that we communicate with tenants in an appropriate format suitable to their needs. We work closely with Local Authorities in meeting accommodation strategies to provide specialist accommodation that meets the design requirements for prospective tenants with physical and behavioural needs. To ensure that our tenants needs continue to be met we survey them bi-annually to ensure their property continues to meet their physical needs. The 2015/16 survey (4) indicated that 94% of tenants felt their home was suitable for their physical needs. Of the 6% of whose homes did not meet the need we have made contact with the tenants individually to determine whether the association is able to resolve the issues. In such cases, the association has either pursued adaptations via a physical adaptations grant or signposted tenants to appropriate sources of assistance.

The service agreement with Domiciliary Care Agencies (2) and training provided by the association to tenants and support staff helps tenants to understand their tenancy rights and responsibilities in the most appropriate way. The tenant survey is used to identify issues that tenants may have, driving an improved service (3) (4)

1.2 We encourage and support early tenant and service user involvement in shaping our services, reviewing our performance and developing plans for the future

First Choice has an interactive group "The Ivor Voice Club" which ensure tenants are involved in the running of the business. The group was set up in the summer of 2016 to replace tenant councils as a result of reduced attendance and lack of engagement. The clubs (5) (6) involve tenants directly in the governance of the association whereby tenants feed views into new strategies and work priorities enabling us to engage them in developing future services. The revised format has reinvigorated interest and increased engagement, encouraging greater feedback from tenants on all service areas. Tenants are consulted on governance issues and their views are considered by the Board when making decisions. This gives tenants a greater knowledge, understanding and input into decisions on the running of the business, aided by the independent tenant representative who provide liaison between tenant clubs and Board. We maximise opportunities for attendance at all tenant participation events making reasonable adjustments and varying the locations of venues to enable as many tenants to attend as possible. We engage an independent Tenant Quality Assurance Officer to ensure tenants have a strong voice in shaping services seeking tenant views on the quality of services to help shape future direction and identify improvements. (24) In the 2015 tenants' survey 97% of tenants were happy that we listened to what they want and did what they asked.

1.3 We have a clear focus on outcomes for the people who want to use our services and take into account their current and future requirements, circumstances and barriers they face

We provide information in an accessible format, which seeks to address the communication barriers tenants may face. Our Single Equality Scheme and Action plan demonstrate we provide services that are tailored to individual needs (7). In response to feedback we included text for the hearing impaired within our rights and responsibilities DVD. We have engaged RNIB as a consultant on several developments and we now use sample boards, demonstrating smart use of colour and contrast to optimise benefit for people with a visual impairment. In the 2015 tenants' survey (4) 94% of tenants felt that access in and out of their home was suitable for their physical needs. Where appropriate we wrote to tenants to advise that Occupational Therapist reports are required for us to look into making physical adaptations to their homes, liaised with the tenants and their support staff and/or visited the tenants at home to address their concerns.

1.4 We are easy to contact, respond in a timely efficient manner and ensure unnecessary contact is avoided

Our contact details are displayed on our website and advertised in all publicity material for ease of contact. We have a one stage telephone system, directed to individual departments. We adhere to our service standards (9) which set out the minimum service that customers can expect and ensure compliance through annual monitoring. Compliance is reported to Board via the balanced scorecard.(10) We avoid unnecessary contact through use of accessible documents such as the "Getting things fixed file "(12) and tenant handbook (11) by informing tenants of rights and responsibilities and emergency contact details. In the 2015 Tenant survey (4) 100% of tenants who contacted First Choice with a problem or complaint in the last 12 months said it was easy to report and 99% were happy with the way that First Choice dealt with the query. Any negative responses related to individual maintenance issues and all feedback has been addressed by the maintenance department.

1.5 We make it easy for people to understand what to expect from our services and how to access them

Our service standards were developed in consultation with tenants (9) and set out the levels of service that stakeholders can expect. The association achieved 99% satisfaction from tenants in meeting our service standards in 2015/16. These were developed in conjunction with tenants with a learning disability from 2 other RSLs. These ensure that tenants with a learning disability are entitled to expect the same standard of service, regardless of their landlord. We produce accessible information for tenants to help them to understand their rights and responsibilities e.g. Tenant Handbook, (11) and The Getting Things Fixed File which includes emergency contact information and information about the repairs services offered by the association detailing what to expect from our maintenance service (12). The Operational Housing Manager meets support staff at newly handed over properties to inform them about the association and provides training on tenancy rights and responsibilities.

1.6 We communicate information and advice in an appropriate, timely effective manner, readily understood by the communities we serve

We provide information in an accessible format to tenants and stakeholders to keep them fully informed and involved with FCHA activities. In our 2015 Domiciliary Care agency survey, 100% of our domiciliary care agency partners agreed that the association provides appropriate information to help enable tenants to understand their occupancy rights and responsibilities. We conduct a robust service and support agreement review process (16) (17) which ensure we are providing tenants the best service alongside our partner DCA agencies.

First Choice has a Welsh Language Scheme to enable everyone who needs to contact us to use either the Welsh or English language, according to their personal choice. The association utilises a free translation service that can translate our English documents and website into over 50 different languages and we have employed a Welsh speaker to the team to support translation services and response. We provide training to tenants and their support staff in an accessible format which increases accountability in relation to their tenancy rights and responsibilities and provides them with knowledge and confidence to maintain their tenancy agreement. The association is responsive to requests from our local authority or domiciliary care agencies to address any tenancy related issues in a timely manner. This partnership approach assists with tenancy sustainment.

1.7 We value and are responsive to the views of the people who want to use our services

We use taking part events to measure tenant's views (18) and collect and analyse feedback, addressing feedback to ensure that future events are improved and take into account tenants' needs. In relation to the consultative events held during 2015-16, 100% of tenants felt that they 'had their say', 'their views were listened to' and they 'learned more about First Choice's activities'.

We survey tenants (3) asking questions about services and the suitability of their home, taking appropriate action to address feedback received to improve services (4) (3). We commission an external survey to all non-tenant stakeholders(4) and analyse the results which feed

into service improvement. The most recent survey showed that 81% of respondents are satisfied with our overall service. The association will strive to improve these satisfaction levels by acting upon constructive feedback from our stakeholders. One domiciliary care agency said “tenant participation is excellent. There are many opportunities for tenants to get involved in and the information provided is very accessible. The senior management team are friendly, approachable and have great values.

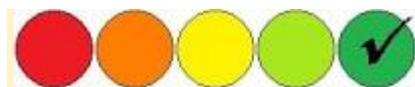
We have a comprehensive complaints policy and a dedicated complaints officer to ensure that all complaints are dealt with properly and consistently. In the 2015 DCA survey, 99% of our Domiciliary Care Agency and Local Authority partners felt that First Choice deals appropriately with complaints.

1.8 We are accountable to our tenants and service users

We ask tenants via surveys (4) if their current home is suitable for their needs and take appropriate action to act upon feedback.(3) We adhere to our service standards which set out what all customers can expect (9). Compliance with the standards against target is reported within the balanced scorecard and scrutinised by Board of Management who act in the best interests of the tenants. We are accountable to tenants by providing information about the business in an accessible format which is open, honest and transparent. We have increased our partnership working with DCA's, holding events enabling us to identify service improvements and work collaboratively on sector issues.

1.9 We make it easy for people to tell us when things go wrong or to make a complaint, using them to improve our services

We publicise our complaints procedure with all complaints reviewed by senior officers and appropriate changes made to working practice. We engage with tenants through a survey, asking a number of questions about the services provided and suitability of their home, taking appropriate action to address feedback. Senior managers seek opportunities to speak directly with tenants about our services. Our Complaints policy meets the requirements of the PSOW and we monitor through an internal database which enable us to capture informal complaints and compliments. 100% of tenants surveyed in the 2015 Tenant Survey (3) advised that it was easy to report a complaint or concern.



2.0 WE LIVE PUBLIC SECTOR VALUES, BY CONDUCTING OUR AFFAIRS WITH HONESTY AND INTEGRITY, AND DEMONSTRATE GOOD GOVERNANCE THROUGH OUR BEHAVIOUR

2.1 We are open about what we do and publish balanced information about our activities

We are open, honest and accountable and information is published and provided to all our stakeholders who are provided with annual reports, (26) business plan,(20) and financial accounts (36). Information is provided in an accessible format, tailored to the needs of tenants and updates on our activities are made available through our website. We provide information about our stock to the local authority and the Local Government Data Unit to meet regulatory requirements. An e-bulletin is issued to all local authority partners to promote the work we undertake, including service improvements and new developments. (13) We publish information about available void bed-spaces on our website.

2.2 We provide information on request, in an accurate, timely and efficient way unless there are justifiable reasons for withholding it.

All documentation is provided in a timely efficient manner that is appropriate for the intended stakeholder to understand. The Director of Corporate Services is the appointed Data Protection Officer responsible for data requests. Information is managed and provided in compliance with the Data Protection Act and retained in line with the association's Data Protection Policy (21).All data is maintained only for the period specified and in a secure manner.

2.3 Our activities and services reflect the diversity of the communities where we operate, are free from discrimination and promote equality of opportunity.

Tenant profiling enable us to tailor services. Following recommendations in our regulatory assessment we have increased the information held in relation to equality data from 50% to 96%. The association's tenant profiling data statistics are analysed following each Tenant Survey and our communication methods tailored to meet tenant's requirements. First Choice has proactively sought to fill the data gaps by requesting profiling information within the tenant survey, at participation events, at property inspections and by writing to the tenants, social services and their support staff, explaining the importance of this information to ensure the most effective service delivery. Analysis of attendance at participation events ascertains whether attendees are representative of all protected groups within the Equality Act and are representative of the association's tenant population. Our Single Equality Scheme (7) and action plan promote equality of opportunity to all tenants, staff and stakeholders and ensure that all tenants are given the opportunity to participate in shaping services. Board assess themselves through the CHC tool-kit to ensure they are meeting all areas of regulation including equal opportunities. We have positively sought to appoint female board members to ensure gender diversity and other underrepresented groups.

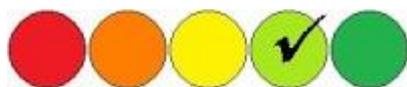
2.4 We treat the Welsh & English languages on the basis of equality.

FCHA adheres to our Welsh language scheme in accordance with the Welsh Language Act. The latest equalities monitoring data demonstrated that no service user or employees currently require communication in Welsh. Important documents are published bilingually on request and our website offers translation to ensure equality of access regardless of language preference.

2.5 We improve economic, social and environmental circumstances in the local community.

All new properties are built to current required levels of the code for sustainable homes and incorporate environmental features where possible to improve economic and environmental factors. We provide employment opportunities through procurement initiatives with SME's via development and maintenance contracts. Bespoke accommodation in a community setting allows tenants to move from residential care enhancing opportunities for social interaction. The community setting not only provides more appropriate accommodation, but raises awareness of learning disability issues amongst the wider community. We have a robust development programme which includes refurbishing existing properties to WG minimum standards enhancing the local environment. The association has a Community Involvement Strategy and during 2015-16 the association's community involvement budget was spent on a variety of sources including support to the Welsh Sports Association for People with a Learning Disability, contribution towards the purchase of specialist bicycles and the Vale People First Annual Conference. We also contributed towards the cost of workshop equipment at the Erlas Victorian Walled Garden in Wrexham, local allotment project and the on-going servicing of a changing table within a changing facility in Carmarthenshire ,a much-needed changing facility for people visiting Carmarthen and the surrounding area.

We consider ourselves to be strong in tailoring our services to the needs of tenants. We have increased engagement with the wider LD field, including Supporting people Regional Collaborative Committee Structure, Cymorth, parents and carers groups, schools and colleges and WCVA.



WE MAKE SURE OUR PURPOSE IS CLEAR AND WE ACHIEVE WHAT WE SET OUT TO DO – KNOWING WHO DOES WHAT AND WHY

3.1 We have a strong accountable leadership with clear informed transparent decision making to ensure we achieve our purpose

Board and Committee structures ensure that the Board are “in control” by measuring the critical areas of the association’s business through detailed papers presented by senior staff. Responsibilities are clearly delineated within staff job descriptions and strategic objectives. Decision making is documented through minutes of Board and Committee meetings. The Board are multi skilled and any gaps are identified through the board annual appraisal leading to training and succession planning. The Board are committed to the principles of the CHC Code of Governance and this was incorporated as part of this appraisal process in 2015. The Chief Executive is subject to an annual review with the Chair of the Board to ensure strong accountable leadership and senior managers undertake appropriate training in leadership and development as well as annual feedback from Board members as part of the annual appraisal process. There are strong and robust relationships between Board members and the senior team all committed to driving and managing change. In 2015/16 the Board strategy day was set on horizon scanning to future plan, scenario test and ensure the association is fit for its future. We understand the importance of ensuring the need to develop senior staff and the Executive team undertook training on leading strategic development through people in summer 2016.

3.2 Our governing body exercises proper control over our activities, and acts in the best interest of the organisation and its tenants and service users

All Board members have job descriptions and a member's handbook ([22](#)) which clearly outlines their roles and responsibilities. There are committees for HR and Scrutiny with appropriately skilled members analysing performance in detail and providing relevant feedback to main Board. All act within delegated authority. There is vigorous scrutiny of risk management within the committees and board via the association's risk map and all developing strategies undergo a thorough risk analysis. Terms of Reference and Standing Orders are reviewed annually. Tenants are engaged and views heard at Ivor Choice Club meetings with feedback from meetings considered by Board members via the Independent Tenant Representative and board meeting decisions shared with tenants via DVD. ([6](#)). All Board members work to the highest ethical standards with clear, explicit and publicly stated values. They adhere to the association's and CHC's Board members Code of Conduct. ([23](#)) The organisational risks are aligned with the Welsh Government sector risks.

3.3 We are independent from other bodies and operate in line with an appropriate constitution

We adhere to our rules, based on NHF rules, which form our constitution. We are independent, but work in partnership with many other bodies including other RSL's, Local Authority Housing strategy and commissioners, ([25](#)) domiciliary support providers ([16](#)) ([17](#)) ([28](#)), Community Housing Cymru (CHC), military charities such as RBL, SSAFA, Local Armed Forces Community Covenant teams and Welsh Government. The Governance audit provided a reasonable assurance that Board members operate in line with our constitution. ([65](#))

3.4 The whole organisation is aligned to delivery of its purpose and has the capacity, skills and tools to deliver successfully.

Board plan the strategic aims and vision of the association at Board strategy days which feed into staff objectives. Performance against strategic objectives is monitored by Board with monitoring of operational objectives undertaken at line management and Scrutiny committee. They review performance on four critical areas of the business reported in the balanced scorecard. ([10](#)) achievement against business plan objectives, internal and external audit and continuous improvement are monitored by this committee ([29](#)). Staff and Board capacity, skills and training are reviewed quarterly through balanced scorecard and annual appraisal of Board and staff ensures a fully skilled composition of members. The association has generous budgets for both Board and staff training and internal audits are undertaken on the management of personnel within the

business. The Board are actively engaged in self-evaluation to ensure the business has the skills to deliver and meet its outcomes and regularly scrutinise the continuous improvement plan (29) to monitor progress on service improvements for our tenants. Board set out the principles and agree the associations delivery via self-evaluation of one delivery outcome at each Board meeting.

3.5 We achieve value for money in delivery and procurement, to make best use of our own and public resources-

Procurement of maintenance and development is achieved through partnering, tendering or negotiation of costs. (31) We have valuable long term relationships with specialist contractors which is none the less market tested. Through maximising use of internal IT resource we reduce the need for external systems and consultants and optimise staff efficiency. We record and report on Value for Money and Community Benefit, recording community benefit for all contracts > £25,000. VFM and CB are collated and reported annually to Scrutiny Committee (29). We have developed our VFM strategy to cover more than repairs and maintenance contracts which encompasses a business decision model for property purchases, review of our asset management strategy, utilisation of in house skills to reduce need for staff cover, challenges to VAT charges and innovation in our approach to tenant participation. VFM is scrutinised by Board.

3.6 Our planning, self-assessment and performance management supports delivery of our purpose, and ensures we continually improve

We have robust performance management systems intrinsically linked to the association's strategic objectives to ensure delivery and continuous improvement. We have developed our tenant and stakeholder engagement including face-face satisfaction meetings with new tenants (27), domiciliary care agency events (19) and a holistic approach to self-evaluation involving Board and senior staff. IIP Gold re-accreditation in 2015 affirms the association's culture of continuous improvement.

The association is taking forward diversification in order to mitigate risk arising from a single client group, looking at a pan-disability approach and widening our mission to cite vulnerable people as our client group. Work is underway delivering supported accommodation for ex-forces personnel, currently delivered in partnership with a partner care provider Alabare. Success in achieving MOD Veterans Accommodation Fund grant monies will enable us to deliver accommodation in Wrexham, Flintshire and Ceredigion plus self-build flats complex in Wrexham whilst the grant will help manage our gearing levels. This accommodation will assist ex-forces personnel make the transition from military life or homelessness back into civilian life, using a specialised Veterans Accommodation and Support Pathway to help them overcome issues such as mental health, addictions etc. The self-build model will also provide training opportunities, vocational qualifications, greater employment opportunities and a secure home.

3.7 Our culture supports the delivery of our purpose and outcomes, innovates, seeks new ideas and evaluates learning from others

By attending networking events relevant to the sector and our client groups we identify good practice and embrace shared learning from others (32) including benchmarking and joint RSL tenant consultation, ensuring learning and development is brought back to the business. FCHA is a learning organisation which enables its staff to deliver the highest levels of customer service through its continuous investment in staff. Staff are developed through training, coaching and mentoring to ensure a skilled workforce and up to date knowledge. All training is measured for effectiveness and value to the association and reported quarterly as part of the balanced scorecard. Staff are encouraged in their personal and professional development by identifying relevant qualifications which are subsidised by the association where appropriate. We respond innovatively to accommodation needs identified by Local Authority commissioners by including self-contained units within dwellings which is a departure to the core business of providing shared, supported living accommodation. The association has developed innovative solutions to involve tenants with learning disabilities in the business of First Choice. (35) We demonstrate innovation through the production of bespoke services for our unique client group as illustrated in the Single Equality Scheme and Local Tenant Participation Strategy which take into account the

specific needs of our tenants which are often very different to the requirements of 'general needs' housing association tenants.



The business has strong, lean leadership from a skilled, professional focused Board and Directorate. Our back to basics approach has improved culture and service delivery resulting in significant business growth.

4.0 WE ARE A FINANCIALLY SOUND AND VIABLE BUSINESS

4.1 We are adequately resourced to meet current and future business and financial commitments

We meet business and financial commitments by scrutiny of financial resourcing by staff and the Board. This is evidenced by Management Accounts which demonstrate the current and projected financial position for the year (36). Our 30 year financial plan demonstrates long term viability, sustainable development and ongoing achievement of funder's covenants and achievable funding levels (36). FCHA's current private finance facility will fund the development programme until March 2017, a new loan facility will be arranged prior to this date to continue to fund the programme beyond 2017. The association meets funders' covenants to ensure compliance with loan agreements (36). Designated Reserve provision levels ensure sufficient funds are in place for the lifetime maintenance of our stock. A robust scheme appraisal process ensures adequate resources to meet the association's financial commitments (34). Staffing levels are reviewed annually and appointments approved by Human Resources Committee. Financial risks pertaining to development are managed by our Business Decision Model plus individual scheme risk appraisal and financial risks feature prominently in our Risk Map, ensuring that they are effectively identified and managed.

4.2 We have a robust financial management framework

The Quarterly Management accounts and variances in cash flow against budget provide board with FCHA's financial position and our 30 year financial model is detailed and evidences long term sustainability, whilst shaping the strategic direction of FCHA by scenario testing. (36) Frequent monitoring of our private finance facility ensures we meet the financial needs of the association and informs when a new facility is required. By meeting funders' covenants we demonstrate financial acuity and retain favourable margins. Adherence to a robust financial framework includes systems, controls, standing orders (37) treasury management (46) and policies to ensure sound financial control. The association's annual fraud risk review (38) minimise potential for fraud and resultant financial and reputational damage. Board are involved in multi- variance stress testing of business plans including impending welfare reform and in particular the proposed cap to LHA rates. In considering liabilities we stress test taking into account potential changes in interest rates. The Director of Finance & ICT is leading on the production of a new asset and liability register in line with the design of the Campbell Tickell example that WG have initially endorsed. Planning will start in August 16, which will involve input from every department, with the aim for the new register to be in place by December 2016, ahead of March 2017 when the WG regulation team are expecting to see the first registers. This will be scrutinised by Board at the annual strategy day and form part of future business planning.

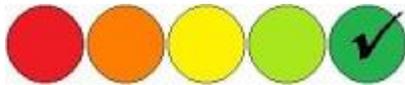
4.3 We can identify and appraise risks and prudently manage those risks

FCHA has a comprehensive approach to risk including a risk policy (39), cumulative risk register and quarterly scored risk map (38) which identifies critical risks to the business and ways in which we militate against those risks. All Board decision papers and development feasibilities have a risk

evaluation incorporated. The association reviews its risk appetite and is risk aware, recognising emerging risks and learning from materialised risks, ensuring mitigation. Board scrutinise business risks on a quarterly basis and on strategic planning days with detailed attention by Scrutiny committee. Board understand the environment within which they lead and there is a robust business planning and risk control framework in place to ensure long term viability. Board understand the implications of changes to rent policy and have undertaken sensitivity analysis on the future potential risks to the association. Board are closely monitoring the future impact of welfare reform and have mitigation strategies in place through our risk control measures.

4.4 Our activities demonstrate the highest standards of financial probity

The association's Standing orders are regularly reviewed and adherence to them is managed (37) to ensure division of duties and delineate responsibilities to ensure probity. The internal controls are regularly tested by an external audit firm that tests all areas over a revolving 3 year period. The audit firm produce a report of their findings to the executive management and Scrutiny Committee. The last review on the tailoring of services resulted in 1 routine and 3 important recommendations (41). We have developed a financial inclusion plan which provides regular information and training to enable tenants' to maximise their incomes.



This is one of our strengths with strong risk awareness and detailed robust financial modelling and management.

5.0 WE ENGAGE WITH OTHERS TO ENHANCE AND MAXIMISE OUTCOMES FOR OUR SERVICE USERS AND THE COMMUNITY

5.1 We engage with all relevant parties and organisations, embrace the principles of partnership, working to enhance our delivery

We work in partnership and engage with key stakeholders to enhance service delivery for our tenants through annual housing management reviews with domiciliary care agencies and local authorities (17)(28), development progress meetings with local authorities(25), biennial property inspections (1) and regular non-tenant stakeholder surveys (4). We engage through tenant participation events (18) co-production events (48), tenant satisfaction surveys (3) quality visits (43) (47)and development feedback forms (48). Tenants are involved in decision making via consultative groups/clubs to ensure they are at the heart of the decision making process.

Engagement (17)(28) is formally documented which includes actions taken to improve services as a result of this feedback. In the 2015 survey of Local Authority and Domiciliary Care Agency partners, 99% felt that the association deals with complaints from their organisation and tenants efficiently and appropriately. 100% satisfaction was reported in relation to First Choice's support to Local Authorities in the delivery of their strategic housing role to house vulnerable people.

First Choice has won a number of tenant participation awards in recent years including 'Communication in Housing' award for our Tenants' Voice newsletter; 'Active Inclusion' category for our work on Tenant Councils, 'Communication In Housing' award for our DVD 'Our Tenants' Lives'. The DVD promotes supported living and is a celebration of the independent lives that our tenants lead. Our tenants were able to draw on different experiences of their previous accommodation, which include family homes and residential settings and make comparisons to their First Choice home. The association has been awarded the TPAS Cymru award for the Tenants' Voice newsletter group in the 'Service User Involvement in Housing Related Support' category.

The bi-annual tenant satisfaction survey provided excellent results. 97% of our tenants felt FCHA listened to what they wanted. 95% felt their home was suitable for their physical needs and 94% of our tenants stating they thought First Choice was a good landlord. 98% were happy overall with the

services provided by the association, which was an increase of 2% from the previous year. Negative feedback related to specific concerns relating to maintenance and development. Individual concerns were dealt with and written responses provided, where applicable. We have further developed our engagement through face-face meetings with new tenants and hosting DCA events at support provider and LA offices. 98% of tenants in the 2015 Tenant Survey (3) were happy that there are enough ways for them to 'take part' in the activities of First Choice. We have enhanced engagement with WG through one-one meetings regarding scheme work submissions which has resulted in a clearer understanding from WG in the understanding of the specialisms of scheme design resulting in prompt scheme approval.

5.2 We work collaboratively, and form appropriate alliances to develop and deliver enhanced services, managing risks appropriately and protecting our housing assets

We work in collaboration with Learning Disability Wales and All Wales Parent and Carers Forum. The association has been actively involved in task and finish groups with CHC and Cymorth in relation to supported housing. The association has started a programme of talks at parent and carers meetings and special schools in order to increase awareness of housing options for people with a wide range of learning disabilities. In driving diversification into Veterans accommodation we attend relevant Armed Forces Community Covenant meetings and regional AFCC meetings, as well as attending key military events and 160(W) Brigade transition events. We partner with military charities to uphold the Military Covenant, and have been awarded the Silver Defence Recognition Employer award in 2016.

5.3 We have a strong relationship with local authorities in the geographical areas where we operate, that enable us to find effective solutions to local issues, and improve outcomes for communities. Our work supports the Local Authority in the delivery of its strategic housing role.

We maintain strong relationships with local authorities through regular meetings with Armed Forces Community Covenant groups, Commissioners and Housing Strategy officers (17) to ensure provision of accommodation in the local area for vulnerable people and assisting the local authority to meet their strategic housing aims. In conjunction with the local authority we meet with local residents, where necessary to allay concerns in relation to new developments. The association partners with the local authority to address breaches of tenancy or neighbour issues. In our recent Local Authority and Domiciliary Care Agency surveys, 100% satisfaction was reported in relation to the association supporting local authorities in the delivery of their strategic housing role to house vulnerable people. FCHA utilises effective tools to improve community relations such as mediation and links with local community police.



The positive results from our partnership and tenant surveys demonstrate improved relationships and satisfaction with our services.

6.0 LANDLORD SERVICES-HOW WE DELIVER EFFICIENT AND EFFECTIVE LANDLORD SERVICES

6.0 WE BUILD AND RENOVATE HOMES TO A GOOD QUALITY

6.1 We build good quality housing which is sustainable and meets the long-term needs of the area in which it is to be built and of existing and intended residents

Design, location, specification and layout of proposed developments are agreed with the relevant local authority commissioning team and are based on pen pictures of proposed tenants and occupational therapist reports. The future needs of tenants are considered at the design stage and built-in where possible. All newly constructed homes are built to WHQS, Code for Sustainable Homes Level 3 and Secure by Design and Lifetime Homes Standard. The association achieved full WHQS

compliance in 2012 and we ensure continuously meeting these standards through stock condition programmes and the implementation of a WHQS compliance policy in line with WG recommendations. (45) Board monitor expenditure on repairs and maintenance quarterly and challenge budgets variations for assurance. Risks are managed in relation to the long term sustainability of stock which may impact on future income streams and in 2015/16 have implemented a robust asset management strategy to support this.

A director independent of the development process undertakes face-face quality assurance meetings with new tenants to seek their views with the satisfaction with their new home ensuring we deliver all future homes to consistently high standards to meet tenant's needs. In the 2015 Tenant Survey (3) 95% of tenants were happy with their neighbourhood as a place to live.

As part of our business strategy for diversification the association has embarked on delivering a 'self-build project' in partnership with Wrexham CBC and the Community Self-Build Agency. This project will provide accommodation for 16 ex-service personal via individual self-contained flats. The development is part funded through a successful grant bid awarded by the MOD's Veterans accommodation fund.

6.2 Our proposals for new and renovated homes demonstrate financial viability and represent value for money now and in future. We consider risks and manage them to protect our core housing activity.

We utilise exit strategies for all new developments, which identify key risks at each stage allowing early exit to minimise abortive costs. A financial feasibility study is prepared at an early stage and rent breakdown details are provided to Housing Benefit departments to obtain in principle approval for the rent level. In addition, our Business Decision Model limits financial risk of new developments whereby the market value of any individual property must exceed 70% of net book value. The excess of the net book cost over the market value must not exceed £300k. Our development programme incorporates a number of refurbishment properties which offer optimum value for money and speedy delivery in comparison to new build, evidenced by historical scheme out turn costs. Board understand the risks associated within the development programme and use due diligence on all planned developments ensuring we do not breach covenants, utilise exit strategies where appropriate and mitigate against variances in the programme.



The implementation of quality assurance checks on tenant satisfaction with their new homes has demonstrated high levels of satisfaction. Implementation of our business decision model alongside robust feasibilities ensures long term financial viability and risk mitigation.

7.0 WE LET HOMES IN A FAIR, TRANSPARENT AND EFFECTIVE WAY

7.1 We manage our homes to ensure they are in demand, maintained, modernised and adapted as people's needs change. We ensure that our adapted homes are available to those who need them

Our homes are subject to maintenance inspections every two years & where present asbestos inspections undertaken annually, robust stock condition surveys and a comprehensive asset management strategy (44) These ensure that we have adequate resources to fund and implement major repair programmes which ensure our homes are maintained to a high quality. This is evidenced by the small number of void bed-spaces within our stock, low levels of property disposals and high level of tenant satisfaction with new homes. FCHA questions bi-annually if tenants' needs have changed through surveys and during the biennial maintenance inspections. This results in a high

demand for adaptations to meet our tenants changing needs which are met using Physical Adaptation Grant and the association's own funds. In the 2015 DCA Survey (14) 95% of our DCA partners confirmed that our properties are maintained to a standard that is safe and appropriate for our tenants.

7.2 We keep empty homes to a minimum to maximise the number of homes available and our revenue

We maintain our revenue through agreements with Local Authorities which state that void bed space rent is paid by them since they have 100% nomination rights. Empty bed spaces are filled by the Local Authority commissioner, due to the need to ensure compatibility with existing tenants. Empty properties only arise where decommissioned by the Local Authority, resulting in disposal and recycling of grant into alternative properties where applicable or where prospective tenants have not been nominated by the Local Authority. This would be given via a 6 month notice period. Whilst our properties are let by local authority partners we acknowledge we need to take responsibility to ensure we are proactive in ensuring that best use is made of our properties and as part of our continuous improvement plan have developed a proactive approach in working with local authorities in the management of void bed-spaces. This includes reviewing voids at LA meetings and reporting all void bed spaces to LA's on a quarterly basis. Information about void bed-spaces by LA areas is also published on the association's website.

7.3 We work with other organisations to prevent and alleviate homelessness

We ensure that access to our homes is fair and open, and we work with others to ensure routes into our housing are well publicised, easy to understand and simple to use. We give reasonable preference to those in greatest housing need or are homeless, maximising choice and sustaining communities. We address homelessness issues by working with local authorities to house in permanent or short term care/respite accommodation. We ask our local authority social services partners whether nominees are homeless or threatened with homelessness. However, feedback from local authority partners has suggested there is little joint working and information sharing between social services and homelessness departments about people with a learning disability who are in housing need. From 2015, First Choice has embarked on the provision of temporary shared accommodation for ex-services personnel with support needs. This has introduced the first 'managing agent' partnership between First Choice and Alabare Christian Care and Support who are responsible for selecting appropriate occupants, managing the residents and providing support. To qualify for such accommodation, the ex-services personnel will either be homeless/threatened with homelessness, have other support needs in relation to substance misuse or be inappropriately housed. We are up to date with changing legislation and aware that changes to housing benefit may impact on the future rent levels of supported housing projects.

7.4 We let homes we are proud of. Our ready to let homes meet resident expectations prior to moving in or as soon as practicable thereafter

FCHA homes are of a high standard as evidenced by development handover feedback from commissioners, tenants and domiciliary care providers. Robust site management prior to handover of a property ensures quality homes and compliance with our outline scheme specification. High tenant satisfaction in re-lets is recorded (10) and in 2015 satisfaction levels reached 99%, representing an increase of 2% from the previous year. All issues arising from re-let surveys are discussed with the maintenance team and actioned appropriately.



Working closely with local authority commissioners we provide and adapt long term bespoke homes to meet the current and future needs of vulnerable people who are in housing need.

8.0 WE MANAGE OUR HOMES EFFECTIVELY

8.1 We use the most secure form of tenancy compatible with the purpose of the housing

We issue assured tenancies (the exception is leased in and short-term care properties) in order to offer our tenants the most secure form of tenure. Licence agreements are issued to ex-services personnel who are occupying supported housing on a temporary basis.

8.2 We make clear the rights and duties of the tenant and landlord from the start of a tenancy, and act to uphold these rights and duties in a fair and responsible manner

Our Tenancy Agreement outlines the roles and responsibilities of the tenant and landlord (8). Our accessible tenant handbook (11) and DVD complements the tenancy agreement by outlining key areas of responsibility. In the 2015 Tenant Survey (3) 99% of tenants agreed that their Tenant Handbook, 'Your First Choice Home' DVD and Rights and Responsibilities workbook explains their rights and responsibilities as a First Choice tenant. 100% of DCA partners surveyed during 2015 (14) confirmed that we provided appropriate assistance to enable tenants to understand their occupancy rights and 100% of Domiciliary Care and Local Authority partners felt that the association effectively supports them to deal with breaches of tenancy such as Anti-Social Behaviour and harassment.

8.3 We know we are responsive to peoples individual housing support needs and help them to sustain their tenancies

We are responsive to physical housing needs by adapting homes to the needs of the tenant. Tenant profiling is undertaken following each Tenant Survey which ensures services are tailored to meet individual tenant needs. Results from our financial inclusion survey have informed ongoing financial advice to tenants which seek to improve the financial wellbeing of tenants.

8.4 Our rents are affordable to households on low incomes, take account of the costs of managing and maintaining our houses, and enable us to service borrowings.

Properties are bespoke and rents are calculated individually in order to deliver the maintenance, funding and servicing requirements within the property. We share detailed rent breakdown figures with Housing Benefit departments before development commences to gain in principal approval to ensure that rents are met in full by housing benefit departments, prior to occupancy. Rent calculations take into account the anticipated average mortgage interest rate over the period of the loan so that we can service borrowings. We aim to maximise tenant income by providing information and training in relation to eligible service charges to DCA staff to enable a number of intensive housing management services to be paid for by housing benefit.

8.5 We set, apportion and collect rents and service charges in a clear, fair and accountable manner, giving a say on the nature and quality of services we provide which are not covered by rent.

We have variable service charges and maintain records outlining spend against projected spend and vary charges as appropriate in accordance with good practice and legislation. Annual service charge statements are issued to every tenant (33) to ensure accountability and transparency. We follow WG guidelines in rent changes and in accordance with our legal obligations advise all tenants in writing of any changes to their annual rent in an accessible format.

8.6 We support tenants to prevent arrears of rent and service charges arising and act quickly to avoid arrears building up. We recover any arrears fairly and effectively whilst helping tenants to meet their due payments.

We adhere to a transparent arrears policy (30) working with tenants to address arrears at an early stage to prevent high arrears. We negotiate affordable payment plans for tenants with arrears to

maintain their tenancy and assure rent recovery. FCHA has never sought possession for rent arrears nor suffered substantial levels of bad debt.

8.7 Communities where our properties are located are attractive, well maintained, safe places to live, where people want to settle and stay and provide a good quality of life for our tenants and their neighbours.

Our properties are safe, secure and well-maintained with newly built properties meeting secure by design standard. We communicate with residents to discuss concerns and answer questions about future use of our properties and the nature of our tenants in conjunction with our local authority partners. We have developed a Community Involvement Strategy(15) and consulted with tenants across a wide geographical area in relation to the strategy and our community involvement priorities (6). The 2015 Tenant Survey (3) demonstrated that 95% of tenants are happy with their neighbourhood as a place to live.



First Choice feels that the management of our home is one of our strongest outcomes as we have robust mechanisms to help tenants understand their tenancy rights and responsibilities and report consistently low levels of rent arrears.

9.0 WE REPAIR AND MAINTAIN HOMES IN AN EFFICIENT, TIMELY AND COST EFFECTIVE WAY

9.1 We have deliverable and affordable plans for the lifetime maintenance and improvement of our houses

Stock condition surveys are conducted every 5 years, supplemented by biennial inspections to identify required improvements by component. These are costed within the association's 30 year financial plan and provided for within designated reserves, both of which ensure deliverability. First Choice met WHQS in December 2012(including acceptable fails). During the stock condition survey a WHQS compliance check is undertaken to ensure the association's ongoing commitment to maintaining and improving upon these standards.

9.2 We deliver maintenance programmes efficiently and effectively

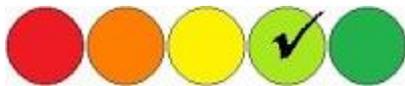
Planned preventative maintenance programmes are developed from the 60 year stock condition survey which drives effective and efficient maintenance. Component life cycles are reviewed and challenged during the biennial property inspection to prevent premature repairs and extend component lives. Value for money is achieved through the use of local contractors and the grouping of major repairs to provide economies of scale through area based contracts. By procuring the supply chain additional quality and cost savings are achieved, this method provides the additional benefit of continual product improvement direct from the manufacturers and the access to improved manufacturer guarantees.

The association engage and consult tenants on larger major repair programmes i.e. kitchen replacements and new developments. To maximise tenants' choice they are consulted on choice of tile colour, kitchen unit colour, worktop selection, handles, floor covering type and wall colour. The association has a range of components tenants can select for their new home via post and our web-site in relation to component selection. We ensure continuous engagement with our tenants in the maintenance of their homes through biennial visits, pre and post inspections and tenant surveys. In the 2015 Tenant Survey (3) when asked to reflect on repairs in their home, with the exception of 2 questions, all maintenance-related questions received satisfaction levels of above 95% in relation to a number of areas which include the quality of work, being kept informed where delays occur and the attitude of workers. The association has developed a reactive repairs appointment system which

provides a repairs service that is carried out at the convenience of tenants. All appointments are monitored on a daily basis with follow up works being reappointed and feedback acted upon.

9.3 We provide an efficient and effective responsive repairs service which meets the requirements of our tenants

The association has 100% attendance on all emergency repairs within 24 hours and we have increased the standards of our service delivery by the introduction of a reactive repair appointment system. Emergency repairs continue to have a target time of 24 hours, all other reactive works are completed at the tenant's convenience and the association is committed to achieve an average 7 working day target to complete these works. Appointments are made by the customer services advisors, ensuring the convenience of the tenants. All properties where appointments have been scheduled receive a monitoring call the next working day to ensure the appointment has been kept, if the repair was completed during the first call, and if not a new appointment can be made with the contractor. During this call the association will seek information on how satisfied the tenant is with the work, the contractor and with First Choice. During the appointments systems first year we received feedback on 69% of appointments, from this 100% were happy with the way they had reported the repair with First Choice, 98% appointments were kept with 99% being happy with the repair, 95% of repairs were fixed during the first visit.



We invest heavily in planned preventative maintenance of our tenant's homes with high WHQS compliance. We aim to improve on good tenant satisfaction with our maintenance service by acting on feedback from tenants and other stakeholders through enhanced systems, communication and processes.

10.0 WE PROVIDE FAIR AND EFFICIENT SERVICES FOR OWNERS

10.1 We sell houses fairly and efficiently through right to buy/acquire schemes

We do not offer the right to buy or acquire on any FCHA properties as this would not be appropriate in shared supported housing.

10.2 We provide fair, efficient and effective services to leasehold and shared ownership owners

FCHA does not offer shared ownership or leasehold. The Association has extensively explored share ownership options for people with learning disabilities but decided the business model was not financially viable for either the Association or prospective shared owners.

No judgement applicable.