

Welsh Housing Quality Standard Compliance Policy



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1. Policy statement

- 1.1 Hafod is committed to providing a high standard of accommodation and achieving and maintaining the Welsh Housing Quality Standard (WHQS) across our housing stock through a pragmatic and financially prudent approach
- 1.2 We will use a range of approaches to ensure we have up to date information on our properties. This will be used to establish compliance with WHQS and the resources required to maintain this standard
- 1.3 There will be occasions where some properties are unable to achieve all aspects of the standard. In most cases, this will be due to timing of the work, and this will be addressed in future planned works
- 1.4 Where properties cannot be brought up to WHQS for other reasons, such as residents' choice or physical constraints, we will continually review the position and ensure we regularly communicate with customers
- 1.5 On occasions where properties fail to meet WHQS without completing significant remodelling or structural alterations, an option appraisal will be undertaken to consider the most appropriate next steps
- 1.6 In implementing this policy, we will ensure a clear focus on value for money in the way we deliver and procure work to improve our homes.

2. Purpose

- 2.1 The aim of this policy is to make Hafod's interpretation of the standard clear to all tenants and stakeholders. It also ensures Hafod meets Welsh Government requirements to have a policy setting out how we will comply with WHQS
- 2.2 This Policy clarifies Hafod's approach to the following:
 - Interpretation of WHQS
 - Interpretation and recording of 'Conditional Passes' and 'Temporary Fails'
 - Elements not measured in the WHQS Standard

- 2.2
- Data collection
 - Data storage
 - WHQS progress and reporting
 - Customer engagement
 - Independent verification
 - Compliance statements for new tenants
 - Target Energy Pathways Narrative
 - Summarised annual financial investment in the stock
 - Link to WG statistical return
 - Interpretation and recording of community benefits

3. Scope

- 3.1 This Policy applies to all domesticated properties in Hafod's portfolio.
- 3.2 It does not apply to offices; commercial units; community halls; LCHO's, garages or domestic properties we have previously sold

4. Responsibilities

- 4.1 It is the responsibility of the Board to ensure the implementation of this policy and that this is monitored effectively
- 4.2 The Chief Executive is responsible for appointing responsible people to deliver the policy and ensure that adequate resources are in place
- 4.3 The Assistant Director of Assets is responsible for ensuring compliance with this policy and the Head of Asset Management for managing compliance on an operational basis
- 4.4 Every Asset Management, Maintenance and Housing Management colleague has the responsibility to read, understand and implement this policy and ensure value for money
- 4.5 All contractors, consultants and partner organisations are responsible for operating in accordance with this policy when delivering services on behalf of Hafod

5. Interpretation of the WHQS

5.1 To clarify our approach we will apply the following principles

5.2 We will:

- Monitor decisions and guidance issued by Welsh Government that will impact upon our interpretation and maintenance of the Welsh Housing Quality Standards, acting upon such changes as is reasonable and practicable to do so within the resources of the approved Business Plan
- Include WHQS compliance within the Asset Management Strategy and delegate to the Assistant Director of Assets the responsibility for overseeing the strategy and its delivery
- Maintain up to date stock condition surveys and the associated database Life Span which informs an annually reviewed 30-year Business Plan and planned maintenance programme
- Maintain an annual work programme in line with the resources available in our Business Plan and budget, which targets investment to meet legal obligations, maintain WHQS and sustain the financial viability and social purpose of the portfolio, with a clear focus on achieving value for money
- Comply with all elements of WHQS where it is reasonable and practical to do so. Where it is not possible to achieve this, we will record a “Conditional Pass”, “Temporary Fail” and “Not Applicable”
- Comply with legal repair obligations and keep components in repair and free from category 1 hazards as defined by the Housing Health & Safety Rating System (HHSRS)
- Take a reasonable and pragmatic approach to the interpretation of WHQS when arriving at cost estimates for the 30-year financial forecast
- Replace components at the end of their useful and/or component life
- Take the opportunity to upgrade components to meet primary elements of WHQS when components are replaced at the end of their useful and/or component life span, where it is reasonable and practicable to do so

- Replace components at the end of their useful and/or economic life span using a just in time policy to maximise and, wherever possible, extend the useful life of existing components. When the application of our just in time policy results in a component falling short of WHQS but not causing a Category 1 hazard; we will record a “Temporary Fail” for that specific element and/or component to be programmed within 5 years
- Use the standard WHQS assessment check lists and guidance issued by Welsh Government when assessing compliance
- Record WHQS compliance using LifeSpan for monitoring and reporting
- Record components that do not meet WHQS from a detailed technical design guidance perspective, but do not cause a category 1 hazard under the Housing Health and Safety Rating System as acceptable and pass the standard
- Incorporate sufficient storage into internal improvement designs where it is reasonable and practical to do so and maintain existing external storage areas where they form part of the originally constructed building
- Record adapted bathrooms which do not have a shower over bath, but which have other bathing facilities designed to meet the tenant’s needs, as a pass
- Assess the needs of the individual tenants and adapt our approach accordingly
- Organise installation of a smart meter at all change of tenancies (excludes mutual exchange)
- Will make sure that at change of tenancy all habitable rooms (bedrooms and living rooms), staircases and landings will have suitable floor coverings. New floor coverings will be “gifted” to the tenant (excluding kitchen and bathroom) to remove ongoing maintenance obligations
- Consider works to minimise the exposure to noise in customers homes following professional judgement using HHSRS

5.2.1 Hafod will not:

- Replace components that do not comply with WHQS, and are not causing a Category 1 hazard, until they reach the end of their useful life
- Maintain, repair or replace customers own fixtures, fittings and building components, e.g. customers own kitchens, bathrooms, fixed floor coverings, internal doors, garden sheds, outbuildings, or any other garden structures
- Provide water butts to flats
- Provide water butts to houses, unless it becomes void and is practical to install
- Undertake works to minimise exposure to noise if it is “cost prohibitive”

5.2.2 Hafod may:

- Consider other solutions and approaches not listed to comply as far as is reasonable & practical to meet WHQS or the spirit of WHQS, when there is a business case to do so, and the solution can be delivered within the budgets set within the approved Business Plan
- Bring forward the replacement of components as part of planned programmes that may result in replacement of components prior to the end of their useful and/or economic life span, where there is a business case to do so
- Bring forward the replacement of components to align component replacements with the provision of aids and adaptations to meet an identified and assessed customer need.
- Remove customers own alterations and/or additions that cause a Category 1 Hazard or a breach of legislation or a health and safety risk to the customer or any other resident.
- Provide external storage as part of a disabled adaptation
- Remove storage additions to the originally constructed building at the end of their useful and/or economic life spans and not replace them

6. Interpretation and recording of conditional passes and temporary fails

6.1 We will interpret guidance relating to “Conditional Passes” and “Temporary Fails” (as defined by Welsh Government) as follows:

6.1.1 Any outstanding works required to convert a “Temporary Fail” will be undertaken prior to re-letting, if property becomes empty

6.1.2 “Conditional Pass” is only suitable for individual elements and not for the home as a whole. It may only be used in one or a combination of “Physical Constraint”, “Heritage / Conservation constraint”, “Cost Prohibition and “Balancing Carbon Emissions”

6.2 Customer choice

6.2.1 Hafod will:

- Allow customers to choose not to have work carried out unless this would result in a Category 1 Hazard, or a breach of any other legal obligation or duty of care relevant to the health, safety and wellbeing of the customer, other residents in the home or neighbours
- Record customer choice/refusal as a “Temporary Fail” and provide evidence in LifeSpan of the customer’s choice/refusal.
- Record an Acceptable Fail for customers own alterations, additions, fixtures and or fitting that cause non-compliance with WHQS, but do not cause a Category 1 hazard
- Record a pass where a shower without a bath is acceptable where agreed with the tenant e.g. disabled accommodation

6.3 Physical constraint

6.3.1 Hafod will:

Record a “Conditional Pass” for physical constraint in the following circumstances:

- Where any part of a building is too small to accommodate works to remedy non-compliance with WHQS, and the reason for the “Conditional Pass” does not cause a Category 1 hazard

6.3.1 • Where there may be physical constraints. It is not possible to list all circumstances where there may be physical constraints. However, some common examples are:

- Adequate space for kitchen appliances
 - Adequate and convenient cupboard storage
 - A shower as well as a bath
 - 10m² of level area directly accessible from the home
 - Facilities for washing, drying and airing clothes
 - Adequacy of internal and external storage
 - Special cultural needs of customers and visitors
- Identification of a Physical Constraint will require supporting evidence on LifeSpan – comments for reasons, plans or dimensions to support constraint and photographs

6.3.2 Hafod will not:

- Routinely extend, either internally or externally any buildings or gardens, neither will we rebuild in part or in whole homes or garden structures to meet WHQS unless failure to do so would cause a Category 1 hazard. Instead, we will carry out an option appraisal for that property and/or property type to determine appropriate action
- Extend existing gardens or provide new gardens to meet WHQS
- Change the topography of land, communal areas and gardens to meet WHQS

6.4 Programmed works

6.4.1 Hafod will:

- Apply a Just in Time policy of elemental component replacement. This means that although elements may fail current WHQS standards, they will be deemed as a “Temporary Fail” due to timing of remedy where they have not;
 - Reached the end of their lifecycle, or;
 - Fallen into contractual or statutory disrepair, or;
 - Caused a Category 1 Hazard
- Manage such replacements through a rolling planned programme of major works within future planned works

- Identification of a programmed works will require supporting evidence on Lifespan – comments on the condition of the component and photographs

6.4.2 Hafod will not:

- Replace components before the end of their useful and/or economic life to comply with WHQS if they are not causing a Category 1 Hazard and/or not in statutory disrepair. Instead, we will record these as a “Temporary Fail” for Timing of Remedy and then replace these items within five years

6.4.3 Hafod may:

- Replace components which are not at the end of their life but where there are compelling value for money or logistical reasons to deliver works within one contracted work package, e.g. where we are replacing a kitchen and combi boiler when a property is empty with associated works, and it may be more cost effective to include other replacements even though they may not be at the end of their lifecycle

6.5 **Cost prohibition**

6.5.1 Hafod will:

- Use evidence to assess social and economic factors before investing in assets
- Adopt a methodical approach to decide on investment and potential options where assets or asset groups are not performing well financially, as defined in our Asset Management Strategy
- Identification of “Cost Prohibition” will require supporting evidence on LifeSpan– comments for reason, estimated costs and photographs

6.6 **Heritage / conservation constraint**

6.6.1 “Conditional Pass” for heritage/conservation constraints can be used for certain elements but not for the home as a whole. These “Conditional Passes” are unlikely to change throughout the duration of the WHQS standards. Although they will be reviewed periodically to ensure they are still accurate

6.6.2 There are specific improvements that are required to achieve Part 3 of the standard (homes must be affordable to heat and have minimal environmental impact). However, due to a considerable amount of Hafod homes being heritage type properties, it is not always possible to undertake these works, e.g. external wall insulation and solar panels. The relevant element of Part 3 will then be classed as a “Conditional Pass”

7. Elements not measured in the WHQS Standard

7.1 There are certain elements of the WHQS that are not formally measured

7.2 Target energy pathways

7.2.1 PAS2035 Whole House Assessments will be undertaken by a mixture of external and internal retrofit surveyors

7.2.2 All Hafod archetypes will have several PAS2035 Whole House Assessments which will then allow an intelligent cloning exercise to be undertaken

7.2.3 These surveys will then produce the “Target Energy Pathway” for all homes in order to develop a future programme of works towards the targets set out to achieve the relevant Standard Assessment Procedure (SAP) and Environmental Impact Rating (EIR)

7.2.4 The “Target Energy Pathway” will be produced via our LifeSpan asset management database

7.3 Homes should suit the specific requirements of the household

7.3.1 Hafod will consider the specific cultural needs of our customers, such as their family structure, religious practices and the homes internal layout, security and external spaces

7.3.2 Prior to any component replacements, major refurbishments or environmental improvements, we will assess the individual customer to determine if there are any reasonable adjustments to suit any specific requirements. Particular attention will be given to the design of kitchens to allow for consideration of high-volume storage and bathrooms for different bathing rituals

7.4 Disabled and older persons housing requirements

7.4.1 Lifetime Homes and higher accessibility requirements and standards will always be considered during any refurbishments or component replacements. These considerations will be underpinned by Hafod’s Physical Adaptation Grant Procedure

7.4.2 Kitchen and bathroom component replacements will be designed to comply with the RNIB - Visibly Better - designing accessible housing and buildings

7.4.3 Consideration of disabled and older persons requirements will be undertaken when allocating new homes

7.4.4 Hafod will endeavour to ensure that disabled people and older people are provided with comfortable housing that will safeguard and promote their wellbeing and ability to live independently

7.5 **Attractive outside spaces**

7.5.1 Any new development undertaken by Hafod will be given the provision of informal areas for members of the community, particularly children and young people. Including the use of areas for outdoor exercise, benches to enjoy fresh air etc.

7.5.3 Existing outside areas are monitored by Estate Inspections to ensure regular maintenance is undertaken and to provide the necessary environmental programmes

7.5.4 Liaise with the Local Authority and other agencies to ensure there are adequate street lighting, play areas and footpaths

7.6 **Biodiversity**

7.6.1 Any new development undertaken by Hafod will have biodiversity opportunities incorporated into the design

7.6.2 Biodiversity opportunities on Hafod's existing grounds and open spaces will be led by the Estates Manager which will be discussed.

8. Component life expectancy

8.1 Hafod's component life expectancies are identified in the table below, in line with WHQS core lifecycles. We have applied financial depreciation accordingly

Item	Years
Roofs	15-60
Doors	30
Communal entrance doors	15
Door entry systems	10
Windows	30
Passenger and fire lifts	25
Bathroom replacements	26
Communal boilers	15
Boilers	15
Central heating systems (excluding boilers)	25
Electric space and water heating e.g. hot water tanks, storage heaters	15
Kitchen	16

9. Data storage

9.1 Hafod will:

- Use LifeSpan, a specialist asset management IT system to store and maintain our asset register, stock condition information, stock attributes, duty or care compliance and WHQS compliance
- Comply with prevailing corporate ICT and data policies
- Review and if required update the WHQS approach annually including any data process maps
- Use LifeSpan to store all the PAS2035 whole stock assessments that produces the Target Energy Pathway to all homes via a cloning method of archetypes

10. WHQS progress and reporting

10.1 Hafod will:

- Report WHQS compliance to the Executive Team and Board at a frequency specified within the KPI Framework and Board schedules
- Report WHQS compliance to Welsh Government as required
- Report WHQS compliance to customers annually
- Report WHQS compliance to new customers at each new letting by issuing them with a WHQS compliance statement. This will support the EPC certificate that the new customer already receives. The statement will include elements of the standard that have not been met with targets of when they will be met

11. Independent verification

11.1 Hafod will:

- Independently verify compliance with WHQS and the accuracy of our data using an independent party every two years
- Review annually the effectiveness of policies and procedures relevant to WHQS compliance and the reporting arrangements to customers and Welsh Government
- Undertake our annual quality assurance checks on the accuracy of data
- Undertake quarterly data quality checks on stock condition surveys including WHQS validation

12. Customer engagement

12.1 Hafod will:

Utilise the customer engagement and communication group:

- To monitor and make decisions on the implementation of the Welsh Housing Quality Standards.
- Consult with customers via satisfaction, results of surveys and external audits to inform the process of the standard

13. Welsh Government statistical return

13.1 Hafod will:

- Produce the WG statistical return setting out our compliance against the WHQS standard directly from our Asset Management IT System
- Carry out an annual audit of the data supporting the return
- Review and update our works programmes annually
- Review our 30-year Business Plan annually
- Include statistics on all properties subject to Welsh Government Rent Policy
- SAP data return will also include intermediate rent properties (whilst verification of reportable properties are confirmed with WG)

14. Community benefits

- 14.1 Community benefits are positive outcomes for local people and communities including boosting employment and skills or providing community facilities



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