



Welsh Housing Quality Standard Compliance Policy



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1. Policy Statement

- 1.1 Cardiff Community Housing Association (CCHA) 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 once planned work is completed.
- 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 tenants.
- 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 CCHAs interpretation of the standard clear to all tenants and stakeholders. It also ensures CCHA meets Welsh Government requirements to have a policy setting out how we will comply with WHQS.
- 2.2 This Policy clarifies CCHA's approach to the following:
 - Interpretation of WHQS
 - Interpretation and recording of 'acceptable fails'
 - Data collection
 - Data storage
 - WHQS progress and reporting
 - Independent Verification
 - Part 6 standard – Located in attractive and safe environments
 - 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 domestic rented properties in CCHA's portfolio.
- 3.2 It does not apply to offices; commercial units; community halls; or 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 Corporate Director of Assets and Property 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 CCHA.

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 Corporate Director of Assets and Property the responsibility for overseeing the strategy and its delivery
 - Maintain up to date stock condition surveys and the associated database LifeSpan which informs an annually reviewed 30 year Business Plan and planned maintenance programme
 - Maintain a rolling 5 year 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 primary and secondary elements of WHQS where it is reasonable & practical to do so. Where it is not possible to achieve this we will record an Acceptable Fail.
- Comply with legal repairing 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
- Take the opportunity to upgrade components to meet secondary elements of WHQS when components are replaced at the end of their useful and/or component life, 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 an Acceptable Fail for 'Timing of Remedy' for that specific element and/or component
- 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
- Require tenants to remove their own garden sheds, outbuildings, or any other garden structures which cause a category 1 Hazard or any other health and/or safety risk
- Assess the needs of the individual tenants and adapt our approach accordingly

5.2.2 CCHA 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 tenants' own fixtures, fittings and building components, e.g. tenants own kitchens, bathrooms, fixed floor coverings, internal doors, garden sheds, outbuildings, or any other garden structures
- Provide external sheds to meet WHQS

5.2.3 CCHA 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 tenants' need, in line with Section 7.9 of the Repairs Policy.
- Remove tenants' own alterations and/or additions that cause a Category 1 Hazard or a breach of legislation or a health and safety risk to the tenants or any other resident. Such intervention will be in line with the Tenancy Agreement and the Recharge statement contained in Section 8 of the Repairs Policy.
- 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
- Require tenants to remove their own garden sheds, outbuildings, or any other garden structures which are not fit for purpose or approved

6. Interpretation and Recording of Acceptable Fails

6.1 We will interpret guidance relating to Acceptable Fails (as defined by Welsh Government) as follows:

6.2 Resident Choice (Tenant Refusal)

6.2.1 CCHA will:

- Allow tenants 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, the safety and wellbeing of the tenant, other residents in the home or neighbours
- Record tenant choice /refusal as an Acceptable Fail for Resident Choice and provide evidence in Lifespan of the tenants choice/refusal.
- Record an Acceptable Fail for tenants' own alterations, additions, fixtures and or fitting that cause non-compliance with WHQS, but do not cause a Category 1 Hazard
- Record an acceptable fail where a shower without a bath is acceptable where agreed with the tenant eg disabled accommodation.

6.3 Physical Constraint

6.3.1 CCHA will:

- Record an Acceptable Fail 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 a Acceptable Fail does not cause a category 1 hazard.
 - 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 tenants and visitors
- Identification of a Physical Constraint will require supporting evidence on Lifespan – comments for reasons, plans or dimensions to support constraint and photographs.
- Apply the following policies as necessary when determining Physical Constraint:
 - Repairs Policy
 - Fire Safety Policy
 - Rent Policy

6.3.2 CCHA 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.

6.3.3 CCHA may:

- Reduce the size of large gardens to make them more manageable for tenants. We may fence off section(s) within gardens to create safe areas so that parents and carers of children and vulnerable adults can take responsibility to proactively manage access to areas of gardens that may contain hazards for unsupervised children and/or vulnerable adults.

6.4 Timing of Remedy

6.4.1 CCHA 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 Acceptable 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
- Identification of a Timing of Remedy will require supporting evidence on Lifespan – comments on the condition of the component and photographs.

6.4.2 CCHA will not:

- Replace components before the end 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 Acceptable Fail for Timing of Remedy and then replace these items at the end of their useful and/or economic life in line with our just in time policy.

6.4.3 CCHA 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 of Remedy

6.5.1 CCHA 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 a Cost of Remedy will require supporting evidence on Lifespan – comments for reason, estimated costs and photographs.

7. Part 6 of the WHQS – Located in attractive and safe environments

7.1 *The Standard* – All dwellings should be located in an environment to which residents can relate and in which they can be proud to live.

7.2 CCHA will:

- Make all opportunities to make improvements to the immediate environment (within the property boundary) of individual dwellings and to the general environment.
- Consult with tenants and residents via tenant satisfaction, results of tenant surveys and external audits to inform the process of the standard.
- Undertake quarterly Estate Inspections to internal and external communal areas and provide the necessary environmental programmes
- Liaise with the Local Authority and other agencies to ensure there are adequate street lighting, car parking, play areas, roads and footpaths.
- Maintain and improve hard and soft landscaping to our estates.
- Continue to care and manage the Estates co-ordinated by the Estates Management Team.

8. Component Life Expectancy

8.1 CCHA’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	20
Bathroom replacements	25
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	15

9. Data Storage

9.1 CCHA 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
- Sense check data with Assets and Liabilities Register data

10. WHQS Progress & Reporting

10.1 CCHA will:

- Report WHQS compliance to the Corporate Leadership Team and Board at a frequency specified within the KPI Framework and Board schedules.
- Report WHQS compliance including Part 6 to Welsh Government as required
- Report WHQS compliance to tenants annually
- Report WHQS compliance to new tenants at each new letting by issuing them with a WHQS compliance certificate, (including an indicative future works programme regarding Acceptable Fails for their home) in addition to a current EPC

11. Independent Verification

11.1 CCHA will:

- Independently verify compliance with WHQS and the accuracy of our data using our externally procured Stock Condition Surveyors
- Review annually the effectiveness of policies and procedures relevant to WHQS compliance and the reporting arrangements to tenants and WG
- Carry our annual quality assurance checks on the accuracy of data.
- The Asset Manager will undertake monthly data quality checks on Stock Condition surveys including WHQS validation. The results will formally be recorded on iAuditor.

12. Summarised KPIs - Annual Investment in Stock

12.1 CCHA will:

- Report annually in the following format:

o Responsive repair costs	£ x	per property/pa
o Void repair costs	£ x	per property/pa

o Cyclical maintenance costs	£ x	per property/pa
o Planned Maintenance costs (not related to WHQS)	£ x	per property/pa
o WHQS works	£ x	per property/pa
o Other capital works	£ x	per property/pa
o Total	£ x	per property/pa
o Total expenditure (all stock)	£ x	

13. Welsh Government Statistical return

13.1 CCHA 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. Interpretation and Recording of Community Benefits

14.1 CCHA will:

- Use the “Value Wales Measurement tool”, to capture Community Benefits on contracts that exceed £1m. For contracts under £1m we will use our own monitoring tools.

15. References

Related External Documents	
Reference	
WHQS Guide for social landlords	https://gweddill.gov.wales/docs/desh/publications/141030-whqs-guide-for-social-landlords-en.pdf
Related Internal Documents	
Health & Safety Policy Electrical Policy Fire Safety Policy Legionella Policy Asbestos Policy Gas Safety Policy Repairs Policy Asset Management Strategy	

16. Document Control

Document Information	
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Document History			
Date	Version no.	Author	Description
April 2016	1.0	Development Director – Caroline Lewis	Policy approved by Board
July 2019	2.0	Corporate Director – Tenant Services – Stephen Evans	Policy reviewed and approval by Board.
May 2021	3.0	Head of Asset Management and Decarbonisation – Andrew Bradley	Policy reviewed including Part 6 statement. Approved by the Board in May 2021.
October 2021	3.1	Head of Asset Management and Decarbonisation – Andrew Bradley	Added Data quality checks by Asset Manager in Section 11.1. Amended to incorporate further evidence in relation to the

			classification of the different categories of acceptable fails.
January 2021	3.2	Head of Asset Management and Decarbonisation – Andrew Bradley	Amended Section 6 to incorporate specific evidence in relation to the different categories of acceptable fails.