

# WHQS Policy Statement

January 2023

## Welsh Housing Quality Standard (WHQS)

### Interpretation of WHQS

#### Tai Calon will:

- ✓ Monitor decisions and guidance issued by Welsh Government (WG) that will impact upon Tai Calon's 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 Director of Assets and Property responsibility for maintaining the strategy and its delivery.
- ✓ Maintain an up to date stock condition survey and database which informs an annually reviewed 30 year Business plan.
- ✓ 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.
- ✓ Comply with primary and secondary elements of WHQS where it is reasonable and practical to do so and there is financial provision within the approved Business Plan. Where it is not possible to achieve this we will record an Acceptable Fail/Qualified Pass as per the WG guidelines.
- ✓ 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 Business Plan.
- ✓ Replace components at the end of their useful and/or economic life span operating 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 Qualified Pass for Timing of Remedy for that specific element and/or component.
- ✓ When components are replaced at the end of their useful and/or economic life span, Tai Calon will take the opportunity to upgrade to meet primary and secondary elements of WHQS, where it is reasonable and practical to do so and there is financial provision within the approved Business Plan.
- ✓ Use the standard WHQS assessment check lists contained within the 2008 guidance or subsequent check lists issued by Welsh Government when assessing compliance.
- ✓ Report WHQS compliance using the most up-to-date format issued by Welsh Government.
- ✓ Record WHQS compliance for Primary, secondary and environmental elements in a specialist asset management IT system. This system will be used for monitoring and reporting. The system will include a full data audit trail and the business process and data will be subject to internal audit annually.
- ✓ Classify components as complying with WHQS with a Qualified Pass where they have not met elements of detailed technical design guidance but they do not cause a category 1 hazard under the Housing Health and Safety Rating System

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- ✓ 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
- ✓ Require Tenants to remove Tenants' own Garden Sheds, outbuildings, or any other garden structures which cause a category 1 Hazard or any other health and/or safety risk.

## **Tai Calon will not:**

- X Immediately replace components that don't comply with WHQS but are not causing a category 1 hazard and/or have not reached the end of their serviceable and/or economic life span and are otherwise in good condition.
- X Provide garden sheds.
- X Maintain, repair or replace, free of charge 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.

## **Tai Calon 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 which 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 tenant need in line with our Adaptations Policy.
- ? Remove Tenants' own alterations and/or additions that cause a category 1 Hazard or a breach of legislation or a H&S risk to the tenants or any other resident. Such intervention will be in line with the Tenants' Improvements Policy and the Recharges 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 Tenants' own Garden Sheds, outbuildings, or any other garden structures which are not fit for purpose or approved.
- ? Bring forward the replacement of components as part of planned programmes which 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.
- ? Consider other solutions and approaches not listed to comply as far as is reasonable and 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.

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## **Interpretation and Recording of Acceptable Fails (Qualified Pass)**

### **Tai Calon will:**

- ✓ Refer to an Acceptable Fail as a Qualified Pass when communicating WHQS compliance to tenants, residents and other third party organisations.
- ✓ Record a Pass for approved tenant's alterations that comply with WHQS.
- ✓ Apply the Welsh Government Acceptable Fails Case Study Guidance July 2019 v2

### **1. Qualified Pass - Resident Choice (Tenant Refusal)**

#### **Tai Calon will:**

- ✓ Permit 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 a Qualified Pass for Resident Choice
- ✓ Record a Qualified Pass for Tenants' own alterations, additions, fixtures and or fitting that cause non compliance with WHQS, but do not cause a category 1 hazard.

### **2. Qualified Pass - Physical Constraint**

#### **Tai Calon will:**

- ✓ Record a Qualified 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 a qualified pass does not cause a category 1 hazard.

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.
    - 10m<sup>2</sup> 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
- ✓ Apply the following policies when determining Physical Constraint:
  - Adaptations Policy
  - Fire Safety Policy
  - Rent Policy (bedroom sizes)

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## **Tai Calon will not:**

- X** 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 “options appraisal” for that property and/or property type to determine appropriate action.
- X** Extend existing gardens or provide new gardens to meet WHQS.
- X** Provide gardens where there is no garden.
- X** Change the topography of land including estates and gardens to meet WHQS.

## **Tai Calon may:**

- ? Reduce the size of large gardens included in a tenancy to make them more manageable for tenants. The removed sections of land will be pro actively managed by Tai Calon.
- ? 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.
- ? Use Tai Calon’s own empirical evidence and accident data to determine risks when carrying out HHSRS assessments.

### **3. Qualified Pass – Timing of Remedy**

#### **Tai Calon 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 a Qualified Pass (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

#### **Tai Calon will not:**

- X** Replace components before the end of their useful and/or economic life span 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 Qualified Pass 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.

#### **Tai Calon may:**

- ? Replace components which are not at the end of their life but where there are compelling Value for Money reasons to deliver works within one contracted work package. e.g. where we are proposing windows and EW1 with associated works it may be more cost effective to include a replacement roof due to the presence of scaffolding even though there may be a number of years life left in the lifecycle of the roof.

### **4. Qualified Pass – Cost of Remedy**

#### **Tai Calon will:**

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- ✓ Use an Asset Performance Evaluation tool and methodology to assist in determining investment thresholds.
- ✓ Adopt a methodical approach where assets or asset groups deviate from the prevailing average Net Present Value (NPV) across the entire stock.
- ✓ Categorise assets into Poor, Marginal & Good based on the following criteria:
  - **Poor** – Assets achieving less than £0 NPV will automatically trigger a data sense check and/or options appraisal
  - **Marginal** – Assets achieving less than £10,000 positive NPV may receive investment up to the values set out in the APE model before triggering an options appraisal
  - **Good** – Assets exceeding £10,000 positive NPV may receive investment up to 115% of the values set out in the APE model before triggering a review and if necessary an options appraisal

## **Data Collection**

### **Tai Calon will:**

- ✓ Utilise both Staff and Contractor resources for gathering stock condition information..
- ✓ Carry out an independent 10% sample stock condition survey at least every 5 years or more often to meet the conditions of our loan facility agreements.
- ✓ Carry out a rolling programme of stock conditions surveys to refresh our stock condition information for at least 20% of our stock every year. The 20% refresh will be based on a minimum industry standard 10% survey of each archetype. The results of the surveys will be used to clone and/or extrapolate information to refresh stock condition information for 20% of the stock. For the avoidance of doubt this means that a minimum of 120 homes will have a full survey each year. As this is a minimum standard this figure is likely to be exceeded every year.
- ✓ Adopt a risk based approach to the targeting stock condition surveys; surveys will be planned to ensure the most up-to-date stock information is available to manage the highest prevailing stock risks and that information is refreshed at least every 5 years.
- ✓ We will use cloning, and /or extrapolation when building our stock condition database.
- ✓ We will gather partial stock condition information when we carry out repairs, planned maintenance and major works programmes.
- ✓ We will gather as built SAP information whenever Major works are completed.
- ✓ We will capture stock condition data using either electronic or paper surveys.
- ✓ We will carry out sense checks and validation on new data to identify bad data before it is used to update our database.
- ✓ All data will be subject to our prevailing Corporate ICT policies.

## **Data Storage**

### **Tai Calon will:**

- ✓ Use 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 policies.

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- ✓ Review and if required update the WHQS Policy Statement annually including any data process maps.

## **WHQS Progress & Reporting**

### **Tai Calon will:**

- ✓ Report WHQS compliance to the Executive Team annually.
- ✓ Report WHQS compliance to Board annually
- ✓ Report WHQS compliance to Welsh Government as required by WG
- ✓ Report WHQS compliance to tenants annually.
- ✓ Report WHQS compliance to new tenants by issuing them with a WHQS compliance certificate, including an indicative future works programme regarding qualified passes for their home.

## **Independent Verification**

### **Tai Calon will:**

- ✓ Carry out an annual internal audit which will examine and test the effectiveness of policies and procedures relevant to stock condition information and WHQS compliance.
- ✓ Carry out an independent 10% sample stock condition survey at least every 5 years or more often to meet the conditions of our loan facility agreements. This will include validation of previous stock condition data already held in the stock condition data base. The independent consultant will compare the prevailing 5 Year Works Programme with the stock data and prepare a report identifying any gaps in the data that represent significant unmitigated risks and/or any unmitigated gaps in the Works Programme and 30 Business plans relevant to Tai Calon's WHQS Policy and WHQS compliance.

## **WHQS + Standard**

### **Tai Calon will:**

- ✓ Aim to achieve an energy efficiency rating of C for all stock and an average SAP (2005) of 75 for the housing portfolio where this is practicable and affordable within the bounds of our business plan, with a minimum SAP (2005) of 65 for all homes.

## **Safety Compliance**

Regulations and Codes of Practice that relate to our specific areas of business will receive the necessary attention to ensure that all aspects of the legislation and guidance are fully complied with, and this will be supported by developing relevant guidance / documentation. Specific hazards related to our work are:

- Asbestos
- Gas
- Electricity
- Fire Safety
- Legionella
- Working at Heights

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- Lone working
- Silica Dust
- Hand Arm Vibration (HAVS),
- Whole Body Vibration (WBV)
- Slips, trips and falls
- Manual handling operations
- Individuals with aggressive behaviour
- Individuals who require mental health support
- Working in restricted / confined spaces
- Control of Substances Hazardous to Health (COSHH)
- Biological agents

## **Summarised KPIs - Annual Investment in Stock**

### **Tai Calon will:**

- ✓ Report annually in the following format:
  - Responsive, void and cyclical repairs           £ x     per property/pa
  - WHQS works   £ x     per property/pa
  - Other capital works                                   £ x     per property/pa
  - Total   £ x     per property/pa
  - Total expenditure (all stock)                     £ x     xxxxxxxxxxxxxx

## **Welsh Government Statistical return**

### **Tai Calon will:**

- ✓ Produce the WG statistical return directly from our Asset Management IT System
- ✓ Carry out an annual internal audit of the data supporting the return.
- ✓ Review and update our works programmes annually
- ✓ Review our 30 year business plan annually

## **Interpretation and Recording of Community Benefits**

### **Tai Calon will:**

- ✓ Use the prevailing “Value Wales Measurement tool”, to capture Community Benefits