# Welsh Housing Quality Standards Policy

Creating better <u>Living Solutions</u> "Our policies embed our culture, expectations. They have been agreed by our Board(s) as best practice documents for the Group's decision making."

# **1. Policy Statement**

ateb is committed to offering a high standard of housing and achieving and maintaining the Welsh Housing Quality Standard (WHQS) across its stock.

This policy aims to clarify, for all contract holders and stakeholders, ateb groups interpretation of the Welsh Housing Quality standard (WHQS). Additionally, it ensures that ateb satisfies the Welsh Government's obligation to have a policy outlining our approach to WHQS compliance.

Approval Date	Lead Contact	Review Date
February 2025	Head of Property	February 2026



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# 2. Purpose

The purpose of this policy is to outline ateb groups approach to the implementation and delivery of the WHQS23.

# 3. Scope

This Policy applies to all social and intermediate rented properties in ateb groups portfolio. It does not apply to offices, commercial units, garages, storage facilities and low-cost home ownership schemes.

# 4. Responsibilities

- The Board is responsible for ensuring that the implementation of this policy is effectively monitored.
- The Chief Executive is responsible for ensuring sufficient resources are available to implement this policy.
- The Executive Director of Customer is responsible for ensuring compliance with this policy and the Head of Property for managing compliance at an operational level.
- All Property Services, Customer Services and Development Team colleagues have the responsibility to read, understand and implement this policy.
- All other stakeholders (e.g. contractors, consultants and partner organisations) are responsible for operating in accordance with this policy when delivering services on behalf of ateb.

# 5. Our Approach to WHQS

ateb will apply the following principles:

ateb will.

#### **New Homes**

- Develop new homes and communities to meet the new WHQS.
- Whenever possible acquire homes e.g. section 106, TACP, that meet the new WHQS.



#### **Existing Homes**

- Ensure properties are free from category 1 hazards, as defined by the Housing Health & Safety Rating System (HHSRS).
- Require contract holders who have made unauthorised alterations to their home which cause a category 1 hazard to carry out remedial works at their own expense to remove the identified hazard.
- Require contract holders 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.
- Remove contract holders' own alterations and/or additions that cause a category 1 hazard or a breach of legislation or a health and safety risk to the contract holders or any other resident. Such intervention will be in line with the Occupation Contract.
- Maintain a programme of works, utilising available resources in our Business Plan, targeting investment to meet legal obligations, achieving WHQS and uphold the portfolio's social purpose and financial sustainability.
- 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, extending the useful life of existing components where possible.

#### **New Measures**

- Organise installation of a smart meter at all change of occupancies (excluding mutual exchange).
- Will make sure that at end of contract / 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 safety flooring) to remove ongoing replacement and maintenance obligations.
- Organise installation of water butts at end of contract / tenancy (excluding mutual exchange and flats).
- Consider works to minimise the exposure to noise in contract holders' homes following professional judgement using HHSRS.
- Incorporate sufficient storage into internal improvement designs where it is reasonable and practical to so and maintain existing external storage areas.



- Install measures to improve water efficiency and alleviate water poverty when replacing fittings and fixed appliances.
- Identify homes that do not have adequate facilities for washing, drying and airing clothes and develop a program of improvement works.
- Issue WHQS compliance statement and certification with all new occupancy contracts (See Appendix 1).
- Carry out all Whole Stock Assessment and produce Target Energy Pathways for our homes by the 31<sup>st</sup> of March 2027.
- Develop a program of works to bring all homes up to a minimum of SAP 75 by the 31<sup>st</sup> of March 2030, delivery of works and timeframes will be subject to finances / funding being available.
- Develop a program of works to bring all homes up to a minimum SAP 92 within a reasonable timeframe, delivery of works and timeframes will be subject to finances / funding being available.
- Develop a program of works to minimise carbon emissions to a minimum EIR
  92, delivery of works and timeframes will be subject to finances / funding being available.

ateb will not:

#### New Homes

• Replace components that do not comply with WHQS when acquiring a home e.g. section 106, TACP, and are not causing a category 1 hazard, until they reach the end of their useful life.

#### **Existing Homes**

- 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 contract holders' own fixtures, fittings and building components, e.g. contract holders' own kitchens, bathrooms, fixed floor coverings, internal doors, garden sheds, outbuildings, or any other garden structures.

#### **New Measures**

• Undertake works to minimise exposure to noise if it is "cost prohibitive".



ateb may:

#### **Existing Homes**

- Consider other solutions and approaches 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 finances available 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 so.
- Bring forward the replacement of components to align component replacements with the provision of aids and adaptations to meet an identified and assessed contract holders' need.
- Consider disposal of properties where certain criteria are met subject to Board and Welsh Government section 9 approval.

# 6. Data Collection and Storage

ateb will:

#### Data Storage and Monitoring

- Use Lifespan, a specialist asset management system, to store and maintain our asset register, stock condition information, stock attributes and WHQS compliance.
- Use Propeller, a specialist landlord health and safety management system to store and maintain compliance data.
- 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.
- Carry out an independent audit of data held every 2 years. The outcome of the audit will inform the Data Improvement Plan.

#### **Data Collection**

- Update data held on completion of a stock condition survey, that will be completed a minimum of every 5 years or at each change of occupancy.
- Update data held on completion of a new Energy Performance Certificate which will be completed before at each change of occupancy.
- Update data held a minimum of quarterly where components have been replaced in the preceding quarter.



• Update data held following major refurbishment and/or completion of works associated with the Target Energy Pathway improvements.

#### Other

- Review and update works programmes annually.
- Review and update the Asset Management Plan annually.
- Review and update the 30-year Business Plan annually.

## 7. Customer Engagement

ateb will:

- Utilise the Customer Committee to monitor implementation of and make decisions on the implementation of this policy.
- Annually review this policy in consultation with customers.
- Gather from occupants' overall satisfaction with the quality of their home at the point let and when undertaking stock condition surveys.
- Publish this policy on our web site.

## 8. Independent Verification

ateb will:

• Independently verify compliance with this policy and the accuracy of our data using an independent party every two years.

## 9. WHQS Compliance & Progress Reporting

- Report WHQS compliance to new contract holders by issuing them with a WHQS compliance statement along with the Energy Performance Certificate. The statement will include an explanation of how ateb will aim to address elements of the standard that have not been met with targets of when they will be met, in line with this policy.
- Use the standard WHQS assessment check lists and guidance issued by Welsh Government when assessing compliance and assess elements as either,
  - Pass
  - Fail
  - Conditional Pass



- Temporary Fail
- Not applicable
- Report WHQS compliance at a frequency specified within the Performance Monitoring and Reporting Framework.
- Report WHQS compliance to Welsh Government as required.
- Report WHQS compliance to all contract holders and stakeholders a minimum of annually.

## **19b. Component Life Expectancy**

A summary of component life expectancies is listed in the table below and are in line with WHQS23 lifecycles. Components will be replaced to these life cycles unless assessed as in being in good condition.

Item	Years
Roofs	70
External Doors	25
Windows	25
Bathroom replacements	25
Kitchen replacements	15
Solar Panels	25
Boilers	15
Central Heating systems (excluding Boilers)	30
Electrical Wiring	30

# **19c. Welsh Government Statistical return**

ateb will:

• Produce the Welsh Government statistical return annually setting out our compliance against the WHQS standard using data directly from our Asset Management System.

#### **10. Elements Not Measured**

# **10a. Cultural and Religious Needs**

ateb will:

• Consider the cultural and/or religious needs of our contract holders prior to letting a home and any reasonable adjustments that may be required.



• Assess individual contract holder requirements prior to any component replacements, major refurbishments or environmental improvements, to determine if there are any reasonable adjustments required to meet cultural and/or religious requirements. Particular attention will be given to the design of kitchens to allow for additional food preparation areas and storage and bathrooms for bathing rituals where identified.

## **10b. Aids and Adaptations**

ateb will:

- Consider Welsh Government Lifetime Homes Standards during any major works, refurbishments or component replacements.
- Ensure all new homes meet the Welsh Government Lifetime Homes Standards.
- Install aids and adaptations where it is practical to do so in line with our Aids and Adaptations policy.
- Endeavour to ensure that we provide occupants with comfortable housing that will safeguard and promote their wellbeing and ability to live independently.

ateb will not:

• Adapt homes in some circumstances as detailed in our Aids and Adaptations policy and will alternatively explore other options with the occupants that promote their wellbeing and independence.

#### **10c. Outside Spaces**

- Continue to provide external lockable storage for occupants, that provides sufficient space for items such as garden equipment, and bicycles, pushchairs and mobility aids.
- Consult with occupants where new external lockable storage provision is made, on its design and location to ensure it reflects occupants' needs.
- Maintain existing shared space(s), including play and recreational areas, ensuring they are safe through a program of regular estate inspections.
- Work with and empower communities to develop plans to enhance shared spaces and maximise opportunities available for funding through the ateb Trust.



# **10d. Biodiversity**

ateb will:

- Create new and enhance existing habitats to support native flora and fauna.
- Increase awareness with customers, teams and stakeholders.
- Create partnerships with interested third parties to support our endeavours.
- Develop a plan to improve our approach to Biodiversity when building new homes and enhancing existing homes and communities.

# **10e. Broadband Connectivity**

ateb will:

- Undertake an exercise to understand the fixed broadband connectivity and usable 4G signal across our homes and estates.
- Use the results of this exercise to continue to work with Broadband installers to improve connectivity across our homes and estates.

# **11. Cost Prohibitive Activity**

#### **Cost prohibition**

ateb 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 Framework.
- When using the conditional pass cost prohibitive code, provide additional information including estimated costs and number of properties using these assessment codes and report annually.

#### Heritage / Conservation constraint

• A "Conditional Pass" for heritage/conservation constraints will be used for certain elements but not for the home. 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.



• 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 several ateb properties being heritage type properties, it is not always possible to undertake these works i.e. external wall insulation, solar panels. The relevant element of Part 3 will then be classed as a "Conditional Pass".

# **11b. Conditional Passes and Temporary Fails**

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

#### **Customer Choice**

ateb will:

- Allow contract holders 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 occupant, other occupants in the home or neighbours.
- Record occupant choice /refusal as a "Temporary Fail" for occupant choice and hold evidence on file of the contract holder's choice/refusal.
- Record an Acceptable Fail for contract holders' own alterations, additions, fixtures and or fittings 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 occupant e.g. adapted accommodation.

#### **Physical Constraint**

ateb 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.
- It is not possible to list all circumstances where there may be physical constraints. However, some common examples are:
  - Inadequate space for kitchen appliances.

- Inadequate space for storage.
- Inadequate space for a shower as well as a bath.
- No 10m2 of level area directly accessible from the home.
- Inadequate space for washing, drying and airing clothes.
- Inadequate space for external storage.

Identification of a Physical Constraint will require supporting evidence, comments for reasons, plans or dimensions to support constraint, and photographs.

ateb will not:

- Routinely extend, either internally or externally any buildings or gardens to achieve compliance.
- 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.
- Change the topography of land, communal areas and gardens to meet WHQS.

ateb may:

- Reduce the size of large gardens to make them more manageable for contract holders.
- 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.

#### **Programmed works**

- Where existing elements may fail **new** 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 the implementation of new elements of the standard through a rolling planned programme of works.



• Carry out works required to address a "Temporary Fail" prior to re-letting, if property becomes void.

ateb will not:

 Replace components before the end their useful and/or economic life to comply with new 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 at the end of their useful and/or economic life.

ateb may:

• Replace components which are not at the end of their life but where there is compelling value for money or logistical reason 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.

## **12. Target Energy Pathways**

- Complete using a combination of external and internal retro fit surveyors PAS2035 Whole Home Assessments on all homes.
- Use the data from the Whole Home Assessment to produce a Target Energy Pathway (TEP) for all homes and develop a future programme of works towards the targets set out to achieve the relevant Standard Assessment Procedure (SAP) and Environmental Impact Rating (EIR).
- Use our Lifespan asset management database to produce and store the TEP.
- Sequence our stock to include all identified energy efficiency improvements.
- Group our stock. (This is required as some dwellings will have identical TEP's depending on the architype. Those with similar characteristics may be grouped together and used to identify suites of TEP's which can be used to plan the decarbonisation of the stock).
- Prioritise our stock, for example 'worst first' approach, or fuel poverty targets.
- Agree dates in principle for the implementation of the measures identified in the TEP for each home.
- Develop an annual program of works to meet SAP and EIR targets subject to available finance.



ateb will not:

• Incorporate the measures set out in the Target Energy Pathways into the Asset Management Plan or 30-year Business Plan due to financial constraints.

## **13. Redevelopment, Demolition & Carbon**

ateb will:

 Consider its assessment options for reducing upfront and embodied carbon during the design and construction phases, and when undertaking property refurbishments, in line with Welsh Development Quality Requirements (WDQR 2021) and best practice.

## **14. Community Benefits**

ateb will:

When evaluating all procurement submissions include how the procurement will generate additional economic, social and environmental benefits beyond just the goods or services being procured. We will evaluate how the procurement:

- Social increases the wellbeing of individuals and communities
- Economic increases societal wellbeing through business practices
- Environmental promotes sustainable practices and processes that protect the natural environment.

An example of the way we will promote added social value in our procurement is through seeking support for the ateb Trust which allocates grants to community groups and projects that enhance the wellbeing of people and improve communities on the areas that ateb work.

# **Documents**

#### **Related External Documents**

- WHQS 2023 (as amended)
- WHQS Guide for social landlords (as amended)
- Welsh Development Quality Requirements 2021 (as amended)

#### **Related Internal Documents**

- Health & Safety Policy
- Electrical Policy



- Fire Safety Policy
- Legionella Policy
- Asbestos Policy
- Gas Safety Policy
- Repairs Policy
- Procurement Policy
- Asset Management Framework
- Aids and Adaptations Policy
- Component Accounting Policy

# Glossary

- WHQS23 The Welsh Housing Quality Standard 2023 (the Standard) sets the target for the condition of all social housing in Wales
- Temporary Fails can be used in situations where social landlords are unable to make necessary changes to a home due to circumstances beyond their control, such as tenant refusal, or the changes are part of a wider programme of works planned within the next few years. Temporary Fails are to be recorded with specific reason codes and directed as acceptable to do so.
- Conditional Pass is acceptable for certain elements. It is only to be used in situations where work to enable compliance cannot be undertaken e.g. physical constraints or heritage considerations and this is unlikely to change. Conditional Passes are to be recorded with specific reason codes and only where directed as acceptable to do so. Conditional passes should be reviewed periodically to ensure they are still accurate.
- Pass meets WHQS23.
- Fail does not meet WHQS23.
- Not Applicable There are certain circumstances where an element may not be applicable e.g. elements concerning common parts of buildings in a single residence. In such circumstances these elements should be recorded as 'Not Applicable'.
- Housing Health and Safety Rating System (HHSRS) The HHSRS is a health-based risk assessment tool for the evaluation of housing conditions. The system operates by evaluating potential risk of harm to an actual or potential occupier from their living environment and is a means of rating the seriousness of any hazard identified.



- Category 1 hazards A hazard rating is expressed through a numerical score, there are 10 possible numerical score ranges or 'Bands'. Numerical scores of a 1,000 or over (Bands A to C) are Category 1 hazards, imposing a duty on enforcing local housing authorities to take appropriate action under Part 1 of the Housing Act 2004. Numerical scores under 1,000 (Bands D to J) are Category 2 hazards, a local housing authority has a power but not a duty to act against any significant hazard in the case of Category 2 hazards.
- SAP The Standard Assessment Procedure (SAP) is the methodology used by the UK Government to assess and compare the energy and environmental performance of dwellings. SAP quantifies a dwelling's performance in terms of energy use per unit floor area, a fuel-cost-based energy efficiency rating (the SAP Rating) and emissions of CO2 (the Environmental Impact Rating).
- Welsh Development Quality Requirements 2021 (WDQR 2021) "Creating Beautiful Homes and Places", sets out the minimum functional quality standards for new and rehabilitated general needs affordable homes.

# Appendix 1. WHQS Compliance Statement for New Customers

Welsh Housing Quality Standard Compliance Statement SPA Welsh Housing Quality Standard Compliance Statement Housing Association ateb Group Limited UPRN: Assessment Date Dwelling Compliant Comments The Welsh Housing Quality Standard 2023 is intended to drive up and maintain the quality of social housing in Wales. The standard sets out what social landlords need to achieve by 2034, requiring all homes to: Be in good condition
 Be safe and secure 3. Not cost much to heat and not be bad for the environment 4. Have an up-to-date kitchen Have an up-to-date bathroom
 Be comfortable and suit the person living there 7. Have a garden if possible Have a nice outside space if possible The information set out in this document supports the Energy Performance Certificate (EPC) that you have been issued with for your home. Some homes are not going to pass every part of the standard so where any fails are identified, ateb will aim to address these through its ongoing planned improvement activities. Compliant Failed Elements WHQS Criteria Compliant Part 1 - In a good State of Repair Part 2 - Safe and Secure Part 3 - Affordable Warmth and Environmental Impact Part 4 - Kitchen and Utility areas Part 5 - Bathrooms Part 6 - Comfort and Well-being Part 7 - Gardens Part 8 - Attractive and Safe Community Spaces Total Falled Elements Total Falled Criteria Make Dwelling Compliant: Reason for Making Dwelling Compliant:



ateb Policy Number: PN24 SA/11 – Strategic Asset Management

# Additional help

Contact our customer team quoting the policy reference:

Tel:	0800 854 568
Email:	hello@atebgroup.co.uk
Facebook	@theatebgroup
Face to Face	Get in touch and we can arrange a location

# **Version History**

Ver.	Date	Changes
1	February 2025	Policy approved by Board
2		
3		

