

Welsh Housing Quality Standard: Compliance Policy

Introduction

All stock retaining Authorities have to bring their properties up to the Welsh Housing Quality Standard by 2020.

On behalf of Welsh Government (WG), Altair was commissioned to research and verify progress made by social landlords in Wales on achieving the Welsh Housing Quality Standard (WHQS). The final report in 2014 highlighted that many of the social landlords interpreted the standard differently depending on their circumstances and their approach.

Following the recommendations made by Altair, the Welsh Government has requested that each landlord prepare and implement a WHQS Compliance Policy which sets out its approach to interpreting, delivering, and measuring WHQS Compliance. The following is the Council's WHQS compliance policy.

What the Policy Covers

The format of the policy follows the recommendations contained within Welsh Government's Guidance for Landlords: WHQS Compliance Policy (March 2015) and includes:

1. Framework for Delivery
2. Interpretation of WHQS, reflecting resources and circumstances
3. Interpretation and recording of 'acceptable fails'
4. Data collection and data storage
5. WHQS progress and reporting
6. Verification
7. WHQS+ Standard
8. Summarised annual financial investment in the stock
9. How progress and performance will be reported, communicated and linked to WG returns
10. Interpretation and measurement of Community Benefits.

1. WHQS Framework for Delivery

The Council has in place a framework for delivering the WHQS:

Time Frame for Delivery

The target for reaching the Welsh Housing Quality Standard and maintaining thereafter will be the end of financial year 2020/21. This also coincides with the statutory deadline for achievement.

Financial Business Plan

The Council will prepare an annual financial business plan that sets out the investment needs and financial calculations that demonstrate how the WHQS will be met financially. All financial plans will be signed off internally by the Council's Section 151 Officer (Section 151 Local Government Act 1972).

Organisational Structure

The Council will maintain an organisational structure and governance arrangements to ensure WHQS is delivered.

The Council will include as part of its structure teams that will deliver future planning and programming, design, liaison and consultation, delivery, progress monitoring and WHQS reporting.

Technical Assessment

The Council will gather and maintain technical data on its housing stock against the requirements of the Welsh Hosing Quality Standard.

Measurement and Key Performance Indicators (KPI)

Each year the Council will provide KPI data that measures current WHQS compliance and set out short term aims and objectives, these will include:

- Number of properties meeting selected components of the WHQS
- Number of properties fully meeting the WHQS
- Number of properties scheduled for improvement across item of work and number completed
- Acceptable Fail Data
- Customer satisfaction
- Standard Assessment Procedure (SAP) Rating
- Major Repairs Allowance (MRA) Grant Data:
- Community Benefits – Training Hours
- Community Benefits – Apprenticeships (Beyond Bricks and Mortar)

2. Interpretation of WHQS, Reflecting Resources and Circumstances

WHQS Interpretation and Definitions

The Council will comply with the requirements of the WHQS where they are prescriptive and explicit. Where interpretation is required, the Council will use the guiding principles of Better Homes for People in Wales and it's vision that "all households in Wales shall have the opportunity to live in good quality dwellings".

Below sets out how the Council interpret each part of the WHQS and where it has been expanded and developed beyond the immediate requirements:

Good State of Repair

Condition and dilapidation are measured based on typical industry standards and Welsh Government stock condition survey guidance.

Safe and Secure

The Council will ensure that the requirements of the WHQS are met through its three methods of delivery – responsive, servicing and its planned maintenance to ensure homes are safe and secure.

With reference to specific elements of the WHQS the Council will:

2 (g) Is there an external fire escape:

The Council has a separate fire safety strategy to meet its obligations within the Regulatory Reform (Fire Safety) Order 2006. The key approach as agreed with the Fire Service will be a ‘stay put if safe to do so’ and combines physical upgrades to fire separation, fire suppression (in selected areas), automatic fire detection and warning systems, regular advice and communication with tenants and residents as well as partnership approach to developing future improvements through working with the Fire Service and related external agencies. External fire escapes will be considered as part of the wider strategy but not be installed as an automatic requirement for managing fire safety.

2 (n) The dwelling must have a reasonable level of physical security.

The Council will observe the requirements of Secured by Design but will, where appropriate, opt for items which are not specifically approved but have the equivalent British Standards certification.

2 (o) Is the rear garden easy to maintain, reasonably private, safe for young children to play in?

Rear gardens will be made reasonably safe for occupants based on Housing Health and Safety assessments.

Adequately heated, Fuel Efficient and Well Insulated

That the average SAP rating for Council’s homes is 65 based on a representative sample of energy performance certificates (EPCs).

Well Managed

The Council has the following service objectives which directly support the WHQS element of providing homes that are ‘well managed’ and include:

- Providing an acceptable HRA Business Plan that maximises available resources and is in compliance with WG terms and conditions (annual requirement).

- Producing a Local Housing Strategy.
- Meeting key performance indicators, that contribute to the continual improvement of services provided to tenants and their communities.
- Maximising the level of investment in energy efficiency measures for homes in Swansea.

Located in Attractive and Safe Environments

The Council will use mechanisms within its Tenant Participation Strategy to enable specific consultation with existing tenant and leaseholder groups including the Estate Management group and Building and Repairs group together with consultation exercises which aim to reach and gather views from the wider community.

The Council also has a number of ways to collect background information which will be used to support the tenant consultation process to prioritise and develop environmental plans. For example street inspection surveys on a street by street basis, (in addition to the local knowledge available via District housing office staff), Local Ward Members and community projects and feedback from tenant surveys/groups. Hotspot monitoring information and reports to the Neighbourhood support unit also help pinpoint areas where anti-social behaviour is prevalent and may be used to help design out key problems. Overall tenant satisfaction will continue to be measured via tenant surveys and other mechanisms as set out in the Tenant Participation Strategy.

Suit the Specific Needs of the Individual

To meet the needs of the individual the Council will ensure staff engaging with tenants and residents are suitably trained and aware to identify individual needs and ensure that their needs are considered within the delivery of the WHQS. Activities will include:

- identifying needs of the individual via its communication and liaison activities (Neighbourhood Officer activities, improvement scheme liaison and promotion of disabled adaptation service)
- meet individual needs at the point where improvement schemes are being prepared or via the Council's disabled adaptations service.
- Staff training and awareness
- Promotion of available services.

Method of Measurement and Component Life Expectancy

Physical Measurement of Homes

To measure homes against the WHQS the Council will:

- Hold and maintain a comprehensive list of building components for each individual property
- Record a predicted replacement year against each building component
- Apply a future replacement year based on WG Guidance on Building Component Life-cycles
- Apply a replacement or improvement costs against each building component
- Periodically carry out stock condition surveys
- Update results when renewal and improvements are completed
- Update results where dilapidation occurs prematurely
- Source and hold relevant guarantees for materials and workmanship

Consultation

Consultation is used to gauge how people feel about their homes, their aspirations and future planned repairs. To undertake this, the Council will use the various mechanisms within its Tenant Participation Strategy to enable specific consultation with existing tenant and leaseholder groups including:

- Estate Management group
- Building and Repairs group
- Issue specific consultation events ranging from one-off to small series of events.
- Surveys within the tenant magazine 'Open House'
- Liaison in preparation of major improvements
- Consultation exercises which aim to reach and gather views from the wider community.

Conventions for Measuring the WHQS

The council will apply the following conventions when measuring WHQS compliance:

- WHQS compliance will be calculated on the basis of a wide range of individual WHQS elements.
- Each WHQS element has to be compliant for a home to be WHQS compliant
- The 'Replacement Year' listed against each WHQS element will be the year where it is anticipated to be no longer WHQS compliant. Elements which have exceeded their anticipated useful life but are judged to be in good condition will be classed as compliant and a new replacement year applied.
- That all replacement years past and present will be considered 'fails'
- Tenants' improvements will be considered compliant if appropriate and assessed by a relevant member of staff. These will be given a new replacement year based on condition.

The Council's approach to meeting WHQS (Whole Stock and Component Basis)

The Council will ensure all improvement and repairs are designed and specified to ensure WHQS compliance.

Delivery will be through a range of approaches from single or multiple element improvements, through to whole house refurbishment. The Council will apply whichever approach is suitable to homes depending on the needs of the dwellings, historical repairs, cost effectiveness and tenant preferences.

Compliance will be based on the assessment of individual building components.

Available Resources to Meet and Maintain the Standard

The Council will, on an annual basis, prepare a long term financial business plan for the purposes of identifying how current and future investment needs will be made available to ensure WHQS is reached and maintained.

The business plan will be in the form of a narrative that includes the financial figures and stress tests against risk.

SMART goals

By 2020, the Council will:

- Target 100% of our properties to have a valid, current electrical test
- Ensure that for each year 100% of our properties will have a valid, current gas service certificate
- Have renewed smoke alarms to ensure uninterrupted protection in all properties
- Ensure that at least 95% of our properties will have a combination type boiler.
- Ensure that 100% of properties which open onto a communal areas will have a 60 minute fire door.

3. Interpretation and recording of 'acceptable fails'

Acceptable fails are permitted within the WG standard and apply to building components which have been judged to have failed or be non WHQS compliant and where the Council is unable to undertake a repair or improvement. The following sets out each category of acceptable fail and the how they will be interpreted:

Cost of Remedy

The Council's Business Plan contains a 3% contingency for repairs and improvements to bring it up to the Welsh Housing Quality Standard; where the cost of delivery is above the typical cost by the 3% contingency the repair will be considered by a panel as to whether an alternative route for future repair/improvement can be undertaken (specification, timing, how it is procured, delivered etc.), and whether the size and scale of the repair places the funding for delivering WHQS at risk. If no alternatives are available and delivery of the WHQS is placed at risk, the planned repair or improvement will not be undertaken and marked as Acceptable Fail: Cost of Remedy.

Resident choice

Residents will be consulted on major works to their home prior to work being undertaken. There will be an expectation that these works will take place but in very limited circumstances, the Council may agree to delay or reschedule the work.

Tenants' own upgrades will be considered and either judged to be compliant or judged as an acceptable fail, where they are marginally outside of WHQS requirements but where it would be unreasonable to repeat the work. The judgement will be made by the technical officer responsible for administering the respective contract. The Council will classify the WHQS element(s) as 'Acceptable Fail: Resident Choice'.

Where a resident refuses to allow access without a stated reason the Council will classify the WHQS element(s) as 'Acceptable Fail: Resident's Choice' but noted as Resident Refusal.

Physical constraint

Where a repair or improvement is required but the physical nature or structural design of the building prevent or constrain the work, this will be marked as Acceptable Fail: Physical Constraint.

Timing of remedy

Meeting the WHQS requires the delivery of major repair and improvement schemes containing multiple building elements. The Council will therefore mark any component forming part of a larger scheme as an acceptable fail until the major component is either due for renewal or scheduled to be renewed. The main areas where this will apply are listed below:

All items forming a kitchen will be delivered in a single scheme. Therefore all items ancillary to the full replacement (extraction, floor covering etc.) will be marked an acceptable fail until the kitchen is due for renewal.

All items forming a bathroom will be delivered in a single scheme. Therefore items ancillary to the full replacement (extraction, over-bath shower, tiling and floor covering) will be marked as an acceptable fail until the bathroom is due for renewal.

Where specific types of properties require major invasive repairs which may affect the majority of the home, other related repairs will be marked as an acceptable fail until the work can be undertaken as a whole package.

This will be marked as 'Acceptable Fail: Timing of Remedy'.

Undertaking Repairs and Improvements to Acceptable Fails

The Council will monitor WHQS elements recorded as Acceptable Fail and re-schedule these annually (where it is known that they can be delivered) or when the property becomes void if this is feasible.

The Council will operate a liaison facility within its delivery structure that provides a link between tenants and major improvements works which aims to understand individual needs, maximise take up by tenants and leaseholders and monitor delivery.

4. Data Collection and Data Storage

Approach to Data Collection

The Council will collect data on WHQS compliance via a range of different sources which will be collated and stored via a database managed and maintained by the Housing Service.

The main body of information will be collected via a stock condition survey undertaken by an independent third party. All surveys will make up a representative sample (minimum of 10%) of the housing stock and will be undertaken at intervals of approximately 5 years.

Specialist surveys will be undertaken periodically depending on the specific needs e.g. passenger lifts, structural assessment of highrise and system built structures, asbestos surveys

Energy use and efficiency data will be collected by undertaking Energy Performance Certificates.

Estate management surveys will be undertaken by in-house staff.

Response lead data capture will be undertaken and inform where problems emerge or occur outside of the predicted failure time-scale.

Information relating to long term repairs and improvements will be recorded by the overseeing officer and stored centrally. The information will be used to update the stock condition survey data and revise future predicted failure dates.

Data Storage

Data collection, analysis and reporting is undertaken by the Housing Service.

Software System

The Council will operate an asset management system that links to the Council's Housing Management System allowing it to measure and monitor WHQS compliance and link in with wider housing management activity.

Process Mapping

The stages for gathering, issuing and updating records include:

Activity	Responsibility
1. Data collection, analysis and data storage	Housing Service, Business Planning Division, Corporate Building and Property Services
2. Long Term Investment Planning	Housing Service, Business Planning Division and Finance
3. Developing Repair and Improvement Schemes	Housing Service, Business Planning Division
4. Issuing information and Long Term Repair Scheme details	Housing Service, Business Planning Division
5. Undertaking Repairs, Improvements and Reporting completions	Corporate Building and Property Services
6. Updating record sets	Housing Service, Business Planning Division

5. WHQS Progress and Reporting

Compliance for each property and the whole stock will be measured against the checklist contained within the WHQS. The progress towards compliance will be measured annually and those improvement schemes designed to bring homes towards the standard will monitored each financial year.

The Council will report WHQS compliance through the following methods:

- Annually to the Welsh Government via its reporting portal
- Annually to tenants and leaseholders via the Council's tenant magazine 'Open House'
- By information sharing as outlined in the Council's Tenant Liaison Strategy

6. Verification

WHQS compliance is currently gauged through the stock condition survey process which is undertaken by an independent third party. This approach is currently considered sufficiently robust to provide statistical returns to the Welsh Government, to inform the HRA Business Plan and to inform the evidence for financial borrowing.

The Council will put in place a verification process that will annually review the following stages that measure WHQS compliance:

Desktop Analysis

- Confirmation that verifiers are independent
- Document review
- Data gathering procedures
- Management of the asset management database
- Processes used for calculating WHQS Compliance

Site Assessment

- Physical check of selected properties

7. WHQS+ Standard

The Council currently carries out improvements to homes that are over and above the requirements of WHQS. Below is the list of improvement to homes which the Council will undertake as part of its WHQS+ :

- Install sprinkler systems to improve fire safety in large and medium sheltered housing complexes
- Install one hour fire doors (FDS 60) to flats with communal areas as standard to improve fire safety
- Install Carbon Monoxide Detectors to homes with solid fuel heating and as a standard component of electrical rewiring.
- Convert communal lighting systems to LED lights to improve lighting levels, to reduce energy use and minimise servicing requirements.
- Provide emergency lighting to small blocks of flats with communal areas
- Install renewable energy generation to selected properties, typically those in rural areas which do not have the opportunity to connect to mains gas
- Provide mobility scooter storage and charging areas to selected sheltered complexes
- Introduce Juliet Balconies to selected flats in order to enhance appearance and living standards
- Integrate the principles of visual and tonal variations into decoration and painting schemes to enhance surroundings for those with visual impairment
- Convert unused ground floor areas into new and suitable living accommodation for disabled tenants

8. Summarised Annual Financial Investment

Each year the will Council prepare a Housing Revenue Account (HRA) Business Plan which will set out the investment needed to reach and maintain the WHQS.

Since the exit from the Housing Revenue Account Subsidy System (HRAS) in April 2015, the Council has become 'self-financing' and, the future investment profile will reflect the financial implications of the HRAS exit.

Each year a summary of the business plan followed by a short term capital investment programme which will be reported to Council.

The Council will share a summary of this information through the Council's Open House magazine which is distributed to tenants and leaseholders. The Council will also disseminate a summarised financial report via the various approaches outlined within the Tenant Liaison Strategy.

9. How Progress and Performance will be reported, communicated and linked to WG returns

The Cabinet Member will be regularly kept up to date regarding progress in meeting the WHQS.

All Members will receive information annually on:-

- The current level of compliance with the WHQS on an individual element and whole stock basis
- Level of progress achieved in the previous year
- Level of improvements planned for the current year
- Future plans contained within the agreed four year programme (as agreed at Council)

The Council will share information on WHQS compliance with tenants and leaseholders via:

- Its tenant magazine 'Open House'
- The Housing Service's public website
- In discussion with tenant and leasehold groups
- In local forums and one-off participation meetings
- In response to individual enquiries

New tenants will be provided with the following information:

- Background to the WHQS and what it contains
- The type of improvements being carried out to homes
- The type of cyclical repairs they can expect
- The time-scales for reaching the WHQS

10. Interpretation and measurement of Community Benefits

The Council will continue to include as part of its procurement policy, social benefit clauses in all its Housing work contracts. The initiative, entitled 'Beyond Bricks and Mortar' has a dedicated team that sets targeted recruitment and training targets within each contract. The contract clauses are a core part of the contract with each tender applicant required to set out how they will achieve the targets.

Each contractor is required to carry out training for long term unemployed and economically inactive participants sourced through the 'Beyond Bricks and Mortar' team, in partnership with external agencies (Jobcentre Plus, Work Programme, Careers Wales, Shaw Trust and others) to ensure trainees are from the hardest to reach groups who have most to gain from the additional training places. The 'Beyond

Bricks and Mortar' team monitor each contract and work directly with the contractor to ensure the agreed outcomes are achieved.

The Council will set out the following goals:

- That for each major scheme training or work related opportunity will be sought
- That for each £1m spent on capital programmes, the Council will seek 52 weeks of training from Contractors.
- Training will be varied including formal apprenticeships, informal training and awareness and/or training in skills that support employment such as basic skills, IT literacy etc. and will depend on the nature of the employment and the needs of the individual.
- Achievements will be reported annually as part of the HRA Submission process to Welsh Government.

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References:

Welsh Government (July 2008) Welsh Housing Quality Standard

Altair on Behalf of Welsh Government (2014) - Welsh Housing Quality Standard: Verification of Progress in Achieving the Standard. Welsh Government Social Research.

Letter: Kath Palmer, Welsh Government (July 2015) – The Welsh Housing Quality Standard (WHQS) – Verification in Achieving and Maintaining the Standards: Next Steps. Welsh Government

Letter: Kath Palmer, Welsh Government (March 2015) – The Welsh Housing Quality Standard (WHQS) – Verification in Achieving and Maintaining the Standards: Next Steps. Welsh Government

National Assembly for Wales (2006) – Housing Health and Safety Rating System Operational Guidance. Welsh Government

(2005) Regulatory Reform (Fire Safety) Order + various Fire Safety Standards and guidance

Principles of Secured By Design

Tenant Liaison Policy

Savills Stock Condition Survey 2012