



**Tai Merthyr  
Merthyr Housing**

**TS05 Welsh Housing Quality  
Standard (WHQS 2023) Compliance  
Policy 2025**

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## **1. Policy statement**

- 1.1 Merthyr Tydfil Housing Association is committed to providing a high standard of housing accommodation by attaining and maintaining the Welsh Housing Quality Standard through a pragmatic and financially prudent approach.
- 1.2 We appreciate that Welsh Government's standard is fluid and may accommodate future changes. Therefore, all properties will be initially surveyed with a five-year review to develop a target energy pathway (TEP) specific to the needs of the property and appropriate to the technology available at the time.
- 1.3 All improvement works will be designed, specified and undertaken in accordance with PAS 2030:2023 and PAS 2035:2023 ensuring that the works undertaken are not detrimental to the structure and fabric of the building.
- 1.4 There will be occasions where some properties will not achieve all targets given in the standard. Where this is the case, we will periodically review the TEP and all other WHQS 2023 standards to consider any new technologies that become available that could improve the property's performance.
- 1.5 Tenants will be consulted with in relation to how their properties achieve the respective standards or not. If not, what works are proposed and the respective timeframe(s). The timeframes will consider the current condition of components along with the proposed replacement dates ensuring that no finances are wasted replacing components early just to achieve respective standards.

## **2. Purpose**

- 2.1. The purpose of this policy is to present and communicate the Association's interpretation of the Welsh Housing Quality standard to tenants and stakeholders. The Compliance Policy complements the statistical return submitted to Welsh Government annually to outline the progress made in meeting the Standard.

## **3. Scope**

- 3.1. This policy applies to all the Associations domestic properties only. It does not apply to offices or commercial units.

This policy sets out the Associations approach to the keys areas such as:

1. Approach to WHQS, reflecting local resources and circumstances;
2. Database/asset management software;
3. Tenant engagement;
4. Independent verification;
5. Compliance statements for new tenants;
6. Elements not measured, to be covered by detailed explanatory statements;

7. Cost prohibitive activity;
8. Target Energy Pathways Narrative;
9. Redevelopment, demolition and carbon;
10. Community benefits.

#### **4. Our Approach to WHQS, Reflecting Local Resources and Circumstances**

- 4.1. The Association understands that WHQS are fluid and may be subject to change. Where reasonably practicable the Association will consider guidance issued by Welsh Government to ensure any changes required to the Associations approach and or Business Plan is accommodated.
- 4.2. WHQS compliance will be surveyed as part of the Associations stock condition surveys. These surveys are undertaken on a 5-year cycle and used to inform the financial business plans and planned maintenance programmes.
- 4.3. The Association will attempt to deliver the services associated with WHQS/planned maintenance/retrofit via local contractors to ensure the local economy is supported. Where this is not possible, we will aim for Welsh suppliers/manufacturers, then UK supplier/manufacturers before further afield.
- 4.4. The Association will not be prematurely replacing components simply to comply with WHQS or replace components that can be maintained in good serviceable condition. When undertaking component replacements, the Association will aspire to meet WHQS.

#### **5. Assessment and Data Collection**

- 5.1. Whilst it is the Association's desire to comply with all elements of the Standard, it is recognised that some elements of the Standard are not applicable to all homes and that not all homes will be able to achieve some elements for various reasons. In such circumstances the Association will follow the assessment hierarchy given in Chapter 4 of the standard.
- 5.2. Where multiple reason codes could be appropriate, the main reason will be used.
- 5.3. Where elements containing statutory or regulatory requirements such as the presence of carbon monoxide detectors shall be considered and reported as either a pass / fail.
- 5.4. We accept that tenants have the right to refuse to have works undertaken unless it results in a Category 1 hazard or a breach of any legal obligation. In such circumstances this would be recorded as a 'Temporary Fail' for resident choice.

## **6. How We Intend to Meet and Maintain the Standard**

6.1. **Homes must be in a good state of repair** – this will be assessed and maintained by our reactive repairs and planned component replacement programme taking into consideration WHQS requirements. It will also form part of our stock condition surveys and our keeping in touch with tenant visits. No works will be undertaken that, in the opinion of our professional officers, will be detrimental to the existing buildings.

Homes must be safe and secure –

- Our properties will comply with “secured by design” for any replacement components.
- Fire detection and alarm systems will be installed and maintained to the appropriate British standard. We will follow the guidance provided by WHQS and the Renting Homes (Wales) 2016 legislation.
- Our homes will have appropriate means of escape in case of fire from the building to a place of safety outside the building, in accordance with building regulation requirements.
- Carbon monoxide detector(s) have been fitted in each room containing a fixed gas appliance, an oil-fired combustion appliance, a solid fuel burning combustion appliance or an associated flue.
- Homes have an electrical safety inspection undertaken by a qualified person at intervals of 5 years or less. There may be instances where there are access issues that takes us over the 5-year target, and we will take appropriate action in court.

6.2. **Homes must be affordable to heat and have minimal environmental impact.**

Heating systems must be reasonably economical to run and capable of heating the whole of the home to a comfortable level in normal weather conditions.

- As part of the Target Energy Pathway we will work on the interim target of SAP 75 for each property by 2030 before pursuing the longer-term goal of EPC A.
- We will investigate and minimise the carbon emissions from homes and where possible, plan and achieve a minimum of EIR 92 (where physically practicable). We will measure and estimate “The Environmental Impact Rating (EIR) by using the latest version of the Government’s Standard Assessment Procedure for Energy Rating of Dwellings.
- The Association will carry out a Whole Stock Assessment and produce Target Energy Pathways for our homes.
- The Association shall provide adequate ventilation to our homes, and in particular kitchens and bathrooms. Where it is deemed appropriate, we shall consider the provision of whole house mechanical ventilation with heat recovery.
- When the Association allocates a property to a tenant, we will suggest that a smart meter is to be installed.
- The Association will investigate and install measures to improve water efficiency and alleviating water poverty when replacing fittings and fixed appliances.

- Following the appropriate guidance Water butts will be provided where appropriate and in agreement with our tenants upon allocation of a home.
- 6.3. **Homes must have an up-to-date kitchen and utility area** – The Association will follow the WHQS guidance where physically possible and in agreement with our tenants.
  - 6.4. **Homes must have an up-to-date bathroom with a shower and bath.** The Association will replace bathrooms over 25 years old unless they are in good condition.
  - 6.5. It is acknowledged that there may be times where tenants require works done to meet their specific needs. Such physical adaption works may be undertaken when recommendations are received from an Occupational Therapist (local authority or private) which does not comply with the Standard. These will override the Standard and be recorded as ‘Temporary Fail’ – ‘Tenant Choice’.
  - 6.6. All kitchens and bathrooms will have suitable flooring (unless changed by the tenant without our knowledge).
  - 6.7. The Association will follow the WHQS guidance and standards to make sure our homes, in our opinion, are comfortable and promote wellbeing.
  - 6.8. The Association will make all attempts for their homes to have a suitable garden following the WHQS guidance and standards.
  - 6.9. **Homes must have an attractive and practical outside space:**
    - We will provide external lockable storage for cycles and equipment.
    - There should be adequate, practical, maintainable and safe community space(s) – this will primarily apply to our new developments and will be discussed as part of the planning process and meetings with the community.
    - We will investigate and implement biodiversity opportunities by changing the way we manage these areas to make them more wildlife friendly.

## **7. Housing Health and Safety Ratings System (HHSRS)**

- 7.1. It is the Associations intention to provide a safe and healthy environment for its residents and any visitors.
- 7.2. The Associations surveyors have been trained to undertake inspections and assessment of hazards in accordance with HHSRS.
- 7.3. Where any category 1 hazards are identified by a surveyor during a visit, all reasonable or practicable repair / improvement works will be specified to eliminate or reduce the risk.

## 8. How the Association Will Achieve the Standard

- 8.1. The Association will conduct an assessment of our stock, analyse the information, and plan the management of our property assets as part of our normal business and financial planning.
- 8.2. It is expected that this assessment will initially take the form of detailed property surveys, including line by line reporting of our property assets. With robust data collection and management, we will keep these detailed assessments up to date as works are carried out on or in properties.
- 8.3. Upon completion of the whole stock assessment the Association will be aware of the work required to meet the Standard, our future liabilities, know when properties and their components are forecast to be replaced and when funds need to be available to meet these liabilities. All of this will assist us to develop a programme to achieve the Standard, considering views of our tenants.
- 8.4. The programme will be dynamic and responsive to changes. It will set out the priorities for the various items of work with a forecast of the finance required and sources of funding available.
- 8.5. The programme will be reviewed annually or following an update of stock information or stock condition data.
- 8.6. Any programmes will involve tenant engagement, and their views will form part of the development of the programme. This programme will be published and show the stages that we have gone through, highlighting the choices that have been made along the way and the rationale behind them. The programme will be part of a viable business plan.

## 9. Database/Asset Management Software

- 9.1. We use Lifespan Housing software developed by Property Tectonics to keep a record of all of the data gathered as part of the stock condition surveys and monitor compliance to the WHQS standard. This software will be supported by the following:
- 9.2. **Carbon in Homes-** This enables assessment to utilise information stored in the Lifespan database such as RdSAP to assist the Association to benchmark its stock carbon footprint, monitor CO2 reductions and target the most cost-efficient energy saving methods.
- 9.3. **Homelife -** This will be used to deliver works via a cloud-based tool designed to ensure PAS 2030 process is followed end to end and supports the collaboration of information activity across all roles involved.

9.4 **PAS 2035 Toolkit** -This will undertake the process of data collection, analysis and updating dwelling asset data to ensure the right tools for collaborating good energy implementation methods and management.

9.5 **Lifespan Mobile** - This will be used by building surveyors to speed up and simplify on site data collection allowing existing property data to be easily loaded on a mobile device and edited on site.

## 10. 30 Year Business Planning

10.1. The Association is required by the Welsh Government (WG) to submit financial business plans. These plans are to be updated annually and are driven predominantly by information gathered at the stock condition surveys.

10.2. The Target Energy Pathway and maintenance programme for the financial business plans will be forecast in line with the 30-year life cycle and component replacement projections as reported by the Association's stock condition database (Lifespan).

10.3. The Association uses notional lifecycles for all components for long term reinvestment forecasts and not as intended replacement dates. The Associations' approach to WHQS is to assess all components based on condition and serviceability. The condition of a component overrides the age; (a younger component in poor condition merits replacement whereas an older component in good serviceable condition will not merit replacement).

## 11. Tenant Engagement

11.1. The Association will actively engage with our tenants to shape our programme of works and will take account of feedback from other tenants' lived experience of retrofits. This will help to improve how homes can be efficiently and effectively maintained, upgraded and decarbonised in future.

11.2. We will assess opinions by confirming the policy with our Tenant's Voice group and using social media to promote and consult. Meetings will be held with our tenants across Merthyr to gather their opinions on the policy. The results of these consultations will be reported back to our Asset and Development Committee and Board. At the commencement of each retrofit scheme, we will meet with individual tenants or on an estate basis to discuss options and to clarify any issues. Upon completion of the retrofit works a further meeting will take place with the tenants on an individual or an estate basis.

11.3. Further consultation will take place with residents when components within their home are proposed for replacement such as new kitchens, bathrooms, windows/doors etc. This consultation will clarify where and why any alterations are proposed, to ensure tenants agree to the changes. Where

possible, the Association will offer the tenant a choice on the design and colour.

## **12. Independent Verification**

- 12.1. The initial verification process will take place two years after the standard came into effect (1<sup>st</sup> April 2026). Thereafter independent verification will be undertaken every two years. The findings and recommendations of this exercise will be reported to Asset and Development committee along with suggested improvements.

## **13. Compliance statements for new tenants**

- 13.1. The Association will provide a compliance statement sheet at the point of re-letting. This will support the EPC certificate that the new tenant will receive.
- 13.2. Where a property does not meet the Standard at the point of re-letting, the Statement will include clear information about the purpose of the Standard, when it is to be met, what it covers, where the home complies and any areas that we are yet to meet the Standard, along with a rationale.

## **14. Elements not measured, to be covered by detailed explanatory statements**

The following elements require an explanatory statement:

- 14.1 **3d Landlords must carry out a Whole Stock Assessment and produce Target Energy Pathways for their homes** - A whole stock assessment will be completed at the latest by 31<sup>st</sup> March 2026 and the data input into the respective software database(s) previously described to produce a T.E.Ps for each property. This will be produced to achieve the interim target of RdSAP 75 by 2030 and the further target of RdSAP 92 at some point in the future. We will ensure that all works and improvements shall be designed to PAS 2030 and coordinated and implemented in accordance with PAS 2035.
- 14.2. **6d Homes should suit the specific requirements of the household** – where we are advised of over or under occupation or any cultural requirements, we will work with the tenants to meet their needs if it is physically possible and not cost prohibitive.
- 14.3. **6e Disabled and older people's housing requirements** - The Association will help and support our older tenants with their housing requirements by investigating improvements via the Physical Adaptation Grant (PAG) process provided by Welsh Government and administered and implemented by us. In extreme conditions where, due to physical or cost constraints, we will investigate alternatives with the tenant such as going on the Living Merthyr Tydfil common housing register to see whether their needs can be met by another property within the County.

- 14.4. **8b Attractive Outside Spaces** – this will form part of the planning community consultation process for new developments. Existing issues will be investigated when requested.
- 14.5. **8c Biodiversity** - We will consult with our tenants and where the response is in the positive, implement biodiversity opportunities by changing the way we manage Merthyr's owned open areas to make them more wildlife friendly.
- 14.6. **Broadband** - We will gain an understanding of the level of fixed broadband connectivity across homes and estates. We will base the results on a representative sample, at least 10 per cent, of properties which are geographically spread across our portfolio. Where possible and practicable, we will liaise with providers in those areas which do not provide the required standards in an attempt to improve the service.

## 15. Cost Prohibitive Activity

- 15.1. For each element using the conditional pass cost prohibitive code, the Association will provide additional information including estimated costs and number of properties using WHQS standard assessment codes. This will form part of the Target Energy Pathway and the 30-year Business Plan 2027 onwards.

## 16. Target Energy Pathways Narrative.

- 16.1. The Association will conduct Whole Stock Assessment every 5 years (20% of properties each year). The purpose of this exercise is to gather information on the condition of all components, the collection of energy efficiency data (SAP and EIR ratings) and monitor compliance against the WHQS standards which will be inputted into our Lifespan software. Carbon in Homes will utilise this information to benchmark its stock carbon footprint, monitor CO2 reductions and target the most cost-efficient energy saving methods. Delivering this will also identify data which summarises the current energy efficiency and other stock characteristics, for example the age and type of dwellings. The Whole Stock Assessment is a pre-requisite to the development of Target Energy Pathways.
- 16.2. The data gathered and entered into Carbon in `Homes will develop a Target Energy Pathway which will enable the Association to assess, prioritise and sequence all identified energy efficiency improvements to all properties in the context of the time, resources available and in a way that complies with PAS2035, ensuring they will not be detrimental to the structure or internal environment.
- 16.3. The Association will segment their housing stock into manageable categories of risk and difficulty. The determination of these categories will be informed by the Whole Stock Assessment and Target Energy Pathways. These categories will help to summarise the housing stock so that the most appropriate measures can be applied to properties at optimal points in time in line with our

planned maintenance programme and dependent on resources and included in our financial business plans.

- 16.4. The Association will not replace components that do not comply to the standard until they reach the end of their useful life just to improve performance or compliance to WHQS.

## **17. Redevelopment, Demolition and Carbon**

- 17.1. The Association will explain how carbon considerations are included in an assessment of options. However, we will only demolish dwellings as a very last resort, understanding the impact on communities and embodied carbon. The retrofitting of homes will be considered and programmed as part of the Target Energy Pathways. The Association will compare the embodied and operational carbon in the proposal for retrofitting homes, against the carbon cost for the proposal to demolish and redevelop homes.
- 17.2. The Association recognises that the Welsh Development Quality Requirements (WDQR 2021) 1c) require new development of social homes to adopt best practice in moving to a decarbonised and circular built environment. We will consider an assessment for reducing upfront and embodied carbon during the design and construction phases, and when undertaking refurbishment.

## **18. Community benefits.**

- 18.1. These are contractual clauses that ask bidders to contribute to tangible social benefits additional to and outside of the main purpose of the contract, when a contract is awarded. These benefits generally relate to but not limited to:
- Recruitment and employment initiatives.
  - Skills and training initiatives.
  - School curriculum and employable support.
  - Local supply chain development.
  - Community enhancement and support.
- 18.2. The Association will apply community benefits to all new contracts greater than £25k in value. Where such benefits are realised, this will be reported per Community Benefit and included in our annual Social Value report.

## **19. Responsibilities**

- 19.1. The Technical Services Manager will produce an annual report from Lifespan to consider improvements that where possible is in line with component replacement and to provide a report to Welsh Government by 31<sup>st</sup> March each year.

## 20. References

Related External Documents	
Reference	
Welsh Housing Quality Standards (WHQS) 2023 Revised Guidance for Social Landlords 2024	

## 21. Document Control

Document Information	
<b>Business Owner:</b>	Technical Services Manager
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Document History			
Date	Version no.	Author	Description
July 2020	2	Technical Services Manager	Put into new policy format
January 2025	3	Director of Operations and Technical Services Manager	Amended to comply with WHQS 2023 guidance provided April 2024

## 22. Equality and Diversity

Merthyr Tydfil Housing Association aims to assist the borough to have an atmosphere of friendship, respect and care for each other. In particular, we aim to treat every individual equally, regardless of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation, political beliefs or offending background that does not create a risk to vulnerable groups including children. The Association will not tolerate discrimination, harassment or hate speech of any kind or any behaviour which others find intimidating, upsetting, embarrassing, humiliating or offensive.

## 23. General Data Protection Regulations (GDPR)

All data will be stored securely on SDM or Lifespan software which limits access to those who need to use the information.