





"Together, we will end poverty"



Welsh Housing Quality Standards Compliance Policy – WHQS

External Consultancy Altair Consultancy and Advisory Services Ltd

IMS/AM-POL-07 Version 7

This document can be made available in other formats. To request an alternative format please contact document control <u>hsqe@clwydalyn.co.uk</u>



ClwydAlyn Housing Limited 72 Ffordd William Morgan, Parc Busnes Llanelwy, Llanelwy, Sir Ddinbych, LL17 OJD **ClwydAlyn Housing Limited** 72 Ffordd William Morgan, St Asaph Business Park, St Asaph, Denbighshire, LL17 OJD





About ClwydAlyn

Our mission is to beat poverty, and we strive to support our residents into work, training and volunteering.



Contact us

C.	Customer Services	Monday to Friday 08:00 to 18:00 Freephone from a landline 0800 183 5757 or 01745 536800
	Out of hours emergency repairs	0300 1233091 or text 07786 202533 (please remember to include your name, address and telephone number in your message).
Ŕ	E-mail/online	<u>help@clwydalyn.co.uk</u> or online @ <u>https://www.myclwydalyn.co.uk/</u>
Ø	Postal address	72 Ffordd William Morgan St Asaph Business Park St Asaph Denbighshire LL17 0JD

#InfluenceUs

Do you want the chance to feedback on what is important to you as a ClwydAlyn resident? Do you want to help shape and improve the service we provide to you? Do you have anything from a few minutes to a few hours to spare each month? If the answer is Yes, then this is your chance to become an Influencer at ClwydAlyn, please follow the link <u>#influenceus form</u> or contact <u>influenceus@clwydalyn.co.uk</u>

Policy Information/Document Control

This Policy is an agreed statement which contains the set of principles acting as guidelines for achieving the goals of ClwydAlyn. This Policy is agreed and owned by the Residents Committee and or the Executive Management Team. This document cannot be changed unless authorised to do so using the document change authorisation note QF-F-10.

The master copy is held by the Document Controller, the PDF version is held in ClwydAlyn's SharePoint.

For further information please contact document control hstenset.example.co.uk https://www.hstenset.example.co.uk

Issue Number and Revision History

Version No.	Revision Details/Reason for change	Author	Date
V1	New document to reflect WHQS 2023 with advice from Altair Consultancy and Advisory Services Ltd. To be approved by Property Committee In Draft last updated 18/10/2024	Ynyr Parri	18/10/2024
V3	Further amendments	Ynyr Parri and Altair	8/11/2024
V4	Further amendments	Ynyr Parri and Altair	15/11/2024
V5	Further amendments	Ynyr Parri and Altair	17/12/2024
V6	Further amendments	Ynyr Parri	11/01/2025
V7	Further amendments	Ynyr Parri	14/02/2025



Table of Contents

1	Introd	luction and Our Approach				
	1.1	What is WHQS 2023?				
	1.2	WHQS 2023 and digital connectivity				
	1.3	WHQS 2023 driving towards a Net Zero Wales				
	1.4	Housing Health and Safety Rating System (HHSRS)5				
	1.5	Our approach				
	1.6	Assessment and Data Collection				
	1.7	Reporting7				
	1.8	Programme				
2	Datab	ase and Asset Management Software11				
	2.1	Cx Assets				
	2.2	Quality of our Data				
	2.3	Stock Condition Programme				
3	WHQS	S Resident Engagement Plan12				
4	Indep	endent Verification				
	4.1	Auditors				
	4.2	Key Controls Healthcheck				
	4.3	WHQS Audit 2026				
	7.0	Whys Addit 2020				
5	Comp	liance Statement for New Lettings14				
	5.1	Housing Health & Safety Rating System Assessments14				
6	Eleme	ents not Measured15				
	6.1	Carry out a Whole Stock Assessment and produce Target Energy Pathways (3d) 15				
	6.2	Homes to suit specific requirements of the household (6d)16				
	6.3	Biodiversity (8c)16				
	6.4	Broadband/Digital Connectivity17				
	6.5	Disabled and older people's housing requirements (6e)18				
	6.5.1	Incorporating Accessibility Standards in Refurbishments				
	6.5.2	Duty to Make Reasonable Adjustments18				
	6.5.3	Data Collection and Assessment of Need18				
	6.5.4	Providing Accessible and Independent Living Solutions				
	6.5.5	Monitoring and Continuous Improvement19				
	6.6	Attractive Outside Spaces (8b)19				
7	Cost F	ost Prohibitive21				
	7.1	Managing Cost Prohibitive Situations at ClwydAlyn21				
8	Our aj	oproach				
	8.1	Incorporation into Future Works Programmes24				
	8.2	Prioritisation Based on Resident Benefit				
	8.3	Adapting to Market Changes				
	8.4	Resident-Centred Approach				
9	Targe	t Energy Pathways				
	•					
	9.1	Resident Consideration				
	9.2	Tailored Pathways				



	9.3	Scenario Modelling	
	9.4	Energy Assessments	
10	Asset a	and Modelling Systems Used	
	10.1	Asset Management System – Civica Cx	
	10.2	Parity Projects	
	10.3	Stock Condition Surveys	
	10.4	Data Improvement Plan	
	10.4.1	Homes Not Meeting Standards	
		Building Limitations	
		Cost Constraints	
		Tenant Refusal	
		Mitigation Plans	
	10.4.5		
11	Carbor	n, Demolition and Redevelopment	
	11.1	Whole Life Carbon Assessment (WLCA)	
	11.2	Carbon Comparison	
	11.2.1	Retrofitting	
	11.2.1	Demolition and Redevelopment	
	11.2.2	WDQR 2021 Requirements for New Developments	
	11.3	wDQR 2021 Requirements for New Developments	
12	Comm	unity Benefits	
Appen	dix A –	Compliance Statement for New Tenants	
Appen	dix B –	WHQS 2023 Resident Engagement Strategy	
Appen	dix C –	Resident Engagement Focus 2025/2643	
Decide	nt Ende	gement Plan	
Reside	nt Enga	gement Ptan	
Decarl	onisati	on and Retrofitting	
	Home	Improvements	
	Home	Improvements	
Captu	ing and	Using Resident Feedback	
	Flexibi	lity and Resident-Led Prioritisation44	
		Awareness of WHQS	
Conclusion			
	5011010		
Appen	dix D –	Acronyms and Terms used	



1 Introduction and Our Approach

The purpose of the Welsh Housing Quality Standard (WHQS) is to improve the quality of social homes in Wales and this dovetails with ClwydAlyn's core principle - **"Together, we will end poverty"**.

We will adopt the guidelines set within the Welsh Housing Quality Standard (WHQS) to ensure the delivery of 'Better Homes for the People of Wales'. The ideals and core values of the WHQS guidelines will complement ClwydAlyn's ongoing approach to maintain and enhance the homes and lives of its residents.

1.1 What is WHQS 2023?

The purpose of the Welsh Housing Quality Standard (WHQS) is to improve the quality of social homes in Wales. Welsh Government intends to drive up the Standard of existing social housing by setting a demanding Standard which all social landlords in Wales are legally obliged to meet.

At its heart, WHQS 2023 is a tenant focused Standard, designed to upgrade social homes in a way that contributes to positive health, education and wellbeing outcomes for tenants. The investment required to enable homes to meet the Standard, also provides a significant opportunity to generate and retain prosperity for local communities, through the creation of jobs, training and apprenticeships in the supply chain.

The Welsh Government recognises that to foster pride, belonging and ownership, tenants should be encouraged to take the opportunity to be involved in making any decisions that affect their community and environment.

WHQS 2023 sets out the minimum quality Standards for existing social homes, and Welsh Government encourages social landlords to aim for Standards beyond the minimum requirements specified in the WHQS.

It builds on the aims of the previous version of WHQS (2008) which set the following targets for residents to have the opportunity to live in good quality dwellings that are:

- in a good state of repair
- safe and secure
- adequately heated, fuel efficient and well insulated
- contain up to date kitchens and bathrooms
- well managed (for rented housing)



- located in attractive and safe environments
- as far as possible suit the specific requirements of the household (e.g. specific disabilities)"

WHQS 2023 develops these themes and introduces three other objectives –

1.2 WHQS 2023 and digital connectivity

Consideration should be given to how landlords can alleviate digital exclusion amongst tenants. Digital connectivity is a social justice matter, with Ministers expecting social landlords to be innovative in maximising the opportunity for individual households and communities to have, where possible equal access to online opportunities.

1.3 WHQS 2023 driving towards a Net Zero Wales

WHQS sets out Standards relating to the decarbonisation of social homes and aims to reduce carbon emissions from the Welsh housing stock. This Standard contributes towards governmental climate change goals expressed through the Net Zero Wales plan published in 2021 and updated in 2022.

1.4 Housing Health and Safety Rating System (HHSRS)

The HHSRS is used to assess a number of elements within a property. It is a health-based risk assessment tool for the evaluation of housing conditions. The potential risk of harm to the occupier from their living environment is evaluated and the seriousness of any hazard identified is rated.

A hazard is any risk of harm to the health and safety of an occupier that arises from a deficiency. A deficiency is a failure of an element to meet the 'ideal', i.e., the perceived optimum standard intended to prevent avoid or minimise the hazard.

The failure could be inherent, such as a result of the original design, construction or manufacture, or it could be a result of deterioration, disrepair or a lack of repair or maintenance.

ClwydAlyn complete HHSRS assessments in accordance with Section 5.1 of this Policy.



1.5 Our approach

In terms of property standards to meet WHQS a home must be:-

- in a good state of repair
- safe and secure.
- affordable to heat and have minimal environmental impact
- 🛕 have an up-to-date kitchen and utility area
- A have an up-to-date bathroom
- be comfortable and promote wellbeing
- have a suitable garden
- A have an attractive and practical outside space

A home will meet the Standard when all relevant elements are achieved. It is recognised that some elements of the Standard are not applicable to all homes. It is also recognised that not all homes will be able to achieve some elements for various reasons.

The original WHQS document was published in 2002 and updated in 2008 prior to the current version which identified areas of the Standard that required updating and improving, areas where research and societal changes had changed expectations, as well as new areas to include:-

- Data collection and reporting
- Compliance policies
- Fire and electrical safety
- Affordable Warmth and Environmental Impact (new elements)
- Flooring (new element)
- Water efficiency (new elements)
- Biodiversity (new element)
- Active travel (new element) and
- Noise nuisance (new element).

To meet the requirements of WHQS and Welsh Government's targets we need to understand our stock and our customer's requirements, specifically we need to understand the condition of the properties and their energy efficiency rating in order to identify the works required to meet WHQS.

Welsh Government expect social landlords adopt a holistic view of quality, recognising the benefit that quality and culturally suitable homes will have on both physical and mental wellbeing for all. It is expected that all homes should be of high quality, be healthy to live in and meet community, family and individual needs of tenants.



WHQS guidance recommends that social landlords actively engage with their tenants to shape their programme of works and to take account of feedback from other tenants' lived experience of retrofits, in order to improve how homes can be efficiently and effectively maintained, upgraded and decarbonised in future.

We already have stock condition information on the majority of the portfolio, and we are carrying out a rolling 20% stock condition survey to improve our records and allow area specific programmes to be developed. The programmes are going to be developed addressing two issues-

- Like-for-like component replacements (e.g., kitchen or bathroom replacements) and
- Target Energy Pathways (TEP). TEPs are the energy improvement works required to bring properties up to Net Zero or as close as possible.

1.6 Assessment and Data Collection

An assessment of each of our properties against the elements of the Standard will be conducted and submitted to the Welsh Government alongside basic and supporting information on each property.

This information may include:

- Inique Property Reference Number (UPRN);
- Age of property;
- **A** Type of property;
- **O** Construction type;
- Number of storeys;
- Number of bedrooms;
- Occupancy;
- A Household type;
- Assessment of each element of the Standard;
- Current SAP score;
- Calculated or modelled SAP and version used;
- Date property expected to achieve SAP 75 and 92; and
- A Hazard rating scores for Hazard referenced in the Standard.

1.7 Reporting

The data specified within this data collection will be submitted at a property level at the end of the first full financial year of the Standard (31 March 2025) and annually thereafter.



As a minimum, an assessment of each element of the Standard for all homes within a social landlord's portfolio must be completed. This will be reported at a property level to the Welsh Government.

1.8 Programme

We are adopting a cautious approach, not wishing to rush in and make hasty decisions that may turn out to be ill-advised when more information is available to inform our decisions.

Year 1 Programme 2024/25 – we are developing a programme for this year, the principles of which are:-

1. Resident-Centric Approach

- Engagement and Communication: Actively involve residents in the process through consultations, surveys, and forums to understand their needs and priorities.
- Transparency: Clearly communicate timelines, benefits, and progress to residents, building trust and understanding.
- Tailored Support: Ensure vulnerable tenants receive specific support, particularly in cases involving significant disruptions (e.g., major repairs or upgrades).

2. Data-Driven Decisions

- Stock Condition Surveys: Conduct comprehensive surveys to identify and prioritise properties requiring the most urgent work.
- Baseline Assessments: Establish a detailed baseline of current compliance with WHQS to track progress.
- Feedback Integration: Use resident feedback and repair history to refine prioritisation.

3. Sustainable Planning

- Focus on Energy Efficiency: Prioritise measures to meet energy efficiency targets (e.g., insulation, heating upgrades) to reduce carbon footprints and tackle fuel poverty.
- Damp and Mould Remediation: Address existing issues to prevent health risks and ensure homes are warm and dry.
- Futureproofing Homes: Ensure any upgrades align with upcoming regulatory requirements, including decarbonisation targets.

4. Collaboration and Partnerships

Internal Coordination: Promote strong communication between housing, maintenance, and finance teams to align objectives.



- External Stakeholders: Collaborate with housing associations, local authorities, contractors, and resident groups to pool resources and share best practices.
- Training and Upskilling: Equip staff with the knowledge and skills needed to implement the programme effectively.

5. Realistic and Flexible Implementation

- Contingency Planning: Prepare for potential delays (e.g., contractor shortages or supply chain issues) to minimise disruption.
- Budget Control: Monitor and adjust budgets to ensure financial sustainability.

6. Monitoring and Evaluation

- Set Clear Metrics: Define success indicators for the first year, such as the number of properties upgraded or tenant satisfaction levels.
- Regular Reviews: Conduct quarterly progress reviews to assess adherence to plans and adjust strategies where necessary.
- Learning from Challenges: Document lessons learned to inform the programme in subsequent years.

In addition we are using 2024/25 as an opportunity to develop a comprehensive 5-year rolling programme of works based on geographical locations. Once the locations are agreed we will develop area specific programmes which will allow us to hold resident engagement sessions.

Our aim is to hold sessions that are meaningful and specific and not too general and vague. We know from experience that if residents cannot see the relevance to them and their property they are likely to disengage and avoiding this outcome is our priority and focus.

We have set out below some of the work that these programme will include:-

Making good - ClwydAlyn accepts responsibility for repairing damage caused by disrepair or by the work to fix it.

Affordable warmth and minimal environmental impact - ClwydAlyn can confirm that the phased improvements we perform on our homes will be informed by Target Energy Pathways. A planned and phased program of achievement will occur with a first step of fabric improvement

Timeline for achievement of the Standard - ClwydAlyn confirms that by the 31st of March 2025, we will have:



- Assessed the condition of our stock and the work necessary to meet the Standard;
- Setimated the investment needed to achieve the Standard;
- Completed tenant engagement on the programme;
- Prepared and submitted a Compliance Policy to the Welsh Government; and
- Updated the Business Plan to Reflect the programme.

We will produce Target Energy Pathways informed by the Whole Stock Assessment by the 31st of March 2027.

ClwydAlyn will aim to ensure all properties meet the standard by 2034. Certain elements will be completed on a TEP for example. Other may have been delayed due to tenant refusal or cost prohibitive.

In order to ensure that our tenant engagement is appropriately focused, and we are able to deliver their priorities we have a list of WHQS Topics which the Resident Committee will be asked to review and help prioritise. The list of topics is set out in Appendix C. It is a live and active list and the process is very much work in progress.



2 Database and Asset Management Software

2.1 Cx Assets

CX Assets, developed by Civica, is an advanced Asset Management system that enables ClwydAlyn to enhance its property management practices to meet the Welsh Housing Quality Standard (WHQS). By consolidating property and resident data, CX Assets allows for real-time tracking of asset conditions, planned maintenance, and building safety.

With CX Assets, ClwydAlyn benefits from automated workflows, and detailed reporting on compliance, enabling proactive management and transparency in achieving WHQS targets. CX Assets' integration of energy management and risk assessment capabilities also helps ensure properties remain safe, energy-efficient, and compliant with regulatory standards. This system provides a scalable and adaptable solution for ClwydAlyn's long-term maintenance planning and operational needs, optimising resources to consistently meet housing quality objectives.

2.2 Quality of our Data

As part of the Whole Stock Assessment process, ClwydAlyn require a high-quality picture of our stock, provided by the data we hold. An assessment of data quality will be undertaken as part of the Whole Stock Assessment process and a Data Quality Improvement Plan will be developed to address any shortcoming identified.

2.3 Stock Condition Programme

ClwydAlyn aims to conduct Stock Condition Surveys on 20% of its housing stock annually, using a newly enhanced survey developed to meet WHQS standards. This updated survey captures critical data aligned with WHQS, Fitness for Human Habitation (FFHH), and Housing Health and Safety Rating System (HHSRS) guidelines. By gathering detailed insights into property conditions and performance, ClwydAlyn gains a clear understanding of its assets, supporting informed decisionmaking and ensuring that resident health and safety remain a top priority.



3 WHQS Resident Engagement Plan

See Appendix B



4 Independent Verification

4.1 Auditors

ClwydAlyn has appointed RSM Risk Assurance Services as its independent auditors. As part of the 2024/25 annual internal audit plan, two audits will include reviews of data collection procedures related to the Welsh Housing Quality Standards (WHQS). These audits include Data Integrity Reviews, which assess how data is controlled and utilised across ClwydAlyn's systems and processes, covering both financial and non-financial data.

4.2 Key Controls Healthcheck

RSM's Key Control Healthcheck will review several critical control areas within ClwydAlyn, including Asset Management, Credit Cards, Creditor Payments, Purchase Ledger, Human Resources, Payroll, and Housing Management. The purpose of this review is to evaluate whether ClwydAlyn has an effective control framework in place that addresses key systems, processes, and risks. Both of these reviews will contribute to RSM's annual assurance opinion.

4.3 WHQS Audit 2026

While certain elements of WHQS compliance will be audited during 2024/25, a comprehensive audit focused on ClwydAlyn's full compliance with WHQS will be conducted in 2026. Consideration is being given to appointing an independent external auditor, with the possibility of involving other Registered Social Landlords (RSLs) to assess specific elements. Full details of this audit will be outlined in the 2025 WHQS Compliance Policy.



5 Compliance Statement for New Lettings

A Statement will be issued at the point of re-letting. This will support the EPC certificate that the new tenant already receives. 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 are yet to meet the Standard.

See example <u>Appendix A</u>

5.1 Housing Health & Safety Rating System Assessments

To ensure ClwydAlyn's compliance with the regulations outlined by the Housing Health and Safety Rating System (HHSRS), a new stock condition survey has been developed incorporating HHSRS guidance. This will enable the identification and recording of any concerns during a stock condition survey, which will be promptly flagged to the property team. While not every property will undergo a full HHSRS assessment, certain triggers, such as the following, will alert us when an assessment is required:

- Serious health and safety concerns raised by a resident or ClwydAlyn employee that may affect physical or mental wellbeing
- Certain Stock condition element failures that could impact residents' physical or mental health. These particular elements apply to sections 1a, 1b, 2b, 4a, 4g, 5a, 5b, 6c and 7b of the WHQS Standard.

To minimise the need for these assessments, ClwydAlyn will ensure that all properties meet the majority of the Welsh Housing Quality Standard (WHQS) at the point of reletting. Certain elements, such as energy efficiency improvements, may be addressed at a later date, depending on the Targeted Energy Pathway and the scheduled plans for the property.



6 Elements not Measured

There are some elements within the WHQS standard that are not measured. These are:

- 3d Landlords must carry out a Whole Stock Assessment and produce Target Energy Pathways for their homes.
- 6 6d Homes should suit the specific requirements of the household.
- 6e Disabled and older people's housing requirements
- 8b Attractive Outside Spaces
- 8c Biodiversity
- Broadband (see page 6 WHQS 2023 and digital connectivity)

The following sections outline ClwydAlyn's approach to provide an understanding for all stakeholders how these elements are being progressed within ClwydAlyn.

6.1 Carry out a Whole Stock Assessment and produce Target Energy Pathways (3d)

Carry out a Whole Stock Assessment and produce Target Energy Pathways for their homes (3d).

The Whole Stock Assessment is being carried out through energy modelling software called Parity Projects (see section 10.2). This allows us to assess the energy performance of each property within our ownership and plan their future energy improvements. Parity Projects calculates an up-to-date energy assessment based on our data rather than a lodged EPC from the past. This allows more accurate decision making and appropriate resource allocation.

We will focus on the homes with the lowest energy efficiency first; those with the lowest SAP score. There are decisions to be made as to the extent of the retrofit of each property, whether to install measures to reach SAP75 and no more or whether to install more measures which will improve the SAP score higher than 75. Cost of installation, budgets, future programmes, resident disruption and resident preference all contribute, as well as other factors, to this decision making. We will engage with residents to provide them with a voice in the process and assist our decision making.

Once the whole stock's energy improvement requirements have been assessed, the Asset capital component replacement programmes will be overlaid to further assist in sequencing of works, maximising spend



and avoiding regretful works. This process will result in each property having a specific plan and timeline for its maximum energy efficiency improvement, called a Target Energy Pathway.

6.2 Homes to suit specific requirements of the household (6d)

Homes should suit the specific requirements of the household.

ClwydAlyn is committed to ensuring that the specific needs of each household are carefully considered. A pre-tenancy survey will be conducted to identify any cultural or family requirements of new residents, which may include preferences for home layout or external security features. The requirements may include additional bedrooms to meet the needs of multi-generational families or extra washing facilities required for religious practice.

Existing residents will also have the opportunity to discuss their needs with us. Prior to any planned upgrades, such as kitchens, bathrooms, or external areas, we will engage with residents to gather their input, ensuring a collaborative process that results in a home tailored to their needs.

We recognise the changing diversity of the communities we serve. With a notable increase in residents from diverse religious and national backgrounds, we see this as an ongoing learning journey that we are deeply passionate about. As part of the Welsh Housing Quality Standard (WHQS) program, we will host a dedicated Resident Engagement activity to discuss these matters in detail and implement meaningful steps that will shape our future approach.

6.3 Biodiversity (8c)

Biodiversity opportunities should be introduced by landlords who own or manage verges, parks, grounds and open green spaces by changing their management of these areas to make them more wildlife friendly.

ClwydAlyn has recently appointed an independent consultant to review the current grounds maintenance contract and recommend improvements to both the services we provide and strategies to increase biodiversity and enhance wildlife on our estates.

In the short term, once the new grounds maintenance contract is awarded, our residents will immediately benefit from an upgraded maintenance specification. Although ClwydAlyn previously conducted resident engagement sessions to discuss the grounds maintenance



contract, ClwydAlyn will be holding new engagement activities focused on biodiversity opportunities.

As part of this initiative, ClwydAlyn is considering the introduction of a 'Green Inspector Scheme.' Under this scheme, nominated individuals will contribute to:

- Improving green spaces and enhancing community environments
- Participating in regular walkabouts or holding resident surgeries to address concerns
- Organising annual gardening competitions
- A Helping residents understand what their service charge covers
- Appointing landscape architects and ecologists to promote biodiversity on larger estates and green areas

Through resident engagement, ClwydAlyn has identified several opportunities to enhance biodiversity across our estates. We aim to introduce the following measures in collaboration with our residents:

- Reducing mowing frequency
- Enhancing wildflower areas
- Re-seeding grassland with meadow mixes
- Planting native wildlife hedges
- Introducing more flowering shrubs and herbaceous plants
- Establishing container gardens
- Planting native trees and shrubs
- Installing bug hotels and nest boxes
- Planting ivy as a food resource
- Creating natural bee nesting sites
- Building log piles for wildlife habitats
- Installing bird nest boxes
- Reducing hedgerow cutting
- Introducing bat boxes and hedgehog highways
- Building or installing compost bins

6.4 Broadband/Digital Connectivity

To address digital exclusion among tenants and ensure equitable access to online resources for individuals and communities, ClwydAlyn will initiate an internal project to assess our housing stock and identify areas where digital connectivity may be lacking. Throughout this process, we will collaborate with residents to explore and implement solutions that enhance access to broadband and mobile data services.



6.5 Disabled and older people's housing requirements (6e)

At ClwydAlyn, we are dedicated to ensuring that all homes meet the diverse needs of our residents, including disabled and older people. Our policy is aligned with the principles of Lifetime Homes and higher accessibility standards, ensuring that these considerations are fully integrated into our refurbishment processes and asset management strategies, in accordance with our duty to make reasonable adjustments.

6.5.1 Incorporating Accessibility Standards in Refurbishments

During refurbishment, Lifetime Homes standards and enhanced accessibility requirements will be carefully considered and implemented wherever feasible. This includes adjustments for individuals with physical, sensory, learning, or other impairments. Where possible, we will ensure homes are adapted to:

- Provide step-free access to entrances.
- Ensure doorways and circulation spaces are wheelchairaccessible.
- Include adaptable bathroom and kitchen layouts.
- Ensure easy access to electrical fixtures and controls.

These measures will not only address the immediate needs of residents but will also prepare homes for potential future accessibility requirements.

6.5.2 Duty to Make Reasonable Adjustments

ClwydAlyn recognises its legal obligation to make reasonable adjustments to ensure homes are accessible and suitable for all residents. Refurbishments will be reviewed against both current and potential future accessibility needs. If full compliance with accessibility standards is not immediately achievable due to financial or structural limitations, we will work with our disabled residents to understand their individual needs and aim to agree an alternative way forward where it is reasonable to do so. In addition we will develop phased strategies to meet residents' needs over time.

6.5.3 Data Collection and Assessment of Need

We will actively gather and maintain data on the housing needs of all residents who require wheelchair-accessible or other adapted accommodation to meet their specific needs. This will include:



- Surveying and assessing the accessibility of our housing stock.
- Identifying the current and future demand for wheelchairaccessible homes.
- Collaborating with local authorities and disability organisations to understand the broader local needs for accessible housing.

6.5.4 **Providing Accessible and Independent Living Solutions**

ClwydAlyn is committed to ensuring that disabled and older residents who use wheelchairs are provided with homes that promote their wellbeing and independence. This will involve:

- Prioritising wheelchair-accessible housing for those who need it.
- Working closely with residents to assess their individual requirements and make appropriate adjustments.

6.5.5 Monitoring and Continuous Improvement

ClwydAlyn will regularly assess the accessibility of our housing stock and refurbishment processes, ensuring ongoing improvement in line with best practices and evolving standards. Feedback from residents with disabilities will be integral in evaluating the effectiveness of our adaptations and informing future strategies.

By embedding Lifetime Homes principles and higher accessibility standards into our refurbishment and asset management plans, ClwydAlyn will continue to create inclusive, adaptable, and sustainable homes that support the independence and quality of life of all our residents.

6.6 Attractive Outside Spaces (8b)

There should be adequate, practical, maintainable and safe community spaces.

In line with ClwydAlyn's commitment to creating inclusive and liveable communities, the provision of informal areas for residents, particularly children and young people, plays a vital role in promoting well-being, physical activity, and social cohesion. As part of our ongoing commitment to providing safe, practical, and well-maintained community spaces, ClwydAlyn will include the review and upgrade of external communal areas as a key component of our resident engagement activities.

Each estate, building, and property has designated staff members responsible for ensuring these spaces are properly maintained, safe,



and meet the needs of our residents. Through regular engagement with residents, the staff members will be tasked to gather feedback to better understand what is important to the community and identify areas for improvement.

This initiative will be aligned with our planned biodiversity upgrades, creating spaces where individuals, families, and especially children and young people, can thrive.



7 Cost Prohibitive

At ClwydAlyn, we define 'Cost Prohibitive' activities as those where the financial cost of implementing certain improvements does not result in a significant improvement in quality of living for our residents or in sufficient energy savings. Cost prohibitive situations may arise in the following instances:

- When the improvement offers minimal benefit in terms of resident quality of life or energy efficiency.
- When certain measures are only cost-effective if part of a larger, planned program that has not yet been scheduled.
- When current funding levels are insufficient to carry out the required work.

For example, upgrading external wall insulation or windows may be classified as cost prohibitive when these actions would only be financially viable within a future planned program, or if no funding is available to initiate such a program in the near term. Similarly, after significant improvements like window replacements and loft insulation, the installation of more costly measures (e.g., replacing a gas boiler with a heat pump) may be deferred if it would place the resident at risk of fuel poverty.

7.1 Managing Cost Prohibitive Situations at ClwydAlyn

When ClwydAlyn identifies a measure as cost prohibitive, it is important to address the situation in a way that balances financial prudence with our commitment to providing safe, energy-efficient, and high-quality homes.

To determine whether an element within the standard is deemed "Cost Prohibitive," ClwydAlyn will utilise the following methods to reach a well-informed conclusion:

1. Initial Inspection and Evaluation

- Assess the property's current condition, identifying areas that do not meet WHQS requirements, including:
 - Structural integrity
 - Energy efficiency (e.g., insulation, heating systems)
 - Safety features (e.g., fire safety, electrical systems)



Accessibility and adaptability

• Estimate the scope of work needed to address identified deficiencies.

2. Detailed Cost Estimation

- Develop a comprehensive cost estimate for each required improvement.
- Account for materials, labour, contractor fees, and administrative expenses.
- Include any specialised work required for older properties or those with unique structural challenges.

3. Market Valuation and Comparison

- Compare the estimated total costs to both the current and potential future market value of the property.
- Calculate the return on investment to determine if upgrading to WHQS standards is financially feasible, particularly for properties with lower valuations where costs may exceed market value.

4. Long-term Financial Projections

- Consider the expected lifespan and ongoing maintenance costs of the proposed improvements.
- Account for potential long-term savings, such as energy cost reductions from enhanced insulation or more efficient heating systems.

5. Alternative Options Analysis

- If upgrading the property to WHQS standards proves too costly, evaluate alternative options, such as:
 - Demolition and rebuilding if it presents a more costeffective solution
 - Selling or transferring ownership of the property
 - Redirecting resources to properties where WHQS compliance can be more feasibly achieved

6. Final Report and Decision-Making



 Compile findings into a comprehensive report with recommendations on whether to proceed with the upgrades.



8 Our approach

Our approach includes:

8.1 Incorporation into Future Works Programmes

When an improvement is deemed cost prohibitive, ClwydAlyn may incorporate it into our long-term planned maintenance and asset management programs. This allows us to achieve economies of scale and financial viability by scheduling these works alongside other necessary improvements, such as external upgrades. For example, external wall insulation may be aligned with future external building works or planned window replacements.

8.2 Prioritisation Based on Resident Benefit

In situations where funding is limited, ClwydAlyn will prioritise works that offer the greatest benefit to our residents, ensuring that essential improvements—those impacting safety, energy efficiency, or comfort are addressed first. Cost prohibitive measures will be reviewed regularly to determine when they can be undertaken as part of future programs.

8.3 Adapting to Market Changes

As market conditions evolve and new technologies become available, ClwydAlyn remains committed to revisiting measures that were previously identified as cost prohibitive. The option of 'Temporary Fail -Currently Cost Prohibitive' is available for measures that are currently too expensive to implement but may become viable as costs decrease, technologies advance, or funding becomes available. For example, as hydrogen-ready boilers or more affordable heat pumps become accessible, we will reassess their inclusion in future works.

8.4 Resident-Centred Approach

At ClwydAlyn, the well-being of our residents is at the heart of every decision. In cost prohibitive situations, we ensure that interim measures are taken to support residents, especially where there is a risk of fuel poverty or inadequate living conditions. Where possible, temporary solutions will be provided to mitigate the impact of delayed works, such as providing financial support for energy costs or improving home environments in other ways.



Through this approach, ClwydAlyn ensures that all homes continue to meet high standards, even when certain improvements are delayed due to cost concerns. Regular review, future planning, and a residentcentred focus ensure that cost prohibitive measures are managed responsibly while maintaining our commitment to providing quality housing.



9 Target Energy Pathways

Our approach to developing Target Energy Pathways is based upon a thorough analysis of our housing stock to ensure that each property reaches the required energy performance standards (3a) and 3b) as per WHQS 2023. The process includes:

9.1 Resident Consideration

We understand that the resident journey is important and that they will be affected by the upgrades and also the timing of the upgrades. Engaging with residents and planning the sequencing of the measures to be installed to be considerate of residents.

9.2 Tailored Pathways

For each property, developing a bespoke Target Energy Pathway and identifying specific interventions needed to achieve the energy efficiency standards required. These pathways consider the unique characteristics of each archetype, ensuring that solutions are practical, cost-effective, and minimally disruptive to residents.

9.3 Scenario Modelling

Using asset and energy modelling tools, running multiple upgrade scenarios to determine the most efficient and feasible pathway for each property, and balancing improvements in energy performance with financial constraints and capital work programs.

9.4 Energy Assessments

Conducting comprehensive energy performance assessments (such as Energy Performance Certificates (EPCs) or SAP assessments) for each property to understand its current energy rating.



10 Asset and Modelling Systems Used

To gather, record, and process information related to the energy performance of our housing stock, we will employ the following asset and modelling systems:

10.1 Asset Management System – Civica Cx

CX Assets serves as the central repository for all property-related data, including construction details, maintenance history, and energy performance metrics. This system is the single point of truth and ensures that we can access up-to-date information on the entire portfolio, which is critical for accurate energy assessments and planning.

10.2 Parity Projects

We are able to model various scenarios relating to the energy performance of all our portfolio with Parity software. Parity takes the data from CX and is able to calculate the expected energy performance of the property. This tool will help us to evaluate the impact of different retrofitting measures (e.g., insulation, heating systems, renewable energy technologies) and to determine the most effective combination of interventions.

10.3 Stock Condition Surveys

Regular surveys will continue to gather critical information on property conditions, including insulation levels, heating system efficiency, and window/door quality, which will be fed into CX and then into Parity Projects for the modelling systems to enable forward planning of works.

10.4 Data Improvement Plan

To ensure the accuracy of our energy performance data and facilitate ongoing compliance, we will implement a robust Data Improvement Plan:

Data Quality Interrogation: We will regularly interrogate the quality of our data by testing our existing stock data on the condition surveys of 10% of properties that become void.

Data Cleansing: We will conduct a thorough review of existing data within our CX Assets and rectify any inaccuracies or missing



information. This may involve revisiting properties for updated surveys or recalculating energy performance metrics.

Ongoing Data Collection: Future stock condition surveys will incorporate additional data points relevant to energy performance to allow for more comprehensive planning.

Integration with Energy Modelling Systems: We will integrate Parity Projects into CX Assets to ensure a seamless flow of updated data between systems, allowing for updates to energy models as new data is collected.

Tenant Engagement: Engaging with tenants to understand their energy usage patterns and collecting feedback on proposed interventions will enhance the accuracy of our models and ensure that any upgrades align with tenant needs.

10.4.1 Homes Not Meeting Standards

While our goal is to bring as many homes as possible into compliance with WHQS 2023, there will be instances where it is not feasible for homes to meet the energy efficiency standards set out in 3a) and 3b). These situations may arise due to:

10.4.2 Building Limitations

Some properties, such as listed buildings or those with specific architectural characteristics, may not be suitable for certain energy efficiency measures (e.g., external wall insulation or window replacements) without compromising their structural integrity, historical value or architectural characteristics.

10.4.3 Cost Constraints

In cases where the cost of bringing a home to the required energy standard is disproportionately high compared to its value or potential savings in energy costs, alternative approaches will need to be considered. This may involve seeking exemptions or proposing alternative energy-saving measures that provide the greatest benefit at a reduced cost.

10.4.4 **Tenant Refusal**

In some cases, tenants may refuse certain retrofit measures due to disruption or concerns about the impact on their living environment. We will work closely with tenants to address concerns, but in cases where



consent is not granted, the property may not reach the full energy standard.

10.4.5 Mitigation Plans

For properties that cannot meet the energy performance standards, we will develop mitigation plans, such as partial compliance with the highest achievable standards, or alternative carbon offsetting strategies. Where possible, we will seek grants or external funding to assist with challenging retrofit projects.

- Element 3d. The brief narrative should contain:
- The approach to generating Target Energy Pathways;
- The asset and modelling systems used to gather, record and process information;
- A Data improvement plan, if one has been produced;
- Information for each significant archetype of property to outline the rationale behind their approach; and
- Information where homes will not reach the standards set out in 3a) and 3b).



11 Carbon, Demolition and Redevelopment

As part of our commitment to achieving WHQS 2023 compliance and supporting Wales's broader goals for carbon reduction, we must assess not only the operational carbon of our homes but also the embodied carbon associated with various interventions. Decisions around retrofitting, demolition, and redevelopment require careful consideration of their full carbon impact to ensure we take the most sustainable approach. At present, we don't conduct whole life carbon assessments due to the lack of situations arising where this is needed. However, after the recent energy efficiency upgrades to our poorest performing homes, there are clear decisions that need to be made using assessment tools to determine whether some housing estates should be retrofitted, or demolished and redeveloped. We will use the following approaches for these situations.

11.1 Whole Life Carbon Assessment (WLCA)

We will adopt the Whole Life Carbon Assessment methodology as defined by the Royal Institute of Chartered Surveyors (RICS) in their Professional Statement: Whole Life Carbon Assessment for the Built Environment. This methodology provides a robust framework for evaluating carbon emissions over the full life cycle of a building, accounting for both embodied carbon (the carbon emissions generated during material production, construction, and disposal) and operational carbon (emissions from the building's energy use during its lifetime). This methodology will form part of our decision-making process including other factors such as costs relating to works and value of property amongst others.

Retrofitting existing homes and demolition and redevelopment will be evaluated based on its carbon emissions across the following stages:

- Product stage (A1-A3): Raw material extraction and production.
- Construction stage (A4-A5): Transportation and construction/ demolition emissions.
- Use stage (B1-B7): Energy use, maintenance, and repair over the building's operational life.
- End-of-life stage (C1-C4): Demolition, waste processing, and disposal.

11.2 Carbon Comparison

Retrofitting verses Demolition and Redevelopment



11.2.1 **Retrofitting**

Retrofitting involves upgrading the energy performance of homes by installing insulation, efficient heating systems, and renewable energy sources. While retrofitting requires materials and construction work, it preserves the existing structure, minimising embodied carbon from construction and materials. The main carbon impacts of retrofitting fall under:

Embodied Carbon: Emissions from the production and transportation of retrofit materials (e.g., insulation, windows, boilers, solar panels).

Operational Carbon: Reductions in operational carbon as a result of improved energy efficiency, such as lower heating demand and electricity usage, offsetting the initial carbon cost of retrofitting over time.

Carbon Advantage of Retrofitting:

Lower Embodied Carbon: Retrofitting generally has a lower embodied carbon footprint compared to demolition and new construction, as it involves fewer materials and less energy-intensive processes.

Immediate Operational Carbon Savings: Since retrofitting focuses on improving energy efficiency, it results in immediate operational carbon reductions, especially when combined with renewable energy installations.

11.2.2 Demolition and Redevelopment

Demolishing existing homes and redeveloping new ones offers the opportunity to construct highly energy-efficient buildings from the outset, potentially achieving net-zero operational carbon standards. However, this approach comes with significant embodied carbon costs:

Embodied Carbon: The embodied carbon from demolition, new material production (e.g., concrete, steel), and construction processes is much higher than retrofitting. The demolition process itself generates emissions from machinery, transportation, and waste management.

Operational Carbon: New homes can be designed to meet the highest operational energy standards, including Passivhaus or zero-carbon standards, which reduce or eliminate operational carbon over the building's lifespan.

Carbon Challenge of Redevelopment:



- High Initial Embodied Carbon: The embodied carbon from construction can take decades to offset, even with highly energyefficient new builds.
- Delayed Operational Carbon Benefits: Although operational carbon savings from new builds are significant, they must be weighed against the initial embodied carbon burden.

11.3 WDQR 2021 Requirements for New Developments

The Welsh Development Quality Requirements (WDQR) 2021 set out criteria for new homes to achieve high standards of energy efficiency, sustainability, and quality.

By adhering to WDQR 2021, we ensure that any new development following demolition aligns with industry-leading sustainability standards, reducing operational carbon to near-zero levels and implementing strategies to lower embodied carbon through design and material choice.

- present an assessment of carbon considerations using a recognised methodology such as Royal Institute of Chartered Surveyors (RICS) Professional Statement 'Whole life carbon assessment for the built environment'
- compare embodied and operational carbon in the proposal for retrofitting homes, against the carbon cost for the proposal to demolish and redevelop homes
- Welsh Development Quality Requirements (WDQR 2021) 1c) require new development to adopt best practice.



12 Community Benefits

Community benefits are positive outcomes for local people and communities, e.g., including boosting employment and skills or providing community facilities.

ClwydAlyn has a Social Value strategy and considers Social Value in all procurement activity where appropriate and proportionate. We include Social Value proposals in our tender documentation and award an evaluation criterion weighting of between 10-20 % to bidder's responses and proposals. Successful suppliers who are awarded a contract will agree to a Key Performance Indicator on their Social Value commitment included in the contract and this will be monitored on a regular basis via the Contract Management plan.



Appendix A – Compliance Statement for New Tenants

assess variou		now, our aim is to achieve full compli properties will be handed over safe a stable, but some standards may not	While some elements may not meet the standards now, our aim is to achieve full compliance by 2034. Al properties will be handed over safe and structurally stable, but some standards may not be met for various reasons, such as the timing of kitchen or bathroom renewals.	
Standards o	re recorded αs:			
Pass	Conditional Pass	Temporary Fail Fail	N/A	
Structural	Stability and Safety:	Select one	•	
Kitchen and Bathroom:		Select one	•	
Outdoor Areas:		Select one	•	
Energy Efficiency:		Select one		
Comfort and Living Space:		Select one	•	
Comment:				
Name:	Representative:	If you would like any further informat compliance statement, please email WHQS@clwydalyn.co.uk You can read the WHQS standard he	your enquiry to:	
Signature:		Welsh Housing Quality Sta	ndard 💥	



Appendix B – WHQS 2023 Resident Engagement Strategy

The aim of the strategy is to outline our broad approach to Resident Engagement in relation to delivering the requirements of Welsh Housing Quality Standard 2023 (WHQS) published by Welsh Government in April 2024.

Welsh Housing Quality Standard 2023 (gov.wales)

What is WHQS 2023?

The purpose of this Welsh Housing Quality Standard (WHQS) is to improve the quality of social homes in Wales. Welsh Government intends to drive up the Standard of existing social housing by setting a demanding Standard which all social landlords in Wales are legally obliged to meet.

At its heart, WHQS 2023 is a tenant focused Standard, designed to upgrade social homes in a way that contributes to positive health, education and wellbeing outcomes for tenants. The investment required to enable homes to meet the Standard, also provides a significant opportunity to generate and retain prosperity for local communities, through the creation of jobs, training and apprenticeships in the supply chain.

The Welsh Government recognises that to foster pride, belonging and ownership, tenants should be encouraged to take the opportunity to be involved in making any decisions that affect their community and environment.

WHQS 2023 sets out the minimum quality Standards for existing social homes, and Welsh Government encourages social landlords to aim for Standards beyond the minimum requirements specified in the WHQS.

WHQS has three other objectives -

WHQS 2023 and digital connectivity

Landlords should consider how they can alleviate digital exclusion amongst tenants. Digital connectivity is a social justice matter, with Ministers expecting social landlords to be innovative in maximising the opportunity for individual households and communities to have, where possible equal access to online opportunities.

WHQS 2023 driving towards a Net Zero Wales

WHQS sets out Standards relating to the decarbonisation of social homes and aims to reduce carbon emissions from the Welsh housing stock. This Standard



contributes towards governmental climate change goals expressed through the Net Zero Wales plan published in 2021 and updated in 2022.

Housing Health and Safety Rating System (HHSRS)

The HHSRS is used to assess a number of elements within a property. It is a health-based risk assessment tool for the evaluation of housing conditions. The potential risk of harm to the occupier from their living environment is evaluated and the seriousness of any hazard identified is rated.

A hazard is any risk of harm to the health and safety of an occupier that arises from a deficiency. A deficiency is a failure of an element to meet the 'ideal', i.e., the perceived optimum standard intended to prevent avoid or minimise the hazard.

The failure could be inherent, such as a result of the original design, construction or manufacture, or it could be a result of deterioration, disrepair or a lack of repair or maintenance.

We are required to carry out HHSRS inspections at each property reletting and to remedy any failures identified.

Property Standards

In terms of property standards to meet WHQS a home must be:-

- in a good state of repair
- safe and secure.
- affordable to heat and have minimal environmental impact
- A have an up-to-date kitchen and utility area
- A have an up-to-date bathroom
- be comfortable and promote wellbeing
- A have a suitable garden
- A have an attractive and practical outside space

A home will meet the Standard when all relevant elements are achieved. It is recognised that some elements of the Standard are not applicable to all homes. It is also recognised that not all homes will be able to achieve some elements for various reasons.

The original WHQS document was published in 2002 and updated in 2008. The new version has been updated and improved, including areas where research and societal changes had changed expectations. The current version includes:-

- Data collection and reporting
- Compliance policies
- Fire and electrical safety



- Affordable Warmth and Environmental Impact (new elements)
- Flooring (new element)
- Water efficiency (new elements)
- Biodiversity (new element)
- Active travel (new element) and
- Noise nuisance (new element).

Our Approach

To meet the requirements of WHQS and Welsh Government's targets we need to understand our stock and our customer's requirements, specifically we need to understand the condition of the properties and their energy efficiency rating in order to identify the works required to meet WHQS.

Welsh Government expect social landlords adopt a holistic view of quality, recognising the benefit that quality and culturally suitable homes will have on both physical and mental wellbeing for all. It is expected that all homes should be of high quality, be healthy to live in and meet community, family and individual needs of tenants.

WHQS guidance recommends that social landlords actively engage with their tenants to shape their programme of works and to take account of feedback from other tenants' lived experience of retrofits, in order to improve how homes can be efficiently and effectively maintained, upgraded and decarbonised in future.

We already have stock condition information on the majority of the stock, and we are carrying out a rolling 20% stock condition survey to improve our records and allow area specific programmes to be developed. The programmes are going to be developed addressing two issues – like for like component replacements (e.g., kitchen or bathroom replacements) and Target Energy Pathways (TEP). TEPs are the energy improvement works required to bring properties up to Net Zero or as close as possible.

When developing our programmes we will acknowledge these two issues and endeavour to plan works to properties in a logical order to minimise disruption and to prevent financial resources being wasted. Some components might be at the end of the life cycle and in need of replacement, but WHQS requirements might mean that a new and different component may need to be installed, e.g., moving from a gas boiler to an air source heat pump.

Assessment and Data Collection

An assessment of each of our properties against the elements of the Standard will be conducted and submitted to the Welsh Government alongside basic and supporting information on each property.



This information may include:

- Inique Property Reference Number (UPRN);
- Age of property;
- Type of property;
- Onstruction type;
- Number of storeys;
- Number of bedrooms;
- Occupancy;
- A Household type;
- Assessment of each element of the Standard;
- Q Current SAP score;
- Calculated or modelled SAP and version used;
- Date property expected to achieve SAP 75 and 92; and
- A Hazard rating scores for Hazard referenced in the Standard.

Reporting

The data specified within this data collection will be submitted at a property level at the end of the first full financial year of the Standard (31 March 2025) and annually thereafter. However, it is recognised that this may not be achievable for all social landlords.

Our initial target is to move all properties up to SAP 75 to help reduce fuel poverty and to address the least thermally efficient properties first.

As a minimum, an assessment of each element of the Standard for all homes within a social landlord's portfolio must be completed. This will be reported at a property level to the Welsh Government.

Programme

We are adopting a cautious approach, not wishing to rush in and make hasty decisions that may turn out to be ill-advised when more information is available to inform our decisions.

Year 1 Programme 2024/25 – we are developing a programme for this year, the principles of which are:-

1. Resident-Centric Approach

- Engagement and Communication: Actively involve residents in the process through consultations, surveys, and forums to understand their needs and priorities.
- Transparency: Clearly communicate timelines, benefits, and progress to residents, building trust and understanding.



Tailored Support: Ensure vulnerable tenants receive specific support, particularly in cases involving significant disruptions (e.g., major repairs or upgrades).

2. Data-Driven Decisions

- Stock Condition Surveys: Conduct comprehensive surveys to identify and prioritise properties requiring the most urgent work.
- Baseline Assessments: Establish a detailed baseline of current compliance with WHQS to track progress.
- Feedback Integration: Use resident feedback and repair history to refine prioritisation.

3. Sustainable Planning

- Focus on Energy Efficiency: Prioritise measures to meet energy efficiency targets (e.g., insulation, heating upgrades) to reduce carbon footprints and tackle fuel poverty.
- Damp and Mould Remediation: Address existing issues to prevent health risks and ensure homes are warm and dry.
- Futureproofing Homes: Ensure any upgrades align with upcoming regulatory requirements, including decarbonisation targets.

4. Collaboration and Partnerships

- Internal Coordination: Promote strong communication between housing, maintenance, and finance teams to align objectives.
- External Stakeholders: Collaborate with housing associations, local authorities, contractors, and resident groups to pool resources and share best practices.
- Training and Upskilling: Equip staff with the knowledge and skills needed to implement the programme effectively.

5. Realistic and Flexible Implementation

- Contingency Planning: Prepare for potential delays (e.g., contractor shortages or supply chain issues) to minimise disruption.
- Budget Control: Monitor and adjust budgets to ensure financial sustainability.

6. Monitoring and Evaluation



- Set Clear Metrics: Define success indicators for the first year, such as the number of properties upgraded or tenant satisfaction levels.
- Regular Reviews: Conduct quarterly progress reviews to assess adherence to plans and adjust strategies where necessary.
- Learning from Challenges: Document lessons learned to inform the programme in subsequent years.

In addition we are using 2025/26 as an opportunity to develop a comprehensive 5-year rolling programme of works based on geographical locations. Once the locations are agreed we will develop area specific programmes which will allow us to hold resident engagement sessions.

Our aim is to hold sessions that are meaningful and specific and not too general and vague. We know from experience that if residents cannot see the relevance to them and their property, they are likely to disengage and avoiding this outcome is our priority and focus.

We have set out below some of the work that these programmes will include:-

- Making good ClwydAlyn accepts responsibility for repairing damage caused by disrepair or by the work to fix it.
- Affordable warmth and minimal environmental impact ClwydAlyn can confirm that the phased improvements we perform on our homes will be informed by Target Energy Pathways. A planned and phased program of achievement will occur with a first step of fabric improvement

Timeline for achievement of the Standard - ClwydAlyn confirms that by the 31st of March 2025, we will have:

- Assessed the condition of our stock and the work necessary to meet the Standard;
- Estimated the investment needed to achieve the Standard;
- Ocompleted tenant engagement on the programme;
- Prepared and submitted a Compliance Policy to the Welsh Government; and
- Ipdated the Business Plan to Reflect the programme.



Principals and Indicative Timeline

- Draft WHQS Compliance Policy and Resident Engagement Strategy agreed November 2024.
- Agree headline priorities with the Resident Committee. January 2025.
- Implement and mobilise Cx Assets our asset management system which houses the stock condition and energy data and allows programmes of works to be developed.
- Develop and seek approval for the 5-year rolling programme to allow focused deliver across the stock.
- Continue data collection and data cleansing.
- Year 1 Programme. By 31st March 2025 assess stock condition, develop a plan with costings and engage tenants, prepare and submit WHQS Compliance Policy and update Business Plan to reflect WHQS requirements.
- Develop improvement programmes to raise properties to SAP 75.
- Develop other capital programmes (e.g., component replacements).
- Develop a new approach to Voids, incorporating WHQS improvements where possible.
- Using our records develop more detailed programmes for each year and each area which will form the basis of the more detailed Resident Engagement discussions. These will include local meetings, presentations workshops, emails, texts and newsletters.
- Develop the draft Target Energy Pathways.
- By November 2025 agree the budget and programme for the financial year 2025/26.
- A Year 2 Programme deliver the 2025/26 investment programme.
- After data collection undertake the Whole Stock Assessment and vision.
- By 31st March 2027 Produce Target Energy Pathways. Informed by the Whole Stock Assessment.
- Move to business as usual as the 5-year rolling programme deliver the WHQS improvements across the whole property portfolio.
- **1** By 31st March 2034 target for all stock to meet the standard.

Implementation and Practical Concerns

- Communications information and misinformation
- Access
- Managing expectations and perceptions
- Prioritising works
- Refusals
- Ensuring value for money
- Complaint handling
- Decanting
- Individual situations EG tenants working from home, hoarding
- Meeting equality needs
- Interpretation of standards



Considerations for Tenants

- Change
- Fear/concern
- **Disruption**
- Anticipation
- **Q** Waiting
- Who's playing rent increases
- 🗴 VFM
- Will support needs be met
- Ontractors in the home quality, professional caring, understanding

Develop a Resident Engagement Framework as suggested by TPAS (see below).





Appendix C – Resident Engagement Focus 2025/26

Resident Engagement Plan

As the new Welsh Housing Quality Standard (WHQS) covers a broad range of topics, it is essential that resident engagement activities are both meaningful and informative. It is equally important to ensure that communications do not raise unrealistic expectations by sharing inaccurate or speculative information.

ClwydAlyn engaged with residents to gather their views on the organisation's approach and priorities for resident engagement in the 2025/26 financial year. Following these discussions, residents identified two key topics as the primary focus areas:

- Decarbonisation and Retrofitting
- Mome Improvements

Decarbonisation and Retrofitting

Decarbonisation can appear complex, but ClwydAlyn is committed to ensuring residents feel confident and enthusiastic about the journey towards achieving NetZero. Building trust between ClwydAlyn and residents is a fundamental part of this process. Engagement on this topic will focus on simplifying technical concepts, addressing concerns, and highlighting the benefits of decarbonisation for residents and their homes.

Home Improvements

The Home Improvement topic will encompass most elements of the WHQS. It will provide residents with detailed explanations of planned specifications, the expected improvements to their homes, and the process involved in carrying out these upgrades. Transparent communication is key to ensuring residents understand what to expect and feel reassured throughout the improvement journey.

Capturing and Using Resident Feedback

Resident feedback from engagement sessions during 2025 and 2026 will play a pivotal role in shaping ClwydAlyn's operations and ensuring that the WHQS implementation is aligned with resident needs and priorities. To support transparency and accountability:



- A dedicated page on the ClwydAlyn website will be created to showcase questions raised during engagement sessions, along with responses and actions taken.
- All frequently asked questions, suggestions, and requests will be documented and made publicly accessible on this page, ensuring residents know their contributions are valued and considered.
- Regular updates will be provided to demonstrate progress and maintain trust.

Flexibility and Resident-Led Prioritisation

While the initial focus is on Decarbonisation and Home Improvements, ClwydAlyn recognises the importance of flexibility. The residents will play a key role in determining the prioritisation of topics, which may include but are not limited to:

- Mealth and Wellbeing
- Safety and Security
- Environmental and Biodiversity Enhancements
- Community Involvement
- Technology and Smart Homes
- Tenant Priorities and Satisfaction
- Training and Employment Opportunities
- Water Efficiency
- Digital Connectivity
- Home Adaptations for Accessibility
- Noise Reduction
- Local Procurement and Contractors
- Sustainable Materials Use
- Maintenance Schedules
- Accessible Communication Channels
- Shared Spaces and Communal Living
- Cultural and Social Inclusion
- Waste Reduction Initiatives
- Garden Sheds
- Carpeting the Home
- Procurement of Contractors
- Kitchens and Bathrooms
- Drying Areas

The range of potential engagement topics ensures ClwydAlyn remains responsive to resident concerns and emerging priorities.



Raising Awareness of WHQS

Given the early stage of WHQS development, increasing general awareness of the standard is a priority for 2025 and 2026. ClwydAlyn will utilise a variety of communication methods to achieve this, including:

- Social media campaigns
- Website articles
- Questionnaires and surveys
- Informative videos
- Newsletters and email updates

These channels will provide accessible and engaging content to keep residents informed and involved.

Conclusion

ClwydAlyn is committed to fostering meaningful engagement with residents throughout the implementation of the WHQS. By focusing on transparency, flexibility, and collaboration, this plan aims to build trust, address resident needs, and support a successful transition to a higher quality of housing for all.



Appendix D – Acronyms and Terms used

Acronym/Term	Meaning
сх	ClwydAlyn's Housing Management and Asset Management system.
ECP	Energy Performance Certificates
HHSRS	Housing Health and Safety Rating System
RICS	Royal Institute of Chartered Surveyors
RSL	Registered Social Landlord
RSM	RSM UK Audit, Tax and Consultancy Services
SAP	Standard Assessment Procedure
WDQR	Welsh Development Quality Requirements
WHQS	Welsh Housing Quality Standards
WLCA	Whole Life Carbon Assessment