



Building Independence
Adeiladu Annibyniaeth

WHQS Compliance Policy V1 2025



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Statement of Intent

FCHA is passionate about providing high quality homes for our tenants and was rightly proud of achieving the last Welsh Housing Quality standard in 2012. We welcome the introduction of the new standards and have been working to both understand the impact of delivering these as well as the key milestones we need to reach in order to do so. We are committed to achieving the standards, where this is possible, for all of our properties and have been laying the groundwork for this for some years through our work on decarbonisation. Our Compliance policy will continue to evolve as the standards themselves will no doubt evolve however we will be transparent about our plans, progress and achievements and will publish this progress annually on our website.

Introduction

First Choice Housing Association (FCHA) has had the privilege of housing people with a learning disability for more than 35 years. Over that time, we have grown significantly and have an ambitious 5 year development programme which will see the association continue to grow in a sustainable way. In 2024 we reached a milestone in now providing ordinary houses in ordinary streets for 1000 tenants to live. The association is rightly proud of this achievement and what it means for the tenants who live in our properties.

First Choice have reported full compliance with the WHQS since December 2012 and maintained that compliance until the introduction of the new standards. With regards to the new standards outlined in WHQS 2023 FCHA, and all other Welsh associations, will have to start from a baseline that is no longer compliant. Instead, we are progressing to full compliance by 31st March 2034, with targeted stages in-between.

This Compliance Policy will set out how the association plans to achieve all the target steps, and it is through this document that all stakeholders, including the Board of Management and the associations Tenants can monitor progress. This policy will be reviewed annually from its introduction on 31st March 2025.

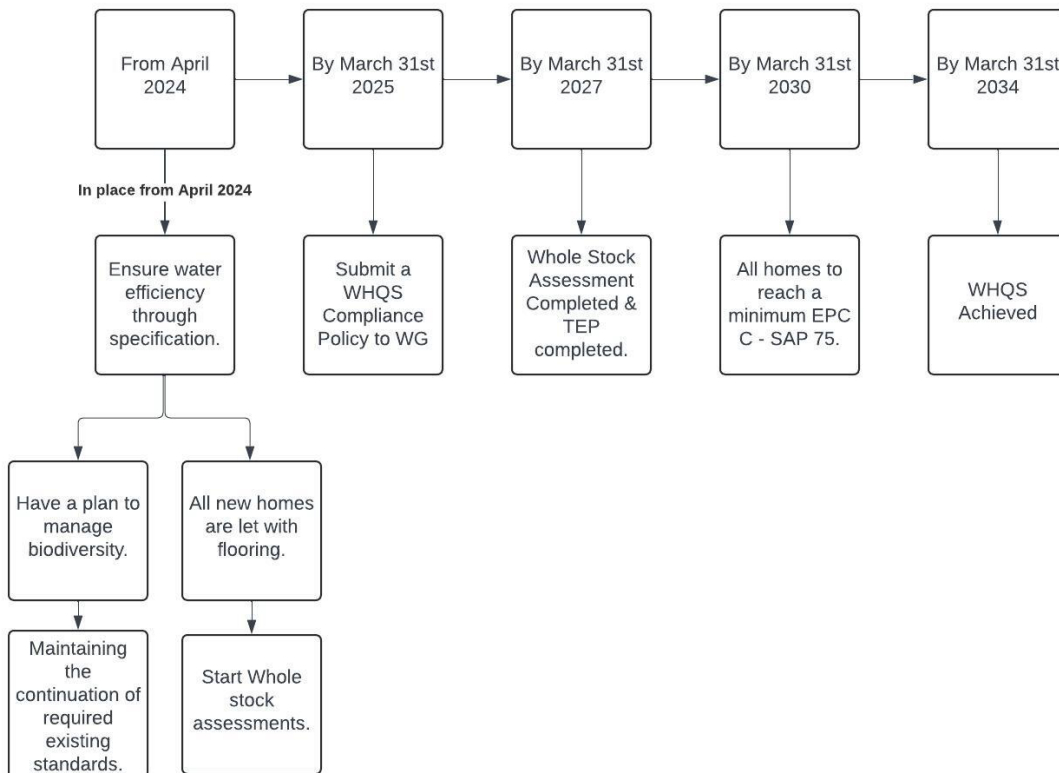
This compliance policy is intended to provide assurance to stakeholders of the accuracy of any statistical returns to Welsh Government, with the following key areas covered:

- Approach to WHQS, reflecting local resources and circumstances;
- Asset management software;
- Tenant engagement;
- Independent verification;
- Compliance statements for new tenants;



- Elements not measured, to be covered by detailed explanatory statements;
- Cost prohibitive activity;
- Target Energy Pathways Narrative;
- Redevelopment, demolition and carbon; and
- Community benefits.

Progress has been made on the association’s journey to full compliance with the standards by March 31st 2034. The introduction of this policy is part of that important early work which was required to be completed by 31st March 2025. The next key milestone to achieve by 31st March 2027 is the completion of a Whole Stock Assessment leading to a Target Energy Pathway (TEP). This is a fundamental requirement of compliance with the standards. There must be an understanding that until these are completed and in place, gaps in the full data set will remain. It is the intention of this policy to assure stakeholders that the set milestones below are met.



FCHA's Approach to WHQS, reflecting local resources and circumstances

The Associations Procurement Policy stipulates the following relating to relationships and local resourcing: -

1. FCHA will work with organisations across the Health & Social Care Sector where there is benefit. This will be achieved through FCHA engaging with other organisations, through staff developing effective relationships and through FCHA being an outward looking organisation.
2. We will seek to work with local suppliers and involve users of our services where possible.
3. We will collaborate with others to avoid duplication of effort and in turn to reduce waste and maximise efficiencies.
4. The use of Sell2Wales and other procurement tools supports the practicalities of this approach by identifying local SMEs offering relevant goods and services.
5. FCHA will continue to work with other Housing Associations where there is a benefit from economies of scale or other tangible benefits such as knowledge sharing with other partners.
6. Where work is related to the energy improvement of a property, works will be designed, specified and completed in accordance with PAS 2030:2023 & PAS 2035:2023, and only undertaken where they are not detrimental to the structure & fabric of the building.

FCHA's Asset Management Software & Databases

Energy

First Choice has chosen Intelligent Energy software by SAVA, to prepare the associations information for each property's Target Energy Pathway. It uses powerful RdSAP and SAP engines to calculate the performance of the Associations whole stocks with accuracy and speed. It is fully aligned to the latest version of the national calculation methodology, and it delivers the full range of required outputs including:

- SAP rating and EPC band
- Carbon output and EI band
- Resident energy cost
- Space Heating Demand and other critical metrics



- Include a set of improvement options with associated energy and carbon saving

The engines use the latest version of RdSAP – RdSAP 9.94 – but also include a SAP 10 allowance for newly contracted dwellings and while it has SAP 10 previewer in recognition of SAP 10 being used for SAP calculations sometime in 2025.

Hosted on scalable Microsoft Azure servers, Sava Intelligent Energy can calculate the SAP analysis on a stock of 10,000 properties in just 4 minutes

The Associations WHQS data is recorded in an Excel spreadsheet, which serves as part of the data source for a Power BI dashboard, allowing for visualisation and monitoring. This data storage system allows for wide access of current information but is restricted to change by authorised personnel only to protect data integrity.

The Association uses a Structured Query Language (SQL) database with a Microsoft Access front-end for managing stock condition data. The SQL backend provides robust data storage, while the Access front-end enables user-friendly data interaction.

Tenant engagement

First Choice is committed to providing accessible information, in the most appropriate format, this starts by working alongside tenants, residents and other people who use our services to ensure they can influence the way we work and deliver all services.

We engage with our tenants and support staff to understand their needs and preferences, to improve the quality of life for our tenants. These are through:

- Tenant Surveys
- Tenants Participation Meetings (Appendix D)
- Biennial inspections
- Project delivery meetings

All tenants are encouraged to be involved in the decision-making process through these organised tenant event across Wales and including home visits made by the Association, our tenants views and priorities will be the highest priority of influencing the delivery of WHQS to date and the future.



Independent Verification

As a result of the Audit Wales review of WHQS in 2012 the requirement for independent verification was introduced, the same requirement remains. This compliance policy will demonstrate the Associations arrangements for independent verification against the Standard.

Fig.1 WHQS Data Process Map

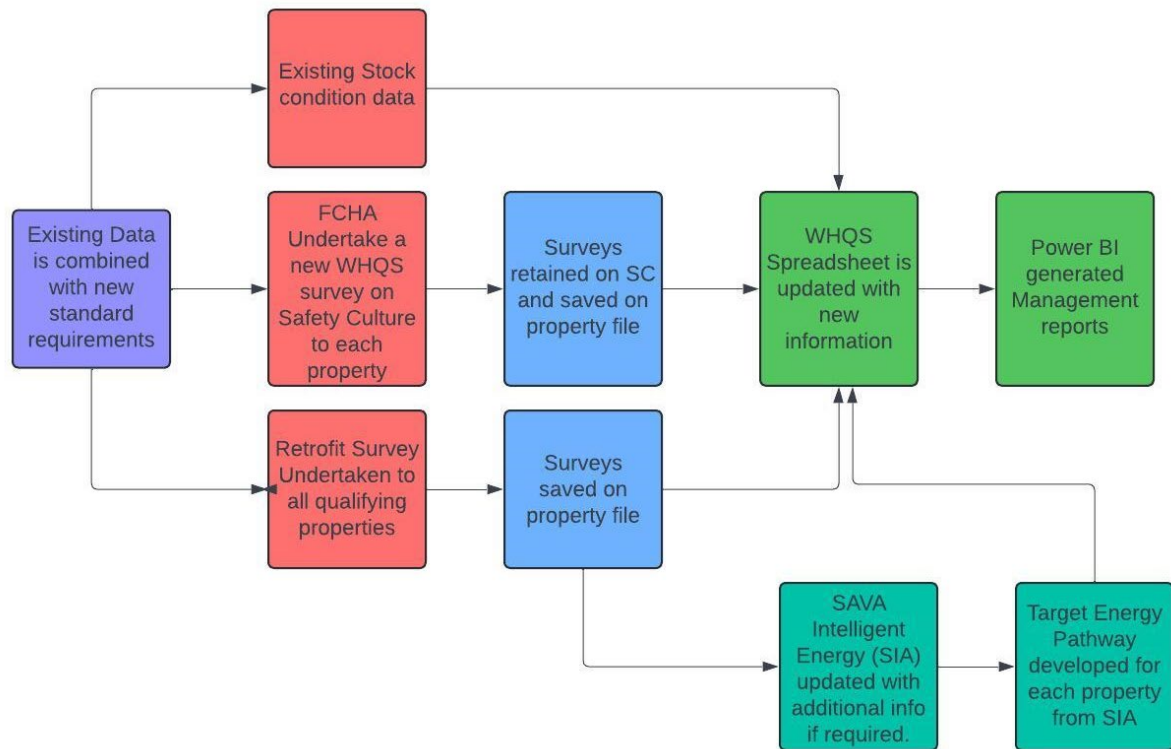


Fig 1. Shows the process of data collection and recording, data from both the Retrofit and WHQS surveys is recorded electronically on Safety Culture (SC) this allows for repetitive questioned survey and is loaded with photographic evidence.

The answer to each question is recorded on the new WHQS spreadsheet. This spreadsheet will be loaded onto Power BI which will allow for the full interrogation of the data.

SAVA Intelligent Energy (SIA) will measure each properties energy performance and measure its carbon footprint from the RdSAP of each home and calculate its retrofit protentional, allowing for a fabric first approach to its targeted energy pathway.



The independent verification process for FCHA will be undertaken by the Associations internal auditors, this will be completed as part of the association's cyclical audit programme starting in the financial year 2026/27 and every 2 years thereafter.

The initial audit will be undertaken as a desk top exercise, with the following information collated and made available to the auditor for all properties:

- Biennial maintenance visit survey sheets (electronic and filed)
- Electronic WHQS survey sheets
- Stock condition database access
- Retrofit survey data
- WHQS record spreadsheet and linked Power BI dashboard
- SAVA Intelligent Energy
- Each qualifying target energy pathway.
- Previous component and major repair replacement records
- Access to all policies and procedures
- Validation of cost projections and the association's ability to fulfil these
- Property contacts and/or property visits available if deemed required by the Internal Auditor.

The Retrofit and WHQS surveys will provide photographic evidence of each question required to meet WHQS allowing the auditor to cross reference the survey evidence, with the recorded data. The auditor can further satisfy compliance with site visits should they deem them required.

The Association will be seeking independent verification of and assurance on:

- Accuracy of the collated WHQS data that is being relied on – testing back to source evidence (surveys).
- Accuracy of performance reporting to Board and WG on compliance – validating the progress made and current compliance reported against supporting data sources.
- Testing the robustness of data integrity controls around the Associations WHQS data.



FCHA's compliance statements for new tenants

There are 8 parts to meeting the standard and can be judged by where an area is either one of the following four headings:

- not applicable,
- pass,
- conditional pass
- or temporary fail.

The Association will inform all new tenants of where their new home meets but more importantly does not meet the standard. The new Compliance Statement (Appendix A) for new tenants will inform new tenants of timescales to meet the standard where a heading is recorded other than a Pass.

Statements on items not measured for reporting

Standard 6d. Homes should suit the specific requirements of the household.

First Choice provides bespoke homes that meet tenants needs when let, the Association fully understand that circumstances change, and homes can become more difficult to live in.

First Choice have always been proactive in ensuring homes are fit for use, during each home's biennial inspection the question of the home's suitability is questioned and responses recorded. If required a tenant needs-based assessment can be carried out by the Technical Officer to identify if the property is still suitable for each tenant and investigate if any physical adaptations to the property are required. Professional assessments from Local Authority and private Occupational Therapists will be used to determine actual physical alterations needed to a tenant's homes.

The Association will consider all streams of funding including, Physical Adaptation Grant from the Welsh Government, Association funding, Local Authority funding, Health Board funding and self-funding.

Officers of the Association work closely with our local authority and health partner commissioners and tailor properties and services to individual needs in terms of development schemes and planned major repair and improvement programmes. The Association utilise tools to capture environmental briefs tailored for individuals via the use of pen picture and housing need pro-formas.

Standard 6e. Disabled and older people's housing requirements



When First Choice develop or refurbish a property Lifetime Homes are always considered during the process and implemented where achievable, FCHA properties are generally bespoke and designed and refurbished to meet specific needs of each new tenant, the Association will endeavour to meet all reasonable adjustments, including requirements of people with physical, sensory, learning or other impairments.

Standard 8b Attractive Outside Spaces

The Associations development policy is to provide specialist properties for people with learning disabilities within communities. Its ethos has been to provide an ordinary home in an ordinary street. Predominantly FCHA homes are individual, and consideration is always given to the provision of informal areas for members of the home, where FCHA have developed a site, the community external areas have allowed for external exercise and seating to enjoy the spaces.

Any future developments where external communal spaces are achievable, tenants will be consulted where practicable in the design and maintenance of such areas.

The Association has implemented several outside space improvements resulting from our annual tenant survey, particularly impacted during the covid pandemic. This has included general garden improvements, accessibility improvements via ramps and external cabins. We continue to target attractive outside spaces through our social value work funded through our community benefit funds

Standard 8c. Biodiversity.

The association does not own or manage many parks, grounds and open spaces, in the occasion that the association has management, from the start the area was set as a dog walk, seating area planted using wild gardening to attract biodiversity. In any future schemes where these areas are purchased, the association will seek advice from a professional ecologist before developing plans for large areas of the estate.

Our design brief for all new developments requires compliance with the Design Commission for Wales Place Making Charter, which promotes the inclusion of high-quality open space and genuinely multifunctional green spaces to maximise the value for the local community and ecosystems, helping biodiversity and putting people back in touch with nature. The advent of SuDS Approval Bodies (SABs) and the requirement for SAB approval to be secured alongside planning consent has provided an opportunity to add character and biodiversity to all our future sites.

As part of our SHIFT Environmental reporting, SHIFT's biodiversity calculator used property type data collected from FCHA's asset management database to calculate



the tonnes of biomass above ground across our stock. This will be reported annually and increases in the sizes and biodiversity of green spaces will be captured via our ESG report. (Environmental, Social and Governance).

Understanding Broadband - Whilst this is not formally assessed within WHQS, the Association has undertaken a detailed observation of each property's connectivity to both Broadband and 4G mobile signal availability. Appendix B shows the status of each property's connection. Although the Association will not be able to influence the geographical rollout of access to superfast (30Mbps download speeds) fixed broadband, the Association can monitor and advise on any updates to existing Tenants.

Cost prohibitive activity

For each conditional pass - cost prohibitive code, FCHA will provide additional information including estimated costs and number of properties using these assessment codes. This information is not currently available and is expected to be realistically aligned as and when the retrofit and WHQS surveys are completed by the target date of March 2027.

FCHA's Target Energy Pathways (TEP's) explained

Sava Intelligent Energy can calculate the SAP analysis on a stock of 10,000 properties in just 4 minutes. This system allows the user to evaluate energy pathway needs in many scenarios. A SAP target can be set and the system will evaluate what energy improvements are required for each property under that SAP value to reach the target and at each element's cost. This information is used to generate a comma-separated values (CSV) file. The Association is currently designing a Target Energy Pathways information sheet that can be saved on each individual property. (Appendix C)

Redevelopment & demolition

Following a stock review and at the request of our commissioners, properties may be remodelled, or assets may be considered for disposal. When considering this we will assess the value of stock rationalisation as a precursor to a detailed financial impairment review.

A detailed financial impairment review will be undertaken prior to disposal or remodelling, these include the following criteria relating to WHQS detailed in the Association's Asset Management Strategy:



- The repair history of the property.
- The property condition, including the condition of communal areas where it compromises the integrity of the building.
- Feasibility for potential re-provision of the property.
- The remaining anticipated lifetime of key components or elements within the property and the imminent costs involved in replacement.
- The status of asbestos within the property.
- The energy rating of the property.
- To meet a mandatory regulatory requirement such as the Welsh Housing Quality standard (WHQS 2023) and targeted SAP ratings.
- Anticipated maintenance and improvement costs.
- The financial viability of incurring the cost of major works on a property, relative to the rent and income being received by FCHA.

Carbon

Improving the energy efficiency of our homes remains a priority. The baseline carbon emissions for our housing stock are 1,352 tonnes of tCO₂e per year, and the average SAP score of our homes is 76, compared to the national average for housing in Wales and England of 60.

Our average, carbon emissions per home is 3.3 tCO₂e per year, which is below the national average of housing in Wales and England of 6 tCO₂/year.

We recognise that our stock requires investment to achieve an EPC C (SAP75) in every home by March 31st 2030 and net zero carbon neutrality by 2030. To achieve carbon neutrality, we will continue to offset at our current rate of 10% year on year, aligned with our strategic objectives set by our Board of Management. Following the completion of our Target Energy Pathways, we will further quantify the carbon reduction on our stock and incorporate this within our carbon off setting targets.

Community benefits

FCHA have the potential to do more through positive outcomes of its contracting commitments, and the association will use its procurement to achieve wider financial and non-financial outcomes, including improving wellbeing of individuals and where possible, employment, communities and the environment by making social value a decision-making criterion when awarding contracts.

Measurement of this will be based on achieved outcomes against the association's strategic themes.





Building Independence

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