

Agenda – Local Government and Housing Committee

Meeting Venue:

Committee Room 2, Senedd

Meeting date: 5 March 2026

Meeting time: 09.15

For further information contact:

Catherine Hunt

Committee Clerk

0300 200 6565

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Hybrid

Private pre-meeting

09.00 – 09.15

Public meeting

09.15 – 14.15

1 Introductions, apologies, substitutions and declarations of interest

2 Hazardous disrepair in social housing: Evidence session 1

09:15–10:00

(Pages 1 – 42)

Michelle Morris, Public Services Ombudsman for Wales

Dr Henry Dawson, Housing Advisory Panel Member, Chartered Institute of Environmental Health

Attached Documents:

Research Brief

Paper 1: Public Services Ombudsman for Wales

Paper 2: Chartered Institute for Environmental Health



Break

10.00 – 10.05

3 Hazardous disrepair in social housing: Evidence session 2

10:05–11:05

(Pages 43 – 65)

Josh Dowdall, Board Member, Tai Pawb

Robin White, Head of Campaigns, Shelter Cymru

David Wilton, Chief Executive Officer, TPAS Cymru

Emma Nicholas, Tenant Co-ordinator, National Independent Tenant Voice
Cymru

Attached Documents:

Paper 3: TPAS Cymru

Paper 4: Tai Pawb

Break

11.05 – 11.15

4 Hazardous disrepair in social housing: Evidence session 3

11:15–12:30

(Pages 66 – 82)

Hayley MacNamara, Policy Lead, Community Housing Cymru

Clarrisa Corbisiero, Deputy Chief Executive, Community Housing Cymru

Andrew Bradley, Director of Property, Cardiff Community Housing
Association

Claire Shiland, Operations Director, North Wales Housing Association

Naomii Thomas, Operational Manager for Homes and Neighbours, Cardiff
Council

Attached Documents:

Paper 5: Cardiff Council

Paper 6: Community Housing Cymru

Break

12.30 – 13.15

5 Hazardous disrepair in social housing: Evidence session 4

13:15–14:15

(Pages 83 – 87)

Joanna Valentine, Deputy Director – Social Housing Regulator and Strategic Business, Welsh Government

Tania Nicholson, Deputy Director – Housing Quality, Welsh Government

Attached Documents:

Paper 7: Welsh Government

6 Papers to note

14.15

6.1 Hazardous disrepair in social housing

(Pages 88 – 99)

Attached Documents:

Paper 8: Hazardous disrepair in social housing – Written evidence from CIH Cymru

Paper 9: Hazardous disrepair in social housing – Written evidence from Isle of Anglesey County Council

Paper 10: Hazardous disrepair in social housing – Written evidence from Public Health Wales

6.2 Commonhold and Leasehold Reform Bill

(Page 100)

Attached Documents:

Paper 11: Commonhold and Leasehold Reform Bill – Letter from the Chair of the UK Parliament's Housing, Communities and Local Government Committee – 4 February 2026

6.3 Inter-institutional relations agreement

(Pages 101 – 104)

Attached Documents:

Paper 12: Inter-institutional relations agreement – Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair of the Legislation, Justice and Constitution Committee – 3 February 2026

Paper 13: Inter-institutional relations agreement – Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs and the Chair of the Legislation, Justice and Constitution Committee – 9 February 2026

Paper 14: Inter-institutional relations agreement – Letter from the Cabinet Secretary for Housing and Local Government in relation to the Inter-Ministerial group for Housing and Local Government – 19 February 2026

6.4 Representation of the People Bill

(Page 105)

Attached Documents:

Paper 15: Representation of the People Bill – Letter from the Cabinet Secretary for Housing and Local Government to the Llywydd – 23 February 2026

6.5 Welsh Government Draft Budget 2026–27

(Pages 106 – 108)

Attached Documents:

Paper 16: Welsh Government Draft Budget 2026–27: Letter from the Chair of the Children, Young People and Education Committee to the Welsh Local Government Association

6.6 Letter from the Auditor General for Wales to Committee Chairs regarding Welsh public services

(Pages 109 – 125)

Attached Documents:

Paper 17 – Letter from the Auditor General for Wales to Committee Chairs regarding Welsh public services – 26 February 2026

6.7 Armed Forces Bill Legislative Consent Memorandum

(Pages 126 – 127)

Attached Documents:

Paper 18: Armed Forces Bill Legislative Consent Memorandum – Letter from the Equality and Social Justice Committee to the Cabinet Secretary for Transport and North Wales and the Cabinet Secretary for Housing and Local Government – 26 February 2026

Private meeting

14.15 – 14.30

7 Motion under Standing Order 17.42 (IX) to resolve to exclude the public from the remainder of the meeting

8 Hazardous disrepair in social housing: Consideration of evidence

14.15 – 14.30

Agenda Item 2

Document is Restricted



Ombwdsmon
Ombudsman
Cymru • Wales

Consultation response: Inquiry to examine hazardous disrepair in social housing

Organisation name: Senedd Cymru (Local Government and Housing Committee)

Submitted: 12/02/2026

As Public Services Ombudsman for Wales (PSOW), we have three main roles:

- We investigate complaints about public services.
- We consider complaints about councillors breaching the Code of Conduct.
- We drive systemic improvement of public services and standards of conduct in local government in Wales.

We are independent, impartial, fair and open to all who need us. Our service is free of charge.

ombudsman.wales

Mae'r ddogfen hon hefyd ar gael yn y Gymraeg.

This document is also available in Welsh.

Overview

We welcome this inquiry.

We believe that everyone deserves to live in a warm, welcoming home. We accept that social landlords in Wales deal with thousands of contacts and service requests every year. By and large, these requests are resolved satisfactorily.

Yet too often, tenants in social housing face issues with disrepair, damp and mould - issues that can escalate when landlords do not act promptly or communicate clearly. What should be a safe haven instead becomes a source of ongoing stress and harm.

The key points that we raise in our response are as follows:

- Trends in our new complaints suggest that issues related to damp and mould or repairs and maintenance are either becoming more prevalent in the social housing sector, or tenants are more prepared and able to pursue complaints about them.
- We were much more likely to find failings by social landlords in relation to issues related to repairs and maintenance or damp and mould, than in relation to other issues affecting tenants in social housing.
- Our casework highlights ongoing themes:
 - delays, at times very significant, in addressing urgent repairs and hazards
 - insufficient updates and clarity on the plan for necessary works
 - insufficient attention to the needs of vulnerable tenants
 - failure to follow organisations policies and procedures
 - failings in the complaints process, including not logging complaints correctly or failure to issue complaint response.

- We have identified a number of lessons which we have been communicating to the sector through our recommendations and public interest reports:
 - acting in a timely manner
 - treating requests as one problem, not in isolation
 - following relevant policies and guidance when dealing with requests.
- In our role as Complaints Standards Authority, we want to support organisations to improve complaint handling processes. At this point, all local councils and most housing associations operate under our Model Complaints Policy, and we are actively engaging with these organisations to drive better complaint handling practice.
- Nevertheless, we are also currently considering taking forward Own Initiative investigations into how social housing providers respond to reports of disrepair, particularly damp and mould, from vulnerable tenants.
- We are supportive of the updated WHQS rule. However, we want to underline that the Renting Homes (Wales) Act 2016 already places obligations on landlords regarding the condition of the homes that they let; and that social housing providers should already be responding to reports of disrepair, damp and mould in line with their internal policies and guidance.

Inquiry questions

The extent of hazardous disrepair in social housing in Wales, the level of health risk faced by tenants, and how housing conditions and responses to disrepair are monitored.

How effectively social landlords are currently responding to reports of hazardous disrepair, particularly issues with damp and mould.

While we cannot comment on extent of disrepair in social housing in Wales, our own casework has evidenced failings in how a number of social housing providers have responded to reports of damp and mould, including from vulnerable tenants. We have published a thematic report as well as several public interest reports highlighting these concerns.

Our casework trends

In 2024-25, we received 323 new complaints about repairs and maintenance or damp and mould issues, relating to the services of social landlords in Wales. This compares to 297 repairs and maintenance complaints in 2023-24 (we only introduced a separate category for damp and mould issues towards the end of that financial year). Between April and December 2025, 259 complaints related to these subjects.

Housing is now our second most complained-about subject and almost half of new housing complaints concern damp and mould or repairs and maintenance.

Overall, trends in our new complaints suggest that these issues are either becoming more prevalent in the social housing sector, or tenants are more prepared and able to pursue complaints about them.

Where we find that an organisation has made a mistake, we intervene to ensure it puts things right. This can happen without a full investigation through Early Resolution or following an investigation by upholding a complaint or suggesting a settlement between the body and the complainant.

Generally, we see that most of housing complaints that we intervene in relate to damp and mould or repairs and maintenance.

- In 2024-25, our intervention in housing complaints overall was 16%. However, we intervened in almost 1 in 4 of complaints about repairs and maintenance or damp and mould issues. Complaints about damp and mould carried particularly high intervention rate – 41%.
- In 2025-26 (April to December), our intervention in housing complaints overall was 13%. However, complaints about damp and mould and repairs carried intervention rates of 33% and 49% respectively.

To summarise, we were much more likely to find failings by social landlords in relation to issues related to repairs and maintenance or damp and mould, than in relation to other issues affecting tenants in social housing.

Themes in our casework

In November 2024, we published a thematic report 'Living in disrepair'. The report gathered examples of housing complaints that we upheld during 2023-24 which related to repair and maintenance issues. These cases highlighted that, far too commonly,

- tenants had to raise complaints to see that remedial work is done, with service providers not treating repeated service requests as complaints
- tenants had to repeatedly chase service providers for a complaint to be initiated
- landlords were undertaking pre-letting inspections of questionable quality
- landlords were not sufficiently considerate of or responsive to vulnerable occupants
- complaint responses were seemingly being delayed whilst the landlord carried out some works in the meantime (perhaps so that the response could reflect well on the landlord); or the landlord failed to properly record a complaint.

Unfortunately, we see that many of these issues persist in our casework. We include in the Appendix examples of further cases highlighting ongoing themes:

- delays, at times very significant in addressing urgent repairs and hazards
- insufficient updates and clarity on the plan for necessary works
- failings in the complaints process, including not logging complaints correctly or failure to issue complaint response.

Finally, in November and December 2025, we published Public Interest investigation reports against Cardiff Council, Flintshire County Council and two Public Interest investigation reports against Trivallis (a Housing Association).

- [Trivallis \(202405250\)](#)
- [Trivallis \(202402960\)](#)
- [Flintshire County Council \(202401983\)](#)
- [Cardiff Council \(202404828\)](#)

These investigations again found delays in responding to reports of disrepair and/or damp and mould and involved vulnerable tenants and their families. They also highlighted ongoing recurring themes that provide clear opportunities for improvements across the housing sector:

- Acting in a timely manner

This is crucial when tenants report damp, mould or repair request. Prompt action not only prevents problems from becoming more complex or costly to resolve but also helps to maintain trust that concerns are being taken seriously.

If it is not possible to act promptly for a valid reason, communication should be clear and include a proposed date for inspection or repair. Early and transparent communication helps manage expectations and reduces anxiety, particularly for tenants in vulnerable situations.

- Treating requests as one problem, not in isolation

As seen in case 202401983, treating repair requests in isolation can leave underlying issues unresolved. Failing to connect related reports can mean missed opportunities to identify wider problems, such as widespread mould or persistent leaks affecting multiples areas of a property.

While issues may not always be connected, asking whether they could be linked helps ensure that root causes are identified and addressed, reducing the risk of disrepair worsening over time.

- Following relevant policies and guidance when dealing with requests

As demonstrated in both Trivallis cases, following relevant policies and guidance is vital to ensure requests are handled consistently and resolved appropriately.

Our complaints standards work

In our role as Complaints Standards Authority, we support service providers in Wales to improve complaint handling processes.

Since 2019, we have the power to set the statutory model policy and guidance on complaint handling for service providers in our jurisdiction as well as to monitor how these organisations handle complaints. This framework now extends to all local councils, health boards, and most housing associations.

We have now provided a definition of what constitutes a complaint and specifies the expected structure of the complaints process as well as timeframes that should be adhered to (for social landlords in Wales, this would involve complaint acknowledgement within 5 working days, and a response expected in majority of cases within 20 working days). We also provide training on good complaint handling.

Since launching our model complaints policy and guidance we have seen better, more consistent logging of complaints and more uniformity in terms of understanding of what constitutes a complaint. We will continue to actively

engage with social landlords in Wales to drive better complaint handling practice. By end of June , all housing associations in Wales will be operating under these complaints standards and that local authorities already do so.

Investigation on own initiative

Overall, our casework trends and prevalence of recurring themes in our casework leads us to suspect that these issues may affect tenants of other social housing providers.

The [Public Services Ombudsman \(Wales\) Act 2019](#) (“the 2019 Act”) empowers us to undertake ‘Own Initiative’ investigations, which do not need to be prompted by an individual complainant.

In November, we launched a consultation on a proposed own initiative investigation into whether social landlords in Wales are appropriately responding to reports and concerns relating to disrepair, with a focus on damp and mould, taking into consideration the needs of vulnerable tenants. The consultation closed in December and received responses from tenants, social housing providers, Welsh Government and third sector advice, advocacy and support organisations. The vast majority supported an investigation into how providers handle disrepair, damp and mould, and related complaints.

We are now reviewing the feedback and will make a decision early in 2026 on whether to proceed with a formal investigation proposal. In the meantime, we will continue to use our casework to identify learning and encourage improvements across the sector. We will share updates on our website as soon as they are available, and we remain committed to ensuring housing complaints are taken seriously and resolved quickly.

The Welsh Government’s creation of a new rule within the WHQS requiring social landlords to investigate and remedy certain hazards within specified timescales, including: the rationale for this approach and how effective it is likely to be; and the anticipated impact on tenants and landlords.

We are supportive of the new rule. However, we want to underline that the Renting Homes (Wales) Act 2016 already places obligations on landlords regarding the condition of the homes that they let. These include ensuring the dwelling is both in repair and fit for human habitation. Furthermore, even without the responsibilities arising from the new WHQS, social housing providers should be responding to reports of disrepair, damp and mould in line with their internal policies and guidance.

We also see in our casework complaints that relate to the handling of issues which were not initially identified as a significant risk and therefore would not come under the new WHQS.

What proactive steps social landlords are taking to identify and remedy hazardous disrepair within their housing stock.

Over recent years there has been a significant focus on failures of social housing providers to respond appropriately to reports of damp and mould. It is clear that this remains an area of focus going forward and work is ongoing in this sector to improve the service provided to social housing tenants and the conditions that they live in. We acknowledge that the sector is committed to ongoing development. However, as evidenced from our casework, it remains that it is likely that further lessons can be learned and best practice shared, across the sector. This highlights the importance of consistent and thorough monitoring of performance of social landlords in Wales against the WHQS.

How the Welsh Government and social landlords are engaging and involving tenants in issues relating to hazardous disrepair.

No comment.

Closing remarks

We welcome this inquiry and trust that it will help to improve the practices within the social housing sector in Wales and, ultimately, service experiences and wellbeing of social housing tenants.

MMA. Morris.

Michelle Morris

Public Services Ombudsman for Wales

February 2026

Appendix

Further examples of our cases related to issues of repairs and maintenance or damp and mould.

Delays in addressing urgent repairs and hazards

In cases [202408308](#) and [202408991](#), [202505478](#) and [202503132](#), tenants experienced significant distress due to delays in addressing urgent repairs.

In **case 202408308**, a Housing Association failed to respond for several months to repeated concerns about outstanding repairs to a 90-year-old tenant's property, only inspecting after MP involvement.

In **case 202408991**, Miss A endured extensive disrepair since early 2023, including black mould, roof leaks, unsecured windows, missing insulation, asbestos needing replacement, and a loss of heating and hot water over Christmas, alongside a large hole in the ceiling. Where work had been carried out, it was of poor quality and caused further damage to the property and possessions.

In **case 202505478**, Miss A complained about knives, nails, weights and waste buried in the grass in her garden, which she said caused rat infestations and created an unsafe environment for her young children. The Association did not properly address the issue, leaving the family unable to use the garden safely.

In **case 202503132**, Ms A complained that agreed repairs and improvements to her garden, boundary fence and driveway had been delayed. Although some work had been carried out, delays and inadequate completion caused stress, anxiety and frustration.

These cases highlight the importance of following repairs and complaints policies to inspect properties promptly, address hazards effectively, and ensure repeated concerns are logged and tracked as formal complaints. Clear communication and timely action are essential to prevent harm and reduce distress for tenants.

Lack of or insufficient updates and clarity on the plan for necessary works

In cases [202503782](#), [202503266](#), [202409225](#) and [202500849](#), tenants experienced frustration and distress due to unclear communication and a lack of updates on planned repairs.

In **case 202503782**, Ms A complained that Trivallis had failed to resolve outstanding bathroom repairs, including a leaking toilet, damp and mould, and a non-functioning shower. Although the Association upheld the complaint in July 2024, repairs remained incomplete and no clear schedule was provided for a planned bathroom replacement. The lack of meaningful updates caused ongoing inconvenience and frustration.

In **case 202503266**, Mrs A raised concerns about delays in repairs. We were concerned that repairs remained outstanding and that Mrs A had not received a formal written response. The Association agreed to provide a written apology, confirm the steps it will take to complete the necessary works, and respond in line with its complaints procedure.

In case **202409225**, a tenant's representative complained that Adra had failed to fix a water leak since May 2023, resulting in damp and mould. While Adra attempted to address the issue externally, it did not keep the tenant updated or respond to reports of damp and mould inside the property.

In case **202500849**, Mr A complained that Adra failed to complete repairs he reported over months and years. He said he struggled to get updates and did

not receive a written response to his second complaint. Mr A said that some repairs had not been acknowledged, and he had lost faith that all repairs would be completed in a timely manner. Mr A said the delays were affecting his physical and mental health.

These cases highlight the importance of clear, regular communication and formal complaint responses, particularly where repairs are complex or long-running. Keeping tenants informed about planned works and expected timelines can prevent frustration and reduce the likelihood of escalation.

Failings in the complaints process, including not logging complaints correctly or failure to issue complaint response

In cases [202502986](#), [202501517](#) and [202501762](#), tenants experienced uncertainty and frustration because their complaints were not logged or responded to in line with the organisation's complaints procedure.

In case **202502986**, Mr X complained that Adra had failed to repair a draught coming from his windows. He complained in January 2025 but did not receive a complaint response.

In case **202501517**, Mrs X complained that Cardiff Community Housing Association had damaged her wall. The Association issued a response, but it was not a formal complaint response and was not issued in line with its complaints procedure.

In case **202501762**, Mr X complained about the communal heating supply and additional charges following works by Denbighshire Council. The Council provided a Freedom of Information response but did not provide a formal complaint response.

These cases demonstrate the importance of ensuring complaints are properly recorded and responded to, so tenants have confidence their concerns are being dealt with correctly.

Written evidence submitted to the Senedd Local Government and Housing Committee inquiry into hazardous disrepair in social housing

February 2026

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private and non-profit sectors. Building on its rich heritage, CIEH ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to our environment and our health.

For more information visit www.cieh.org.

Any enquiries about this response should be directed to:

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Chartered Institute of Environmental Health
Email: m.hope@cieh.org

The extent of hazardous disrepair in social housing in Wales, the level of health risk faced by tenants, and how housing conditions and responses to disrepair are monitored

1. CIEH represents local government enforcement officers. Our members have a wide range of powers to address issues relating to housing, environmental protection, health and safety and food safety. Local government environmental health private housing teams can employ several pieces of legislation to address problems with individual dwellings and deal with area-based issues relevant to housing management and the built environment. Environmental health practitioners (EHPs) have powers to assess and address compliance with the following relevant legislation in properties owned or managed by registered social landlords (RSLs).
 - Housing Act 2004
 - EHPs can use the Housing Health and Safety Rating System (HHSRS) and associated legal notices under Part 1 of this Act to require measures to improve health and safety in social rental accommodation. Notices cover making landlords aware of hazards, taking emergency remedial action, improvement notices, prohibition orders, and orders for demolition or clearance of exceptionally poor-quality dwellings.
 - The HHSRS is the risk assessment tool used to evaluate the threat to health from 29 different hazards found in people's homes. Hazards are rated at Category 1 or 2 with Category 1 hazards being the most serious.
 - Building Act 1984
 - This can be used to deal with drainage issues and ruinous and dilapidated premises. Various other pieces of legislation are also used to address drainage and sanitation issues.
 - Prevention of Damage by Pests Act 1949
 - Used to address infestations of rats and mice.
 - Town and Country Planning Act 1990
 - Used to address land or buildings whose appearance is detrimental to the amenity of the area.
2. Local authority private housing enforcement teams primarily focus on private rental sector accommodation but will respond to complaints from social housing tenants where they are living in housing owned by registered social landlords. They do not carry out enforcement in properties owned by the local authority.
3. The distribution of hazards identified by local authority inspections of all non-HMO properties taken from the Welsh Government website is shown in Figures 1 and 2.¹

¹ Welsh Government, 'Housing hazards: April 2023 and March 2024', Housing Hazards', 2024, <https://www.gov.wales/housing-hazards-april-2023-and-march-2024-html> (accessed 12th February 2026).

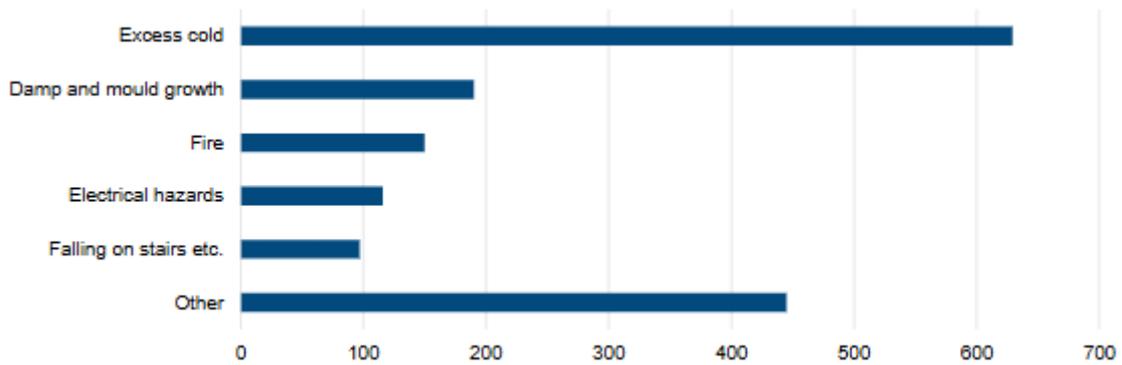


Figure 1 – Number of Category 1 hazards found in non-HMO assessments by hazard type, 2023-24.

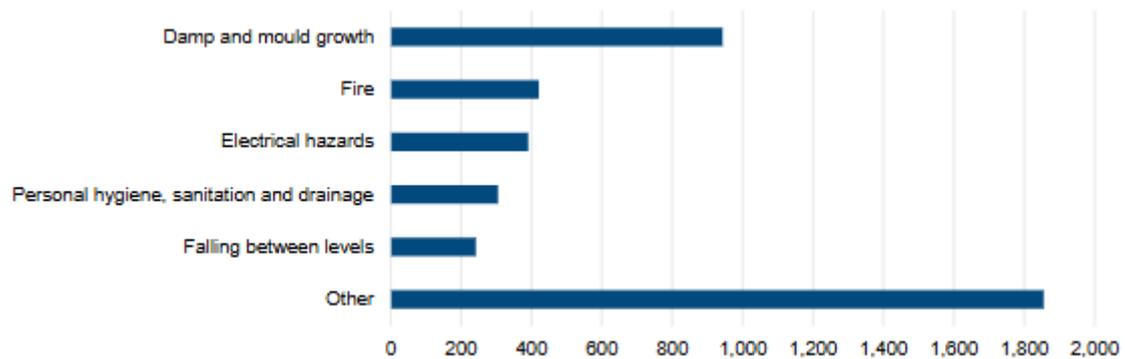


Figure 2 – Number of Category 2 hazards found in non-HMO assessments by hazard type, 2023-24.

4. The last Welsh Housing Conditions Survey (2017-18) provided figures for compliance with the Welsh Housing Quality Standard (WHQS), which included a requirement for a property to be free from Category 1 hazards. Individual primary and secondary elements of the standard relevant to HHSRS hazards showed compliance levels above 90%. The proportion of dwellings passing all 13 primary elements and at least 9 of the 13 secondary elements of the standard was 46% across all social housing (40% in local authority and 49% in registered social landlord properties). Annual WHQS returns from housing providers show higher percentages. It is clear that the original WHQS has brought about substantial improvement in the social housing stock. Overall, 93% of social housing in Wales is free from Category 1 hazards.²
5. The percentage of dwellings built before 1920 is much lower in the social rented sector than for owner occupied and private rental properties.³ Older properties are more likely to contain Category 1 hazards due to their age and design at the time of construction

² Welsh Government, 'Statistical Bulletin. Welsh Housing Conditions Survey 2017-18: Assessment of Elements of the Welsh Housing Quality Standard', 2019, <https://www.gov.wales/sites/default/files/statistics-and-research/2019-04/welsh-housing-conditions-survey-2017-18-assessment-of-the-welsh-housing-quality-standard-567.pdf> (accessed 12th February 2026).

³ Welsh Government, 'Statistical First Release. Welsh Housing Conditions Survey 2017-18: Headline Report (Updated)', 2020, <https://www.gov.wales/sites/default/files/statistics-and-research/2020-02/welsh-housing-conditions-survey-headline-results-april-2017-march-2018-update-570.pdf> (accessed 12th February 2026).

(e.g. lack of a damp proof course in walls and solid walls). These properties will be more difficult to improve (e.g. hard to treat properties such as those with solid walls requiring internal/external wall insulation).

6. The last Welsh Housing Conditions Survey (2017-18) also noted that the average Energy Performance Certificate (EPC) rating for social rented dwellings was 68 (EPC Band D), whilst owner occupied and private rented dwellings both averaged 60 (EPC Band D). A more recent report by the Office of National Statistics shows that this has now increased to a median of 72 (EPC Band C).⁴ SAP ratings will continue to improve under the WHQS update introduced in 2023, reducing fuel poverty and numbers of Category 1 excess cold and damp and mould hazards in homes.
7. Hazards do remain in the social housing stock with falls risks, cold, and damp and mould still presenting problems. These are most likely to affect those over 60 years of age and those under 14 years of age.⁵ Falls remain a significant concern across Wales's housing stock. Falls injuries were the single largest type of call to the Welsh Ambulance Service last year. They were the cause of 12% of calls, 72,000 of which (69%) required an ambulance to attend, and 42,000 involved someone being taken to hospital.⁶ The proportion of these falls in social housing cannot be determined from the evidence collected. Social housing is more likely to have older or disabled occupiers. There has been a great deal of work to adapt social housing for those with additional mobility requirements which would help to reduce the risk of falls.
8. Until the next Welsh Housing Conditions Survey is carried out it is very difficult to provide accurate figures on aspects of the housing stock to inform policymaking and enforcement activities. The 2027-28 Welsh Housing Survey will provide more information on housing quality in the social sector but the results will not be available until 2028-29/2029-30.

How effectively social landlords are currently responding to reports of hazardous disrepair, particularly issues with damp and mould

9. The previous section indicates that there are still serious hazards relevant to both housing design and disrepair in the social rented sector. The sector has improved substantially since the millennium, however, and remaining issues are at a lower level than in either owner occupied or private rental accommodation. This improvement has been supported by focused activity to improve energy efficiency in social rented properties and ongoing work to adapt properties to those with impaired mobility.

⁴ Office for National Statistics, 'Energy Efficiency of Housing in England and Wales: 2024', 2024, <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/energyefficiencyofhousinginenglandandwales/2024> (accessed 12th February 2026).

⁵ Office of the Deputy Prime Minister, 'Housing Health and Safety Rating System Operating Guidance', 2006, <https://assets.publishing.service.gov.uk/media/5a78d3d940f0b62b22cbd1d6/142631.pdf> (accessed 12th February 2026).

⁶ Care and Repair Cymru, 'From Wear and Tear to Disrepair: The Cause and Impact of Poor Housing', 2024, <https://careandrepair.org.uk/wp-content/uploads/2024/02/From-Wear-and-Tear-to-Disrepair-FINAL-ENG.pdf> (accessed 12th February 2026).

10. We have asked our members for more information from their direct experiences of dealing with issues across Wales. Due to the timescale for providing this written evidence we can only present one local authority's evidence here. This authority found that complaints from registered social landlord tenants were declining over time (see Table 1). Complaints were dealt with through informal activity by the enforcing officers. Where difficulties did arise, these tended to be linked to more complex situations where there might be access restrictions, neighbouring property constraints, or contractor disputes. Investigating officers did not encounter any lack of willingness to rectify problems from the landlords' representatives. Their engagement with Environmental Health and their compliance with requests for action remain generally effective, which is reflected in the reducing complaint numbers. Overall, the local authority had very few concerns regarding registered social landlord responsiveness.

Table 1 – Data on complaint levels from one local authority

Year	Proportion of complaints from RSL tenants	Proportion of those complaints about damp and mould growth
2023-24	20%	64%
2024-25	13%	45%
2025-26	7%	41%

11. We may be able to provide further feedback in this respect in our oral evidence.
12. The 2024-25 annual report of the Public Services Ombudsman for Wales indicates the Ombudsman received 411 complaints about housing associations (an 8% increase from last year and 103% increase from 2019-20). Repairs and maintenance made up 41% of these complaints (down from 48% last year). When looked at over time, the main areas responsible for an increase in complaints were neighbour disputes / antisocial behaviour and damp and mould. It is very likely that these complaints are indirectly attributable to increased public awareness of the risk from damp and mould in rental accommodation as a result of the press coverage of the tragic death of Awaab Ishak.⁷
13. The Ombudsman will provide their own evidence in respect of their handing of disrepair complaints, but their annual report highlighted the following issues.
- Often occupiers had to raise a complaint to obtain remedial work and repeatedly chase public bodies in order for a response to the complaint to be initiated.
 - Pre-letting inspections were sometimes of questionable quality.
 - Some occupiers in vulnerable situations would have had to wait significantly longer for works to be carried out if it were not for the intervention of the Ombudsman.

⁷ Ombudsman Cymru/Wales, 'Turning the Page. Annual Report and Accounts 2024-25', 2025, https://www.ombudsman.wales/wp-content/uploads/2025/08/Annual-Report-and-Accounts-24-25-FINAL.pdf?_gl=1*1wp1zca*_up*MQ..*_ga*MTc1NjgxMjlyNi4xNzcwMzIxMDA5*_ga_RHY6X4DM35*_czE3NzAzOTEwMDgkbzEkZzAkDDE3NzAzOTEwMDgkajYwJGwwJGg3MjA2MjM0NjE. (accessed 12th February 2026).

- There were issues with complaint handling responses seemingly being delayed whilst the organisation carried out works in the meantime or failure to properly record a complaint.

14. The Ombudsman’s report on housing disrepair and damp and mould complaints provides a range of specific examples in support of the above comments. The report raises a concern over the lack of proactivity of many landlords in identifying and dealing with properties suffering from damp and mould, as opposed to waiting for occupiers to draw attention to the issue.⁸

The Welsh Government’s creation of a new rule within the WHQS requiring social landlords to investigate and remedy certain hazards within specified timescales

15. We welcome the addition of the timescales to address HHSRS hazards under new element 1c of the WHQS. The timescales set out in the addendum⁹ are aligned with those set out in the Social Housing (Regulation) Act 2023 in England and will provide additional accountability over responding to hazards in the social housing stock.
16. The requirement to provide tenants with a summary plan will ensure they are included in the communications about remedial measures. This will provide reassurance, support EHPs through information provision when dealing with tenant complaints and manage the expectations of tenants through the works. The improved awareness this information gives will reduce the sense of powerlessness and lack of control tenants can experience when awaiting works to their home, reducing the psychological impact of living with unsafe housing conditions.
17. The addendum is vague as to what constitutes a significant and an imminent hazard. Imminent risk is not defined. A significant risk is defined as ‘a risk of harm to the occupier’s health or safety that a competent member of the landlord’s workforce with the relevant knowledge would take steps to make safe as a matter of urgency’.
18. We are concerned that the guidance does not appear contain a strict requirement for those carrying out an investigation to be trained in the use of the HHSRS. This would seem to be a prerequisite to be competent to carry out such an assessment. There is potential to use local authority environmental health practitioners here, but inspectorates are under-resourced. Unless inspections are paid for, there are currently insufficient public funds for environmental health teams to support large-scale routine inspections of social landlord properties.

⁸ Ombudsman Cymru/Wales, ‘Living in Disrepair – A Thematic Report About Housing Disrepair and Damp and Mould Complaints to PSOW’, 2024, <https://www.ombudsman.wales/wp-content/uploads/2024/11/Living-in-Disrepair-a-thematic-report-about-housing-disrepair-and-damp-and-mould-complaints-to-PSOW.pdf> (accessed 12th February 2026).

⁹ Welsh Government, ‘WHQS Addendum’, 2026, <https://www.gov.wales/sites/default/files/publications/2025-12/whqs-addendum-responding-to-hazards.pdf> (accessed 12th February 2026).

19. It is not clear what proportion of social landlords' stock management teams have taken the two-day industry course to become an HHSRS assessor. A property can be found to have Category 1 or 2 hazards only once it has been inspected under the HHSRS, by a qualified assessor. Failing to inspect means failing to identify significant risks from hazards. We would welcome some clarification of the terms 'imminent' and 'significant' and encourage any measure that increased the number of social landlord staff qualified in the use of the HHSRS.
20. The timescales in the addendum are clear but there is no detail in the guidance specifying the point at which there exists a trigger to investigate a problem. Given the Ombudsman's concerns referred to in paragraph 19 above over delays in registering tenant concerns about their property, this is a concerning omission in the guidance.
21. We note that the new standard does permit the landlord to consider additional vulnerabilities specific tenants may have for a particular hazard alongside the likelihood of harm and severity of harm from the hazard. This allows the requirement to cater for those with particular vulnerabilities to a given hazard. We find this to be a welcome consideration as social housing provides accommodation for a range of tenants with additional needs.
22. When we asked StatsWales for information on HHSRS hazards in the WHQS returns, they responded that publication of the first headline figures has been delayed but they are due to be published on 26th February. They also noted that it will take a few years before the data is of sufficient quality to look at the presence of Category 1 hazards in detail.
23. The timescales set out in the new standard will provide welcome accountability for social landlords handling complaints about health and safety related issues in their stock.
24. Given the national shortages of skilled trades in the building sector, we are concerned about the feasibility of meeting these tight deadlines for investigations and the ensuing works. Once initial deadlines have been missed, it is unclear what accountability there is for landlords expediting repairs aside from annual reports from social housing providers on levels of Category 1 hazards causing failures against WHQS in the housing stock.

What proactive steps social landlords are taking to identify and remedy hazardous disrepair within their housing stock

25. Please see the comments made above. We have asked our members for more information from their direct experiences of dealing with issues across Wales. We may be able to provide further feedback in this respect in our oral evidence.

How the Welsh Government and social landlords are engaging and involving tenants in issues relating to hazardous disrepair

26. Please see the comments made above. We have asked our members for more information from their direct experiences of dealing with issues across Wales. We may be able to provide further feedback in this respect in our oral evidence.



Inquiry into Hazardous Disrepair in Social Housing: TPAS Cymru Written Evidence Submission

Submission date: 12/02/26

About TPAS Cymru

TPAS Cymru is a Wales-wide tenant engagement organisation with over 30 years' experience. We support tenants and landlords, promote high standards of engagement, run tenant surveys, provide training and help ensure tenant voices shape housing policy and decisions across Wales. Championing the tenant voice is at the core of what we do.

Evidence Context

This evidence is submitted to the committee for the inquiry into hazardous disrepair in social housing. It is based on TPAS Cymru's ongoing engagement with tenants and registered social landlords, including:

- Tenant and community consultations
- Tenant Pulse¹ and Mini Pulse surveys
- Direct contact with tenants (calls, emails, in person)
- Monitoring of publicly shared tenant discussions
- Issues logged through our advice and signposting service

Limitations

TPAS Cymru is not a landlord or regulator and does not have access to landlords' records or communications. We cannot independently verify landlord responses or case outcomes. The evidence reflects patterns and issues reported or observed, not a formal assessment of landlord performance.

¹ Tenant Pulse's are our Wales-wide surveys for tenants. We complete one Annual Tenant Pulse and one Annual Tenant Pulse on Affordable Warmth, in addition to smaller 'mini' Pulse's. The insights from the reports of these surveys inform Welsh Government research.

Questions:

1. The extent of hazardous disrepair in social housing in Wales, the level of health risk faced by tenants, and how housing conditions and responses to disrepair are monitored;

Social landlords in Wales are committed to adhering to regulation around repairs; however we recognise that these standards are not always met. Across multiple years of tenant insight activity, hazardous disrepair has been a consistent and recurring theme in our data and direct engagement with tenants. This pattern is evident in our major insight tools mentioned above.

• The extent of hazardous disrepair in social housing in Wales:

The extent of hazardous disrepair in social housing in Wales is not something we gather quantitative data on and cannot provide a numerical figure of levels; however, our Annual Surveys repeatedly highlight damp, mould and ventilation concerns as primary issues raised by social housing tenants through a qualitative lens. These themes are persistent across surveys over recent years, indicating that hazardous disrepair is not isolated or sporadic but a common lived experience for many tenants.

In the 2024 Annual Survey, when asked about health and safety concerns in their homes, tenants frequently articulated how poor housing conditions were affecting their lives. For example:

"It's similar to living in a house that constantly leaks – the environment is making things worse rather than providing shelter."

"Need to move from flat due to health issue."

"Saving up to move due to rising damp and mould."

Although TPAS Cymru is not a housing advice service, we are routinely contacted by social housing tenants across Wales who seek our signposting, advice and support. Disrepair issues, especially damp and mould, are regularly raised in these contacts, reinforcing that hazardous disrepair is a recurring problem across different tenures and parts of Wales.

Our Tenant Pulse database, comprising regular input from over 1,500 tenants, continues to show that hazardous disrepair is a recurrent concern for social housing tenants consulted throughout each year.

These data points, from repeated surveys and ongoing tenant engagement, clearly demonstrate the prevalence of hazardous disrepair in social housing in Wales, with damp and mould standing out as dominant issues in tenant experience and reporting.

Evidence also suggests that BAME groups experience disproportionate levels of damp and mould, due to a mixture of racial disparities and inequalities they face in housing, a lack of culturally sensitive and aware communication materials and education for the tenants in these communities; some of whom have different cooking and living habits.

- **Health Risks Faced by Tenants**

TPAS Cymru's insight consistently shows that tenants perceive a direct link between housing disrepair and their health:

In qualitative responses, tenants describe how poor housing conditions exacerbate or create serious health concerns. For example, some respondents indicate that they feel compelled to move because their accommodation is worsening existing health problems.

Our insight also reveals that tenants do not frame hazardous disrepair purely as maintenance defects, they describe broader impacts on wellbeing and comfort. Tenants have expressed that unresolved hazards cause persistent anxiety and discomfort, indicating impacts that extend beyond physical health into emotional and mental wellbeing.

Specific feedback from Pulse surveys highlights this experience. For example, in the Mini-Tenant Pulse (June 2025), tenants emphasised that hazards should not be limited to structural defects alone: they stated that anything that could and does harm health, comfort or wellbeing should be taken seriously under housing quality standards.

Tenants in our 2025 Annual Tenant Pulse reported that although most renters felt settled in their homes, a notable portion (16 %) selected "I'm not settled in my home" when describing their situation. Among reasons cited for feeling unsettled were damp and mould, which tenants linked to both physical discomfort and mental strain.

In Mini-Tenant Pulse feedback, social housing tenants described living with mould for months, feeling unwell, avoiding using parts of their homes, and feeling embarrassed about their living conditions. One tenant noted,

"I don't use my bedroom anymore — no one's taken it seriously."

These statements indicate that hazardous disrepair impacts tenants not only physically, but psychologically and socially, affecting daily living, use of space and overall wellbeing.

Hazards of the home are not confined to damp and mould, but also prevention of fire risk. The increasing use of E-scooters, mobility scooters, e-cigarettes and

lithium powered batteries, when stored or charged incorrectly, pose significant fire safety risks, with the most serious resulting in death.

- **How housing conditions and responses to disrepair are monitored:**

TPAS Cymru recognises that social landlords have systems to record and monitor reports of damp, mould and other disrepair issues, and many tenants do see their concerns logged and acted on.

However, tenant insight shows that monitoring and response are not always consistent in practice. Some tenants describe repeated reporting without effective resolution or clear communication about progress.

The Public Services Ombudsman for Wales has also highlighted cases where social landlords failed to respond appropriately or in a timely way to reports of damp and mould. These findings indicate that, despite monitoring frameworks being in place, there are occasions where landlords have not met the standards tenants reasonably expect in addressing hazardous disrepair.

2) How effectively social landlords are currently responding to reports of hazardous disrepair, particularly issues with damp and mould;

Through our engagement with social landlords across Wales, it is apparent that they are committed to dealing with hazard reports and disrepair issues effectively and within reasonable timeframes, while meeting their legal and regulatory responsibilities. For example, social landlords usually attend emergency repairs within 24 hours to make a property safe. The Renting Homes (Wales) Act 2016 requires social landlords to keep homes in good repair and ensure they are fit for tenants to live in. Once an issue is reported, social landlords are expected to respond promptly, with repair processes in place to meet these legal duties.

Effective hazard response can often depend on timely and accurate reporting from tenants, but this can often be hindered by a range of social, personal and reporting barriers. For example, language barriers, digital exclusion and a lack of trust in their landlord can prevent tenants from raising concerns. Poverty and worries about high costs of living is also something tenants are concerned about and can have implications when it comes to tenant education around damp and mould. The way tenants are educated on damp and mould through landlord communication in a sensitive and inclusive way is key, they must be brought on the journey and understand the why, rather than simply being told. We have seen efforts made by landlords around this but emphasise this must be continuous and across the board.

We are also a partner organisation for the 'Ventilation Matters: Framework to Create Mould-Free, Healthier Homes for Housing Associations and Third Sector' project, which aims to produce culturally aware and informed information in relation

to communicating ventilation and mould for BAME tenants to ensure equity and improve equality of outcomes.

Some tenants may fear eviction, being blamed, feeling ignored based on past experiences or simply not being aware of how to report issues. Such barriers can lead to underreporting which creates blind spots in awareness and delays in intervention, putting vulnerable tenants at greater risk.

In addition to legal and regulatory responsibilities, organisational culture, staff attitudes and behaviours are critical to ensuring tenants feel empowered, supported and confident to report hazards.

3) The Welsh Government's creation of a new rule within the WHQS requiring social landlords to investigate and remedy certain hazards within specified timescales, including:

- **the rationale for this approach and how effective it is likely to be; and**
- **the anticipated impact on tenants and landlords;**

TPAS Cymru welcomes the creation of a new rule within the WHQS requiring social landlords to investigate and remedy certain hazards within specified timescales. Insight from tenants through our Tenant Pulse survey clearly indicated that tenants supported the strengthening the WHQS to include clearer, faster, and more transparent reporting on hazards.

The requirements in the new rule align with the views of tenants. The response in our Tenant Pulse survey and related consultation session was clear: tenants across Wales want urgent, consistent action.

Key findings from tenants which are positively reflected in the new rule include:

- All hazards matter not just perceived high-risk ones. *"Whether it's mould or faulty electrics, it all matters. It affects your health, your mind, and your dignity."*
- The risks from hazards tenants face aren't just physical: Tenants say emotional stress, poor communication, and feeling blamed or ignored are just as harmful as the hazards themselves.
- Clear, consistent standards, fair response times for all social landlords across Wales to comply with rather than a "postcode lottery".

However, the creation of a new rule does not address tenants' views that the reporting of hazards and the response from social landlords is also about respect, not just repairs: Tenants want to be listened to, feel understood and treated with dignity, not just given faster fixes.

The new rule does not directly legislate change to organisations "culture and behaviours" because its primary purpose is to address the **physical, structural, and procedural response of** landlords.

While the legislation doesn't *codify* culture, it may be a spur for some landlords to shift their organisation's "culture and behaviours" and reflect on how they support and engage with tenants and move from reactive to proactive management of hazards.

Emphasis on shared responsibility and accountability: landlords are increasingly presenting this as a requirement for all staff who are made aware of or witness hazardous disrepair in tenants' homes, not only those who work in repairs and maintenance.

Whilst the implementation of the new rule is welcome, it will present significant challenges for social landlords. These challenges will range from operational and financial pressures to cultural shifts, staff training & recruitment, systems changes and organisational capacity.

In addition, the implementation timescales give social landlords only 4 months to prepare. Social landlords have reported concerns around the lack of clear guidance, with no phased approach and limited practical detail on how hazards and risks should be assessed. In the absence of consistent and comprehensive direction, landlords may apply the requirements in different ways, which risks weakening efforts to achieve greater consistency across the sector. Such consistency across the sector was a key expectation of tenants.

There may also be challenges in respect of making assessment of hazards response. The new rule requires landlord staff to make a test of "significant risk" on a potentially subjective assessment of a tenants' vulnerabilities such as physical and mental health. It will require tenants to potentially reveal personal and sensitive information to make an informed assessment. Therefore, it will be essential that landlord staff are trained in how to ask for and handle such personal information. More importantly, tenants will need assurance as to how this information will be used, recorded and shared with. Trust between tenant and landlords will be crucial to ensuring the assessment and resulting hazards response meet the needs of all tenants.

Whilst there will be challenges in implementing the new rule, we fully support the new rule and its aim to ensure that tenants in Wales have safe, secure, and healthy homes to live in.

TPAS Cymru will continue to support social landlords and tenants through our Roundtables sessions, Tenant Voice Forums and webinars all designed to share knowledge, learning and to understand tenants' lived experiences of the new rule.

5) What proactive steps social landlords are taking to identify and remedy hazardous disrepair within their housing stock;

The social landlords we have spoken to already take active steps to find and deal with unsafe conditions in their homes. This includes carrying out property checks and running planned repair and improvement programmes.

In recent years, there has been a stronger focus across the sector on tenant safety. As part of this, social landlords are regularly reviewing and updating how they work, including responding more quickly to issues and using routine home visits to spot early signs of disrepair, damp and mould.

Some landlords have recruited more specialist staff and established specialist staff teams to focus on prevention and the response to hazards, such as setting up damp & mould teams/dry home teams.

Others have also invested in staff training, both technical knowledge and in people skills such as through our TPAS Cymru training course on '*Damp & Mould: getting the support right for tenants*'.

Many have also invested more in preventing problems in the first place, for example through better ventilation, upgrades to the building fabric and the use of monitoring sensors. Overall, these steps are intended to help identify problems earlier, fix them sooner, and make sure solutions reflect tenants' real experiences of their homes.

6) And; How Welsh Government and social landlords are engaging and involving tenants in issues relating to hazardous disrepair.

A number of social landlords have also invested time in developing and producing information and communications for tenants focusing on prevention advice, such as for damp & mould and on how to report concerns.

Some landlords have worked collaboratively with tenants to co-produce safety & hazards information for tenants. In addition, some landlords have also involved their tenants in testing their damp & mould reporting services and systems.

We emphasise the importance of clear, inclusive communication about damp and mould that reflects the local population. All tenants, including those for whom English is not a first language, should be able to access and understand this information. With Welsh language standards coming into force in May, we encourage landlords to provide bilingual materials wherever possible.

During Welsh Government's consultation on proposals to introduce the new WHQS rule, TPAS Cymru facilitated opportunities for tenants from across Wales and all backgrounds to feed into the consultation process. We facilitated this engagement in the following ways:

- Online Focus Group session with sample of tenants to provide insight into the perceptions, attitudes. WG officials developing the new rule were in attendance so they could directly from tenants
- 'Tenant Pulse' national survey to gather insight into the perceptions, attitudes, and experiences of tenants across Wales relating to hazards/ disrepair and the proposed new WHQS rule.

The insight from these engagement methods is covered in points above.

To date we are not aware of information or communications /awareness campaign produced by WG aimed at Tenants, to inform them of the new rule and what they expect from their social landlord from 1st April this year. TPAS Cymru has asked for such information so that we can help raise awareness through our networks and communication platforms. We have also offered support to WG to enable Tenants to help coproduce such information so that it meets tenant's needs.

We are not aware of consequences of social landlords failing to comply with the new rule.

How information about how well the landlord is complying with the new will be made public in the interest of transparency and openness and so that tenants can see how their landlords are performing and hold them to account where necessary

Summary

The new WHQS rule is welcomed and if implemented and monitored effectively, should help ensure tenants are safe and improve accountability and transparency. However, meeting legal requirements alone will not keep tenants safe if concerns are dismissed, delayed, or treated as low priority. Failure to act reflects not only a breach of statutory obligations, but a wider failure of duty to tenants and residents.

Social landlords and the sector should view this new rule as not simply a compliance exercise, but as an opportunity to build trust and demonstrate a genuine, ongoing commitment to tenant safety. While the new provisions set clear expectations, lasting improvements in tackling hazards and disrepair will only be achieved where positive organisational cultures, responsible attitudes, and proactive behaviours are embedded across housing services.

Our message is clear: tenants deserve homes that are safe, healthy, and free from hazards. Delivering this requires landlords to put tenants first, supported by strong

leadership, a culture of accountability, and behaviours that prioritise early action and respect for tenants' lived experiences.

Written by:

David Lloyd (Programme Director), **Olivia Browne** (Policy & Engagement Officer).





promoting equality in housing
hybu cydraddoldeb ym maes tai

Tai Pawb

Response to:

Hazardous disrepair in social housing

Senedd Local Government and Housing Committee

February 2026

For further information about this paper please contact:

Name: Gareth Lynn Montes
Position: Policy Manager
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Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: www.taipawb.org

Charity registration no. 1110078

Company No. 5282554

Tai Pawb welcomes the Local Government and Housing Committee's inquiry into social landlords' response to hazardous disrepair, and the steps the Welsh Government has taken to improve processes to identify and remediate hazards.

1 The extent of hazardous disrepair in social housing in Wales, the level of health risk faced by tenants, and how housing conditions and responses to disrepair are monitored

Damp and mouldy housing is an extremely harmful environment to live in and can cause severe respiratory problems. This is especially true for young children and older adults. It disproportionately impacts vulnerable social groups as they are more likely to live in poor quality housing.

Unfortunately, official data for housing disrepair in social housing is not widely available. The most recent Welsh Housing Conditions Survey (WHCS) from 2017/2018 showed that damp and condensation affected between 4% and 6% of all social homes. Furthermore, it pointed to Welsh households in general being more likely to have damp and condensation and Category 1 Hazards than their English and Northern Irish counterparts.¹

Other sources suggest the situation is even worse. TPAS Cymru, a Wales-wide tenant engagement organisation, found that only 39% of social housing renters taking part in their survey reported that their home was free from damp and mould.² More recent TPAS publications may acknowledge limitations in their methodology, but the TPAS Cymru research still indicates a very significant gap between what tenants perceive and what official figures claim.

Tai Pawb together with the Open University carried out research into tenants' experiences of decarbonisation in social housing. It found that approximately

¹ Welsh Government and Statistics for Wales, Welsh Housing Conditions Survey 2017-18: headline report (18 February 2020) [Welsh Housing Conditions Survey 2017-18: headline report \(updated\)](#)

² TPAS Cymru, Third Annual All Wales Tenant Survey on Tenant Perceptions: What Matters Right Now (December 2023) [Full Report \(E\)\(2\).pdf](#)

20% of tenant participants variously experienced issues with damp and mould.³

Participants told us how living in damp and mouldy homes forces them to make difficult and often costly decisions around energy use. To manage household finances, some tenants reported limiting their use of heating, even where this risked the worsening of existing damp and mould conditions. Others described having to use tumble dryers to dry clothes rather than hang the washing indoors to prevent additional moisture, despite the higher energy costs involved.

The announcement of a new 2027/2028 Welsh Housing Survey is, of course, to be welcomed. We do feel, however, that the ten-year gap between datasets does not allow us to accurately monitor the changing situation, particularly given the rise in the cost of living since 2018. The cost of living crisis has significantly contributed to an increase in fuel poverty, intrinsically linked to mould and other hazardous disrepair factors. We are reassured though by the Cabinet Secretary for Housing and Local Government that the 2027/2028 Welsh Housing Survey will be more detailed than previous versions and that fuel poverty will be considered.⁴

We know that social housing providers do collect data internally, carrying out their own surveying and will have their own key performance indicators (KPIs) regarding hazardous disrepair and response monitoring.

Nevertheless, we are concerned that none of the existing data is broken down by protected characteristics. We are also aware that social housing providers in

³ The Open University and Tai Pawb, A Fair and Equitable Transition? Tenants' experiences of decarbonising social housing (May 2025) [A-Fair-and-Equitable-Transition-report-English.pdf](#)

⁴ Welsh Government, Cabinet Statement, Written Statement: Welsh Housing Survey 2027-28 (9 May 2025) [Written Statement: Welsh Housing Survey 2027-28 \(9 May 2025\) | GOV.WALES](#)

Wales do not know the demographics of their tenants. Internal data collection with our members showed that nearly 60% of social landlords are unable to break down their stock condition data by household characteristic.

The tragic case of Awaab Ishak demonstrated that people from certain backgrounds are more likely to be affected by hazardous disrepair and mould within social homes than others.

An Ombudsman investigation into Awaab’s death confirmed a culture within the social housing provider that saw Black tenants with refugee status as less deserving of a good home. The Housing Ombudsman in England told the Coroner’s Court that the law needed to be re-enforced in this area as some social landlords have an “outdated, ineffective, sometimes dismissive” approach, with an overemphasis on blaming the tenant’s lifestyle.⁵

Understanding the diversity of tenants in social housing is key to dealing with hazards. We know certain ethnic minorities are overrepresented in social housing. The most recent English Housing Survey (2025) showed that people from a Black ethnicity accounted for 11.2% of all social renters, compared to 4.9% of all households in England.⁶

Tai Pawb research with EYST Wales (Ethnic Minorities and Youth Support Team), a registered charity that supports ethnic minority people in Wales to participate, integrate, and be a valued part of Wales, also offers up some figures. Our joint research into the experiences of housing in Wales of people from ethnic minority communities found that 50% of issues reported by

⁵ Garden Court North Chambers, Awaab Ishak Inquest: Prolonged Exposure to Mould Led to Death (16 November 2022) [Awaab Ishak Inquest - Garden Court North Chambers](#)

⁶ UK Government, Ministry of Housing, Communities & Local Government, Annex tables for English Housing Survey 2024 to 2025 headline findings on demographics and household resilience, Annex Table 1.3: Demographic and economic characteristics, 2024-25 (4 December 2025)

tenants relate to damp, mould, and insulation, followed by leaks at 18%.⁷ It is worth acknowledging that 48% of surveyed tenants said their property was in need of repairs, and that the data does not disaggregate by tenure type, although 22% of total responses came from social rents.

ONS data from 2021 estimated that nearly 25% of all disabled adults in the UK lived in social housing, compared to just 7.9% of the non-disabled population.⁸ The same 2025 English Housing Survey identified people aged 65 or over as the largest group in social housing.⁹ There will be variations to this data in Wales, but the figures are indicative of the situation.

At the same time, combined data from the 2021 and 2023 English Housing Survey found that people from a Black ethnicity were twice as likely to have damp in their homes as any other ethnic group.¹⁰

We are hopeful that the new Welsh Housing Quality Standards (WHQS) will help to establish the extent of hazardous disrepair. Our response to the Welsh Government's consultation on setting timescales for social housing landlords to respond to reports of hazards which have significant health impacts showed wide support for the policy change and the need for equality considerations.

⁷ EYST and Tai Pawb, The experiences of housing in Wales of people from ethnic minority communities (February 2024) [The experiences of housing in Wales of people from ethnic minority communities](#)

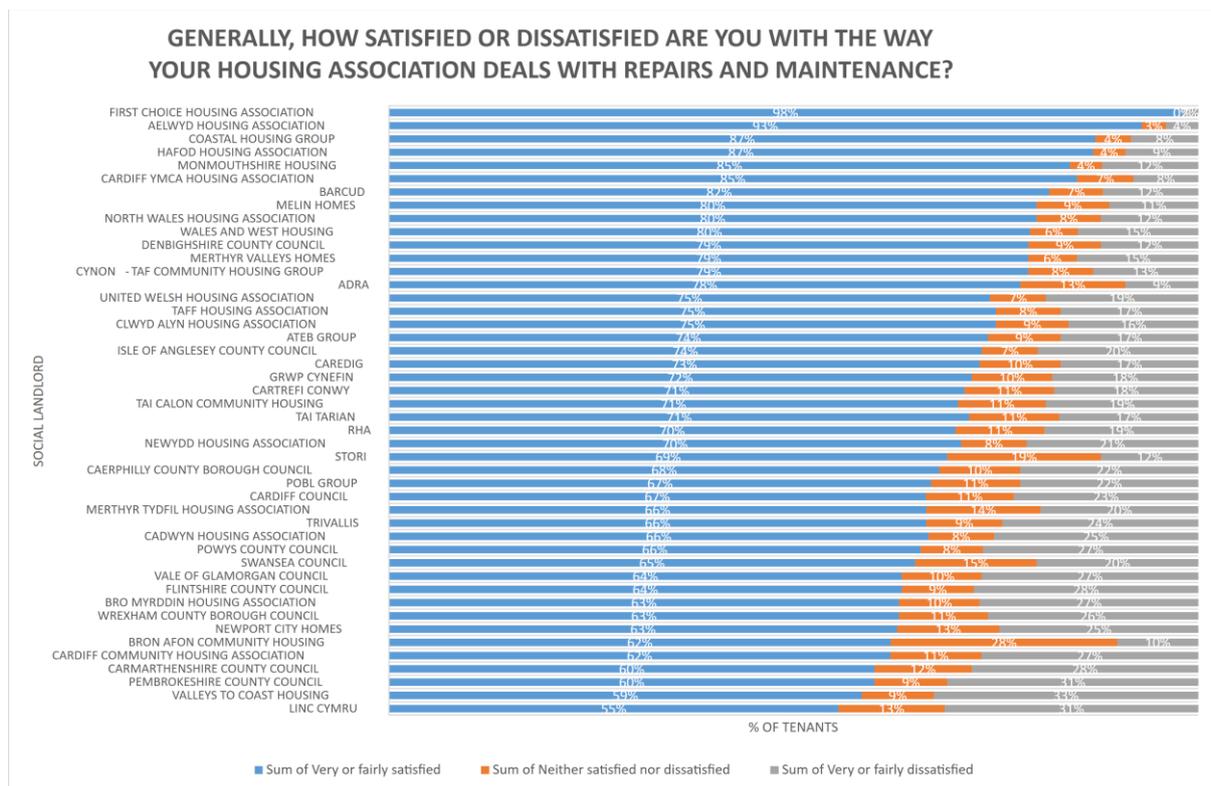
⁸ Office for National Statistics, Census 2021, Outcomes for disabled people in the UK: 2021 (10 February 2022) [Outcomes for disabled people in the UK - Office for National Statistics](#)

⁹ UK Government, Ministry of Housing, Communities & Local Government, Annex tables for English Housing Survey 2024 to 2025 headline findings on demographics and household resilience, Annex Table 1.3: Demographic and economic characteristics, 2024-25 (4 December 2025)

¹⁰ UK Government, Housing with damp problems (30 April 2025) [Housing with damp problems - GOV.UK Ethnicity facts and figures](#)

2 How effectively social landlords are currently responding to reports of hazardous disrepair, particularly issues with damp and mould

The lack of consistent and reliable data means this is a difficult issue to analyse. The most recent Welsh Government social landlords tenant satisfaction survey (2025) presents a mixed picture, with between 55% and 98% of social tenants across local authority and registered social landlord tenants being very or fairly satisfied.¹¹ Those very or fairly dissatisfied range from between 2% and 31%. This discrepancy is consistent with previous annual surveys.



Source: Social landlords: tenant satisfaction survey 2025

¹¹ Welsh Government, Social landlords: tenant satisfaction survey 2025 - What housing association and council tenants think about their homes (8 July 2025) [Social landlords: tenant satisfaction survey 2025 | GOV.WALES](https://gov.wales/social-landlords-tenant-satisfaction-survey-2025)

Variation between providers is understandable, but it is important that a household's repairs and maintenance should not be subject to a postcode lottery.

As the data is not disaggregated by demographic, we have no way of knowing if the outcomes for any particular group are less favourable than for others.

A report into housing disrepair and damp and mould complaints by the Public Services Ombudsman for Wales provides some evidence akin to those of the very or fairly dissatisfied respondents in the Welsh Government's social landlords tenant satisfaction survey.¹² A number of the twelve case studies make reference to damp, mould, and disrepair exacerbating long-term or chronic illnesses and health conditions. The majority of the twelve case studies also impact disabled or older age people, perhaps demonstrating a clear equalities' dimension as to how seriously complaints are taken, or in these cases, not taken.

3 The Welsh Government's creation of a new rule within the WHQS requiring social landlords to investigate and remedy certain hazards within specified timescales, including:

- **the rationale for this approach and how effective it is likely to be; and**
- **the anticipated impact on tenants and landlord**

In our response to the Welsh Government's consultation on setting timescales for social housing landlords we suggested a clear cause of action.

We recommend that tenants, landlords, and maintenance professionals work together to co-produce appropriate timelines for action. This could be done on

¹² Ombudsman Wales, Living in Disrepair - a thematic report about housing disrepair and damp and mould complaints to PSOW (November 2024) [Living in Disrepair - a thematic report about housing disrepair and damp and mould complaints to PSOW](#)

a broad level, with national principles and minimum/maximum times at a national scale to ensure consistency.

Given the different types of housing stock and its condition in Wales, a flexible approach may be preferable and more practical than one that is just target-based. During the co-production, there should be particular efforts made to engage disabled and older people and people from black and other minoritised communities in this process.

We support the Welsh Government's new WHQS rule (Element 1c). We feel that it drives transparency and will create clear guidelines that will embed accountability into the system. The new system should ensure the deplorable case of Awaab Ishak is not repeated.

Tackling damp and mould protects housing assets. Unresolved defects compromise property quality, value, and lifespan. It is in everyone's interests, including social landlords, for issues to be identified and addressed at a national level.

Registered social landlords, many of whom are our members, have raised concerns regarding the implementation of Element 1c and we share some of these. The proposed timescales, starting from April 2026 may prove restrictive.

Compliance with Element 1c will be reported as a fundamental part of the detailed WHQS compliance report. A separate high level summary compliance report will also be required as an element of the quarterly social landlord return. The first quarterly report will be due at the end of June 2026, with the full detailed report at the end of the 2026/7 financial year.

It could be that the short timeframe will result in instances of non-compliance in the first report. Social landlords need time to adopt the changes and also data collection methods need to be refined.

Currently, all social housing providers will have their own data collection methods and systems in place monitoring disrepairs and responses. As a result of Element 1c, all social housing providers will have to adhere to new monitoring methods controlled by the Welsh Government. In practical terms, this will mean staff retraining, the creation of new risk assessments, etc. without the financial support to do so.

One member privately told us that they would like politicians to be more pragmatic when it came to WHQS. Overall, Tai Pawb is supportive of Element 1c and hopes it will create a clear pathway to remedy certain hazards within specified timescales.

4 What proactive steps social landlords are taking to identify and remedy hazardous disrepair within their housing stock

Good practice in this area exists. For example, Taff Housing has developed a damp and mould policy using a dashboard that assesses problems by severity and any vulnerability in households. Based on the risk of both factors, a timeline is established to prioritise the completion of repairs.

In light of Awaab Ishak's tragic death, one of our registered social landlord members told us that as part of their 'Healthy Homes' project they were reviewing their internal systems and processes. The reason being to consider how they properly gather, store, and use customer data regarding protected characteristics, vulnerabilities, etc. and how they can then use this data to better serve their tenants.¹³

Aelwyd Housing is a housing association supporting older people across South Wales. Every year they have a "what matters" conversation, where they visit each tenant. These visits can identify any unreported or unrequested needs a tenant may have and also the condition of the home. Aelwyd has found that sometimes older people are reluctant to report issues in their home and so the

¹³ Tai Pawb, Deeds Not Words: A pledge to end racial inequality in housing - Two years on: Progress and impact of Deeds not Words (May 2023) [Deeds-not-Words-2-Years-On-Final.pdf](#)

visits often provide the opportunity to monitor problems such as damp or mould. It also serves to build rapport between the organisation and the tenant.

Similarly, Newydd Housing Association took measures to resolve mould and damp issues when carrying out disability adaptations or other repairs, even if these had not been reported.

Whilst Element 1c does not take into account overcrowding, we have heard of instances that registered social landlords have taken action into mould and disrepair whilst setting up to tackle overcrowding.¹⁴ In these cases, they are using internal and external data to identify overcrowding and assess its ethnic impact. As a result, they have integrated this work into broader initiatives such as housing allocations, damp and mould interventions, and EDI campaigns.

At Tai Pawb, we are keen that policy embeds equality and is therefore compliant with equality legislation. Local authority social landlords will have a legal duty to carry out an Equality Impact Assessment (EqIA) on their WHQS Compliance Policy. Even if the situation is not the same for registered social landlords, EqIA will still be the best way of ensuring that their legal equality duties (to advance equality, reduce discrimination, and promote good relations) are met.

Additionally, we would like to highlight our Good Practice Guides on using KPIs to advance equality, diversity, and inclusion in housing. This member-only resource gives practical tips, such as the use of dashboards to help:

- track progress over time
- identify patterns and disparities between groups
- support timely, evidenced-based decision-making

¹⁴ Tai Pawb, Anti-Racist Wales & Deeds not Words 5 years of progress and impact in social housing (August 2025) [Deeds not Words DNW 5 year survey Anti-Racist Wales 2025](#)

- communicate performance clearly to staff, board members, tenants, and regulators

By using KPIs, social landlords and other housing providers can identify gaps in their services and ensure that there is no discrimination against any particular group. We would be more than happy to share our resources with the Committee to aid their inquiry if necessary.

5 How the Welsh Government and social landlords are engaging and involving tenants in issues relating to hazardous disrepair

Information should be accessible. Emphasis should be put on participation in this process, so that tenants of all backgrounds, including those who may have communication needs can participate. Communication needs in this case refers to language considerations, as for example, if the tenant prefers to communicate in Welsh or if English is not their first language. It also refers to disability considerations, for example, if the tenant needs a British Sign Language interpreter. Not meeting a tenant's communication needs here is a significant obstacle to achieving the set objectives.

To our knowledge, there is no Welsh Government guidance for tenants on Element 1c nor instructions on what steps to take if their social housing provider does not respond to or act upon hazards.

We know that a lack of knowledge of one's rights is what hampers people's ability to exercise them. We also are aware that tenants do not always make complaints about their housing conditions or situations for fear of negative consequences this could have on their living situation. Considering the current housing crisis, this is not something that should be taken lightly.

People from certain protected characteristics, including disabled people or from a minority ethnic background, are even less likely to raise issues because of systemic discrimination. As such, a lack of clear tenant guidance will only

have a pronounced negative impact on people already struggling to access their rights.

Conversations with our registered social landlord members have revealed that some are concerned about whether they will be able to provide easy-read, accessible guides for tenants relating to WHQS.

6 Summary

Evidence highlights both a gap between official data and tenants' lived experience when it comes to hazardous disrepair, particularly damp and mould. It is also clear that there is a need to strengthen the data itself, including demographic breakdowns, to ensure that social landlords and the Welsh Government fully understand who is most at risk. Without a robust foundation of accurate, disaggregated information, hazardous disrepair cannot be effectively identified, monitored, or addressed.

The Welsh Government's introduction of Element 1c within the new WHQS marks an important and welcome step towards greater transparency, accountability, and consistency. However, for these changes to be successful, the implementation process will require adequate time, resources, and clarity, particularly for social landlords who will be adjusting to new reporting requirements and monitoring systems.

As our evidence demonstrates, proactive good practice already exists across the sector, but embedding this more widely requires meaningful engagement with tenants, accessible communication, and a firm commitment to equality duties and co-production with communities most affected by poor housing conditions.

Overall, tackling hazardous disrepair must be seen not only as a technical or compliance issue but also as a matter of social justice, health equity, and human rights. Ensuring that every tenant lives in a safe and healthy home is fundamental to the long-term sustainability of social housing in Wales.

We hope the Committee will use this inquiry to recommend strengthening national systems, reinforcing equalities considerations, and promoting approaches that place tenants' voices, needs, and rights at the centre of decision-making. We would welcome the opportunity to support this work and to share further evidence or resources as required.

Cardiff Council

Written Evidence Submission to the Senedd Local Government & Housing Committee

Inquiry: Social Landlords' Response to Hazardous Disrepair

Date: February 2026

1. Introduction

Cardiff Council welcomes the opportunity to contribute to the Committee's inquiry into hazardous disrepair and the implementation of the WHQS Amendment relating to hazards.

This submission reflects Cardiff Council's current interpretation of the WHQS Addendum and associated legislation, and we would welcome further detailed guidance from Welsh Government to support greater understanding and consistent implementation across the sector.

2. The new requirements to investigate and remedy certain hazards within set specified timescales

Summary of the Requirements

The requirements: From 1 April 2026, WHQS Element 1c will be amended to require social landlords to investigate and remedy significant Housing Health and Safety Rating System hazards to set timescales, including:

Significant hazards that present an imminent risk (investigate within 24 hours; remedy within a further 24 hours) and

Significant hazards without imminent risk (investigate within 10 working days; remedy within a further 5 working days).

Where timescales cannot be met, a written Summary Plan must be issued.

Cardiff's view of the new requirements

This change was expected for damp and mould cases, following the introduction of Awaab's law in England, however in Wales this new requirement has been extended to include all other hazards in a property set out in the Housing Health and Safety Rating System, except for overcrowding. In total the change relates to 28 different hazards. This considerably extends the requirements and adds to administrative complexity and reporting requirements.

The new addendum was issued on 19th December 2025 and is due to come into force on 1st April 2026, giving little time to plan and implement the change. While this would not be an issue for damp and mould, where the change has been expected for some time, the extension to the other hazards does pose some issues and further guidance is needed to fully understand the impact of this. A meeting held on 10th February 2026 hosted by Welsh Government failed to give clear guidance on the change and reporting expectations.

Overall however Cardiff welcomes the change as it provides clear expectations for responding to hazards and consistency across social landlords in Wales.

Expected benefits

- Clearer expectations for tenants and landlords
- Consistent, risk-based practice across Wales
- Greater accountability and transparency
- Improved data for oversight and learning

Impact on tenants

- Faster identification and resolution of hazards
- Clearer communication and Summary Plans
- Reduced health risks and improved long-term housing conditions

Impact on landlords

- Increased pressure on workforce and technical capacity
- Increased need for HHSRS-competent practitioners (depending on the interpretation of the changes)
- Substantial workflow, systems and reporting changes
- Increased administrative requirements

Cardiff Council has already acted to strengthening teams, upskilling staff, and aligning repair categories and processes to WHQS timescales

3. Background to Repairs in Cardiff

The Responsive Repairs Unit (RRU) completes over 4,000 repairs per month across approximately 15,101 homes, including 679 temporary accommodation properties. During the pandemic access to properties to complete repairs was restricted leading to pent up demand. In the post pandemic period demand increased significantly and this together with workforce pressures resulted in a significant backlog, with over 5,800 repair jobs unallocated at the peak. Unfortunately the pressure on services did

result in significant service delivery issues leading to an increase in complaints, an Ombudsman investigation has been published in the public interest as a result of these issues.

To stabilise the service during this time, repair timescales were temporarily extended as part of the improvement plan.

A comprehensive Repairs Improvement Plan was put in place to address the issues within the service, this is a wide ranging plan that aims to improve response times and enhance customer service.

Considerable progress has since been made and unallocated works have reduced by 89%, outstanding work is now at normal operational levels. Complaints handling has also improved both in time and quality. This improvement plan is continuing to ensure that we offer a high quality of service to our tenants.

4. How hazardous disrepair and housing conditions and responses to disrepair are monitored.

Understanding our housing stock

We commission property condition surveys of our homes from independent surveyors Savills to help understand our housing stock. Between October 2024 and February 2026, Savills carried out 6,242 Stock Condition surveys based on the Housing Health and Safety Rating System. This allowed any significant hazards in those properties to be identified and remedied, even if the tenant had not reported the repair. We aim carry out independent surveys of at least 10% of our homes each year.

We maintain an up to date Asset Management database that contains information about each element of our homes and the date they should be replaced. This database has enabled the production of Target Energy Pathways for each property and will in future identify trends in property condition. This information will help us to prioritise larger capital programmes of work based on risk and need and will support proactive, WHQS-aligned planning.

When a property becomes vacant and before it is re-let; stock condition surveys are carried out to ensure the property meets the WHQS. The surveys are aligned to the HHSRS hazard categories.

All housing staff who visit properties are encouraged to report any issues with property condition, this is being strengthened through a new procedure and briefings on the hazard categories and potential impact on tenant health, so that an effective triage of any issues can be carried out proactively, whenever an officer visits the property.

Tenants are encouraged to report repairs and any significant hazards are prioritised, with emergency repairs responded to within 24 hours or less, on a 24/7 basis.

5. The effectiveness of Cardiff's response to reports of hazards, particularly issues with damp and mould

Damp and mould response

Damp and mould growth remains the most prevalent and complex of hazards with potential significant implications for tenants health and wellbeing. This is a particular issue for Cardiff due to the age of our housing stock, insulation and ventilation constraints, and increasingly wet weather.

The Dry Homes Team

Cardiff acted early after the reports of the tragic death of Awaab Ishak, and set up a dedicated Dry Homes Team, a specialist team that oversees damp/mould and other complex cases. Alongside the Dry Homes team a new Case Management Team has been established, in recognition of the complexity of responding to damp and mould cases. These cases may require a multi-trade response and the scheduling of works in a specific order. The Case Management Officers co-ordinate these works to ensure they are carried out effectively.

Timescale for Responses

Any reports of Damp and Mould are triaged and an initial risk rating is assigned of Red, Amber and Green. All reports of damp and mould are responded to, regardless of the level of assessed risk, however more priority is given to Red and Amber cases.

The target time for inspection of a Red damp case is 24 hours and an Amber case is 10 days. These target times therefore broadly align with the new WHQS requirements as can be seen in the table below:

Risk Rating	Timescales	Description of Risk
Red Severe risk	Inspection within 24 hours. Remedied within a further 24 hours.	A hazard which may present a significant risk with an assessed likelihood of imminent harm.
	Inspection within 10 working days.	A hazard which may present a significant risk with no

Amber Moderate risk	Remedied within 5 working days or a written summary plan provided.	assessed likelihood of imminent harm.
Green Minor risk	Inspection within 25 working days.	A hazard which may present a low risk with no assessed likelihood of harm.

Response times are monitored and reported on regularly.

When the Dry Homes Team was initially set up, the service was impacted by the issues that faced the whole of the Responsive Repairs Service. Demand for the service was high and available capacity was limited both in our inhouse workforce and from our commissioned contractors. However work to address this has taken place and the response times as set out are now generally being achieved, although peaks in referrals can impact performance.

For 2026/7 significant additional investment is being made into the Dry Homes Team including an additional 10 skilled Tradespersons, 2 Case Management Officers, 1 Technical Officer and 1 Technical Manager – Increasing the overall team from 23 to 37 members of staff. This will provide greater resource to respond within timescales and will allow more work to be delivered by the inhouse workforce, allowing us to provide a more joined up service.

Severe hazards identified through survey or inspection are raised for immediate response. Action is taken to mitigate these as soon as possible. However the work to resolve damp and mould can take an extended period of time, particularly if structural work is needed.

The new WHQS requirements do allow that in some cases it will take longer to carry out the works, and in these cases a Summary Plan is required. This is a new requirement and will create more administrative work, however for damp and mould cases this is achievable as the Complex Case Team already co-ordinate the works involved, work to implement this change has already taken place and will be further embedded before the change comes into force in April. This will ensure tenants receive clear written information on the hazard identified, the actions taken, the actions still required, statutory timescales, interim safety measures, and contact details for the team. Copies will be held on record for audit and compliance purposes. For the wider range of hazards, other than damp and mould, producing a Summary Plan may be more challenging and this is detailed later in this paper.

Cardiff Council’s damp and mould inspection process now follows a structured, whole-house approach Technical Managers and Officers who carry out the

inspections have undertaken accredited HHSRS training and can effectively assess the 29 matters.

A comprehensive inspection is carried out using standardised survey tools. These inspections assess condensation, ventilation, water ingress, structural defects, insulation, overcrowding. The age of the tenant and their family and any health or disabilities are taken into account in the assessment. Fuel-poverty is also considered, as inability to keep the home warm can increase the likelihood of damp and mould. If this is an issue a referral is made to the Council's Money Advice Team, who can support with income maximisations and any grants available.

All inspections are recorded on detailed forms with photos. Damp inspections are regularly audited to check for accuracy and consistency.

As stated above complex or recurring cases are managed through a formal case-management process involving multi-trade coordination and access to specialist independent surveys where needed.

A follow up process has been put in place for Red and Amber cases to ensure that when the work is completed it has been effective and the damp does not reoccur. A process has also been put in place to monitor repeat reports of damp and mould and to escalate these.

Wider systemic issues identified by the Dry Homes Team are used to inform planned programmes of work.

A new Damp and Mould policy is under development which sets out our approach to damp and mould, this has been the subject of an equality impact assessment to ensure that we are addressing our tenants needs. A separate Temporary Accommodation (Decant) policy has also been developed, for when a tenant cannot remain in the property while works are underway, again an equality impact assessment has been carried out with the aim of minimising the impact on tenants. Tenant consultation will also take place before implementation.

Cardiff's Response to Other Hazards

While the requirement to respond to damp and mould within set timescales was expected, the inclusion of the wider range of hazards was not and the impact of this is not yet clear. We would welcome further Welsh Government guidance on the scope of this responsibility.

When a tenant or officer reports a significant disrepair or fitness for human habitation issue that is not related damp and mould , an inspection will take place by an officer trained in the Housing Health and Safety Rating System and based on the level of the severity of the issue in the property combined with information about the age, health, disability or other issues faced by the tenant and their household, a risk rating will be applied and emergency or urgent works will be carried out. These cases are relatively small in number and addressing the repairs in the way set out in the new

WHQS statutory guidance, including the creation of Summary Plan would not be an issue. These cases are co-ordinated by the Complex Case Team in the same way as damp and mould cases.

However the way that most hazards are reported to the Council is through the normal repair process.

Every day the Responsive Repairs Unit respond to requests from tenants to resolve significant hazards that occur in their home. Cardiff does this through its Responsive Repairs Service.

Typical emergency/urgent hazards include:

- electrical issues,
- leaks and bursts,
- boiler failure,
- broken glazing,
- compromised stair rails/handrails, and
- issues with access

Cardiff categorises reports of hazards into two types:

Emergency – this aligns closely with category “significant risk with an assessed likelihood of imminent harm”.

For emergency hazards, Cardiff Council responds within 24 hours, aiming to make properties safe within approximately 4 hours wherever possible. Cardiff has maintained excellent performance in responding to emergency repairs, even during periods of very high workload.

Urgent – some repairs categorised as urgent align with the category “significant risk with no assessed likelihood of imminent harm” however some are of a lower level.

For urgent cases, targets were temporarily increased to 15 days, but work is underway to reduce this to 10 days by April 2026. The intention will be to reduce the response time further for those urgent cases that meet the definition of “significant risk with no assessed likelihood of imminent harm” to 5 days.

It is not clear whether the new reporting and planning requirements apply to responsive repairs and guidance has been sought from Welsh Government regarding this. While the timescales for response should not be an issue for Cardiff, the need to provide a Summary Plan would be administratively burdensome and difficult to co-ordinate, any detailed reporting would be difficult to achieve. This is due to the very high level of repairs received.

The table below shows the total number of emergency repairs completed by both the internal teams and by a contractor:

	Completed Financial YTD	Monthly Average Completed	Requiring Summary Plan (Estimated)
Contractor	2129	213	3
Internal	4715	472	3
Total	6844	685	6

The table below shows the number of urgent jobs completed by both the internal team and by the contractor.

	Completed Financial YTD	Monthly Average Completed	Requiring Summary Plan (Estimated)
Contractor	2101	233	70
Internal	11733	1304	600
Total	13834	1537	670

Of these, we anticipate that approximately 670 per month would require a written summary plan for job completed by the internal team and a further 70 for contractor jobs, which would create another layer of complexity. This is using the assumption that all urgent repairs fall into significant risk with no assessed likelihood of imminent harm.

A manual exercise is currently being carried out to identify which urgent repairs would meet the definition of significant risk no imminent harm. As stated above the aim will be to inspect these within 5 days to ensure completion within the timescales.

5. Proactive steps being taken by Cardiff to prevent hazards

Actions are taken by Cardiff Council Homes to proactively prevent damp and mould occurring in the first instance, this includes several initiatives, maintenance programmes and equipment for tenants to use in their homes, including the following:

Initiatives & Maintenance Programmes

Deliver external painting and maintenance programmes, which includes render repairs and other protective external works, to ensure it effectively prevents future issues such as water ingress, corrosion and deterioration of the building fabric.

As part of our ongoing window upgrade programme and during any window installation, we continue to install high-performance PVCu windows that help prevent damp and mould by improving both ventilation and thermal efficiency. Each window is fitted with approved through-frame trickle vents to maintain effective background ventilation and manage internal moisture levels. Tight weather seals, double glazing,

and controlled drainage channels prevent water ingress, while all installations include proper sealing and making-good to stop moisture tracking into the structure

Installing modern, continuous running ventilation fans during full electrical rewires, routine 5year electrical safety checks, as part of a kitchen or bathroom upgrade and whenever damp or mould is reported. These systems work by constantly removing moisture from kitchens, bathrooms, and other high humidity areas. This improves air circulation, reduces condensation, and helps prevent mould from developing, while remaining highly energy efficient and inexpensive to run.

Provide adequate facilities for safe and suitable washing, drying and airing facilities to minimise moisture buildup within the home. This includes:

- Space, power and plumbing for a washing machine
- Heated airing cupboard with shelving, if not already in place this will be installed when the property becomes void.
- External drying line in houses and low rise blocks, and appropriate arrangements in high-rise settings.

New Build Properties

We continue to provide the highest standards of energy efficiency, ventilation and moisture control in new build properties.

Void (Empty) Properties

We carry out comprehensive surveys, including a damp survey when a property becomes void, including a review of the repairs history to identify previous damp and mould issues. Additional measures include:

Installation of extractor fans in kitchens and bathrooms.

Creating space, power and plumbing for a washing machine.

Installation of an airing cupboard, where possible, to reduce the need of drying clothes on radiators.

Survey of window seals and carrying out the necessary repairs to reduce the likelihood of cold spots.

Inspect all rainwater goods, including drains and gutters from ground level to assess leaks and repair where necessary.

Apply a mould inhibitor mixture in paint to further reduce the likelihood of mould and condensation on the walls.

Inspect internal walls for open and defective joints in the brickwork or cracking to the render and repair where necessary.

Additional preventative measures are being considered and incorporated as part of a wider Responsive Repairs service improvement action plan.

6. Engagement with tenants relating to hazardous disrepair.

Effective communication is fundamental to our approach. We prioritise advice and education to support tenants in maintaining safe and healthy homes. Guidance is available through the Council's C2C service and comprehensive online resources, offering practical information on topics such as ventilation, condensation and energy usage, including a short video. All information is presented in plain English, ensuring tenants understand the nature of hazards and their potential health impacts.

Educational materials, including damp and mould leaflets, are distributed at tenancy sign-up and during damp inspections, helping tenants to identify and address issues proactively.

Named officer contacts are assigned to complex cases to ensure accountability and clarity throughout the process. Following a damp or HHSRS inspection we will provide tenants with Summary Plans that detail identified hazards, the actions to be taken, associated timescales and any necessary safety arrangements. During multi-trade programmes, tenants are kept informed with regular updates, enabling them to remain fully aware of work progress and any changes that may affect their property.

Tenant feedback is integral to shaping and improving our service. Complaints, surveys and recommendations from the Ombudsman are used directly to inform meaningful change. Consultation with tenants remains central, particularly when developing new policies in areas such as Temporary Accommodation (Decant), Damp & Mould, and the broader Responsive Repairs service, ensuring that tenant voices are heard and reflected in decision-making processes.

7. Conclusion

Cardiff Council is committed to a robust, transparent and tenant-centred response to hazardous disrepair. Significant progress has been achieved through specialist teams, improved triage, enhanced data systems, stronger tenant communication and comprehensive stock intelligence and we will continue to build on these improvements.

While we are fully prepared for these changes for damp and mould. We would welcome more information and guidance about how the changes apply to other hazards and a phased approach to the application for these wider hazards would be helpful in ensuring effective implementation.

Cardiff Council will continue to work with Welsh Government, partners and tenants to ensure homes are safe, healthy and compliant.

LGHC inquiry written evidence: hazardous disrepair in social housing

February 2026

About

Community Housing Cymru (CHC) is the voice of housing associations (HAs) in Wales. We represent 30 not-for-profit housing associations that provide over 170,000 homes to 10% of the Welsh population. Our members work throughout Wales, providing homes and services to a wide range of people. As their trade body, we fight for the things they need to support their communities and to ensure that together we can achieve our vision.

As an influential voice, we work to secure stable and sufficient funding, alongside a policy framework that supports investment in new and existing homes and support services.

Executive Summary

Community Housing Cymru welcomes the opportunity to respond to the Committee's inquiry into hazardous disrepair in social housing in Wales.

Housing Associations recognise that hazardous disrepair can pose serious risks to tenants' physical and mental health and safety. Across the sector housing associations have strengthened their policies and practices resulting in quicker response times, improved record keeping processes and placed a much greater emphasis on early identification of hazards. This includes improvements in tenant engagement and communications, ensuring residents are better informed and have clear channels to report concerns. We also acknowledge that there have been cases where individual landlord responses have fallen below expected standards, and that ongoing focus and continual improvement is required.

The vast majority of social homes are well maintained, warm, safe and affordable. The most recent data from the Regulator shows that housing associations have high levels of compliance on safety checks, almost 98% of emergency repairs were completed on time and the number of outstanding routine repairs per property is 0.11 (weighted average).



Housing Associations are highly regulated and subject to ongoing scrutiny through the Regulatory Framework for Housing Associations in Wales, quarterly regulatory reporting, board oversight, complaints handling and tenant feedback, including the annual Tenant Satisfaction Survey. Housing Associations have accepted findings and recommendations from the Public Services Ombudsman for Wales and Welsh Government, and have used these to drive improvement as part of a culture of learning and accountability. However, the sector recognises that regulation and assurance alone do not prevent all service failures, and that learning from individual cases remains essential.

The safety and quality of our members' homes is their highest priority and housing associations are investing significant sums in existing homes. Housing associations spend on average £1728 per home on routine maintenance. The most recent [Welsh RSL Global Accounts](#) show that in 2023/24 compared to 22/23, median costs increased in nominal terms by over 20% for routine maintenance and major repairs, while management costs reduced by 0.4%. This demonstrates the efforts that housing associations are making to maintain homes while preserving service quality. This is during a time of unprecedented pressure on business plans and numerous and competing demands for investment.

Community Housing Cymru supports the intent of the new Welsh Housing Quality Standard (WHQS) requirement to improve transparency, consistency and tenant confidence in responses to hazardous disrepair. Social landlords already operate risk-based repairs systems focused on rapid remediation of the most serious risks. The sector has raised concerns about the short lead-in period, the absence of phased implementation, and the lack of detailed operational guidance, which risk inconsistent interpretation and unintended pressure on frontline services. We want this to work and see its value. However, to make this a success we need to ensure that there are consistent national expectations and a realistic lead in period to enable reporting systems to be put in place.

Written evidence in response to the committee's inquiry focus

The extent of hazardous disrepair in social housing in Wales, the level of health risk faced by tenants, and how housing conditions and responses to disrepair are monitored;

Housing Associations take seriously the risk that poor housing conditions can have to tenants' physical and mental health and safety. The sector has intensified its focus on tenant safety in recent years, particularly following the Grenfell Tower tragedy and the tragic death of Awaab Ishaak, which has led to social landlords regularly reviewing and revising their policies and practices to strengthen tenant safety. This has included establishing quicker response times, actively encouraging tenants to promptly report any issues with their home, and using any home visit to identify early signs of disrepair, damp, and mould.

We have been proactive in working with partners to identify changes which strengthen our collective response to this issue. The Welsh Government conducted a [Damp and Mould assurance exercise in 2023](#), and collated information on policies and practice to inform national policy



expectations. Community Housing Cymru has worked with sector partners including the Housing regulator, Welsh Local Government Association, TPAS Cymru, Shelter Cymru and others, to review current policy and practice in responding to reports of disrepair, with a particular focus on damp and mould. Community Housing Cymru has supported our members through a regular community of practice space for landlords to share approaches, webinars on key topics, and support to develop tenant communications on how to report a problem within the home.

We recognise that a number of investigations in recent years have identified instances in which social landlords' responses have fallen below the high standards they and their tenants expect. In each instance, housing associations have fully accepted the recommendations made by the Public Service Ombudsman for Wales and the [Welsh Government's "think points"](#), using these outcomes to drive service improvements as part of a culture of learning and accountability.

Housing Associations are highly regulated organisations. They report quarterly through the Registered Social Landlord regulatory survey. They are regulated using the [Regulatory Framework for Housing Associations in Wales](#), which requires the provision of high-quality tenant services (RS3) and high-quality accommodation (RS10). Housing association Boards take these responsibilities seriously and monitor performance on repairs and complaints received from tenants.

Performance is scrutinised by Boards, routinely reported on through complaints and repairs reporting, and further assurance provided through tenant feedback mechanisms, including regular tenant surveys and the annual [Tenant Satisfaction Survey](#), which provides national insight and benchmarking of tenant experience of repairs and maintenance services.

The most recent of the regulatory surveys shows a sector that is serious about compliance and acts proactively to ensure repairs and maintenance issues are tackled.

- **Compliance is an absolute priority:** The weighted average of properties without a current gas safety certificate is just 0.21%. Out of 31 housing associations, nine reported 0.00% non-compliance. Housing associations continue to show a proactive commitment to addressing urgent issues:
- **On-Time Completion:** The weighted average for emergency repairs completed on time during Q2 2025 is 97.78%.
- **The sector maintains a low backlog of non-emergency work:** The number of outstanding routine repairs per property is just 0.11 (weighted average). Two housing associations reported 0.00 outstanding repairs per property, and the majority (25 out of 31) have fewer than 0.20 outstanding repairs per unit.

Regulation and assurance mechanisms, while essential, do not on their own prevent all service failures, which is why the sector has placed increasing emphasis on learning from complaints, Ombudsman findings and crucially tenant feedback. We recognise that overall system improvements do not negate the very real harm experienced by tenants in individual cases, which is why learning from those cases remains central to sector improvement.



How effectively social landlords are currently responding to reports of hazardous disrepair, particularly issues with damp and mould

We support the underlying intent of the new requirement as a means of improving transparency, consistency and tenant confidence.

Housing associations are committed to effectively addressing hazard reports and disrepair issues in a reasonable timeframe, in full compliance with legal and regulatory obligations. Specifically, the Renting Homes (Wales) Act 2016 mandates that housing associations maintain properties in good repair and ensure they are fit for human habitation. Once a problem is reported, housing associations must respond promptly, and across the whole sector repair processes are structured to meet these legal requirements.

Housing associations typically respond to emergency repairs within 24 hours to make the property safe, including for critical issues such as gas leaks, power outages and loss of water supply. In relation to damp and mould, the sector has already strengthened response times, escalation processes and internal oversight in recent years.

However, applying a HHSRS-based assessment framework to all hazard reports represents a shift from established repairs practice and requires significant changes to staffing models, training, systems and workflows. Our concern is that resources should remain focused on resolving the most serious risks quickly, rather than becoming absorbed in lengthy assessments at the expense of timely remediation.

The Welsh Government's creation of a new rule within the WHQS requiring social landlords to investigate and remedy certain hazards within specified timescales, including:

- **the rationale for this approach and how effective it is likely to be; and**
- **the anticipated impact on tenants and landlords;**

The Welsh Government has introduced [a new requirement](#) within the Welsh Housing Quality Standard (WHQS) relating to landlords' response to damp, mould and other hazards, with compliance due to be measured from April 2026. We support the intention of the measure and our comments are focused on ensuring that housing associations are able to implement it effectively.

This is a significant change and a longer lead in and phased approach would support housing associations to ensure that it is rolled out effectively. Similar requirements introduced in England through Awaab's Law were supported by a longer lead-in period of 9 months, substantial written guidance, and a phased approach to the inclusion of hazards beginning with damp and mould and emergency hazards. England's approach acknowledged the substantial changes and resource challenges involved. This guidance and phasing supports social landlords to build systems, upskill staff, and comply properly.

In Wales, the sector has had a considerably shorter preparation period (4 months), no phasing, and no detailed operational guidance on how hazards and risk are expected to be assessed. This



is despite these concerns raised during consultation and subsequent discussions with officials. Without clear and consistent guidance, there is a very real risk of varied interpretation for requirements between social landlords, which undermines the core objective of achieving consistency across the sector.

Operational challenges in implementing the policy include changes to practice, systems and training:

- The requirement introduces fixed timescales for investigation and remediation, with landlords required to determine whether a reported issue presents a “significant or imminent risk of harm”. While housing associations already apply risk-based decision-making, the new rule requires frontline staff to consider 28 HHSRS hazards alongside tenants’ personal circumstances at the point of initial contact with customer care representatives. This represents a change to current practice and comes with significant implications for staff training, systems development and organisational capacity.
- Existing repairs systems are designed to prioritise risk and tenant safety, with a strong focus on rapid intervention rather than the formal application of the full Housing Health and Safety Rating System (HHSRS) to every hazard report, as will be required from the 1st April. It is important to note that the HHSRS is a highly technical assessment tool developed primarily for environmental health enforcement. It is not standard practice for landlords to apply a full HHSRS assessment to every reported hazard.
- In responding to the Welsh Government consultation on the requirement, CHC raised concerns that applying the rule to all HHSRS hazards could unintentionally complicate repairs services and divert resources away from the most serious risks. Some hazards included in the HHSRS framework are not always linked to the physical condition of the property or are not within the landlord’s direct control. While we welcome the removal of overcrowding from the final rule, other hazards such as personal hygiene and food safety are not always linked to the physical condition of the home and are often outside the control of the landlord, particularly where no structural risk is present.

The requirements must be pragmatic and proportionate so that they do not inadvertently create capacity challenges or excessive administrative burden that detract from frontline service delivery.

For the new policy to work effectively there needs to be clear guidance and clarity of expectations:

- The “significant” and “imminent” test requires subjective judgements to be made about tenants’ physical and mental health which housing staff are not clinically trained to make. We expect interpretation and application of this test to evolve over time as experience develops. Guidance would be helpful to support these decisions.
- The current 1c addendum is intentionally brief, suggesting that landlords would be responsible for interpreting the requirements. However, the absence of detailed operational guidance and clear process expectations creates a significant risk of varied and



inconsistent interpretation among social landlords, which ultimately undermines the objectives of achieving consistency and transparency.

Given the limited preparation time and the absence of Welsh Government guidance at the time of writing (7 weeks prior to implementation), we anticipate that it is inevitable that compliance approaches will mature over time. We want this to work and see its value. However to make this a success we need to ensure that there are consistent national expectations and a realistic lead in period to enable reporting systems to be put in place.

Community Housing Cymru is supporting members through establishing communities of practice, hosting webinars, shared learning activity and continued active engagement with Welsh Government on emerging data and reporting requirements.

What proactive steps social landlords are taking to identify and remedy hazardous disrepair within their housing stock and how the Welsh Government and social landlords are engaging and involving tenants in issues relating to hazardous disrepair

Housing Associations already take proactive steps to identify and address hazardous disrepair within their homes. This includes responding to tenant reports, undertaking comprehensive stock condition surveys, and executing planned maintenance and improvement programmes.

Some cases, particularly occurrences of damp and mould, can be complex and require detailed investigation, trial interventions and sustained engagement with tenants before they are fully resolved. Housing associations are increasingly investing in preventative approaches, including improved ventilation, upgrades to the building fabric, sensor monitoring and issuing tenant-facing guidance on condensation, heating and ventilation.

Taken together, these measures are intended to ensure that hazards are identified earlier, addressed more quickly, and resolved in a way that reflects tenants' lived experience of their home.

Tenant engagement is of course crucial and central to this work. Housing associations encourage tenants to report concerns early and have collaborated across the sector to develop clear, accessible communications. Examples include guidance, videos, downloadable resources and targeted campaigns aimed at supporting tenants to both report issues and understand contributing factors. These resources include the following amongst other examples:

- [Bron Afon video on preventing damp, mould and condensation](#), and advice on how Bron Afon can help.
- Hedyn [web pages](#) explaining how to identify damp, mould and condensation, how to prevent it, how to contact the HA about this and what they can do to help.
- [Taff Housing downloadable guides in English, Somali and Arabic](#) with advice on preventing damp, mould and condensation, how to prevent it, and how to heat your home, and HA contact details to report issues.



- [Grwp Cynefin webpage](#) with video on how to prevent damp and mould, infographic on spotting damp and mould, and a form to report concerns
- [Trivallis website](#), posters and booklets on staying warm and well at home, with a focus on collaborative communication with tenants to prevent and resolve damp, mould and condensation issues.

To conclude, Community Housing Cymru and our members are united in our commitment to addressing hazardous disrepair and prioritising tenant safety. The sector welcomes the intent of the new WHQS requirement as a means of improving transparency, consistency, and tenant confidence.

However, for the new requirement to be truly effective and not inadvertently create capacity challenges, it must be pragmatic, proportionate, and supported by clear, consistent operational guidance. Given the limited preparation time, we anticipate that compliance approaches will evolve beyond the April 2026 implementation date as a continuous cycle of learning, guidance, and practice refinement is embedded across the sector. CHC will continue to support its members and actively engage with the Welsh Government to ensure a successful outcome that places tenants' well-being at the center of service delivery.

Hayley Eastment

Policy Lead, Community Housing Cymru



Welsh Government Evidence to Local Government and Housing Committee Inquiry into Hazardous Disrepair in Social Housing

05/03/2026

Background

1. Addressing hazardous disrepair in social housing has always been, and remains, a priority for Welsh Government. We recognise the link between poor housing and health conditions and take the quality of social housing very seriously.
2. The Welsh Housing Quality Standard (WHQS) was introduced in 2002 and set the first comprehensive minimum physical standards for all social housing in Wales, requiring homes to be in a good state of repair, safe, and secure. Building on this progress, the updated WHQS, effective from April 2024, requires all social housing to be in a good state of repair. Any home containing a Category 1 hazard which is the most serious health and safety risk, automatically fails this standard.
3. WHQS was complemented by the Housing, Health and Safety Rating System (HHSRS) which was introduced in 2006. The HHSRS is a risk-assessment tool used to identify and address housing hazards. It focuses on the actual impact of disrepair on the occupant's health and safety.
4. The legislative framework surrounding disrepair was further strengthened by the introduction of The Renting Homes (Fitness for Human Habitation) (Wales) Regulations 2022. These regulations require landlords to ensure properties are fit for human habitation (FFHH) at the

carbon monoxide alarms, and conducting electrical safety inspections at least every five years. There are also requirements to address issues such as damp and mould.

5. Despite this legislative framework, in the wake of the coroner's report into the tragic death of Awaab Ishak, reports from the Public Services Ombudsman for Wales (PSOW), as well as ongoing press interest in tenants' lived experience of damp and mould, it became clear some social landlords were not acting adequately to address instances of disrepair.

Disrepair in Social Housing Stakeholder Group.

6. Following the coroner's report into the shocking death of Awaab Ishak, CIH Cymru and Community Housing Cymru (CHC) jointly wrote to the Minister for Climate Change and Rural Affairs (MCC) in relation to the *Better Social Housing Review (BSHR)* which was jointly published by the National Housing Federation (NHF) and the Chartered Institute of Housing (CIH). The report identified disrepair in social housing as a significant issue stemming from systemic maintenance failures and a lack of connection between landlords and residents. Damp and mould was highlighted as a major source of complaints.
7. Recognising the different legislative and regulatory environment in Wales, a stakeholder group was established to consider learning from the BSHR and its recommendations, in the context of the Welsh social housing sector. This group consists of representatives from CIH Cymru, Community Housing Cymru, TPAS Cymru, Shelter Cymru, WLGA, Tai Pawb and the Welsh Government.
8. The group's initial analysis determined that there were significant policy initiatives, existing legislation and regulation, that set out a robust framework to minimise risks relating to serious damp and mould issues, and disrepair generally. The group however concluded that despite these existing measures there were clear opportunities for improvement in addressing disrepair, to ensure the best outcomes for tenants are delivered and the risk to their health and safety minimised.
9. The group identified opportunities to improve social landlords' accountability and ensure enhanced transparency of their responses to damp and mould and other hazards. Consequently, it was recommended that a new rule should be introduced within WHQS 2023 in relation to social landlords' response to damp, mould and other hazards. Using existing performance mechanisms, rather than a legislative route which would have required primary legislation, was chosen to ensure the swiftest implementation. The Welsh Government's priority was to set clear, risk-based timeframes and transparent reporting, providing an enhanced accountability framework and greater visibility for tenants enabling them to seek redress where appropriate.

Consultation on specifying a rule in relation to social landlords' response to damp, mould and other hazards

10. The scope and content of the consultation exercise was developed in conjunction with the stakeholder group. A 12-week consultation period was agreed to allow full consideration of the

proposals, and the consultation was issued through all members of the steering group in addition to the statutory consultee groups¹.

11. The consultation covered matters including which hazards the new rule should relate to, whether a common timeframe for investigation or remedy should apply or not and the length of such a timeframe, the treatment of hazards determined to be a 'significant risk'. The consultation took place from 01 April 2025 and ran until 20 June 2025. 29 responses were received and of these 19 were from social landlords.
12. Overall, responses to the consultation were mixed. Social landlords generally favoured what they considered to be a more proportionate, risk-based approach with flexibility to manage operational constraints, citing concerns about resource implications. In contrast, other stakeholders, including tenant representatives and advocacy groups, tended to support broader coverage and stricter, standardised requirements to ensure fairness, transparency, and stronger tenant protections. This feedback was used to inform the Cabinet Secretary's decision on refining the final WHQS rule.

Implementation

13. The Cabinet Secretary issued a written statement on 19 December 2025 announcing that WHQS would be updated to set out clear timescales for investigating and remedying hazards, including those relating to damp and mould. A WHQS addendum setting out the new rule and providing guidance was published at the same time, confirming that the rule will come into effect from 1 April 2026.
14. To support implementation officials will be running awareness raising sessions with all social landlords, this is being supported through CHC and WLGA. This will include an explanation of the requirements of the new rule and new reporting arrangements. These will be interactive sessions and officials will consider if additional guidance is required based on feedback from the sector. Awareness raising sessions are also being planned for tenants and will be facilitated by Tenant Participation Advisory Service Cymru (TPAS).
15. The Welsh Government has provided circa £2 billion of funding to social landlords since 2004 to support the original WHQS programme which significantly improved the quality of social homes across Wales. In the last two years nearly £250m has been allocated to social landlords in Wales via Major Repairs Allowance, Dowry funding and WHQS Implementation Grant. This provides a package of support for social landlords in continuing to improve the quality of their social housing.

Impact monitoring

16. Compliance with the new WHQS rule will be reported as part of the WHQS compliance monitoring report (CMR). From October 2026 and annually thereafter, social landlords will need to submit a CMR which reports on specific aspects of the standard. The monitoring on Hazardous Disrepair will be included from October 2027, after the first full year of its implementation.
17. Alongside this to improve transparency for tenants, a separate high level summary compliance report will be required as part of the quarterly social landlord return. The first quarterly report will be due at the end of June 2026.

¹ Under the Housing Act 1996, the Welsh Ministers must consult: (i) one or more bodies appearing to them to represent the interests of RSLs; (ii) one or more bodies appearing to them to represent the interests of tenants; and (iii) one or more bodies appearing to them to represent the interests of LHAs.

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18. The quarterly return will provide individualised social landlord data which the Regulator (on behalf of Welsh Ministers) will use as part of their routine regulatory activities. This data reporting complements initiatives agreed with the sector under the latest *Rent and Service Charge Standard*. Specifically, a commitment to work with the Welsh Government to strengthen transparency and accountability and improve learning and practice through enhanced data sharing. As part of this, we will be working alongside the sector to develop individualised performance data, once any data quality concerns have been addressed.
 19. This data picture is also enhanced by the recent implementation of a revised regulatory assessment model used by the Regulator. This includes consideration of how effective the RSL Board's oversight is of health and safety, including assurance that underpinning systems and data are robust.
 20. The Welsh Government is cognisant of the ongoing work of the Public Services Ombudsman for Wales (PSOW) with respect to disrepair, including damp and mould, in social homes. When PSOW upholds a complaint against a Registered Social Landlord (RSL), the Welsh Government is formally notified by both PSOW and the RSL. This notification sets out the findings of the investigation, details the action plan established to address the issues identified, and confirms whether all PSOW recommendations have been accepted.
 21. The Welsh Government subsequently monitors the implementation of the agreed actions through the Regulation Team to ensure that appropriate remedial steps are taken within the specified timescales and that the recommendations are fully and effectively embedded.
 22. Officials are in regular dialogue with PSOW and to further strengthen this relationship and facilitate regular data-sharing, initial work is ongoing to develop a Memorandum of Understanding between PSOW and the Regulator.

Expected impact for tenants and social landlords

23. As a result of the introduction of this new rule, tenants will benefit from set national response times, providing greater confidence that issues such as damp and mould will not be left untreated for long periods. Alongside the enhanced data requirements through both the CMR and the quarterly data returns, this will create greater accountability and transparency for tenants.
24. Where it is not possible to fully repair the hazard within a set time period, tenants will receive a written summary plan detailing:
 - Confirmation of the nature of the hazard identified and whether it has been assessed as presenting imminent harm or not.
 - Any action that has been taken/will be taken to make the property safe.
 - Details of the work to be undertaken to remedy the hazard.
 - When the work is likely to start and finish.
 - Detail of the arrangements made to mitigate any risks to the tenant in the interim.
 - Advice on how to contact the landlord.
25. When determining whether a hazard represents a "significant risk" consideration must be given to the tenant's circumstances and vulnerability, as a result tenants in poor health or with additional needs or vulnerability are expected to receive faster or higher-priority action.
26. Care has been taken to build on the existing legislative and regulatory framework in relation to the safeguarding of tenants and keeping housing in a good quality of repair. However, Welsh Government recognises that some landlords may experience additional resource implications

through the roll out and learning phase of this rule, particularly in respect of the additional reporting requirements and greater scrutiny of performance.

Disrepair Data held by Welsh Government

27. The Welsh Government collects a range of different data sets that are relevant to understanding the prevalence of social housing disrepair and the quality of social housing stock.
28. The Regulator collects non-validated **data** quarterly for all stock holding Local Authorities and all Registered Social Landlords (RSLs) in the following categories.
 - Number of properties with a damp and mould case open as at quarter end, whether categorised under HHSRS or not – to identify total open cases in quarter.
 - Number of new disrepair pre-action protocol (including early notification letters) cases opened during the quarter.
 - Number of disrepair pre-action protocol cases that have been issued with the Court during the quarter.
 - Total number of outstanding disrepair claims as at the quarter end.
29. In 2021 the Welsh Government undertook an assurance exercise across all social landlords to understand policy and practice in relation to cases of disrepair and in maintaining the quality of their housing stock, This provides a snapshot of data across social landlords: [Social housing conditions and disrepair \[HTML\] | GOV.WALES](#).
30. The Welsh Government publishes an annual report on hazards identified through Housing Health and Safety rating System HHSRS assessments as part of the Housing hazards release [Housing hazards | GOV.WALES](#). Whilst it is more common for these assessments to be undertaken in the private sector, some will be undertaken in respect of social landlords' stock.
31. Data on the quality of social housing is reported through the Welsh Housing Quality Standard [Welsh Housing Quality Standard | GOV.WALES](#). As of 31st March 2023, 100% of social housing in Wales met the previous Standard with some acceptable fails. 78% achieved full compliance with no acceptable fails. The previous Standard was replaced on the 1 April 2024 with the new WHQS 2023. The first statistical publication on the new standard is due to be published on 26th February 2026 but it will take several years before the data can be used to identify trends in Hazard data.
32. The 2017-18 [Welsh Housing Conditions Survey](#) (WHCS) looked at the presence of housing hazards across all tenures. The 2027-28 Welsh housing survey will provide updated information on housing quality across Wales, with headline results expected from 2028-29, and more detailed findings from 2029-30.
33. The Welsh Index of Multiple Deprivation ([WIMD](#)) 2025 also included an estimate of the presence of category 1 hazards in homes across Wales.

CIH Cymru response to consultation on hazardous disrepair in social housing.



Introduction

Social housing providers in Wales are committed to providing their tenants with a safe, sustainable and affordable place to call home. For many this is written into their mission statements and organisational values. This does not mean that there are never any issues relating to disrepair and response to hazards in every single social housing home in Wales. There are always improvements to be made to systems and the collection of data. The housing sector is committed to this improvement and the continuous development of good practice.

The extent of hazardous disrepair in social housing in Wales.

The social housing sector in Wales provides a home for 222,093 individuals¹. According to the latest Welsh housing conditions survey 7 per cent of social homes in Wales had a category one hazard. This is compared to 20 per cent of owner-occupied homes and 24 per cent of privately rented homes². This seems to suggest that overall, the likelihood of a hazard in a socially rented home is significantly lower than for other tenures. Yet this data has not been refreshed in nearly a decade due to the current absence of a stock condition survey in Wales.

There have been several high-profile disrepair issues in Wales over the last six months but without the data that a Welsh housing condition survey provides it is difficult to quantify the level of hazardous disrepair in social housing pan Wales. Individual social landlords will record this data as part of their internal record process but there is very much a need for the pan Wales data. We welcome the reinstatement of the Welsh housing condition survey in the next 12-18 months as part of understanding the level of hazardous disrepair in Wales. Yet we expect the

¹ Tenure type, 2021, England, Wales and regions of England, all households. [Office for National Statistics – Census 2021.](#)

² Welsh Housing Conditions Survey 2017-18: headline report (updated). <https://www.gov.wales/sites/default/files/statistics-and-research/2020-02/welsh-housing-conditions-survey-headline-results-april-2017-march-2018-update-570.pdf>



level to be low due to ongoing improvements being made to social homes in Wales as part of WHQS.

How effectively social landlords are currently responding to reports of hazardous disrepair.

Apart from the three high profile cases reported on by the ombudsman, generally social landlords in Wales are responding well to reports of hazardous disrepair. As previously mentioned, social landlords in Wales seek to provide individuals with a home that is of good quality, safe and secure. Whilst we are not naïve to think that this is the case 100 per cent of the time, we are confident that this commitment means that social landlords are doing everything they can to address hazardous disrepair in the homes they own. There are improvements to be made, nothing is perfect, but the sector is committed to improving homes and developing good practice. For many it is the organisation's core purpose and provides the foundation of their mission statement and organisational values.

CIH Cymru as the professional body for housing is committed to working with the housing sector in Wales to celebrate good practice and to ensure everyone in Wales can access a safe, suitable and affordable home.

The Welsh Government's creation of a new rule within the WHQS

In 2022 the Chartered Institute of Housing (CIH) and the National Housing Federation (NHF) set up the Better Social Housing Review (BSHR) to examine issues relating to the quality of social housing in England. This review was carried out over six months by a panel of independent experts with the report being published late 2022.

Following the publication of the BSHR CIH Cymru, along with Community Housing Cymru, wrote to the then Housing Minister Julie James suggesting that we needed a Wales approach to the issue of damp & mould, and wider disrepair, as the landscape was different to that in England.



The outcome of that exchange was that CIH Cymru, in partnership with Welsh Government and CHC, established a sector working group to look at disrepair more widely, specifically at legislation, regulation and current approaches to engagement with tenants on disrepair. This group has concluded that there are opportunities for improvements and development to ensure the best outcomes for tenants are delivered but that this work should relate more widely to hazards rather than specific types of hazards.

A consultation was held by Welsh government on a new rule to be included in the WHQS and whether or not this new rule should cover all 29 hazards set out in the Housing Health and Safety Rating System (HHSRS). The consultation also asked for views on a reasonable timeframe to respond to hazards reported and whether a remedy plan should be provided if the hazard cannot be remedied under normal emergency repair targets. The outcome of this consultation was the addendum to WHQS of a new rule covering hazards in social housing and the timescales to address these hazards, which goes live in April this year.

CIH Cymru wholly welcomes the introduction of the new rule within WHQS. Yet by including 28 of the 29 hazards it is likely to throw up some issues around approaches to implementation that may have unintended consequences for tenants and landlords. CIH Cymru supports the implementation of the new rule, playing a central role in its development, and we are not saying some of the that some hazards should be excluded or included but want to highlight some issues around proportionality in equivalising all hazards as part of the addendum the WHQS.

Some of the category 1 hazards such as noise are influenced by external and structural factors that may be beyond the scope of social landlords to fix. Noise can still impact a tenant even when all mitigating work has been undertaken. Rather it often requires a strategic approach underpinned by antisocial behaviour and neighbourhood management policies.



Another hazard that is becoming an emerging issue as we decarbonise our homes is excess heat. We often hear from our tenant members that their homes are often too hot in summer months because of the insulation added to homes as part of affordable warmth policies. Whilst this can and does pose a hazard to some tenants, a more strategic approach is needed to the thermal comfort of our homes to ensure a balance of affordable warmth and effective cooling.

We do however welcome the decision of Welsh government not to include overcrowding as a WHQS hazard. This will enable landlords to assess overcrowding holistically in the context of cultural choice and to mitigate the ongoing impact of the bedroom tax.

Overall, the addendum to WHQS will help Welsh social housing standards improve and ensure that every social housing tenant in Wales can access a safe, suitable and affordable home.

How the Welsh Government and social landlords are engaging and involving tenants in issues relating to hazardous disrepair.

Tenant engagement should not be related to just one issue. It should form a key part of the social landlord's function and how they develop the services they provide. As such we have addressed the issue of tenant engagement as a whole in responding to this question.

Whilst generally tenant engagement is good across Wales, with some examples of good practice, we still hear from tenants that engagement could improve. It should not matter who your landlord is, there should be the same commitment to tenant engagement. Tenants have also been clear in their conversations with us that engagement does not always happen during business hours and that the views of more tenants need to be considered. Tenants want to be engaged with, but traditional methods do not always work. Consideration of childcare to enable a single parent or carer is key for some tenants whilst others would prefer more



engagement via social media. We also need to consider how we thank tenants for their time as often paid engagement can impact benefit income.

We also need to look at how we can engage with those tenants who do not want to engage proactively with their landlord. How can we ensure that we capture their views during key contact points such as annual gas services.

We need to ensure that we value the role and experience of tenants within our social housing sector learning from others and tenants around how best to engage. Tenants are at the heart of what we do and as such tenants should be the ones to inform us how they want to be engaged with

Conclusion

We all know and understand the impact that a poor-quality home can have on an individual's health and wellbeing. As such social housing providers in Wales are committed to providing individuals with homes that are safe, suitable and secure. The new WHQS rule is a key element of this work. We look forward to continuing to work with social housing providers, Welsh government and tenants to ensure everyone in Wales can access a safe, suitable and affordable home.

Written Evidence Submission

Anglesey Council Housing Services

Inquiry: Social Landlords' Response to Hazardous Disrepair

Submitted to: Local Government and Housing Committee

Date: February 2026

1. Introduction

Anglesey Council Housing Services welcomes the opportunity to contribute evidence to the Committee's inquiry into social landlords' response to hazardous disrepair. We strongly support the Welsh Government's focus on improving systems for identifying, investigating and remedying hazards in social homes.

2. Extent of Hazardous Disrepair and Health Risks in Wales

Evidence from the Public Services Ombudsman for Wales shows nearly 800 complaints relating to disrepair between 2021 and 2024. Health impacts disproportionately affect vulnerable groups.

3. Effectiveness of Current Social Landlord Responses

Findings show inconsistent inspection quality and delays. Comparative evidence from England highlights similar systemic issues.

4. Welsh Government's WHQS Hazard Response Rule (Effective April 2026)

The Rule introduces mandatory investigation and response timescales. It strengthens transparency and aligns with Awaab's Law in England.

5. Proactive Steps Taken by Social Landlords

Proactive stock surveys, strengthened data systems, early interventions, and updated damp and mould policies are being adopted.

6. Tenant Engagement and Involvement

We support person-centred communication, written findings following inspections, and accessible information formats.

7. Conclusion and Recommendations

We support the WHQS Hazard Response Rule and recommend continued guidance, support for digital systems, and strengthened tenant engagement.

Public Health Wales – Written Evidence

Local Government and Housing Committee Inquiry: Social Landlords' Response to Hazardous Disrepair

Summary

- Housing is a fundamental building block of health. Damp, mould and cold¹, are strongly linked to respiratory disease (including asthma), cardiovascular illness, and poor mental health.
- These harms fall disproportionately on children and families living in poverty, contributing directly to health inequalities².
- Public Health Wales (PHW) are supportive of proposed changes to the Welsh Housing Quality Standard (WHQS) to ensure social landlords take proactive action on health hazards in the home.
- Extending WHQS principles to the private sector, would ensure consistent protection across tenures and reduce inequities in housing-related health risks.
- PHW also supports joint working between housing and health services, and greater use of lived experience and strengthened data sharing to inform policy and practice.

Introduction

PHW welcomes the opportunity to contribute written evidence to the Local Government and Housing Committee's inquiry into hazardous disrepair in social housing and the Welsh Government's actions to strengthen the WHQS by requiring social landlords to investigate hazards with significant risk of imminent harm within 24 hours and remediate them within a further 24 hours.

PHW has previously responded to Welsh Government consultations on housing quality, and we continue to support the principle that healthy housing is fundamental to protecting and improving population health. Our previous responses have emphasised the need for joined up working, monitoring, and a preventative focus, in relation to damp and mould and other environmental hazards.

Housing Quality and health risks

Housing conditions are a wider determinant of health and health inequalities in Wales. An assessment in 2024 found nearly 1 in 5 homes in Wales have a Category 1 Hazard present, meaning that the home is in a condition that is hazardous to health³ and all 29 of these hazard types have the potential to impact the health and well-being of tenants. These hazards can be particularly harmful to children. For example, children who live in mouldy or damp conditions have a higher risk of developing asthma, allergies, and other respiratory conditions⁴.

Wales has some of the oldest housing stock in Europe⁵ and older dwellings are more likely to contain Category 1 hazards⁶. For example, older housing is more likely to contain lead paint and lead plumbing. PHW data show higher levels of elevated blood lead in more deprived communities, and it is likely that many affected

households are in social housing⁷. Even low-level lead exposure can cause lifelong harm to children's health, learning, and life chances.

Poor quality housing contributes significantly to respiratory disease, cardiovascular illness, injuries, poor mental health, and avoidable pressure on health and health services⁸. PHW lived experience research (to be published on 10th March 2026) shows that people in Wales face damp that has affected their children's health:

"When we moved in, this house was riddled with mould and damp... it was on my children's bedding, and I had to move my two older girls out of their bedroom." One child "had to have an inhaler... in the winter she had to take an inhaler for the cold." (P9) Trying to manage the mould also impacts their wellbeing: "I don't think it's good for their mental health having to shift furniture and rooms around all of the time."

From a public health perspective, the WHQS provide an opportunity to move towards a preventative approach to addressing hazards in the home. By identifying and responding to risks early, rather than waiting for complaints or serious harm, housing and health systems can work together to protect residents before conditions worsen.

Strengthening environmental health monitoring and embedding clear and accessible reporting pathways can ensure issues are raised and resolved quickly and safely. This approach reduces pressure on health services by preventing avoidable GP visits, hospital admissions, and long-term illness, while also promoting healthier, safer homes. It also reflects the preferences PHW heard from those with lived experience of unhealthy housing, who want to be able to share their information once and have services work together, so their story is remembered, respected, and used to provide smoother, more joined-up support.

The economic benefit to society of removing these hazards is also important. PHW has [estimated](#) that if the most severe hazards were removed from housing in Wales, there would be benefits to the NHS of £95m a year in saved treatment costs. The full cost to society of leaving people living in poor housing in Wales is estimated to be around £1 billion per annum.⁹

Looking towards the future, climate change will increase risks from heat, cold and flooding, further damaging housing quality and increasing health harms unless homes are proactively adapted.

Welsh Housing Quality Standard and timescales

PHW supports changes to the WHQS to improve living conditions and therefore improve health and reduce health inequalities. These proposals and new timescales represent a significant step toward embedding health into housing policy.

The WHQS should continue to address environmental hazards such as lead, damp and mould, and climate-related risks such as overheating, cold and flooding, particularly in older housing.

While this inquiry focuses on social housing, PHW would support exploring opportunities to extend the WHQS to the private rented sector (PRS). The most recent Welsh Housing Conditions Survey found that the PRS generally has the oldest housing stock and a higher proportion of poor-quality housing (e.g. containing damp or other hazards)¹⁰.

Furthermore, findings from a PHW housing and health [survey](#), showed that private renters were twice as likely to live in colder homes compared to homeowners and were also more likely to experience thermal discomfort and to cut or skip meals due to heating costs¹¹.

PRS tenants would benefit from increased protections and power for environmental health to enforce standards.

PHW supports a housing model that includes:

A collaborative approach

In our upcoming publication, to be released in March 2026, PHW shows that stakeholders strongly support closer collaboration across housing, health, social care, and community services. Clear communication and a skilled workforce are seen as essential for effective delivery.

Bringing together housing services, environmental health, primary care, and public health teams can dramatically improve the identification and resolution of hazardous living conditions. This is already evident in successful initiatives across Wales, such as the [Warm Wales – Healthy Homes, Healthy People](#) project highlighted in our 2025 report [Shaping the future of healthy housing in Wales](#).

Looking forward, the Welsh Housing and Regeneration Strategy¹² offers a real opportunity to embed this joined-up approach, turning collaboration into tangible improvements in people's homes, health, and wellbeing.

Lived experience engagement

As noted in our response to the previous consultation, lived experience and tenant feedback is crucial and should inform service improvement. Embedding lived experience through early and meaningful engagement is needed to ensure policies reflect the challenges people are experiencing and are feasible to deliver.

To achieve this, lived experience should be embedded across policy design and delivery through employing people with lived experience in strategic roles, co-production panels, and long-term engagement with families. This needs to be a core practice with minimal barriers to participation. Lived experience should also be integrated into monitoring and evaluation frameworks to assess the impact of housing interventions on health and wellbeing.

Integration of health and housing data

Stakeholders have also told us that more joined-up, consistent data on housing conditions enables a clearer understanding of the links between housing and health,

with information brought together across local authorities, housing providers, health services and the third sector through improved interoperability and data quality.

One way in which this could be addressed is through frequent and detailed Welsh Housing Surveys, with a strong focus on health-related indicators. Improved survey data would enable better understanding of:

- the prevalence and distribution of hazards,
- regional and socio-economic and health inequalities, and
- the relationship between housing conditions and health outcomes.

Updating the Welsh Housing Conditions Survey more regularly would strengthen evidence-based policy making, ensuring decisions are informed by the most current data.

Conclusion

PHW views hazardous disrepair as a preventable public health issue. The new WHQS represents a positive step forward, and its implementation can be further strengthened through a focus on prevention, joined up working, meaningful tenant engagement and stronger sharing of data between housing and health.

Ensuring safe, healthy homes is one of the most powerful interventions available to reduce health inequalities and improve long-term outcomes for people in Wales.

¹ Health Equals. (2025). New data shows more than 1 in 4 of us live in homes that could harm our health. Health Equals. https://healthequals.org.uk/data_insights/homes-that-harm-health/

² Holden, K. A., Lee, A. R., Hawcutt, D. B., & Sinha, I. P. (2023). The impact of poor housing and indoor air quality on respiratory health in children. *Breathe* (Sheffield, England), 19(2), 230058. <https://doi.org/10.1183/20734735.0058-2023>

³ [Care and Repair Cymru \(2024\). Policy and Research: Housing Conditions.](#)

⁴ Gehrt, Daniel & Hafner, Marco & Christoffersen, Jens. (2021). Impacts of the indoor environment in our homes and schools on child health: A novel analysis using the EU-SILC Database. https://www.researchgate.net/publication/354793221_Impacts_of_the_indoor_environment_in_our_homes_and_schools_on_child_health_A_novel_analysis_using_the_EU-SILC_Database

⁵ Decarbonisation of Homes in Wales Advisory Group. (2019). *Independent review on decarbonising Welsh homes: Report to Welsh Ministers* (Crown copyright). Welsh Government. <https://www.gov.wales/sites/default/files/publications/2019-07/independent-review-on-decarbonising-welsh-homes-report.pdf>

⁶ Welsh Government. (2020). *Welsh Housing Conditions Survey 2017-18: Headline results (updated) April 2017 to March 2018* (Statistical First Release SFR 10/2020). Welsh Government. <https://www.gov.wales/sites/default/files/statistics-and-research/2020-02/welsh-housing-conditions-survey-headline-results-april-2017-march-2018-update-570.pdf>

⁷ Public Health Wales. (n.d.). *Lead exposure*. Public Health Wales. <https://phw.nhs.wales/services-and-teams/environmental-public-health/lead-exposure/>

⁸ Ministry of Housing, Communities & Local Government, Department of Health and Social Care, & UK Health Security Agency. (2024). *Understanding and addressing the health risks of damp and mould in the home*. <https://www.gov.uk/government/publications/damp-and-mould-understanding-and-addressing-the-health-risks-for-rented-housing-providers/understanding-and-addressing-the-health-risks-of-damp-and-mould-in-the-home--2>

⁹ Nicol S, Garrett H, Woodfine L, Watkins G, Woodham A. (2019). *The full cost of poor housing in Wales*. Building Research Establishment Ltd, Public Health Wales, Welsh Government.

¹⁰ Welsh Government. (2018). Welsh Housing Conditions Survey (headline results): April 2017 to March 2018. <https://www.gov.wales/welsh-housing-conditions-survey-headline-results-april-2017-march-2018>

¹¹ Hill R, Griffiths D, Janssen H, Ford K, Carella N, Gascoyne B, Azam S. (2024) *Cold homes in Wales: Is the satisfactory heating regime appropriate for health and well-being?* Cardiff: Public Health Wales NHS Trust. Available from: [Cold homes in Wales](#)

¹² Welsh Government. (2025). Consultation Analysis for the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability. <https://www.gov.wales/sites/default/files/consultations/2025-07/securing-path-towards-adequate-housing-summary-responses.pdf>

Agenda Item 6.2



**Housing, Communities
and Local Government
Committee**

**John Griffiths MS
Chair of the Local Government and Housing Committee
Senedd Cymru**

By email

4 February 2026

Dear John,

Pre-legislative scrutiny of the draft Commonhold and Leasehold Reform Bill

I am writing to inform your Committee that the Housing, Communities and Local Government Committee has launched our [pre-legislative scrutiny inquiry](#) into the draft Commonhold and Leasehold Reform Bill. The Government has requested that we undertake this inquiry to examine the draft Bill before legislation goes through its formal parliamentary stages.

The draft Bill's provisions will extend and apply to England and Wales, and so I would be particularly interested in any work which your Committee has undertaken regarding leasehold reform in Wales. If your Committee wishes to share your views on the draft Bill in response to our [inquiry Terms of Reference](#), we would be very grateful for a written submission.

In addition to our call for written evidence, we are also conducting an [online survey](#) to seek views on the draft Bill from leaseholders and from freehold homeowners who pay private estate charges (sometimes known as 'fleecehold'). The survey closes on 31 March 2026.

I would be very grateful if you would share the details of our inquiry and the online survey with your Committee members, and if you would consider promoting our online survey to affected homeowners where appropriate.

Best wishes,

**Florence Eshalomi MP
Chair, Housing, Communities and Local Government Committee**

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs

Agenda Item 6/3


Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref HID-PO-067-26

Mike Hedges MS
Chair
Legislation, Justice and Constitution Committee
Senedd Cymru

3 February 2026

Dear Mike,

I am writing in accordance with the Inter-Institutional Relations Agreement to notify you of the eleventh meeting of the Inter-Ministerial Standing Committee (IMSC), which will take place on 5 February 2026. I will be attending virtually.

The discussion is anticipated to focus on Election Security, the UK Covid-19 Inquiry Module 2 Report and live issues including UK legislation and the Sewel Convention.

This letter has been copied to the Chairs of the following Committees: Public Accounts and Public Administration; Health and Social Care; and Local Government and Housing.

I will provide an update after the meeting in line with established arrangements.

Yours sincerely,



Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: HID-PO-076-26

Mike Hedges MS
Chair
Legislation, Justice and Constitution Committee
Senedd Cymru

9 February 2026

Dear Mike,

I am writing in accordance with the inter-institutional relations agreement to notify you that the eleventh meeting of the Inter-Ministerial Standing Committee (IMSC), which was due to place on 5 February 2026, has been postponed.

I will notify you once a new date has been confirmed.

This letter has been copied to the Chairs of the following Committees: Public Accounts and Public Administration; Health and Social Care; and Local Government and Housing.

Yours sincerely,

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

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Jayne Bryant AS/MS
Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref JB/PO/90/26

John Griffiths MS
Chair
Local Government and Housing Committee
Senedd Cymru

SeneddHousing@senedd.wales

19 February 2026

Dear John

Inter-Institutional Relations Agreement: Inter-Ministerial Group (IMG) for Housing, Communities and Local Government

In accordance with the inter-institutional relations agreement, I am providing an update on the meeting of the IMG for Housing, Communities and Local Government that took place on 4 February 2026.

The meeting was hosted by the Northern Ireland Executive's Minister for Communities, Gordon Lyons MLA, and took place virtually. Also in attendance were the Right Honourable Steve Reed MP, the UK Government's Secretary of State for Housing, Communities and Local Government, and Màiri McAllan MSP, the Scottish Government's Cabinet Secretary for Housing.

The meeting agenda focused on topics relating to the development and delivery of housing strategies, with reference to increasing supply across all tenures and building thriving, sustainable communities and places.

The group discussed best practice approaches in place-based policy for housing, as well as challenges and solutions to increasing housing supply across the UK. The group agreed that increasing housing supply across all tenures was essential to building thriving, sustainable communities. All governments agreed to work together to deliver homes for everybody across the UK, with Ministers noting the benefits of the positive working relationships that already exist between officials and agreeing for this official level collaboration to continue.

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I also took the opportunity to highlight the importance of closing the gap between housing-related benefits and the actual cost of renting, particularly via the Local Housing Allowance.

The meeting closed with confirmation that the governments would work together at official level to agree who would chair the next meeting of the IMG for Housing, Communities and Local Government. A suitable date and agenda items will be identified in due course.

A joint communiqué was published following the meeting and can be found [here](#).

I hope this information helps.

Yours sincerely,

A handwritten signature in black ink that reads "Jayne Bryant". The signature is written in a cursive, flowing style.

Jayne Bryant AS/MS

Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government

Jayne Bryant AS/MS
Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government



Llywodraeth Cymru
Welsh Government

Elin Jones MS
Llywydd
Senedd Cymru
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23 February 2026

Dear Llywydd,

The UK Government introduced the Representation of the People Bill into the House of Commons on 12 February 2026.

The breadth and complexity of the Bill is considerable, and it contains 81 clauses and 11 schedules which span a wide range of electoral matters, many of which are technical in nature. My officials are working through the provisions of the Bill, and our initial analysis is that the Bill makes relevant provision for the purposes of Standing Order 29 and will therefore require a Legislative Consent Memorandum to be laid. Although we had productive engagement with the UK Government and have had the opportunity to feed into the development of the legislation before the Bill was published, the size and complexity of the Bill, and its continuing evolution up until introduction, have posed a challenge in carrying out our analysis.

Whilst the Legislative Consent Memorandum will be laid as soon as possible, due to the scale and complexity of the Bill, this will be outside the normal two-week Standing Order 29 deadline. We aim to lay the Legislative Consent Memorandum before the dissolution of the Senedd under the expectation that a further Legislative Consent Memorandum will need to be laid after the election so that the consent implications may be considered by the next Senedd.

I am copying this letter to the Counsel General, Legislation, Justice and Constitution Committee, and to the Local Government and Housing Committee.

Yours sincerely,

Jayne Bryant AS/MS
Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

**Children, Young People
and Education Committee**

Welsh Parliament

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Chief Executive, Welsh Local Government Association
Chris Llewellyn

17 February 2026

Prioritising Education Within the Final Local Government Settlement

Dear Chris,

I am writing on behalf of the Committee following our recent general scrutiny session on 4 February with the Cabinet Secretary for Education.

During the session, the Cabinet Secretary reiterated her commitment to securing additional core funding for education within the Final Local Government Settlement – an objective she first set out during draft budget scrutiny on 27 November 2025¹. We welcome her confirmation that this had been reflected to a meaningful degree in the final budget, resulting in an additional £112.8 million for local government².

She also explained that, following discussions across Government, the Cabinet Secretary for Housing and Local Government wrote to local authorities on 20 January to underline that this additional investment recognises the financial pressures facing education services and social care.

We welcome this acknowledgement of the challenges schools are facing and of the importance of ensuring they are adequately funded. At a time when public finances remain extremely challenging, we recognise that the additional resource provided through the Revenue Support Grant may not

¹ CYPE Committee, 27 November 2025, Record of Proceedings, paragraph 35

² CYPE Committee, 4 February 2026, Record of Proceedings, paragraph 11



meet every pressure. However, we see the improved final settlement as a vital means of enabling local authorities to support schools as far as possible.

Throughout the budget process, we have been very aware of these financial pressures on schools. Your submission to the Finance Committee's consultation provided a clear account of the financial challenges facing local authorities, including the £137 million gap for 2026-27 and the escalating pressures associated with additional learning needs (ALN). The Cabinet Secretary for Education acknowledged the seriousness of this position during our budget scrutiny session on 27 November. She noted that some local authorities now have ALN on their corporate risk registers³. Her evidence reinforced the need for continued prioritisation of core education services.

Her view - one we share - is that what schools most need is stable, sufficient core funding to deliver their day-to-day work, where the greatest impact is made on children and young people's lives. We realise this fact is not lost on local authorities who are obviously closer to the 'chalk face'. We know that core funding for schools is delivered primarily through the Revenue Support Grant and local authorities decide how to allocate the resources available to them. Against that backdrop, the uplift in core funding presents an important opportunity to continue prioritising education. We want to see this funding reach education services.

We also note that the Cabinet Secretary for Housing and Local Government's letter to local authorities said the settlement "offers a valuable opportunity for local authorities to allocate significant resources to their schools, to focus on the key pressures of Additional Learning Needs (ALN), school transport, workforce, and workload".

In light of this and the Cabinet Secretary for Education's position, we wish to underline the importance of using the additional resources within the settlement to support schools. We fully recognise the difficult financial context in which local authorities are operating and the wide range of responsibilities you must balance, including the other main pressure of social care. Nonetheless, our shared ambition to improve outcomes for children and young people depends on ensuring that the system as a whole can sustain the progress we all want to see.

We therefore hope that local authorities will carefully consider how the uplift in core funding can best support education services, particularly in areas such as ALN, school transport, workforce and workload. With a new Senedd and Welsh Government term approaching, this feels like an important moment for all parts of the system to work closely together. Local authorities are fundamental delivery partners in education. We are keen to ensure that, as responsibility passes to a successor committee in the next Senedd, learners continue to receive the stability and support they need through sufficient funding for schools.

³ CYPE Committee, 27 November 2025, Record of Proceedings, paragraph 34

We are copying this letter to the Cabinet Secretary for Education, the Cabinet Secretary for Housing and Local Government and the Chair of the Local Government and Housing Committee for their awareness, recognising that this is an important moment to strengthen the foundations of the education system for the years ahead.



Buffy Williams MS

Chair

Children, Young People and Education Committee

Cc

Lynne Neagle MS, Cabinet Secretary for Education

Jayne Bryant MS, Cabinet Secretary for Housing and Local Government

John Griffiths MS, Chair, Local Government and Housing Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.



Peredur Owen Griffiths MS
Chair
Finance Committee
Senedd Cymru

Mark Isherwood MS
Chair
Public Accounts and
Public Administration Committee
Senedd Cymru

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Reference: AC535/caf
Date issued: 26 February 2026

Dear Peredur and Mark

Challenges and opportunities for Welsh public services

As you are aware, I am approaching the end of my term as Auditor General over a period that coincides with the Senedd election. Whatever the policy priorities for the next Welsh Government, the incoming administration faces some big questions around the future sustainability of our public services.

We recently released a [podcast series](#) that explored my perspective on some of those issues. My reflections built on the work of Audit Wales over the past eight years, as also summarised through my earlier [Picture of Public Services](#) reporting, my [‘Firefighting to future-proofing’](#) commentary, and my [‘No time to lose’](#) report on implementation of the Well-being of Future Generations (Wales) Act 2015. The podcasts also touch on themes discussed during my appearance at the [Finance Committee on 5 November 2025](#) as part of its Welsh Government budget scrutiny and in my [supporting written evidence](#). That evidence highlighted various relevant examples from my more recent work.

As your committees reach the end of their own terms, I wanted to put on record a summary of some of the thinking that sits behind the podcast series, although this is by no means exhaustive.

Frustratingly perhaps, much of what I have set out is not new; for example, my reflections around our public service landscape mirror issues raised by my predecessor and, before that, by other commentators. These issues are, in my view, ever more pressing. In the course of my time as Auditor General, I have seen much that is good. But the challenges facing public services are huge and the scope for improvement considerable. I hope that these reflections, and the fabulous work of my colleagues at Audit Wales, will be drawn on by the next Senedd and Welsh Government as they seek to address those issues.

As I step down, I should like to thank both Committees and the wider Senedd for their support for the work of Audit Wales throughout my tenure.

Yours sincerely



ADRIAN CROMPTON
Auditor General for Wales

Copied to: Senedd Policy & Legislation Committees

Auditor General reflections on challenges and opportunities for Welsh public services

Wales has a strong and capable public service

The people of Wales rely on our public services – we see their impact and delivery all around us in our schools, our hospitals, our homes, our environment, our communities.

Those services in turn rely on the skill, hard work and dedication of hundreds of thousands of public servants – frontline staff, politicians, senior leaders – whose motivation is to serve their communities and to improve the lives of others.

Services have been tested by two decades of financial pressure, demographic and social change, ever increasing demand, and wider challenges from climate change, Brexit and global events. The COVID-19 pandemic rocked our society to its core and called for an unprecedented response. The residual effects of the pandemic are still with us today in the shape of pent-up demand for services and fundamental changes to society and behaviours.

There is much to reflect on and learn from the pandemic response, as we are still seeing played out through the UK public inquiry and wider scrutiny. However, we should recognise we also saw the very best of the public service in Wales during the response. Frontline workers continued their vital work, often under immense pressure; the NHS and local and central government collaborated to deliver life-saving initiatives such as the Test, Trace, Protect programme and mass vaccination; all parts of the public service adapted swiftly through remote working and service redesign to continue supporting their communities.

Though a dreadful time for so many, the response showed what can be achieved when public services are united around a clear, common objective and pulling in the same direction. We saw this too in how public services worked together to accommodate and support displaced Ukrainians arriving in Wales from early 2022 onwards, building on learning from the pandemic response.

But excellent service delivery is not just about responding to emergencies. The public have a right to expect it always and for the flexibility, collaboration and pace we saw in the pandemic to be standard. They should also expect that public money is well-managed and delivering good value.

Persistent and emerging challenges

Through the work of my office, I have consistently reported on some persistent challenges faced by the public sector.

Financial pressures

In local government, budgets have been squeezed. Fast rising costs in areas like children's services and temporary accommodation are bringing some councils to the very edge of financial sustainability.

Generally, we see councils having a sound grip on their immediate financial pressures but with many relying on reserves to balance budgets.

This approach is unsustainable in the long run. Individual councils, and the sector as a whole must strengthen their long-term planning, forecasting and oversight if they are to remain financially viable.

In the NHS, the Senedd passed legislation in 2014 requiring individual health bodies to break even over a three-year period and to have medium-term financial plans that are approved by the Welsh Government. Yet despite these statutory expectations, most health boards have been unable to meet that break-even duty for several years.

Despite record levels of investment and ever-increasing levels of savings, health boards are struggling to control costs driven by rising demand for services, overall growth in pay costs, and other inflationary pressures. With most health boards still unable to produce financially balanced three-year plans, the overall NHS deficit position is unlikely to change for the foreseeable future.

Those financial pressures stimulate an understandable focus on short-term financial management. But this reactive approach hinders the longer-term planning and transformational changes that are needed to create more financially sustainable services.

This is all before we add into the mix wider pressures, for example around the investment needed to support policy priorities around decarbonisation, deal with the impacts of climate change, and help society adapt. I have reported previously that the scale of spending that might be needed in these areas, and where that funding will come from, remains unclear.

Against this backdrop, making the most of every pound of public spending is essential. The work of my office gives assurance that, overwhelmingly, public money

is well managed. Many public bodies demonstrate strong governance and accountability. However, there is still waste, error, and fraud. Exercises like the data matching we facilitate as part of the UK-wide National Fraud Initiative are an important part of our counter fraud landscape. However, there is much more that public bodies need to do to raise their game in response to increasing fraud risks.

Demand and performance

Demographic and societal change, and the lingering impact of the pandemic are driving ever-increasing demand.

In some important areas, service performance and quality are declining. My 2025 report on cancer services, for example, described a failure to meet key waiting time targets and growing inequalities in outcomes despite increased funding. These issues are compounded by workforce shortages, ageing infrastructure, and rising public expectations.

Simply allocating more funds does not guarantee a solution. Except for 2022-23, the NHS has seen large, above inflation increases in its funding in recent years yet still it is unable to break even and performance in many areas is unsatisfactory.

And that ever-growing share being taken by the NHS undoubtedly squeezes the resource available for other areas. That changing pattern of funding between sectors needs to be rebalanced if important services are to be sustainable, and better outcomes need to be achieved across the board with the public money that is available.

Complexity and fragmentation

The public service delivery landscape in Wales is crowded. By way of illustration, my office audits the accounts of close to 100 larger public bodies and structures, even before considering other smaller bodies that I audit, notably the over 700 town and community councils.

In addition, various partnership and collaborative arrangements exist to address the challenges and problems that cannot be addressed by individual organisations alone; for example, Public Services Boards, Regional Partnership Boards and Corporate Joint Committees.

These partnership structures are of variable effectiveness – with some very good and others less so. They often work on differing geographical footprints and can have

overlapping memberships and objectives. They each require contributions from many of the same players, so spreading available resource more thinly.

While every one of our public bodies and partnership structures is no doubt rooted in a well-intentioned rationale, the combined effect is overly complex.

That complexity leads to a system that can be fragmented and slow-moving, with overlapping responsibilities and unclear lines of accountability. This complexity can hinder transformation and make it difficult for citizens to navigate services or understand who is responsible for what.

Our work also shows how many public bodies often fail to capture the service-user perspective. This affects service design, public understanding of lines of accountability, and the ability of service users to navigate what can be complex and poorly signposted systems.

Trust and confidence

I have growing concerns about declining trust and confidence in public services and governance structures across Wales.

That is not unique to Wales and is fed in part by factors beyond our control – broader geopolitical and domestic political issues, societal changes, change in the way people access media, information and analysis, the public's view of politics nationally and internationally.

Some factors, though, are much more within our gift. To win and maintain public trust and confidence, we must consistently demonstrate public service delivery that is timely and of good quality. When outcomes are poor and are not seen to improve – or seen to worsen – it is unsurprising that the public loses confidence in the public sector's capability. Not so much in the efforts of individuals and frontline services, but organisationally and system-wide.

We know from our own work and wider evidence that poverty and inequality remain deeply entrenched in many communities despite the best efforts of local government and others.

Similarly, my work in the NHS has shown that the failure to meet targets in key areas such as elective waiting times and ambulance handovers has sadly become the norm. This is demoralising for staff and will colour patients' views.

A further factor, on which I have a direct line of sight, is governance. It might not sound the most obvious cause of low public confidence, but I believe it is important.

The overwhelming majority of public sector organisations are well governed most of the time. Regrettably, though, I have reported on too many examples of poor organisational governance at every tier of the public sector – from the Welsh Government itself to the NHS, local government, some central government organisations, and the smallest tier of government in our town and community councils.

I fear even a small number of such cases colour the public's perspective of public sector governance in the round. These failures invariably feature some weaknesses in process such as poor record-keeping, application of policy, or a lack of transparency. But more significantly, in my view, many governance failures in public organisations are rooted not in process but in human behaviour.

If those in the public sector, especially in positions of leadership, lose sight of the required values and behaviours, the effects are damaging. They manifest in the form of poor decision making, relationship breakdown, wasted public money – on settlement payments, legal or consultancy fees – and distracted organisational leadership and service provision.

And every time the public sees such examples, it further undermines their confidence and trust: trust that is essential if the public is to support the kind of transformation required to make our public services sustainable for the long term.

Opportunities to do things better

Getting the basics right

Effective public service delivery begins with getting the basics right. Years of financial pressure has left some important areas under-invested and this needs addressing if we are to improve services and increase public sector productivity.

Digital

The technology already exists to transform service delivery, reduce costs and improve the user experience. I recognise that the public sector is already working to improve its approach to realising benefits from digital solutions and identifying services requiring transformation.

This work must replace antiquated IT systems, improve the quality and shareability of data, recruit and retain scarce skills in high demand across the economy, and reshape service delivery with citizens and users at the heart. The challenge is considerable.

The potential efficiency gains in those services are enormous, with more modern and responsive public services delivering improved service to customers. However, I have also emphasised the importance of balancing spending on infrastructure with work to tackle the root causes of digital exclusion. And while artificial intelligence presents great opportunity, it is not without risk.

My work on councils' digital strategies has revealed uneven progress. Only half of Welsh councils had up-to-date digital strategies, and many lacked robust arrangements for resourcing, monitoring, and evaluating impact.

In the NHS, digital transformation can be extremely slow and made more difficult by funding and capacity constraints, information governance challenges, and a lack of consistency on the 'Once for Wales' approach.

One prime example of these challenges can be seen in my previous reporting on the implementation of the Welsh Community Care Information System where, unfortunately, the reality of implementation did not meet the original ambition.

More specific and closer to home, my audit work could be made far more efficient and effective if the bodies we audit had modern systems for their financial and

performance information. In many cases, bodies instead have ageing, unreliable systems that are difficult to interrogate or integrate.

Many systems are outdated and not fit for purpose, limiting the ability of organisations to manage operations effectively or provide timely, reliable data for audit and decision-making. This technological deficit hampers both assurance and accountability, and crucially the ability to modernise and join up services to make them more efficient and improve the end-user experience.

So investing in updated finance and performance platforms is not simply to benefit the auditor – that is a relatively marginal matter. The more important question, and what should be front of mind for senior leaders, is how can they expect to run well-governed organisations, and take informed decisions, without them? Outdated systems can also increase cyber-security risks, something public bodies cannot afford to be complacent about.

Workforce

Workforce pressures are a recurring theme across my work. In all sectors and many specialised areas, staffing challenges – exacerbated by rising demand – have strained service delivery.

Examples from our work include capacity and capability challenges within the Welsh Government's civil service, pressure resulting from recruitment and retention challenges in the NHS and education, and in other specialised areas such as digital transformation, planning, active travel, building safety, and flood defence.

We see in our audit of accounts work too that many organisations are struggling to recruit and retain high quality finance professionals. This is concerning, and not just because we need these people to help produce good quality sets of accounts but because the finance profession has an important role to play in plotting a path to a more sustainable future for our public services.

Competition for specialist skills is inevitable, even within the public sector, and there will always be questions for public bodies to ask themselves about what they do in-house and what could be done by other organisations. But there needs to be a stronger approach to developing coherent workforce strategies, aligning staffing models with future service needs, and developing staff accordingly. Without this, policy ambitions risk being undermined by operational constraints.

Asset and infrastructure management

The efficient maintenance and improvement of existing assets such as roads, hospitals, schools and flood defences is every bit as important as getting value for money in building new infrastructure. After all, new assets will only deliver promised benefits if they are properly maintained.

All too often our work has highlighted the false economy of allowing maintenance backlogs to build up. Not least within the NHS where challenges with an outdated estate can drive inefficiencies, cost and impact negatively on patient care.

So a disciplined approach to asset management, for each part of the public estate, is an essential component of the change we need to see.

Overall, the Welsh Government spends more than £3 billion a year on infrastructure, although a lot of that is delivered through other public bodies. My recent review of how the Government is managing that significant spend shows clear effort to align it with wider strategic outcomes.

But these benefits will not magically materialise. It will need a concerted effort to line up the machinery of government – baking these benefits into plans from the outset and ensuring they are delivered over the longer-term. These issues are within the Welsh Government’s gift to put right but rely on a sustained improvement in programme and project management that has not been achieved to date.

The underlying weaknesses in some of these basic building blocks of our public service contributes to the second area where I believe change is required, namely productivity and value for money in the public sector.

Productivity and value for money

In the face of rising demand pressure and ever-more stretched budgets, improving productivity and delivering better value for money is essential.

Our work points to some of the productivity challenges for the public sector, especially in the NHS where outputs in terms of activity have not increased in proportion to additional inputs in terms of money and capacity in areas such planned care.

I am sure that leaders across the public sector share an ambition to make a step change in productivity. There’s enough evidence from the positive examples we have found in our work to be confident that significant amounts of public money can be

freed up. But it will take a disciplined, focused, cross-government approach over several years to fully realise the potential and make the exceptional the norm.

Hence, my reports consistently highlight that VFM is not just about spending less, it is about making the money we do have work better. A good example is the number of people who are in hospital awaiting discharge. While there has been some recent improvement, the picture across Wales remains challenged, absorbing huge costs and adversely affecting patient flow and the optimal rehabilitation of patients.

Many discharge delays are a result of waiting for social care support, often linked to funding and resource pressures in local authorities. Better funding to increase social care capacity would therefore free up significant NHS resource and represent a cost-effective way of improving patient experience and outcomes.

In a context of constrained budgets and rising demand, public bodies must focus on outcomes, not just outputs, and ensure that every pound spent contributes meaningfully to public well-being. At a very basic level, our work shows that too often public bodies lack reliable data with which to assess value for money and are unclear as to the outcomes they are looking to achieve.

My work on Active Travel, for instance, demonstrated how the Welsh Government itself is unclear about how assessment of its policy is to be achieved. As a result, significant sums had been invested without a robust means to assess its effectiveness and value for money.

And I have reported previously on how the Welsh Government had not done enough to ensure its investment in affordable housing contributes to wider policy objectives and to be able to tell a clear story on that front.

Many public organisations struggle to report on outcomes effectively. Performance tends to focus on outputs—such as the number of services delivered—without evaluating the difference those services make.

It is vital too that the public sector views value for money through the lens of the Well-being of Future Generations Act, which requires public bodies to consider long-term impacts, prevention, integration, collaboration, and involvement. As I have emphasised through my reporting on implementation of the Act, we cannot afford for public services to design solutions that do not meet people's needs, burden future generations with avoidable higher costs, or miss opportunities to deliver more with the same or less.

That much sharper and relentless focus on the delivery of value for money also requires a mindset shift to one focused on prevention and the longer term.

Shifting to a long-term, preventative mindset

Public Health Wales has estimated that for every £1 invested in public health interventions, there is a return of £14. This includes reduced demand on hospitals, social care, housing, and emergency services.

But too often, public services operate in crisis mode, responding to immediate pressures rather than planning for the future. This short-termism is reinforced by annual budget cycles, reactive funding decisions, and political incentives that prioritise quick wins over sustainable outcomes.

The Well-being of Future Generations Act provides a legislative framework to do something different – to act for the long-term and to act preventatively by addressing the root causes of issues, rather than dealing with the symptoms.

However, I have highlighted recently some prime examples where public bodies have been struggling to make a meaningful shift towards prevention, as evidenced for example in my work on cancer services and on how councils are managing temporary accommodation demand. This is despite there being clear evidence that investment in prevention makes sense from a value for money perspective.

Though Wales has an overarching, legislative framework to drive a longer-term, preventative mindset, our work suggests it is not yet doing so.

One of the challenges with prevention is that benefits take time to materialise. This lag can make prevention politically and operationally difficult, especially in a climate of financial pressure. However, the long-term gains—in health, well-being, and cost savings—are substantial and well-evidenced.

The Welsh Government has a critical role in enabling prevention. This includes setting coherent policy frameworks, aligning funding mechanisms, and creating incentives for collaboration.

It must lead a shift towards long-term financial planning, integrated delivery models, and cross-sectoral working. This means breaking down silos and ensuring that prevention is a whole-of-government priority.

Prevention cannot be achieved through isolated programmes. It requires a more radical, whole-system change and joined-up working between a range of agencies such health, social care, housing, education, and the third sector, with aligned accountabilities and funding streams and shared outcomes. Prevention must be embedded not just in strategy documents, but in everyday decision-making,

budgeting, and service design. Without this any policy aspirations around prevention risk becoming more rhetoric than reality.

Reducing complexity

As noted earlier, the current landscape of Welsh public services is characterised by a web of organisations, partnerships, and governance structures. The cumulative effect is a system that is fragmented and difficult to navigate.

While it is not for me to blueprint the alternative, I am clear on the need to simplify and avoid further complexity. If starting from a blank sheet of paper, we would surely not design the arrangements we currently have in place.

Reducing complexity is not about dismantling collaboration but about streamlining it. We need fewer, clearer structures with well-defined and sharper lines of accountability.

This is also not simply about rationalising the number of public bodies or making their collaboration with each other more effective. Reducing complexity and strengthening integration and collaboration applies just as much to the internal functioning of public organisations. These are expectations set by the Well-being of Future Generations Act where our work demonstrates much more needs to be done.

Citizen-centred design must underpin this simplification: services should be organised around the needs of people, not the convenience of institutions. This means engaging communities in shaping services, using plain language in communication, ensuring that performance information is meaningful and accessible, and considering the equality and other impacts of decisions. It also means being honest with the public about what constitutes safe and affordable public service provision, especially in relation to health and care services.

A simpler, more streamlined public service in Wales would also help breakdown silos within and between sectors and support better sharing and embedding of good practice. The latter is something that Wales seems to struggle with and all too often my work points to unexplained and often unacceptable variation in performance across different public bodies. This is despite our relatively small size and the close connections of many in the public sector. When good practice is established in part of the public sector, a more robust approach to 'adopt or justify' elsewhere may be required.

As Auditor General I see complexity manifested in other ways, including through our annual audit of the accounts of public sector bodies. A dry topic to some, this work is

essential if the public and the Senedd are to have an accurate and timely picture of the state of the public finances. For individual organisations, that accuracy and timeliness are essential if good decisions are to be taken.

For our local authorities, for example, the financial regime in which they operate is becoming increasingly technical with disproportionate emphasis on things like asset valuations and pension liabilities. Important, but obscuring what truly matters to users – councillors, officers, the public – namely, how public money is spent and the value it delivers.

I see some particular challenges emerging in this area which, if not addressed, will quickly weaken the overall financial regime and lead to poor decision making and a reduction in transparency.

Leadership

Addressing the areas I have mentioned will require political and executive leadership.

That means being honest about the scale of change required, making difficult decisions, and communicating clearly the necessary trade-offs. It also means modelling the behaviours we want to see: integrity, collaboration, and a relentless focus on outcomes.

The Welsh Government has a pivotal role to play in enabling this transformation. It is our system leader, sets the tone, and provides the legislative and financial frameworks within which other public bodies operate. While the Welsh Government does much that is good, too often I find myself reporting that it needs to be clearer and firmer in its system leadership.

My work has also highlighted examples where the Welsh Government can do more to support implementation of legislation it has introduced and follow up on whether it is being implemented effectively and having the desired impact.

It must provide clarity and coherence across policies, funding, and accountability frameworks. Mixed messages – such as promoting prevention while incentivising short-term performance targets – undermine progress.

This has been my central message in much of the work we have done around the Well-being of Future Generations Act. So that, for example, the expectation on organisations to plan and act for the long term and with prevention in mind, is not undermined by funding decisions, target setting, and accountability frameworks that incentivise the opposite.

I recognise the intense pressures faced by public sector leaders. These are difficult jobs. It is testament to them that our work often highlights examples of good practice where leaders have taken bold decisions in difficult circumstances.

But as noted already, my work on governance and transparency has also shone a light on the small number of cases where leadership fails to uphold the desired values. The result can be costly, public confidence erodes and service effectiveness suffers.

The challenges facing Welsh public services are complex and systemic. They cannot be solved by technical fixes or incremental change. They require bold decisions, honest conversations, and a shared commitment to doing what is needed.

Conclusion

Despite the significant challenges facing public services, there is potential for meaningful reform and improvement, especially if the themes I have described are sincerely addressed.

Wales is a small, tightly networked country; a population of just over three million people; a newly expanded legislative parliament and a government with significant autonomy; its public spending budget of nearly £30 billion represents almost one third of Welsh GDP; and despite challenges its public sector is highly capable and well-resourced compared to many countries.

One of our advantages is our scale. We are big enough to act strategically but small enough to be agile, collaborative and innovative. We can convene the key players on any issue, enabling us to act swiftly and cohesively in a way that is much harder in larger jurisdictions. That is a great base to work from.

The expansion of the Senedd to 96 members marks a further significant milestone in Welsh democracy. The public sector will rightly look to that new Senedd and Welsh Government for leadership in tackling the challenges I have outlined.

I very much hope that the larger legislature uses its additional capacity to improve scrutiny and accountability, and thereby to strengthen evidence-led policymaking. If not, a hard-won constitutional change will have been wasted.

As it does so, the message I would leave after eight years in the role of Auditor General is that radical transformation is needed.

It is possible, but difficult, and will require a clarity of purpose on the scale of that seen during the Covid years.

Public service leaders across Wales recognise the scale of the challenge and many are already navigating complex environments with limited resources. But the pace and progress need to be increased.

If not, our current model of public service delivery is not sustainable. Money will become even more thinly spread, services will continue to deteriorate, and outcomes will worsen. There must be a shift from short-term firefighting to long-term futureproofing, as I have called for consistently.

The Welsh Government has a critical role in providing leadership and in creating the conditions for transformation. This includes reducing funding uncertainty where possible, aligning policy and delivery frameworks, incentivising collaboration and

encouraging investment in prevention. It must also lead by example, embedding the sustainable development principle in its own operations and ensuring that its actions match its policy intent.

And even then, success will hinge on individuals making the right choices. Funding, process, frameworks and policies are important, and of course the work of auditors, regulators, politicians, and the media are essential in holding public organisations accountable. But those scrutineers should not, and cannot, be everywhere. Ultimately, our public services rely on thousands of people making the right choices, taking the right decisions, and acting in the right way.

The challenge for government and organisational leaders throughout the public sector is to make that as easy as possible – to lead by example, to role model desired behaviours, to give clarity about the scale of challenge and permission to make the changes required, and to create an environment in which all those in public service can play their part.

Agenda Item 6.7

Y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol

Equality and Social Justice Committee

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Ken Skates, MS, Cabinet Secretary for Transport and North Wales

Jayne Bryant, MS Cabinet Secretary for Housing and Local Government

26 February 2026

Dear Jayne and Ken,

The Armed Forces Bill

The [Equality and Social Justice Committee](#) met on 23 February 2026 to consider the Legislative Consent Memorandum relating to the [Armed Forces Bill](#).

Members raised a number of questions and would like to know:

- What discussions has Welsh Government had with the UK Government about providing funding to meet the cost of implementing the Bill;
- What are the views of Welsh Government in relation to Clause 3 and does Welsh Government have any concerns about the potential use of compulsory purchase powers in Wales by the Defence Housing Service (DHS); and
- Has Welsh Government sought clarification on how the DHS will be expected to work with Welsh Government and local authorities in Wales.

Given the strict and fast approaching reporting deadlines in this case, we look forward to hearing from you and would appreciate if you could provide a response by 9 March 2026.

This letter is being shared with the Local Government and Housing Committee.

Yours sincerely,



Jenny Rathbone MS

Chair, Equality and Social Justice Committee