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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.

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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.