

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.