HDS 02
Ymgynghoriad ar ymgynghoriad ar gyflwr anniogel tai cymdeithasol
Consultation on hazardous disrepair in social housing
Ymateb gan: TPAS Cymru
Response from: TPAS Cymru

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 Pulse[1] 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-cigarrettes 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 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 tenant 's 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 Pusle' 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.

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