

HDS 03

Ymgynghoriad ar ymgynghoriad ar gyflwr anniogel tai cymdeithasol

Consultation on hazardous disrepair in social housing

Ymateb gan: Cyngor Caerdydd

Response from: Cardiff Council

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.