

HDS 05

Ymgynghoriad ar ymgynghoriad ar gyflwr anniogel tai cymdeithasol

Consultation on hazardous disrepair in social housing

Ymateb gan: Cartrefi Cymunedol Cymru

Response from: Community Housing Cymru

# 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.

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