

HDS 09

Ymgynghoriad ar ymgynghoriad ar gyflwr anniogel tai cymdeithasol

Consultation on hazardous disrepair in social housing

Ymateb gan: Sefydliad Siartredig Iechyd yr Amgylchedd

Response from: Chartered Institute of Environmental Health

Written evidence submitted to the Senedd Local Government and Housing Committee inquiry into hazardous disrepair in social housing

February 2026

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private and non-profit sectors. Building on its rich heritage, CIEH ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to our environment and our health.

For more information visit www.cieh.org.

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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

1. CIEH represents local government enforcement officers. Our members have a wide range of powers to address issues relating to housing, environmental protection, health and safety and food safety. Local government environmental health private housing teams can employ several pieces of legislation to address problems with individual dwellings and deal with area-based issues relevant to housing management and the built environment. Environmental health practitioners (EHPs) have powers to assess and address compliance with the following relevant legislation in properties owned or managed by registered social landlords (RSLs).
 - Housing Act 2004
 - EHPs can use the Housing Health and Safety Rating System (HHSRS) and associated legal notices under Part 1 of this Act to require measures to improve health and safety in social rental accommodation. Notices cover making landlords aware of hazards, taking emergency remedial action, improvement notices, prohibition orders, and orders for demolition or clearance of exceptionally poor-quality dwellings.
 - The HHSRS is the risk assessment tool used to evaluate the threat to health from 29 different hazards found in people's homes. Hazards are rated at Category 1 or 2 with Category 1 hazards being the most serious.
 - Building Act 1984
 - This can be used to deal with drainage issues and ruinous and dilapidated premises. Various other pieces of legislation are also used to address drainage and sanitation issues.
 - Prevention of Damage by Pests Act 1949
 - Used to address infestations of rats and mice.
 - Town and Country Planning Act 1990
 - Used to address land or buildings whose appearance is detrimental to the amenity of the area.
2. Local authority private housing enforcement teams primarily focus on private rental sector accommodation but will respond to complaints from social housing tenants where they are living in housing owned by registered social landlords. They do not carry out enforcement in properties owned by the local authority.
3. The distribution of hazards identified by local authority inspections of all non-HMO properties taken from the Welsh Government website is shown in Figures 1 and 2.¹

¹ Welsh Government, 'Housing hazards: April 2023 and March 2024', Housing Hazards', 2024, <https://www.gov.wales/housing-hazards-april-2023-and-march-2024.html> (accessed 12th February 2026).

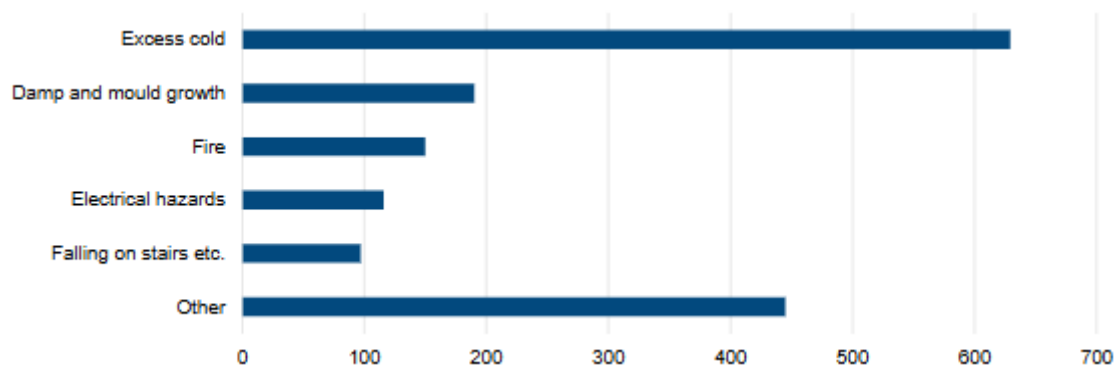


Figure 1 – Number of Category 1 hazards found in non-HMO assessments by hazard type, 2023-24.

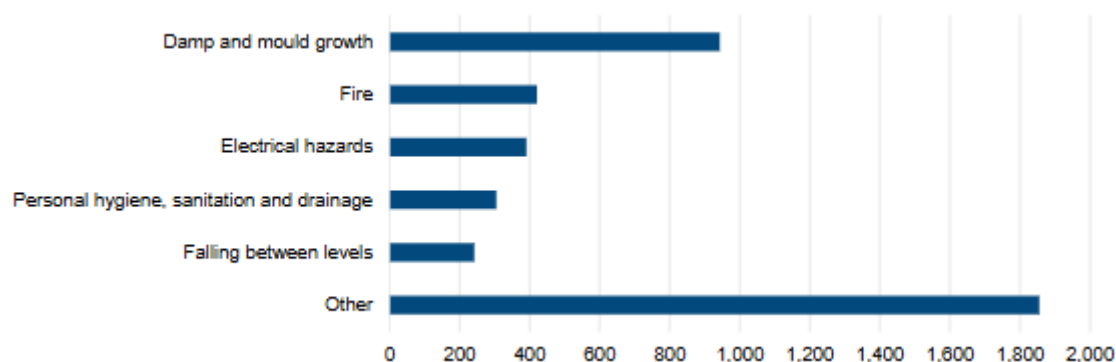


Figure 2 – Number of Category 2 hazards found in non-HMO assessments by hazard type, 2023-24.

4. The last Welsh Housing Conditions Survey (2017-18) provided figures for compliance with the Welsh Housing Quality Standard (WHQS), which included a requirement for a property to be free from Category 1 hazards. Individual primary and secondary elements of the standard relevant to HHSRS hazards showed compliance levels above 90%. The proportion of dwellings passing all 13 primary elements and at least 9 of the 13 secondary elements of the standard was 46% across all social housing (40% in local authority and 49% in registered social landlord properties). Annual WHQS returns from housing providers show higher percentages. It is clear that the original WHQS has brought about substantial improvement in the social housing stock. Overall, 93% of social housing in Wales is free from Category 1 hazards.²
5. The percentage of dwellings built before 1920 is much lower in the social rented sector than for owner occupied and private rental properties.³ Older properties are more likely to contain Category 1 hazards due to their age and design at the time of construction

² Welsh Government, 'Statistical Bulletin. Welsh Housing Conditions Survey 2017-18: Assessment of Elements of the Welsh Housing Quality Standard', 2019, <https://www.gov.wales/sites/default/files/statistics-and-research/2019-04/welsh-housing-conditions-survey-2017-18-assessment-of-the-welsh-housing-quality-standard-567.pdf> (accessed 12th February 2026).

³ Welsh Government, 'Statistical First Release. Welsh Housing Conditions Survey 2017-18: Headline Report (Updated)', 2020, <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> (accessed 12th February 2026).

(e.g. lack of a damp proof course in walls and solid walls). These properties will be more difficult to improve (e.g. hard to treat properties such as those with solid walls requiring internal/external wall insulation).

6. The last Welsh Housing Conditions Survey (2017-18) also noted that the average Energy Performance Certificate (EPC) rating for social rented dwellings was 68 (EPC Band D), whilst owner occupied and private rented dwellings both averaged 60 (EPC Band D). A more recent report by the Office of National Statistics shows that this has now increased to a median of 72 (EPC Band C).⁴ SAP ratings will continue to improve under the WHQS update introduced in 2023, reducing fuel poverty and numbers of Category 1 excess cold and damp and mould hazards in homes.
7. Hazards do remain in the social housing stock with falls risks, cold, and damp and mould still presenting problems. These are most likely to affect those over 60 years of age and those under 14 years of age.⁵ Falls remain a significant concern across Wales's housing stock. Falls injuries were the single largest type of call to the Welsh Ambulance Service last year. They were the cause of 12% of calls, 72,000 of which (69%) required an ambulance to attend, and 42,000 involved someone being taken to hospital.⁶ The proportion of these falls in social housing cannot be determined from the evidence collected. Social housing is more likely to have older or disabled occupiers. There has been a great deal of work to adapt social housing for those with additional mobility requirements which would help to reduce the risk of falls.
8. Until the next Welsh Housing Conditions Survey is carried out it is very difficult to provide accurate figures on aspects of the housing stock to inform policymaking and enforcement activities. The 2027-28 Welsh Housing Survey will provide more information on housing quality in the social sector but the results will not be available until 2028-29/2029-30.

How effectively social landlords are currently responding to reports of hazardous disrepair, particularly issues with damp and mould

9. The previous section indicates that there are still serious hazards relevant to both housing design and disrepair in the social rented sector. The sector has improved substantially since the millennium, however, and remaining issues are at a lower level than in either owner occupied or private rental accommodation. This improvement has been supported by focused activity to improve energy efficiency in social rented properties and ongoing work to adapt properties to those with impaired mobility.

⁴ Office for National Statistics, 'Energy Efficiency of Housing in England and Wales: 2024', 2024, <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/energyefficiencyofhousinginenglandandwales/2024> (accessed 12th February 2026).

⁵ Office of the Deputy Prime Minister, 'Housing Health and Safety Rating System Operating Guidance', 2006, <https://assets.publishing.service.gov.uk/media/5a78d3d940f0b62b22cbd1d6/142631.pdf> (accessed 12th February 2026).

⁶ Care and Repair Cymru, 'From Wear and Tear to Disrepair: The Cause and Impact of Poor Housing', 2024, <https://careandrepair.org.uk/wp-content/uploads/2024/02/From-Wear-and-Tear-to-Disrepair-FINAL-ENG.pdf> (accessed 12th February 2026).

10. We have asked our members for more information from their direct experiences of dealing with issues across Wales. Due to the timescale for providing this written evidence we can only present one local authority's evidence here. This authority found that complaints from registered social landlord tenants were declining over time (see Table 1). Complaints were dealt with through informal activity by the enforcing officers. Where difficulties did arise, these tended to be linked to more complex situations where there might be access restrictions, neighbouring property constraints, or contractor disputes. Investigating officers did not encounter any lack of willingness to rectify problems from the landlords' representatives. Their engagement with Environmental Health and their compliance with requests for action remain generally effective, which is reflected in the reducing complaint numbers. Overall, the local authority had very few concerns regarding registered social landlord responsiveness.

Table 1 – Data on complaint levels from one local authority

Year	Proportion of complaints from RSL tenants	Proportion of those complaints about damp and mould growth
2023-24	20%	64%
2024-25	13%	45%
2025-26	7%	41%

11. We may be able to provide further feedback in this respect in our oral evidence.

12. The 2024-25 annual report of the Public Services Ombudsman for Wales indicates the Ombudsman received 411 complaints about housing associations (an 8% increase from last year and 103% increase from 2019-20). Repairs and maintenance made up 41% of these complaints (down from 48% last year). When looked at over time, the main areas responsible for an increase in complaints were neighbour disputes / antisocial behaviour and damp and mould. It is very likely that these complaints are indirectly attributable to increased public awareness of the risk from damp and mould in rental accommodation as a result of the press coverage of the tragic death of Awaab Ishak.⁷

13. The Ombudsman will provide their own evidence in respect of their handing of disrepair complaints, but their annual report highlighted the following issues.

- Often occupiers had to raise a complaint to obtain remedial work and repeatedly chase public bodies in order for a response to the complaint to be initiated.
- Pre-letting inspections were sometimes of questionable quality.
- Some occupiers in vulnerable situations would have had to wait significantly longer for works to be carried out if it were not for the intervention of the Ombudsman.

⁷ Ombudsman Cymru/Wales, 'Turning the Page. Annual Report and Accounts 2024-25', 2025, https://www.ombudsman.wales/wp-content/uploads/2025/08/Annual-Report-and-Accounts-24-25-FINAL.pdf?_gl=1*1wp1zca*_up*MQ..*_ga*MTc1NjgxMjlyNi4xNzcwMzIxMDA5*_ga_RHY6X4DM35*_czE3NzAzOTEwMDgkbzEkZzAkDE3NzAzOTEwMDgkajYwJGwwJGg3MjA2MjM0NjE. (accessed 12th February 2026).

- There were issues with complaint handling responses seemingly being delayed whilst the organisation carried out works in the meantime or failure to properly record a complaint.

14. The Ombudsman's report on housing disrepair and damp and mould complaints provides a range of specific examples in support of the above comments. The report raises a concern over the lack of proactivity of many landlords in identifying and dealing with properties suffering from damp and mould, as opposed to waiting for occupiers to draw attention to the issue.⁸

The Welsh Government's creation of a new rule within the WHQS requiring social landlords to investigate and remedy certain hazards within specified timescales

15. We welcome the addition of the timescales to address HHSRS hazards under new element 1c of the WHQS. The timescales set out in the addendum⁹ are aligned with those set out in the Social Housing (Regulation) Act 2023 in England and will provide additional accountability over responding to hazards in the social housing stock.
16. The requirement to provide tenants with a summary plan will ensure they are included in the communications about remedial measures. This will provide reassurance, support EHPs through information provision when dealing with tenant complaints and manage the expectations of tenants through the works. The improved awareness this information gives will reduce the sense of powerlessness and lack of control tenants can experience when awaiting works to their home, reducing the psychological impact of living with unsafe housing conditions.
17. The addendum is vague as to what constitutes a significant and an imminent hazard. Imminent risk is not defined. A significant risk is defined as 'a risk of harm to the occupier's health or safety that a competent member of the landlord's workforce with the relevant knowledge would take steps to make safe as a matter of urgency'.
18. We are concerned that the guidance does not appear contain a strict requirement for those carrying out an investigation to be trained in the use of the HHSRS. This would seem to be a prerequisite to be competent to carry out such an assessment. There is potential to use local authority environmental health practitioners here, but inspectorates are under-resourced. Unless inspections are paid for, there are currently insufficient public funds for environmental health teams to support large-scale routine inspections of social landlord properties.

⁸ Ombudsman Cymru/Wales, 'Living in Disrepair – A Thematic Report About Housing Disrepair and Damp and Mould Complaints to PSOW', 2024, <https://www.ombudsman.wales/wp-content/uploads/2024/11/Living-in-Disrepair-a-thematic-report-about-housing-disrepair-and-damp-and-mould-complaints-to-PSOW.pdf> (accessed 12th February 2026).

⁹ Welsh Government, 'WHQS Addendum', 2026, <https://www.gov.wales/sites/default/files/publications/2025-12/whqs-addendum-responding-to-hazards.pdf> (accessed 12th February 2026).

19. It is not clear what proportion of social landlords' stock management teams have taken the two-day industry course to become an HHSRS assessor. A property can be found to have Category 1 or 2 hazards only once it has been inspected under the HHSRS, by a qualified assessor. Failing to inspect means failing to identify significant risks from hazards. We would welcome some clarification of the terms 'imminent' and 'significant' and encourage any measure that increased the number of social landlord staff qualified in the use of the HHSRS.
20. The timescales in the addendum are clear but there is no detail in the guidance specifying the point at which there exists a trigger to investigate a problem. Given the Ombudsman's concerns referred to in paragraph 19 above over delays in registering tenant concerns about their property, this is a concerning omission in the guidance.
21. We note that the new standard does permit the landlord to consider additional vulnerabilities specific tenants may have for a particular hazard alongside the likelihood of harm and severity of harm from the hazard. This allows the requirement to cater for those with particular vulnerabilities to a given hazard. We find this to be a welcome consideration as social housing provides accommodation for a range of tenants with additional needs.
22. When we asked StatsWales for information on HHSRS hazards in the WHQS returns, they responded that publication of the first headline figures has been delayed but they are due to be published on 26th February. They also noted that it will take a few years before the data is of sufficient quality to look at the presence of Category 1 hazards in detail.
23. The timescales set out in the new standard will provide welcome accountability for social landlords handling complaints about health and safety related issues in their stock.
24. Given the national shortages of skilled trades in the building sector, we are concerned about the feasibility of meeting these tight deadlines for investigations and the ensuing works. Once initial deadlines have been missed, it is unclear what accountability there is for landlords expediting repairs aside from annual reports from social housing providers on levels of Category 1 hazards causing failures against WHQS in the housing stock.

What proactive steps social landlords are taking to identify and remedy hazardous disrepair within their housing stock

25. Please see the comments made above. We have asked our members for more information from their direct experiences of dealing with issues across Wales. We may be able to provide further feedback in this respect in our oral evidence.

How the Welsh Government and social landlords are engaging and involving tenants in issues relating to hazardous disrepair

26. Please see the comments made above. We have asked our members for more information from their direct experiences of dealing with issues across Wales. We may be able to provide further feedback in this respect in our oral evidence.