



promoting equality in housing
hybu cydraddoldeb ym maes tai

Tai Pawb

Response to:

Hazardous disrepair in social housing

Senedd Local Government and Housing Committee

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Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: www.taipawb.org

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Tai Pawb welcomes the Local Government and Housing Committee's inquiry into social landlords' response to hazardous disrepair, and the steps the Welsh Government has taken to improve processes to identify and remediate hazards.

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

Damp and mouldy housing is an extremely harmful environment to live in and can cause severe respiratory problems. This is especially true for young children and older adults. It disproportionately impacts vulnerable social groups as they are more likely to live in poor quality housing.

Unfortunately, official data for housing disrepair in social housing is not widely available. The most recent Welsh Housing Conditions Survey (WHCS) from 2017/2018 showed that damp and condensation affected between 4% and 6% of all social homes. Furthermore, it pointed to Welsh households in general being more likely to have damp and condensation and Category 1 Hazards than their English and Northern Irish counterparts.¹

Other sources suggest the situation is even worse. TPAS Cymru, a Wales-wide tenant engagement organisation, found that only 39% of social housing renters taking part in their survey reported that their home was free from damp and mould.² More recent TPAS publications may acknowledge limitations in their methodology, but the TPAS Cymru research still indicates a very significant gap between what tenants perceive and what official figures claim.

Tai Pawb together with the Open University carried out research into tenants' experiences of decarbonisation in social housing. It found that approximately

¹ Welsh Government and Statistics for Wales, Welsh Housing Conditions Survey 2017-18: headline report (18 February 2020) [Welsh Housing Conditions Survey 2017-18: headline report \(updated\)](#)

² TPAS Cymru, Third Annual All Wales Tenant Survey on Tenant Perceptions: What Matters Right Now (December 2023) [Full Report \(E\)\(2\).pdf](#)

20% of tenant participants variously experienced issues with damp and mould.³

Participants told us how living in damp and mouldy homes forces them to make difficult and often costly decisions around energy use. To manage household finances, some tenants reported limiting their use of heating, even where this risked the worsening of existing damp and mould conditions. Others described having to use tumble dryers to dry clothes rather than hang the washing indoors to prevent additional moisture, despite the higher energy costs involved.

The announcement of a new 2027/2028 Welsh Housing Survey is, of course, to be welcomed. We do feel, however, that the ten-year gap between datasets does not allow us to accurately monitor the changing situation, particularly given the rise in the cost of living since 2018. The cost of living crisis has significantly contributed to an increase in fuel poverty, intrinsically linked to mould and other hazardous disrepair factors. We are reassured though by the Cabinet Secretary for Housing and Local Government that the 2027/2028 Welsh Housing Survey will be more detailed than previous versions and that fuel poverty will be considered.⁴

We know that social housing providers do collect data internally, carrying out their own surveying and will have their own key performance indicators (KPIs) regarding hazardous disrepair and response monitoring.

Nevertheless, we are concerned that none of the existing data is broken down by protected characteristics. We are also aware that social housing providers in

³ The Open University and Tai Pawb, A Fair and Equitable Transition? Tenants' experiences of decarbonising social housing (May 2025) [A-Fair-and-Equitable-Transition-report-English.pdf](#)

⁴ Welsh Government, Cabinet Statement, Written Statement: Welsh Housing Survey 2027-28 (9 May 2025) [Written Statement: Welsh Housing Survey 2027-28 \(9 May 2025\) | GOV.WALES](#)

Wales do not know the demographics of their tenants. Internal data collection with our members showed that nearly 60% of social landlords are unable to break down their stock condition data by household characteristic.

The tragic case of Awaab Ishak demonstrated that people from certain backgrounds are more likely to be affected by hazardous disrepair and mould within social homes than others.

An Ombudsman investigation into Awaab's death confirmed a culture within the social housing provider that saw Black tenants with refugee status as less deserving of a good home. The Housing Ombudsman in England told the Coroner's Court that the law needed to be re-enforced in this area as some social landlords have an "outdated, ineffective, sometimes dismissive" approach, with an overemphasis on blaming the tenant's lifestyle.⁵

Understanding the diversity of tenants in social housing is key to dealing with hazards. We know certain ethnic minorities are overrepresented in social housing. The most recent English Housing Survey (2025) showed that people from a Black ethnicity accounted for 11.2% of all social renters, compared to 4.9% of all households in England.⁶

Tai Pawb research with EYST Wales (Ethnic Minorities and Youth Support Team), a registered charity that supports ethnic minority people in Wales to participate, integrate, and be a valued part of Wales, also offers up some figures. Our joint research into the experiences of housing in Wales of people from ethnic minority communities found that 50% of issues reported by

⁵ Garden Court North Chambers, Awaab Ishak Inquest: Prolonged Exposure to Mould Led to Death (16 November 2022) [Awaab Ishak Inquest - Garden Court North Chambers](#)

⁶ UK Government, Ministry of Housing, Communities & Local Government, Annex tables for English Housing Survey 2024 to 2025 headline findings on demographics and household resilience, Annex Table 1.3: Demographic and economic characteristics, 2024-25 (4 December 2025)

tenants relate to damp, mould, and insulation, followed by leaks at 18%.⁷ It is worth acknowledging that 48% of surveyed tenants said their property was in need of repairs, and that the data does not disaggregate by tenure type, although 22% of total responses came from social rents.

ONS data from 2021 estimated that nearly 25% of all disabled adults in the UK lived in social housing, compared to just 7.9% of the non-disabled population.⁸ The same 2025 English Housing Survey identified people aged 65 or over as the largest group in social housing.⁹ There will be variations to this data in Wales, but the figures are indicative of the situation.

At the same time, combined data from the 2021 and 2023 English Housing Survey found that people from a Black ethnicity were twice as likely to have damp in their homes as any other ethnic group.¹⁰

We are hopeful that the new Welsh Housing Quality Standards (WHQS) will help to establish the extent of hazardous disrepair. Our response to the Welsh Government's consultation on setting timescales for social housing landlords to respond to reports of hazards which have significant health impacts showed wide support for the policy change and the need for equality considerations.

⁷ EYST and Tai Pawb, The experiences of housing in Wales of people from ethnic minority communities (February 2024) [The experiences of housing in Wales of people from ethnic minority communities](#)

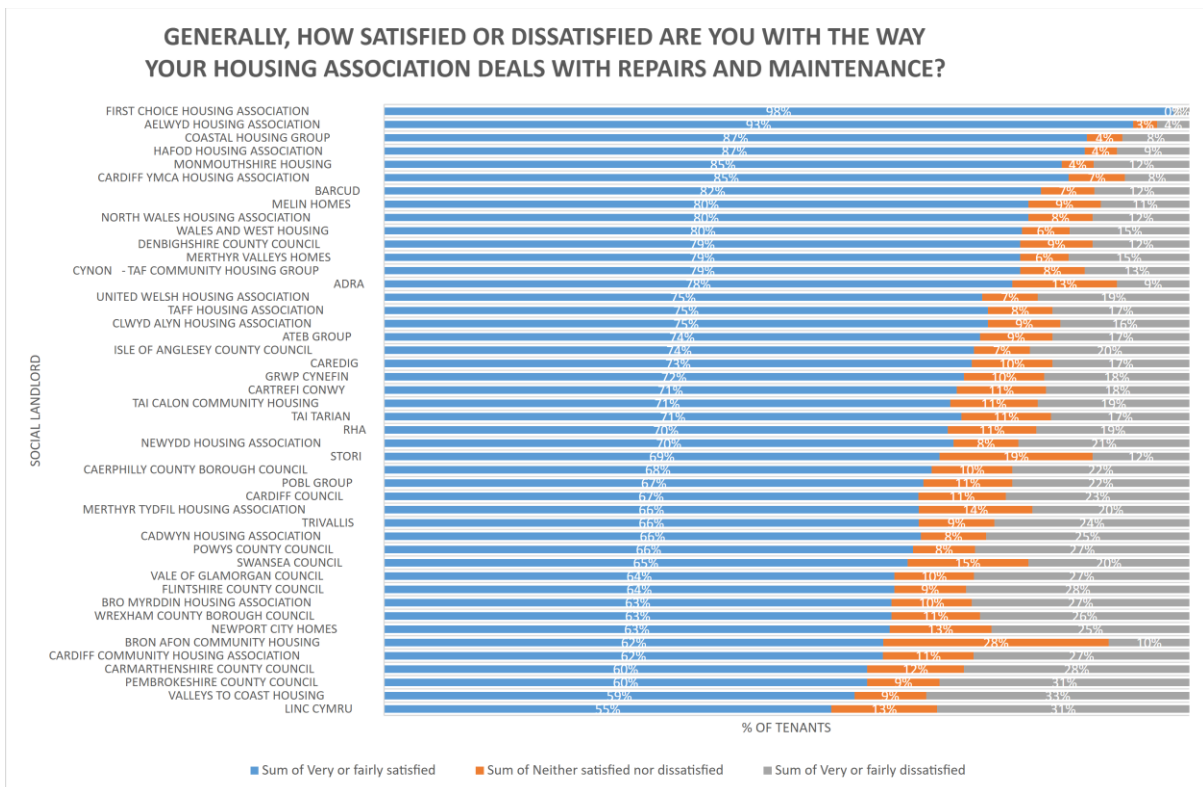
⁸ Office for National Statistics, Census 2021, Outcomes for disabled people in the UK: 2021 (10 February 2022) [Outcomes for disabled people in the UK - Office for National Statistics](#)

⁹ UK Government, Ministry of Housing, Communities & Local Government, Annex tables for English Housing Survey 2024 to 2025 headline findings on demographics and household resilience, Annex Table 1.3: Demographic and economic characteristics, 2024-25 (4 December 2025)

¹⁰ UK Government, Housing with damp problems (30 April 2025) [Housing with damp problems - GOV.UK Ethnicity facts and figures](#)

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

The lack of consistent and reliable data means this is a difficult issue to analyse. The most recent Welsh Government social landlords tenant satisfaction survey (2025) presents a mixed picture, with between 55% and 98% of social tenants across local authority and registered social landlord tenants being very or fairly satisfied.¹¹ Those very or fairly dissatisfied range from between 2% and 31%. This discrepancy is consistent with previous annual surveys.



Source: Social landlords: tenant satisfaction survey 2025

¹¹ Welsh Government, Social landlords: tenant satisfaction survey 2025 - What housing association and council tenants think about their homes (8 July 2025) [Social landlords: tenant satisfaction survey 2025 | GOV.WALES](https://gov.wales/social-landlords-tenant-satisfaction-survey-2025)

Variation between providers is understandable, but it is important that a household's repairs and maintenance should not be subject to a postcode lottery.

As the data is not disaggregated by demographic, we have no way of knowing if the outcomes for any particular group are less favourable than for others.

A report into housing disrepair and damp and mould complaints by the Public Services Ombudsman for Wales provides some evidence akin to those of the very or fairly dissatisfied respondents in the Welsh Government's social landlords tenant satisfaction survey.¹² A number of the twelve case studies make reference to damp, mould, and disrepair exacerbating long-term or chronic illnesses and health conditions. The majority of the twelve case studies also impact disabled or older age people, perhaps demonstrating a clear equalities' dimension as to how seriously complaints are taken, or in these cases, not taken.

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 landlord**

In our response to the Welsh Government's consultation on setting timescales for social housing landlords we suggested a clear cause of action.

We recommend that tenants, landlords, and maintenance professionals work together to co-produce appropriate timelines for action. This could be done on

¹² Ombudsman Wales, Living in Disrepair - a thematic report about housing disrepair and damp and mould complaints to PSOW (November 2024) [Living in Disrepair - a thematic report about housing disrepair and damp and mould complaints to PSOW](#)

a broad level, with national principles and minimum/maximum times at a national scale to ensure consistency.

Given the different types of housing stock and its condition in Wales, a flexible approach may be preferable and more practical than one that is just target-based. During the co-production, there should be particular efforts made to engage disabled and older people and people from black and other minoritised communities in this process.

We support the Welsh Government's new WHQS rule (Element 1c). We feel that it drives transparency and will create clear guidelines that will embed accountability into the system. The new system should ensure the deplorable case of Awaab Ishak is not repeated.

Tackling damp and mould protects housing assets. Unresolved defects compromise property quality, value, and lifespan. It is in everyone's interests, including social landlords, for issues to be identified and addressed at a national level.

Registered social landlords, many of whom are our members, have raised concerns regarding the implementation of Element 1c and we share some of these. The proposed timescales, starting from April 2026 may prove restrictive.

Compliance with Element 1c will be reported as a fundamental part of the detailed WHQS compliance report. A separate high level summary compliance report will also be required as an element of the quarterly social landlord return. The first quarterly report will be due at the end of June 2026, with the full detailed report at the end of the 2026/7 financial year.

It could be that the short timeframe will result in instances of non-compliance in the first report. Social landlords need time to adopt the changes and also data collection methods need to be refined.

Currently, all social housing providers will have their own data collection methods and systems in place monitoring disrepairs and responses. As a result of Element 1c, all social housing providers will have to adhere to new monitoring methods controlled by the Welsh Government. In practical terms, this will mean staff retraining, the creation of new risk assessments, etc. without the financial support to do so.

One member privately told us that they would like politicians to be more pragmatic when it came to WHQS. Overall, Tai Pawb is supportive of Element 1c and hopes it will create a clear pathway to remedy certain hazards within specified timescales.

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

Good practice in this area exists. For example, Taff Housing has developed a damp and mould policy using a dashboard that assesses problems by severity and any vulnerability in households. Based on the risk of both factors, a timeline is established to prioritise the completion of repairs.

In light of Awaab Ishak's tragic death, one of our registered social landlord members told us that as part of their 'Healthy Homes' project they were reviewing their internal systems and processes. The reason being to consider how they properly gather, store, and use customer data regarding protected characteristics, vulnerabilities, etc. and how they can then use this data to better serve their tenants.¹³

Aelwyd Housing is a housing association supporting older people across South Wales. Every year they have a "what matters" conversation, where they visit each tenant. These visits can identify any unreported or unrequested needs a tenant may have and also the condition of the home. Aelwyd has found that sometimes older people are reluctant to report issues in their home and so the

¹³ Tai Pawb, Deeds Not Words: A pledge to end racial inequality in housing - Two years on: Progress and impact of Deeds not Words (May 2023) [Deeds-not-Words-2-Years-On-Final.pdf](#)

visits often provide the opportunity to monitor problems such as damp or mould. It also serves to build rapport between the organisation and the tenant.

Similarly, Newydd Housing Association took measures to resolve mould and damp issues when carrying out disability adaptations or other repairs, even if these had not been reported.

Whilst Element 1c does not take into account overcrowding, we have heard of instances that registered social landlords have taken action into mould and disrepair whilst setting up to tackle overcrowding.¹⁴ In these cases, they are using internal and external data to identify overcrowding and assess its ethnic impact. As a result, they have integrated this work into broader initiatives such as housing allocations, damp and mould interventions, and EDI campaigns.

At Tai Pawb, we are keen that policy embeds equality and is therefore compliant with equality legislation. Local authority social landlords will have a legal duty to carry out an Equality Impact Assessment (EqIA) on their WHQS Compliance Policy. Even if the situation is not the same for registered social landlords, EqIA will still be the best way of ensuring that their legal equality duties (to advance equality, reduce discrimination, and promote good relations) are met.

Additionally, we would like to highlight our Good Practice Guides on using KPIs to advance equality, diversity, and inclusion in housing. This member-only resource gives practical tips, such as the use of dashboards to help:

- track progress over time
- identify patterns and disparities between groups
- support timely, evidenced-based decision-making

¹⁴ Tai Pawb, Anti-Racist Wales & Deeds not Words 5 years of progress and impact in social housing (August 2025) [Deeds not Words DNW 5 year survey Anti-Racist Wales 2025](#)

- communicate performance clearly to staff, board members, tenants, and regulators

By using KPIs, social landlords and other housing providers can identify gaps in their services and ensure that there is no discrimination against any particular group. We would be more than happy to share our resources with the Committee to aid their inquiry if necessary.

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

Information should be accessible. Emphasis should be put on participation in this process, so that tenants of all backgrounds, including those who may have communication needs can participate. Communication needs in this case refers to language considerations, as for example, if the tenant prefers to communicate in Welsh or if English is not their first language. It also refers to disability considerations, for example, if the tenant needs a British Sign Language interpreter. Not meeting a tenant's communication needs here is a significant obstacle to achieving the set objectives.

To our knowledge, there is no Welsh Government guidance for tenants on Element 1c nor instructions on what steps to take if their social housing provider does not respond to or act upon hazards.

We know that a lack of knowledge of one's rights is what hampers people's ability to exercise them. We also are aware that tenants do not always make complaints about their housing conditions or situations for fear of negative consequences this could have on their living situation. Considering the current housing crisis, this is not something that should be taken lightly.

People from certain protected characteristics, including disabled people or from a minority ethnic background, are even less likely to raise issues because of systemic discrimination. As such, a lack of clear tenant guidance will only

have a pronounced negative impact on people already struggling to access their rights.

Conversations with our registered social landlord members have revealed that some are concerned about whether they will be able to provide easy-read, accessible guides for tenants relating to WHQS.

6 Summary

Evidence highlights both a gap between official data and tenants' lived experience when it comes to hazardous disrepair, particularly damp and mould. It is also clear that there is a need to strengthen the data itself, including demographic breakdowns, to ensure that social landlords and the Welsh Government fully understand who is most at risk. Without a robust foundation of accurate, disaggregated information, hazardous disrepair cannot be effectively identified, monitored, or addressed.

The Welsh Government's introduction of Element 1c within the new WHQS marks an important and welcome step towards greater transparency, accountability, and consistency. However, for these changes to be successful, the implementation process will require adequate time, resources, and clarity, particularly for social landlords who will be adjusting to new reporting requirements and monitoring systems.

As our evidence demonstrates, proactive good practice already exists across the sector, but embedding this more widely requires meaningful engagement with tenants, accessible communication, and a firm commitment to equality duties and co-production with communities most affected by poor housing conditions.

Overall, tackling hazardous disrepair must be seen not only as a technical or compliance issue but also as a matter of social justice, health equity, and human rights. Ensuring that every tenant lives in a safe and healthy home is fundamental to the long-term sustainability of social housing in Wales.

We hope the Committee will use this inquiry to recommend strengthening national systems, reinforcing equalities considerations, and promoting approaches that place tenants' voices, needs, and rights at the centre of decision-making. We would welcome the opportunity to support this work and to share further evidence or resources as required.