



**Ombwdsmon
Ombudsman**
Cymru • Wales

Public consultation

**Proposed wider own initiative investigation:
Responding to reports of disrepair, damp and
mould from vulnerable tenants**

Closing date: 8 December 2025



We have three main roles.



We investigate complaints about public services.



We consider complaints about councillors breaching the Code of Conduct.



We drive systemic improvement of public services and standards of conduct in local government in Wales.



We welcome responses in Welsh. Responses submitted in Welsh will be treated no less favourably than responses submitted in English.

Mae'r ddogfen hon hefyd ar gael [yn y Gymraeg](#) / This document is also available [in Welsh](#).



This document is also available [in Easy Read](#).

We can provide a summary of this document in other accessible formats. To request, please contact us:

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Overview

As the Public Services Ombudsman for Wales (“the Ombudsman”) we can undertake “Own Initiative” investigations where evidence suggests that there may be systemic service failure or maladministration. As with all of our investigations, the main test is whether a service provider has acted in line with the law, its own policies and procedures and good standards of administration. Examples of maladministration and service failure include:

- delays in taking action
- failure to provide information
- failure to maintain adequate records and
- failure to act fairly.

You can find more information in our Principles of Good Administration guidance. Click [here to find the guidance](#).

We can consider undertaking an Own Initiative investigation if we:

- have reasonable suspicion that there is maladministration or services are failing, and that this has caused, or may cause injustice or hardship
- believe that it would be in the public interest if we looked into the matter
- believe that the matter impacts on a large number of people.

Click [here to read our formal criteria for undertaking these investigations](#).

We are now considering undertaking an Own Initiative investigation into how social housing providers respond to reports and complaints relating to disrepair, with a focus on damp and mould, from vulnerable tenants.

By “social housing providers” we mean Registered Social Landlords (“RSLs”, also known as Housing Associations) and local councils.

The purpose of the investigation would be to identify whether social housing providers are appropriately responding to reports and concerns relating to

disrepair, damp and mould, taking into consideration the needs of vulnerable tenants.

If needed, the investigation would identify what social housing providers can do better to ensure that they respond to concerns of vulnerable tenants appropriately and in a timely manner. The investigation would also share any good practice identified to drive improvement across public services in Wales.

We invite comments and responses on the proposed investigation.

The context

There has been significant media attention to the impact of poor living conditions in recent years, particularly following the tragic death, in 2020, of a young boy in Rochdale from a respiratory condition. The Coroner, in November 2022, found his death to be due to exposure to mould at the family's social housing owned property.

Social housing comprises 16% of Wales' housing¹ and, as at 31 March 2024, social housing stock comprised approximately 240,000 properties².

A report by the British Research Establishment ("BRE"), Public Health Wales and Welsh Government³, in 2019, found that poor housing seriously damaged people's physical and mental health. It also found that if the most severe hazards were removed from housing in Wales, it would benefit the NHS by £95m a year in saved treatment costs. In 2023, the BRE issued a report⁴ that estimated the remedial work to England's poorest housing could provide £135.5 billion in societal benefits over the next 30 years, including savings to the NHS (£13 billion), lower energy bills and carbon emissions, higher asset values and

¹ [Senedd Research 3 February 2025](#)

² [StatsWales social housing stock](#)

³ [BRE Trust, Public Health Wales and Welsh Government: The full cost of poor housing in Wales](#)

⁴ [BRE: The cost of ignoring poor housing](#)

improved economic opportunities as a result of better health. More recently, a tenant survey undertaken by TPAS Cymru⁵, published in June 2025, found that tenants said hazards were a daily source of anxiety when not resolved.

Tenants found the situation was made worse when there was poor communication and tenants also considered that damp and mould were not just health hazards, but were a sign their voices were not being heard. The impact on vulnerable tenants was also highlighted, as a seemingly small issue could become a significant barrier to safety and independence.

Social housing providers legal obligations

The Renting Homes (Wales) Act 2016 places obligations on landlords regarding the condition of the homes that they let. These include ensuring the dwelling is both in repair and fit for human habitation. The Welsh Housing Quality Standard (“WHQS”) 2023 also sets out the standards expected for social housing in Wales, against which landlords are measured. This requires homes to be in a good state of repair.

Providers of social housing in Wales should have policies in place in respect of repairs and maintenance, along with complaints processes which are followed when a tenant wishes to raise a complaint. If a person is unhappy with the complaint response, they can complain to us.

The evidence

We have seen evidence to suggest that social housing tenants in Wales, particularly those that could be considered vulnerable, face issues in how social housing providers respond to reports and complaints relating to disrepair, damp and mould.

⁵ [TPAS Cymru survey](#)

In recent years, we have seen an increase in complaints about social housing. In the year 2024-2025, just over 19% of our new complaints related to that subject.

In November 2024, we issued a thematic report, [Living in Disrepair](#). The report detailed themes and learning points emerging from our casework. These included cases where vulnerable tenants had waited longer than necessary for repair or maintenance work to be completed and highlighted that the cost to anyone living in poor housing conditions is all the greater if the occupier is elderly or disabled.

More recently, we received further complaints of this nature. During the year 2024 – 2025, we intervened early (without an investigation) in 79 cases relating to disrepair and/or damp and mould. In addition, we recently issued 4 Public Interest reports against Cardiff Council, Flintshire County Council and Trivallis, a housing association. These investigations all found delays in responding to reports of disrepair and/or damp and mould, and involved vulnerable tenants and their families. This leads us to suspect these issues may affect tenants of other social housing providers.

Given the evidence outlined above, we are considering whether we should use the Ombudsman's own initiative powers of investigation to investigate this issue in Wales.

Those impacted

We believe that any investigation could focus specifically on experiences of vulnerable tenants, who could be more affected by issues with the quality of social housing. Examples of potential vulnerable groups are:

Disabled people

Evidence shows disabled people are over-represented among social housing tenants in Wales and face specific barriers - notably lack of accessible

housing, long waits for adapted properties, and disproportionate harm from poor housing conditions (for example, damp and mould).

Older people

While less likely to live in social housing than younger demographics, older people are a vulnerable group in the context of social housing because, as people age, their housing needs tend to change significantly (including concerns around mobility, accessibility, health, safety and warmth). Available evidence in Wales shows that older people face greater exposure to housing disrepair (particularly issues like damp, mould, poor insulation), and can live in accommodation that may not be well suited to their changing needs.

Young people and children

Children and young people are directly affected by housing, both as members of households in social housing and as young people transitioning into independent living. In Wales, child poverty rates remain among the highest in the UK and families with children make up a large share of those on waiting lists for social housing or in temporary accommodation. Poor housing conditions such as damp and mould pose particular risks to children's health and development, while long waits or frequent moves disrupt education and stability. For young people, limited access to affordable, suitable housing increases the risk of homelessness, especially for those leaving care or experiencing family breakdown. However, the evidence base for children and young people in Wales appears to be much stronger around access to housing, waiting lists, homelessness prevention, and temporary accommodation. Once households are actually in social housing, the data becomes patchier.

People from diverse ethnic backgrounds

Evidence indicates that while ethnic minority households are slightly underrepresented in social housing relative to their population share, they are more likely to experience overcrowding, economic pressures, and barriers to accessing suitable housing. Qualitative research also highlights experiences

of discrimination, cultural insensitivity, and limited access to tailored housing support services. Taken together, these factors suggest that ethnic minority tenants may face substantive disadvantages in securing and maintaining adequate, safe, and culturally appropriate social housing.

People on low income

Individuals on low incomes are disproportionately represented in social housing. These tenants often experience housing affordability issues, with many spending a disproportionate amount of their income on rent. Concerns about the quality of housing, including issues related to energy efficiency and maintenance, will disproportionately affect low-income tenants.

More broadly, we believe that any investigation could serve to address a significant gap in the understanding of the scale and nature of issues faced by different vulnerable groups in social housing in Wales. [The Anti-racist Wales Social Housing Baseline Survey](#) conducted by Tai Pawb found that 43% of organisations with housing stock were either unable or unsure if they could break down housing conditions data by household protected characteristics. This means that almost a half of social housing providers would not be able to identify how commonly issues around repairs and/or damp and mould are raised by particular vulnerable groups. Furthermore, our review of evidence suggests that research often focuses on difficulties faced by different groups in securing suitable housing. However, we know less of the extent of problems faced by these groups once housed.

Welsh language

We have not identified reliable data on how well Welsh speakers are represented among social housing tenants in Wales. However, social housing providers in Wales all have statutory duties under the Welsh Language (Wales) Measure 2011. As such, they are under a duty to ensure that their complaints process can be accessed in Welsh. The [Welsh Language Commissioner](#)

reported in 2015 that while many social landlords have commitments to provide services in Welsh, the actual implementation varies, and some tenants may not receive services in their preferred language. This could lead to misunderstandings, delays, and dissatisfaction with repair services.

Overall, while direct evidence of repair issues specific to Welsh speakers in social housing is limited, the potential for language barriers to affect service quality exists.

Invitation to respond

We are seeking views before we decide whether the Ombudsman should begin an investigation and if we do so, the scope of any such investigation or investigations⁶. We invite comments and evidence on whether it would be in the public interest for us to investigate issues relating to this matter and whether the Ombudsman is the appropriate body to undertake such an investigation.

We would especially welcome evidence or views from:

- Those who are residents of social housing accommodation, consider themselves to be vulnerable, and have experienced reporting concerns of disrepair and/or damp and mould to their landlord.
- Those who have experience in dealing with concerns about disrepair and damp and mould from vulnerable tenants.
- Those who have experience of assisting vulnerable tenants through the process of reporting concerns, or making complaints, to social housing providers.
- Social housing providers, including housing associations and local authorities.

⁶ In accordance with section 4(2) of the PSOW Act.

- Advocates.
- Third sector organisations.
- Elected representatives.
- Those with an interest in this subject.

Consultation questions

Please answer the following questions and provide an explanation to your answer, with examples where possible.

1. Do you consider that it is in the public interest for the Ombudsman to undertake an investigation into how social housing providers respond to reports and complaints relating to disrepair, with a focus on damp and mould, from vulnerable tenants?

Please explain your answer.

2. Do you consider it is reasonable to suspect that there is systemic maladministration in relation to how social housing providers respond to reports and complaints of this nature?

Please explain your answer with examples.

If you consider that it is in the public interest for the Ombudsman to investigate and that there is systemic maladministration in how such issues are handled by any social housing providers:

3. Do you consider that any investigation should focus on a particular vulnerable group?

If so, please specify which vulnerable group(s) and why.

4. Do you consider there are any particular bodies that should be investigated?

If so, please specify which bodies you believe should be investigated by the Ombudsman and why, providing any evidence you consider to be relevant.

5. What are the effects (whether positive or adverse) the proposed investigation would have on
 - (a) opportunities for persons to use the Welsh language, and
 - (b) treating the Welsh language no less favourably than the English language.
6. How could the scope of the investigation be formulated or revised so that it would have positive effects, or increased positive effects, on
 - (a) opportunities for persons to use the Welsh language, and
 - (b) treating the Welsh language no less favourably than the English language
7. How could the scope of the investigation be formulated or revised so that it would not have adverse effects, or so that it would have decreased adverse effects, on
 - (a) opportunities for persons to use the Welsh language, and
 - (b) treating the Welsh language no less favourably than the English language
8. Do you have any other comments you would like to share on our proposed investigation?

How to respond

Please share your views with us by **12:00 PM (midday) on 8 December 2025** in any of the following ways:

- **Complete our online form:** <https://www.surveymonkey.com/r/DJGGZYT>
- **Email** your response to OwnInitiative@ombudsman.wales
- **Call us** on 0300 790 0203 and ask to speak to the Own Initiative Lead Officer.
- **Post your response** to:

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- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

Responses to consultations may be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tell us.

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Click here to see our [Consultations Privacy Notice](#), which has more information about how we use your data for consultations.



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