



Ministry of Housing,  
Communities &  
Local Government

OFFICIAL

# Housing safety and quality system mapping

## User research report

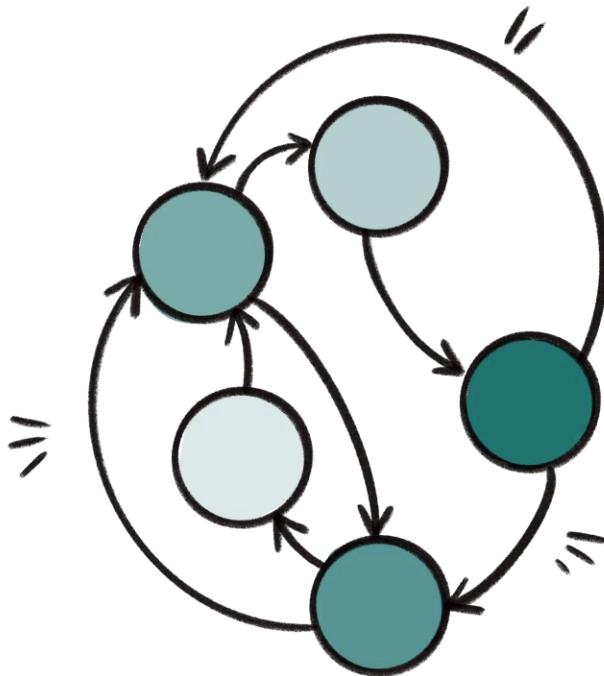
March 2025

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# Introduction



This project was completed by the Ministry of Housing Communities and Local Government's (MHCLG) System Design team in March 2025.

The project and its outputs aimed to give a high-level snapshot of the housing quality and safety system to support and inform internal teams. We've published our work because we believe it may be useful to others too.

Given the scale of the system and the short timeframe of the project, these outputs cannot offer an in depth or representative view of the whole system. So, the team will be continuing their work through future projects.

This document is marked as Official like the majority of information that is created, processed, sent or received in the public sector and by partner organisations. But the insights it contains reflect what we've heard from people at the heart of the system, rather than MHCLG policy positions.



# Contents

1. Research approach
2. Desk research insights
3. External user research with professionals – cross cutting themes
4. External user research with professionals – role specific insights

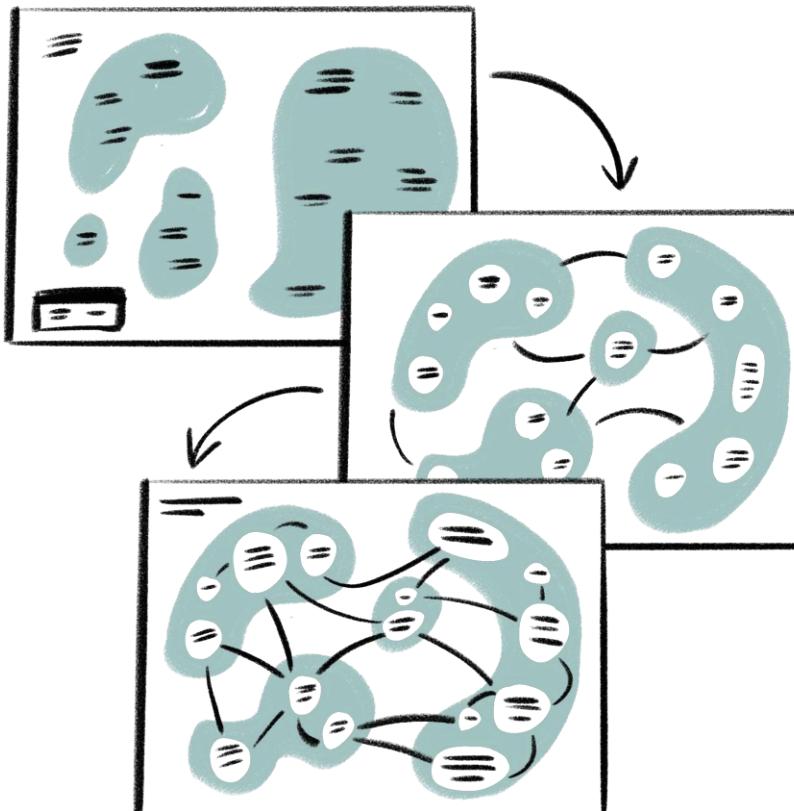
**This user research report is a companion to our end of project report, which you can also find in our GitHub repository.**

The End of Project report offers a summary of all research and design activities and outputs from the project. This User Research report aims to give more detail on our methods and the findings from our desk research and primary research with professionals.



# The ask

We are mapping the system of people and things that relate to the safety, quality and sustainability of residential buildings



Our key objectives are:

1. Visualising a clear view of the as-is system
2. Delivering insights about the reality of that landscape
3. Assessing and stress testing assumptions, guiding star proposals, and any reform proposals
4. Identifying gaps, challenges and opportunities for further change

# Research approach



# Research objectives

## Main research objective

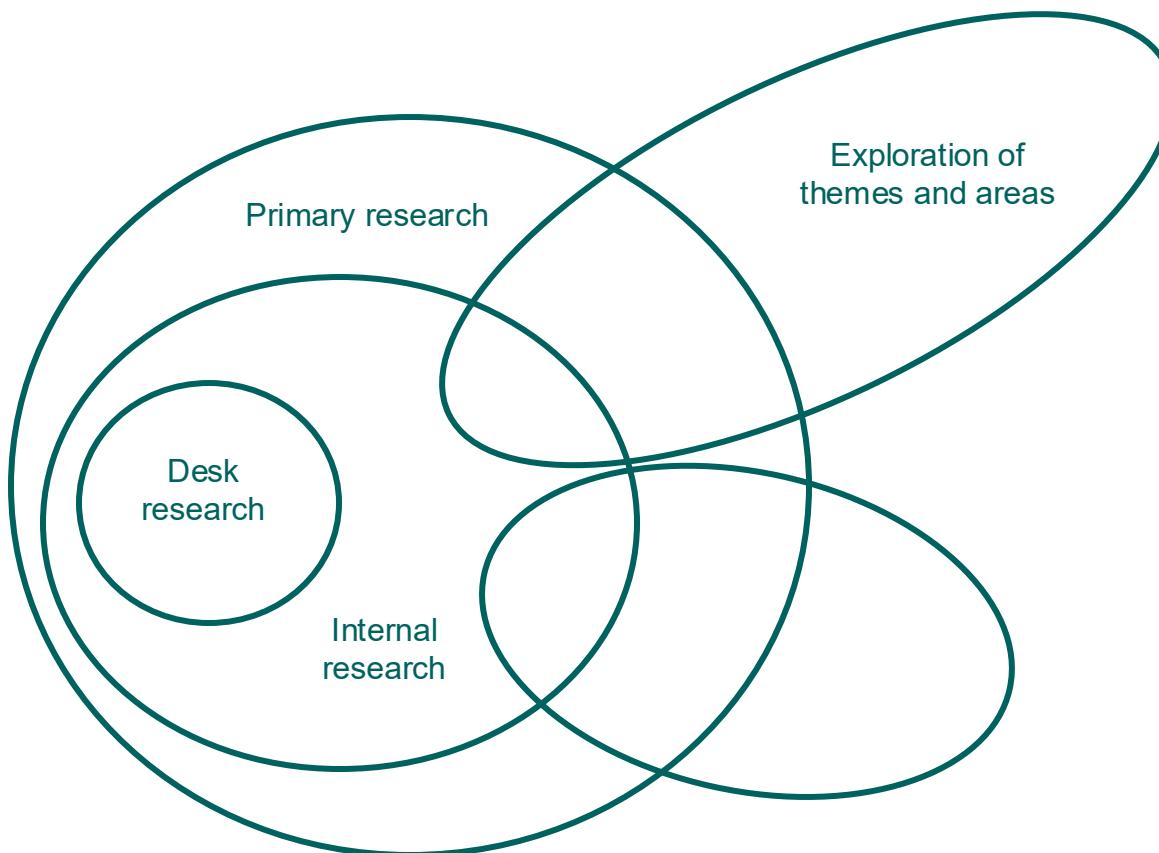
To explore and generate insights to enable a good understanding of the system we are working in, from the perspective of users, so that we can put their voices and experiences at the heart of system design work.

## To achieve this objective, user research will seek to:

1. Ensure a good understanding of the system in which we are working
2. Identify issues and pain points within the current system from a user perspective
3. Understand what is changing and the impact of that change from a user perspective
4. Determine what is needed to support users to implement changes
5. Ensure user insights inform the wider programme



# Research methods



To avoid duplication and enable speed, we started with research that already existed, drawing on existing data and insights to form an understanding of the current systems view.

Then we engaged and collaborated with internal and external stakeholders to add depth and value to the secondary research findings whilst closing knowledge gaps.

Primary research with key roles in the system allowed us to generate rich insights and inform our best understanding of the current system. We invited external users 1:1, moderated research sessions which were depth interviews around the context of the system and their place within it.

At each level we looked to gather insights from across the system, rather than diving deep into segments based on users or system areas.



# Our research in numbers



Desk research  
including **91** internal  
and external sources

Analysis of data  
from **13** sources

Research with  
**17** internal stakeholders

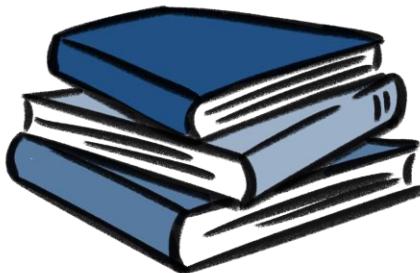
Research with  
**27** professional actors  
and residents in the  
system

Insights from the full range of research fed into our end of project report, which you can find in our GitHub repository. This report offers more depth into our desk research and research with professionals.

# Desk research insights



# Scale of the desk research

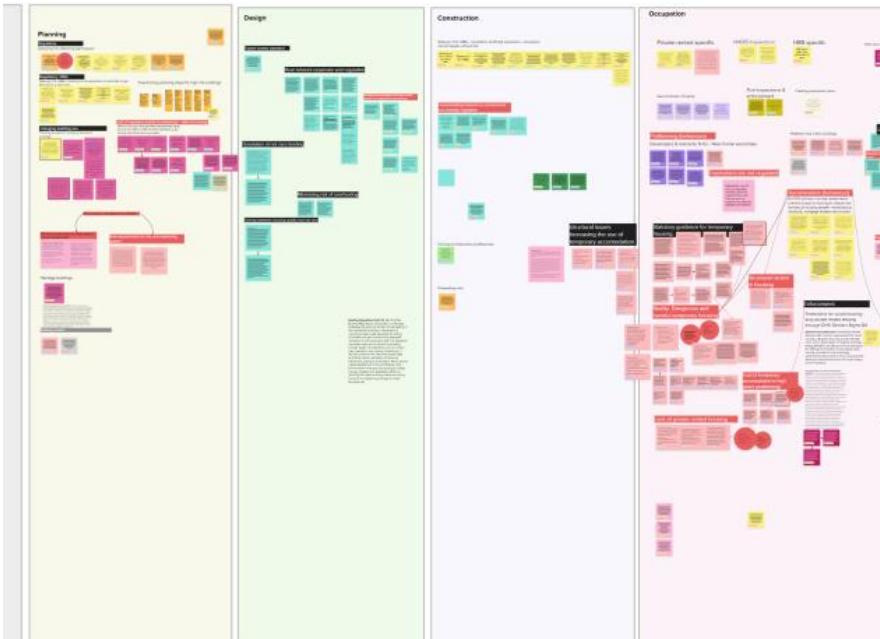


Desk research  
including **91**  
internal and  
external sources





# Limitations of our desk research



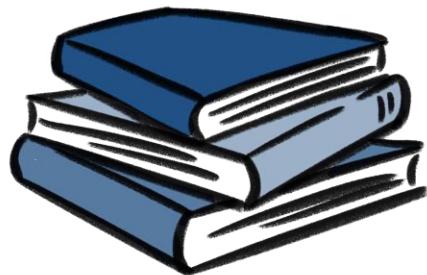
Some insights from our desk research including **91** internal and external sources

Desk research enabled us to synthesise insights about what we already know as a department and helped us to identify the gaps in our collective knowledge.

The output will not be ground-breaking as these insights are drawn from past research but it looks at the whole problem space and tries to join the dots between all existing research findings.



The data is limited as it speaks to the original ask of the data and doesn't provide the depth we need to fully understand what's going on within the system today. The lack of real time data may now not reflect the current themes and trends emerging.



# Summary of key findings

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- As a fundamental human need, housing is part of several wider systems (immigration, health, education) we don't control these, but need to be aware of the interconnectedness of our work
- Within the data we've analysed, fragmentation and complexity means it's hard for actors to see who/what/where/how/why. Regulation is often an example of this fragmentation and complexity.
- Competing demands on regulators, particularly at a local level, impacts enforcement capacity and activity
- Lack of regulation of temporary housing and office to housing developments may be leaving the most vulnerable residents in harmful conditions

# External user research with professionals

Cross cutting themes



# Who we spoke to (external research)

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Research with  
**27** professional actors  
and residents in the  
system

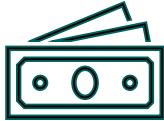
We aimed for a selection of professionals who could give us insights into how the system is working, this included:

- Local authority building control
- Architects (including principal designers)
- Environmental Health Officers
- Fire Safety Professionals
- Building Management
- Construction Products
- Developers
- Planner/housing delivery
- Programme Manager (LA Enforcement – consultant)

While these professionals shared a wealth of insight, there are still key groups missing and we were not able to achieve a representative sampling within groups.



# Cross cutting themes summary



## Culture and behaviour

Public sector professions and residents often feel worried about the personal and professional risk and responsibility they must take on. This risk is amplified by the ‘race to the bottom’ culture to increase profit over safety and quality which still exists. *[Read more on slide 17 and 18.](#)*



## Capacity & capability

Experienced professionals are stretched to capacity and the uncertain pipeline of newly skilled professionals throughout the system is jeopardising the safety and quality of existing homes and the system’s ability to build the homes that are needed. *[Read more on slides 19 and 20.](#)*



## Clarity and communication

Industry can struggle to meet expectations of regulators and government when they are uncertain about the detail of those expectations. *[Read more on slide 20.](#)*



## Resident experience

Residents in the worst housing are often the most vulnerable with more barriers to finding and accessing support. *[Read more on slides 21 and 22.](#)*



## Regulatory gaps

Key professions are currently unregulated, and the complexity of the housing landscape means regulation does not always fit residents' needs. *[Read more on slides 23 and 24.](#)*



## Sustainability

Sustainability for new builds can be dependent on client motivations. *[Read more on slide 25.](#)*



# Culture and behaviour

## The ‘race to the bottom’ culture to increase profit still very much exists

- Professionals from across the sector have emphasised that the race to the bottom is still a problem impacting the safety and quality of housing
- We heard that some private sector developers, and other professions involved in house building, are still doing the bare minimum to meet standards to keep costs low and profit margins high
- But professionals across the sector have explained that only meeting the minimum legal requirements is not enough to create good quality homes, there needs to be best practice
- Compliance and ensuring safety of homes can be seen by some actors as a burden rather than a responsibility
- Professionals in local authorities have highlighted how difficult it can be to hold developers to account after completion of buildings which is when most issues are identified



# Culture and behaviour

**Concern around personal and professional risk is prevalent throughout the system particularly for regulatory professionals and residents**

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- Compliance and ensuring safety of homes can be seen by some actors as a burden rather than a responsibility
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# Capacity and capability

**The stretched capacity and unclear pipeline of skilled professionals throughout the system is jeopardising the availability of safe and good quality homes**

- There are not enough people with the right expertise throughout the system from local regulators to small builders
- Crucial roles in public services such as Fire Services and Environmental Health are unable to recruit and retain staff due to high pressure and better incentives in private sector roles
- Most participants across Building Control, Fire Services and Environmental Health emphasised the impacts on staff wellbeing of increasing workload and responsibility for safety which is made harder by other actors in the system not prioritising safety when building and maintaining of housing
- Pressures are compounded, particularly for Building Control and Fire Services, as the BSR is drawing on the same local authority resource to fill multi-disciplinary teams for the new regulatory system for high rise buildings (known as the building gateways). These pressures are having consequences for house building. Delays with the Stage 2 Gateway for high rise buildings is adding months into projects and leading some investors to pull out of high-rise projects, creating the unintended consequence of slowing down house building
- The new accreditation for Building Control Inspectors has led many skilled professionals to take early retirement rather than go through additional exams. There is a greater risk of not receiving accreditation and no financial incentive to be accredited at Class 3 which is needed for high rise buildings.



# Clarity and communication



**Industry can struggle to meet expectations of regulators and government when they are uncertain about the detail of those expectations**

- Across professions, it was felt that ambiguity and gaps in the guidance around the building gateways for new buildings or safety case reports for in occupation buildings had left them struggling to submit good quality applications
- Those in design and construction wanted more conversation and communication with regulators, particularly where regulations had recently changed
- Professions feel that the implementation of new regulation/legislation is not always communicated well by government which makes it difficult for industries and professions to prepare for change
- One participant highlighted the confidence they felt after when they received what they felt was a good level of engagement from MHCLG when drafting recent legislation, including answering questions publication.



# Resident experiences



Many of the professionals we interviewed, work with or speak to residents on a regular basis. They gave their perspectives on their interactions and perceptions.

## **Workforce capacity issues, combined with residents' fear of eviction and unclear routes to get help, means issues become more dangerous**

- Pressures on staff capacity mean the sector is limited in being able to proactively identify issues, which can mean issues go unidentified and become more dangerous
- The regulatory system relies on residents or neighbours making a complaint. However, the correct body to report issues to can depend on your region, your tenure, whether your property is under warranty, the type of issue and who you have raised an issue with before. This means the system is difficult to navigate for all.
- Residents in privately rented housing may face or fear the threat of eviction or rent increases if they do complain
- Seeing these risks, some councils have adopted an approach to identify issues through partner agencies such as social services, the police or health care professionals to raise concerns which places less onus on vulnerable residents to navigate a complicated system



# Resident experiences



Many of the professionals we interviewed, work with or speak to residents on a regular basis. They gave their perspectives on their interactions and perceptions.

## Vulnerable residents, who need help with housing the most, face more barriers in finding and accessing support

Where the regulatory system is difficult to navigate for all residents, there are additional barriers which make this even harder:

- Housing issues aren't the only problems residents might be struggling with in their lives. They may have health, financial and/or family issues and the cumulative impact can make an already complicated system almost impossible to navigate
- For those who are able, and feel able, to complain to their landlord or housing provider, it's not clear to residents where they can go to next if that doesn't work
- This is particularly the case for the most vulnerable, or those for whom English is a second language
- For example, migrant workers are more likely to be living in overcrowded houses in multiple occupation with other safety issues. But they have less power to complain due to combination of barriers including fear of eviction or threats to safety and language barriers, combined with unclear routes to making a complaint
- Migrant workers may also be working for their landlord which adds an extra layer which means a complaint could result in losing their income as well as their home



# Regulatory gaps

**There are types of housing where regulation is falling short, leaving the most vulnerable in the worst conditions**

- Some Environmental Health Officers (EHOs) talked about how very poor-quality caravans are being rented out, exploiting the most vulnerable. Caravans are not covered under the 'Housing Act', making them more difficult to inspect and enforce against owners, and residents may be fearful of coming forward. Environmental Health can become aware of this when families present as homeless or try to apply for social housing
- Limited enforcement action can be taken against landlords of temporary accommodation in hotels or any setting not covered under Housing Act, unless proven to be a House in Multiple Occupation (HMO) through an HMO declaration
- Office to housing conversions skip formal planning processes allowing corners to be cut which only become apparent years later



# Regulatory gaps

**There are differing standards for professions which provide advice on building safety, which can have dangerous consequences**

- Fire Risk Assessor is not currently a regulated profession as set out in the Professional Qualifications Act, therefore there are no set mandated requirements for becoming, or carrying out work, as a fire risk assessor
- We heard reports of some fire risk assessors only advising on how to achieve the bare minimum requirements to support the building owner's goals of cutting costs, and at worst providing the wrong advice with dangerous consequences
- Most fire safety participants supported the need for regulation of fire risk assessors
- Some participants highlighted that the Principal Designer role is ambiguous and does not have the weight of accreditation needed to empower people in that role.
- One participant felt that the Building Safety Act created a new industry of opportunists e.g. 'Compliance officers' that are profiting from clients who feel uncertain about their obligations under the new act



## Sustainability for new builds can be dependent on client motivations

- Architects were most concerned about sustainability, but the race to the bottom can get in the way as their clients need to be willing to pay for sustainable design
- Greater London Authority include sustainability requirements as part of the planning process which helps to ensure that it is embedded as a minimum requirement
- There was a concern that the new gateway process could hinder innovation in sustainable design
- One architect mentioned a lack of consideration of energy performance alongside remediation work. Clients are focussed on removing unsafe cladding and are not wanting to increase insulation thicknesses once cladding is removed, as this could lead to more cost in adjusting balconies and windows. This could result in damp, mould and ventilation issues as an unintended consequence of remediation work in 10-15 years' time
- One construction product manufacturer representative said they plant trees for every square metre of membrane they produce, as well as recycle old materials that need replacing

# External user research with professionals

Role specific insights



# Role specific insights

This section shares role-based insight for some of the professions we engaged. Each section starts with a profile, then shares further insights.

Profiles give you a snapshot of the behaviours, frustrations and context of different users based on insights from our research. We designed them to be used to build a better picture of what those users are experiencing and to consider how different policy changes and interventions might be received.

## Local Authority Building Control Officer

Tend to have worked in local authorities for years. Sound understanding of the regulatory environment. Day to day activities include assessing compliance with building regulations and enforcing against non-compliance.

### Goals and wishes

- Better pay in line with private sector
- More staff
- Better incentivisation to register as Class 3 Inspectors (required for high-risk buildings)
- Appropriate technical expertise for roles involved throughout the construction and building control process
- More understanding and value of their role at management level and versus other roles
- Better oversight of private sector building control
- Clarity around the role now they are no longer allowed to advise applicants

### Frustrations

- Lost too many skilled people due to the accreditation system and feeling overstretched
- Felt unprepared for the new system and exam requirements
- Takes a long time to train up new people
- Having to pick up the pieces of private building control when businesses fail or the buildings they inspect aren't assessed properly (reversion applications)
- Having to pick up enforcement - feels like they are just becoming enforcers
- It is felt senior management don't always understand or value building control

### Behaviours and emotions

- Perform soft enforcement by speaking to responsible persons
- Struggling to manage workloads
- Frightened about being seen to give advice in case they are prosecuted
- Leaving for the private sector for better pay
- Retiring early to avoid more exams

### Relevant qualifications

- Must be registered with BSR and demonstrate skills within the building inspector competence framework (2 years+)
- To regulate on behalf of BSR for high-risk buildings may take up to 10 years

### Relevant legislation

- Building Safety Act 2022
- Building Regulations 2010
- Building Act 1984
- The Regulatory Reform (Fire Safety) Order 2005
- Fire Safety (England) Regulations 2022
- The Defective Premises Act 1972

### Who regulates this profession

- Building Safety Regulator

We currently have profiles for the roles we have the most robust insights for from this project; these are:

- Local Authority Building Control Officers
- Architects/Lead designers
- Environmental Health Officer
- Fire service

# Local Authority Building Control Insights

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## Who regulates this profession

- Building Safety Regulator



# Impact of the new regime

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## The implementation of the new accreditation system has been painful and unintentionally further reduced the workforce

- Participants told us that the implementation of the requirements for Building Control Inspectors to be registered and accredited has led to many officers with years of experience and skills to take early retirement
- Building Control Inspectors felt unprepared for the new accreditation scheme regime
- Inspectors would have wanted further training or support to navigate what they perceived as ambiguity in the guidance around the new expectations of the Building Control capability
- One participant highlighted that under the new accreditation system, there is no incentive to be accredited at Class 3 (competency level required for high rise buildings) because if you fail Class 3 exams, you instantly fail Class 2. There is also no pay incentive to be accredited at Class 3
- This has led to there not being enough Class 3 Inspectors, despite there being a demand, especially in big and growing cities like Manchester and London



# Impact of the new regime

## Building Control being unable to provide advice to industry has caused confusion

- Participants noted the change in relationship with applicants (i.e. the developer/builder/individual), where previously they could provide design advice to support with ensuring compliance, they are now not allowed to advise
- The responsibility is on the applicant and Building Control can only approve or reject applications
- However, participants told us that there is still a perception that Building Control is responsible for ensuring safety, which is in tension with the new regime placing the onus on the applicant
- There was widespread confusion about what would be considered advice and what Building Control could be prosecuted for. One participant with an oversight role across regions believes there is more of an understanding of what this involves now but highlighted the difficult start to the new regime
- Architects we spoke to also highlighted how the change in relationship is creating difficulties in ensuring projects meet regulation first time

Theme also found in research with architects



# Accountability for safety

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## **There is not enough individual responsibility and accountability for safety across the system**

- At a household level, the general public are not aware that they need building control for certain works and then realise when they try to sell
- At a large house builder level, participants told us that the perception is still that building control is solely responsible for ensuring safety. This perception exists in tension with new requirements for applicants to comply without receiving advice from building control
- Participants felt there is a lack of understanding of building control at the senior management level in local authorities, where a huge range of services must be considered, which means building control is not valued or prioritised
- One participant who was experienced with building control for individual properties felt that licensing and regulation of builders could drive up quality and place less reliance on building control to drive up standards



# Impact of private regulation

## Local Authorities lose inspectors to the private sector due to better financial incentives and the additional burden of enforcement

- Participants highlighted the lack of financial incentive to stay in Local Authority Building Control as an issue as the private sector offer a much higher salary and benefits
- Private Registered Building Control bodies do not have the power to enforce once works have taken place. Registered Building Control bodies do have the option to cancel an initial notice, when this happens if no other companies will take on the work the case will revert to Local Authority Building Control. This means that Local Authority building control workload is often made up of complex cases and enforcement.
- The sector's reliance on private building control can exacerbate local authority capacity issues if private sector companies go into liquidation, as any cases will revert to Local Authority Building Control
- Participants highlighted how local authorities are seen by industry as enforcers rather than inspectors, shifting their relationship with the sector

Theme also found in research with fire service

# Architect / Lead Designer insights

# Architects / Lead Designers

Manage projects from concept design to completion, ensuring compliance. Aim to create safe, high quality, aesthetically pleasing and functional buildings. Work closely with developers, engineers, regulatory bodies and fire safety consultants.

## Goals and wishes

- Clarity and support to successfully meet Gateway 2 applications
- More dialogue with BSR to resolve issues collaboratively and develop clearer technical guidance
- More and clearer communication with fire services and LA planning authorities
- Sector-wide, standardised education about the new Building Safety Act (BSA) 2022 and BSR changes for High-Risk Buildings (HRBs)
- Review of new roles that have emerged since the BSA 2022 and ensuring all roles have clear responsibilities
- A system where financial incentives are not prioritised over quality, safety, aesthetics and functionality.

## Frustrations

- Uncertainty on what makes a good Gateway 2 application and subsequent rejections
- Architects must now complete designs upfront, often before contractors are engaged, creating difficulties in providing complete plans for approval, causing Gateway 2 rejections.
- Clients struggle to understand cost and timeline implications of regulation compliance
- Clients and stakeholders lack understanding of new BSA regulation and although often responsible, the onus feels like it sits with architects
- Financial considerations are prioritised over well-designed, good quality, safe buildings

## Behaviours and emotions

- Motivated by designing the best buildings they can, always with an eye to safety, practicality and environmental/sustainability factors
- Go outside of their profession to share knowledge and best practice
- Approve of BSA but finding it difficult to work with the current implementation of it

## Relevant qualifications

Architects need to complete Parts 1, 2 and 3 of architectural training

- Part 1: a degree recognised by the Architects Registration Board
- a year of practical work experience
- Part 2: a further 2 years' full-time university course like a BArch, Diploma, March
- a year of practical training
- Part 3: a final qualifying exam

## Relevant legislation

- The Architects Act 1997
- Building Safety Act 2022
- Building Regulations 2010

## Who regulates this profession

- Architects Registration Board



# Impact of new legislation

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## There is a conflict arising from the new legislation with traditional design and procurement methods

- The requirement for fully detailed designs before construction approval (Gateway 2) conflicts with traditional procurement methods, which typically involve phased design and construction
- Architects must now complete plans upfront, often before contractors are engaged, causing difficulties in providing complete information for plans and leading to Gateway 2 rejections
- As regulators reject applications without engaging in dialogue about how to fix problems, this can create delays, inefficiencies and uncertainty for projects and lead to them becoming financially unviable
- In response to the lack of clear guidance, some industry groups are proactively creating best practice frameworks, such as the Architectural Technical Leads Group (ATLG) which is a forum for architects and designers to discuss technical issues, share knowledge and resources
- Collaboration across firms is increasing, with architects and designers sharing insights and redacted regulatory feedback with each other to improve their compliance strategies
- The lack of clear guidance can be exploited to produce the lowest-complying homes



# Impact of new legislation

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**New legislation has inadvertently increased bureaucratic layers but many professionals in the system are still not aware of the legislative changes**

- Many in the construction and design sector remain uninformed or ill-prepared for the new regulatory framework
- Architects and Principal Designers often have to educate other stakeholders, such as contractors, clients and project managers, about the new processes
- Clients and contractors often lack a clear understanding of their responsibilities, leading to misplaced duties and over-reliance on architects to resolve compliance issues
- There is a lack of industry-wide standardisation and training to align professionals on how to navigate the new system
- The new regulations have led to the emergence of additional roles, such as Building Safety Advisors and Compliance Managers, adding complexity and cost to projects. These roles sometimes create confusion in accountability and duplicate responsibilities, leading to inefficiencies.
- A lack of enforcement against incompetent or unqualified professionals claiming expertise in building safety further complicates the industry landscape.



# Wider landscape

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**There is a tension between the financial pressures felt in the system, and the social responsibility and housing need that should be addressed**

- Architects highlighted that safe, high-quality housing is fundamental to social well-being, advocating for housing to be treated as infrastructure rather than just a real estate asset.
- Some expressed concerns about redevelopment strategies leading to a reduction in social housing availability, often replaced by higher-cost private developments.
- The industry is experiencing a "race to the bottom," where cost-cutting takes precedence over best practices in safety and quality. Developers and clients often seek to meet only the legal minimum requirements rather than invest in enhanced safety and compliance. This means even where architects may have ambitions to design to high quality and safety standards, they must respond to their client's constraints and requests.
- We also heard reports of contractors substituting non-compliant or lower-quality materials which were not in original designs without thorough reviews.

# Environmental Health insights

# Environmental Health Officers (EHOs)

Spend a lot of their time coordinating with other agencies. Work includes inspecting housing, resolving landlord-tenant disputes, enforcement against rogue landlords and checking fire safety compliance. Strong enforcement role.

## Goals and wishes

- More staff to ease caseload burden & make the role more attractive to new recruits to prevent attrition
- Streamlined enforcement processes & stronger legal powers to hold rogue landlords accountable  
Greater funding and secure funding streams
- Clearer roles and responsibilities across agencies in the planning process especially fire services and building control
- Better coordination of agencies involved in complex cases
- Reconsider out-of-county tenancies
- Communication could be improved between agencies to stop any confusion about who is responsible for enforcement

## Frustrations

- Under-resourced teams due to budget cuts, burnout and lack of newly-qualified EHOs
- Increasingly complex cases
- Lack of capacity for proactive work mean less serious cases become more problematic over time
- Tenant's and landlord's perception of their rights can often conflict with those they may seek redress with
- Cross-agency communication is poor e.g. they may have to manage complex fire safety issues without Fire Service support
- Rogue landlords exploiting gaps
- Enforcement is time-consuming, costly and can be ineffective
- Selective licensing and civil penalty fines are hard to collect in practice
- Out-of-county tenancies are hard to inspect and underfunded

## Behaviours and emotions

- Strive to keep people safe but it's becoming difficult due to caseloads
- Frustrated by the lack of communication between agencies (for example between environmental health, police, social services, fire service)

## Relevant qualifications

- Registered with the Chartered Institute of Environmental Health
- Relevant BSc, MSc or apprenticeship qualification, including professional portfolio

## Relevant legislation

- Housing Act 2004
- Housing and Planning Act 2016
- Homes (Fitness for Human Habitation) Act 2018
- Landlord and Tenant Act 1985
- Renters Rights Bill 2025
- Environmental health also enforce a wide range of legislation beyond housing

## Who regulates this profession

- Chartered Institute of Environmental Health



# Limited resources

**Environmental health teams are understaffed and overwhelmed. Inter-agency working could help to resolve issues but there are challenges for making this happen.**

- Environmental Health enforcement teams are under-resourced, with many councils unable to recruit new staff due to budget constraints. Enforcement teams are overworked, leading to staff burnout and sickness absence As a result:
  - Complaints take longer to process, and some housing issues remain unsolved for months. Issues like damp, mould and fire hazards are not addressed quickly and tenant safety is compromised.
  - There is less preventative work and more reactive enforcement as local authorities have to prioritise statutory obligations over best practices.
  - Rogue landlords face fewer consequences as enforcement is delayed or deprioritised.
- Councils partner with police, fire services, immigration and social services to address housing safety and rogue landlords. Cross-agency cooperation is essential for example where EHOs are expected to inspect high-rise buildings but lack fire engineering expertise. But there are two key barriers:
  - Limited capacity across all of the required organisations, has left them struggling to collaborate and provide additional support
  - The division of responsibilities between LAs and fire services is unclear, leading to confusion and inaction



# Wider landscape

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**Increasing complexity of cases puts pressure on EHOs already limited capacity and ultimately makes roles less attractive for new recruits.**

- Cases are no longer straightforward. Damp, mould and fire safety complaints are the most common, but issues often intersect with poverty, immigration status and tenant fear of eviction, meaning EHOs may have to liaise with multiple departments to understand and resolve issues.
- Hoarding, pest infestations and dangerous structures make some cases exceptionally difficult for officers to deal with
- Expectations from the public, which are based on customer service elsewhere, are not always in line with what can be accomplished within teams
- Many tenants fear retaliatory evictions and are hesitant to report unsafe conditions



# Tracking and enforcement

**EHOs feel their current legal enforcement mechanisms are weak and are looking for more strategic tracking and data to support their enforcement work**

- Licensing provides a revenue stream for enforcement work, but it is not a complete solution with some landlords find ways to evade licensing, limiting its effectiveness.
- Civil penalties are difficult to enforce with many fines not being collected
- Councils currently use Selective Licensing Schemes to track landlords and enforce housing standards
- Some landlords repeatedly violate laws but there is no effective system to prevent them from continuing to operate. The Renters Rights Bill currently before Parliament has provisions to tackle some of these problems and a national landlord database is being developed
- The 'fit and proper person' test is often ineffective, as rogue landlords can find a proxy to hold their licence
- Landlords resist enforcement, arguing that they lack funds for required repairs

# Fire and Rescue Services Insights

# Fire and Rescue Service

Day to day activities may include leading fire and rescue services' response to emergencies and preventative work in communities such as home safety checks. Alongside the day job, co-ordinating the response to remediation of high-risk buildings and being a part of multi-disciplinary teams to assess high risk building control applications.

## Goals and wishes

- Improve retention of fire services staff
- Better incentives for fire services staff
- Regulation of Fire Risk Assessors and Fire Engineers to improve quality of assessments
- Access to more Fire Engineers
- Improvements to regulatory practices

## Frustrations

- Problems with capacity and retention
  - losing trained staff to the private sector and local authorities who offer better incentives
- No power to regulate the inside of homes, where most fires happen
- Lack of Fire Engineers and limited providers of fire engineering degrees
- Find it challenging to work with regulators due to conflicting priorities and levels of experience between agencies
- Backlog for remediation of Higher Risk Buildings (HRBs) is putting pressure on the workforce

## Behaviours and emotions

- Strive to protect the public from fire risk but finding it harder due to lack of resource
- Engage with various professions and agencies including local authorities, trading standards, the police, BSR and MHCLG

## Relevant qualifications

- Fire safety Competency Framework
- Up to 3 years to train a member of staff

## Relevant legislation

- The Regulatory Reform (Fire Safety) Order 2005
- Fire Safety (England) Regulations 2022
- Fire and Rescue Services Act 2004

## Who regulates this profession

- His Majesty's Inspectorate of Constabulary and Fire & Rescue Services – inspects
- National Fire Chiefs Council – sets standards



# Capacity and capability

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## Fire services are losing staff to the private sector and LAs due to better incentives

- Participants highlighted difficulties with capacity and retention of fire service staff which makes it more difficult to manage risk in their areas
- Fire services are investing in training up their staff, and once trained, are losing them to the private sector and local authorities who can offer better incentives
- One fire service is trying to write into contracts that staff who leave before a certain time need to pay back the money spent on training or degrees, but the private sector signing bonuses mean this does not have much of an impact
- Remediation work for high rise buildings is also putting pressure on the workforce as the BSR is drawing on Fire services resource for multi-disciplinary teams for high-risk buildings
- There are a lack of fire engineers both within the fire services and the private sector. We heard that there is only one provider in England where you can train for a fire engineering degree, despite there being a demand for this profession
- Lack of funding was also highlighted as an issue impacting the capacity and capability of the fire services



# Support for professional regulation

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## There is strong support for continuous monitoring and regulation of fire risk assessors and engineers

- There was strong support for better regulation of Fire Risk Assessors and Fire Engineers as recommended by the Grenfell Inquiry
- Participants felt that if they could trust that Fire Risk Assessors were competent, it could help Fire Services to manage workload and risk
- We heard reports of many Fire Risk Assessors only advising on how to achieve the bare minimum requirements to support the building owner's goals of cutting costs, and at worst providing the wrong advice with dangerous consequences
- Some participants suggested that if assessments or other outputs are incompetent, accreditation or registration should be removed



# Limitations of the Fire Safety Order

## Fire services have no power to regulate the inside of homes, where most fires happen

- While the Fire Safety Order (2005) gives fire services the powers to inspect homes where required and risk assessments for multiple dwelling buildings, consideration should be given to the range of locations of sources of ignition and combustible materials. Typically, the focus of these efforts is on shared spaces and entryways and participants highlighted their concerns about having a lack of enforcement power over the inside of people's flats and houses, where most fires start
- Some examples were shared of prevention activity becoming ineffective because of resident behaviour, presenting a danger to themselves and others, for example, in the case of hoarding
- The complexity of resident behaviours and actions was recognised as factors such as mental health and addiction can influence residents home environments and require multi-agency support
- One participant felt the Building Safety Act could have gone further to better regulate the inside of people's homes to protect residents