

Written evidence submitted by Derby City Council

Derby City Council is at the forefront of Councils undertaking work into the local relationship between poor quality housing and poor health – this work includes a:

- Private sector housing Stock Condition Survey
- Private Rented Sector Housing Stock Condition Survey
- Housing Health Impact Assessment.

Following funding received from MHCLG, the Council has also undertaken a physical survey of a sample of privately rented homes in the City. Whilst still in analysis, initial results indicate that the condition of privately rented homes in the more deprived areas of Derby is appreciably worse than privately rented homes of similar type surveyed as part of the English Housing Survey. For example, 37.5% of pre-1918, mid-terraced homes in the 20% most deprived areas (from IMD 2019) have an HHSRS Category 1 hazard for ‘Falls associated with Stairs and Steps’ – this compares to just 8.8% of similar homes in the EHS data modelled as part of the stock condition surveys. This strongly suggests that conditions in the Private Rented Sector are significantly worse than shown in the evidence available to Government. This has significant implications for health and wellbeing of residents and has significant impacts on services such as health and social care brought about by health impacts of poor quality housing.

In undertaking these studies, several notable problems have been identified. We would ask that Government consider making available information which would support both local government’s analysis and licensing / enforcement of the PRS, including:

1. A live, national register of privately rented homes / tenure at address level. (Combining data from local and national sources, identifying all homes within the PRS remains extremely difficult, not least because of the number of landlords failing to register tenant deposits. Further, the tenure of homes within an area changes on a daily basis.)
2. Address level, property age and type information held by the Valuations Office Agency.
3. A common Unique Property Reference Number in all datasets produced by / on behalf of Government.

We welcome the Government’s commitment to improve housing standards in the Private Rented Sector and would invite dialogue between DLUHC and Derby City Council to support

improvements. A key factor behind this is ensuring Local Authorities have the skills and resource to work with landlords and enforce better standards.

The “Environmental health workforce survey report: local authorities in England” (<https://www.cieh.org/policy/campaigns/workforce-survey-england>)

report recognises the very significant pressures on recruiting and retaining Environmental Health staff. In England, approximately 25% of EHOs work in the field of Private Sector Housing. The difficulties caused by recruitment and retention as well as significant budget constraints will have a fundamental impact on improving the PRS, due to significant capacity issues. Any efforts by Government to improve the PRS should therefore be accompanied by a concerted effort to increase capacity in this sector.

Given the difficulties in recruitment, Derby City Council has sought to identify opportunities to ‘grow our own’ Housing Standards Officers through training courses. One opportunity considered was to apply Apprentice Levy Funding towards offering the opportunity to attend a stand alone Certificate in Higher Education (or similar) to obtain appropriate qualifications. However, we are advised that currently, there are no stand alone Apprentice Levy funded Housing Standards courses offered at any University in the UK (the closest equivalent being a 3-4 year full Environmental Health degree). In order to seek to establish such a course, we would need to go through a very long winded process involving a range of organisations, taking at least two years to set up <https://www.instituteforapprenticeships.org/developing-new-apprenticeships/developing-an-apprenticeship-occupation-proposal/>. We would ask that Government consider this issue and identify ways in which this can be addressed urgently to ensure Housing Standards officers can be trained and recruited by Local Authorities to fill the skills gaps and help to improve the Private Rented Sector.

January 2022