

# **Response to DHSSPS Home Accident Prevention Strategy 2014 – 2024**

August 2014

## **1. Introduction**

Housing Rights Service was established in 1964 and is the leading provider of independent specialist housing advice services in Northern Ireland. Housing Rights Service works to improve lives by tackling homelessness and housing problems in Northern Ireland. Our policy work is based on the experience of our clients. Our services are delivered throughout Northern Ireland and focus on the key areas of preventing homelessness; accessing accommodation; and tackling affordability and poor housing conditions.

## **2. Summary**

Housing Rights Service welcomes the opportunity of responding to this consultation paper. The relationship between poor quality housing and home accidents has been well documented by a number of agencies and individual researchers. Yet it is surprising that this synergy is not mentioned in the consultation document. We are disappointed that the impact of poor housing on home safety is not referenced as a risk factor particular when there is such strong emphasis placed by the Department on the correlation with poverty, deprivation and health inequalities. The risk of having an accident can greatly increase in poor and inadequate housing in addition to circumstances such as disability, illness, or other types of vulnerability.

This review is opportune as, for the first time in many years, the rate of unfitness in Northern Ireland's housing stock has increased from 2.4 % in 2009 to 4.6 % in 2011,<sup>1</sup> reflecting the lower levels of disposable income available to owners and occupiers for improvements and repairs and the dramatic reduction in grant aid, particularly discretionary grants, made available by government in the private housing sector.

We believe the current housing fitness standard is unable to address the most common health and safety defects found in rented accommodation and we believe the consultation exercise should consider the introduction of the Housing, Health and Safety Rating System (HHSRS), which exists in England and Wales, in order to address safety concerns and improve in particular the health and well-being of private tenants in Northern Ireland.

We would also like to see a recommendation in the strategy making it a requirement for carbon monoxide and smoke alarms to be installed and maintained in all private rented homes. In addition, we would encourage the Department to consult with the Department for Social Development (DSD) on electrical safety issues in this sector.

## **3. Poor Housing and Health**

The link between poor quality housing and home accidents is well documented in the research record. According to the Chartered Institute of Environmental Health (CIEH):

*“Evidence suggests that living in poor housing can lead to an increased risk of cardiovascular and respiratory disease as well as to anxiety and depression. Problems such as damp, mould,*

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<sup>1</sup>NIHE Northern Ireland Housing Market Review & Perspectives 2012-2015, Pg 47

*excess cold and structural defects which increase the risk of an accident also present hazards to health.”<sup>2</sup>*

In a report published by the Parliamentary Office of Science and Technology (2011)<sup>3</sup> it was stated that “45% of accidents occur in the home and accidents are in the top 10 causes of death for all ages.... Housing-related hazards that increase the risk of illness ....include damp, mould, excess cold and structural defects that increase the risk of an accident (such as poor lighting, or lack of stair handrails).”

The report also stated:

*“The quality of the home has a substantial impact on health; a warm, dry and secure home is associated with better health. In addition to basic housing requirements, other factors that help to improve well-being include the neighbourhood, security of tenure and modifications for those with disabilities. Overall the Building Research Establishment (BRE) has calculated that poor housing costs the NHS at least £600 million per year.”<sup>4</sup>*

In a more recent report, commissioned by CIEH and undertaken by Dr Jill Stewart from the University of Greenwich *Effective Strategies and Interventions: environmental health and the private housing sector* (2013)<sup>5</sup>, examples are highlighted of innovative environmental health practices, including partnership working, to demonstrate the fundamental importance of focusing on housing as a social determinant of health and the potential for improved health outcomes and impacts.

We agree with the statement in the consultation document that “the aim and objectives of this Strategy can be achieved if there is a coordinated approach which ensures effective partnership working between Government departments, statutory, private, voluntary and community sectors”. However we would question why there is no cross-departmental initiatives proposed with DSD and would propose that housing bodies such as the Northern Ireland Housing Executive and housing associations should be highlighted as partners in this strategy.

As the consultation paper points out, here are groups in society who are especially vulnerable to accidents in the home such as young children and elderly people, particularly under-5s, over-65s and “those who are socially deprived suffer disproportionately from the unintentional injuries that result from home accidents”. In addition, the consultation paper states: “Accident trends vary and the type of accident suffered can be influenced by a range of factors such as weather, time of the year, demographics, economic factors.”

We also note that the risk of having an accident can increase depending on a range of circumstances including disability, illness, multiple medications or other types of vulnerability. We would also add poor quality of housing to this list of factors that increase the risk of accidents.

Although the consultation paper makes a brief reference to “The environments in which people live do much to determine injury risks and opportunities for injury prevention”, this consideration is not

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<sup>2</sup> See <http://www.cieh.org/policy/housing/poor-housing.html>. Accessed 11/08/14

<sup>3</sup> Housing and Health Post Note Number 371 (January 2011)

[http://www.parliament.uk/documents/post/postpn\\_371-housing\\_health\\_h.pdf](http://www.parliament.uk/documents/post/postpn_371-housing_health_h.pdf). Accessed 11/08/14

<sup>4</sup> Ibid

<sup>5</sup> See <http://www.cieh.org/WorkArea/showcontent.aspx?id=46516>. Accessed 12/08/14

developed and there is no discussion of the well documented concerns with fitness standards particularly in the private rented sector (PRS). The PRS is of growing importance for housing provision for those in housing need and the costs of unhealthy and unsafe housing are of increasing concern with poor housing conditions increasing demands on the NHS.

According to Dr Stephen Battersby, former President of the CIEH: “Local housing authorities need to find different ways of working and managing information to ensure so that they are better able to protect the health and safety of those who are tenants of more irresponsible landlords. Dealing only with complaints is not an adequate approach.”<sup>6</sup>

#### **4. Private Rented Sector**

The 2011 House Condition Survey confirmed that although the profile of the PRS housing stock has extensively changed, fitness standards are still substantially lower than other sectors. Although the level of unfitness has reduced, falling from 2.7% in 2006 to 2.0% in 2011, this rate is still much higher compared to the social housing (0.1%) and owner occupied (1%) sectors. Furthermore, 8.2% of PRS properties were deemed to be defective in 2011 compared to only 1.5% for social housing and 3.2% in owner occupation. In the PRS, the non-decency rate was 10.2% (12,830 properties) a reduction from the 17% of properties recorded in 2009. The corresponding figures for the social housing sector were 3.7% and 8.2% for owner occupation. In 2011, 7.5% of PRS homes (9,350 properties) had Category 1 hazards, compared to 2.1% in social housing. According to NIHE: “there is a growing (income-based) segregation in the private rented sector, with lower income households more concentrated in poorer quality housing and an increase in overcrowding”.<sup>7</sup>

#### **5. Carbon monoxide poisoning**

We welcome the identified priority issues for focus in the proposed strategy as: falls, carbon monoxide, smoke, fire and flames, and blind cords. As the consultation paper points out:

*“The majority of deaths and serious injuries caused by house fires are the result of exposure to smoke and toxic gases produced by the fire, rather than exposure to heat and flames. Carbon monoxide poisoning is the main cause of death following smoke inhalation. Smoke also obscures the vision of those trapped by fire, decreasing their ability to escape to a place of safety.”*

In young people aged 15-19 accidental poisoning is the main cause of death. Of the 17 accidental poisoning deaths in those aged 10-19, referred to in the consultation paper, nine were due to carbon monoxide poisoning.<sup>8</sup> Exposure to carbon monoxide by any fossil fuel-burning appliance that is not properly installed or regularly serviced can lead to death or illness. The *Power NI Carbon Monoxide Report* (2011) showed that 69% of their customers said they had not undertaken the recommended annual boiler check.<sup>9</sup>

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<sup>6</sup> Are Private Sector Tenants Being Adequately Protected? A study of the Housing Act 2004, Housing Health and Safety Rating System and Local Authority Interventions in England. Dr Stephen Battersby. June 2011.

<sup>7</sup> NIHE Northern Ireland Housing Market Review & Perspectives 2012-2015

<sup>8</sup> PHA analysis of deaths data from The General Register Office for Northern Ireland

<sup>9</sup> RoSPA Big Book of Accident Prevention NI <http://www.rospa.com/PublicHealth/big-bookni.pdf>

We would like to see a recommendation in the strategy making it a requirement for carbon monoxide and smoke alarms to be installed and maintained in all private rented homes. We note that the UK Government is currently considering this proposal as part of a wider review of the PRS in England.<sup>10</sup>

## 6. Electrical safety

A study produced by the Electrical Safety Council (ESC) found that private tenants are more likely to be affected by electrical accidents and fires with landlords exposing themselves to significant financial risks, from fines and invalidated insurance by not acting on their electrical safety obligations.

The ESC reports that 1.7 million private renters across the UK have reported electrical concerns that were either ignored by their landlord or acted on too slowly<sup>11</sup>, and 1.3 million renters were waiting for electrical issues to be resolved<sup>12</sup>. The study also found that more than 2 million private tenants have expressed concern about the electrical safety of their home<sup>13</sup>. The ESC recommends landlords should have electrical appliances and installations checked at least every five years by a registered electrician, along with carrying out regular visual checks themselves.

Phil Buckle, Director General of the ESC, has stated:

*"We've found that many landlords are ignorant of their responsibilities. In the long term, we'd like to see tighter guidelines for landlords on electrical safety but with the number of non-professional landlords increasing every day, we also need to address this now. We need all landlords to understand that they are not only putting people's lives at risk, but they could also face serious financial loss through fines or invalidated insurance if they don't act on their existing obligations."<sup>14</sup>*

The UK Parliament's Communities and Local Government Committee has recommended legislative change in this area. In its report on the PRS, which was published in July 2013, the Committee recommended that the Government develop an electrical safety certificate and legislate to ensure that landlords carry out full wiring checks every five years. This recommendation is backed by ESC, CIEH, the National Private Tenants Organisation, the Residential Landlords Association and the National Association of Professional Inspectors and Testers - an electrical certification body. We would encourage the Department to consult with DSD on this issue.

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<sup>10</sup> See <https://www.gov.uk/government/news/government-to-review-policy-on-smoke-and-carbon-monoxide-alarms>. Accessed 11/08/14

<sup>11</sup> 17% of current tenants agreed with the statement 'I reported concerns with the state of the electrical safety of the property and this was either not addressed or response was too slow'. The ESC estimates there are approximately 9.74 million private tenants in the UK, based on ONS 2011 Census data for number of PRS households, combined with data on average household size and TGI statistical analysis.

<sup>12</sup> 13% of current renters agree with the statement 'I am currently awaiting electrical issues to be resolved in my property'.

<sup>13</sup> 22% of renters agreed with the statement 'I have been concerned about the electrical safety of the property I was living in'.

<sup>14</sup> ESC press release. 6 June 2013. <http://www.electricalsafetyfirst.org.uk/news-and-campaigns/press-releases/2013/06/landlords-risking-lives-and-livelihoods-by-ignoring-electrical-safety/>. Accessed 11/08/14

## **7. Housing Health and Safety Rating System**

When considering this proposed strategy, within the broader context of other strategic priorities, there is a clear link with the DSD's current review of the statutory housing fitness standard. As we have discussed, any improvement on the basic statutory housing standard is likely to have a complimentary impact on the risk of home accidents. This would be particularly relevant if the DSD adopted the system that currently applies in England and Wales, namely, the Housing Health and Safety Rating System, (HHSRS).

The HHSRS is a risk-based evaluation tool that has been designed to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. The HHSRS assesses 29 categories of housing hazard. Each hazard has a weighting which helps to determine the risk rating of the property.

Judgements are made by reference to those who, mostly based on age, would be most vulnerable to the hazard - even if people in these age groups were not actually living in the property at the time. This focus on age would clearly be consistent with the objectives under discussion in this consultation exercise, namely, young children - particularly those under 5, and people over 65. We believe the HHSRS would also be an effective tool in helping to reduce health inequalities generally.

The HHSRS is, in fact, a comprehensive assessment of the potential health problems associated with a dwelling. It is specifically targeted at identifying anything that could cause harm or ill health, often referred to as "the effect of the defect". Also, it is evidence-based and is supported by extensive literature reviews and by detailed analyses of statistical data on the impact of housing conditions on health and therefore can be adapted to take account of the latest research and information.

Unlike the current Home Safety Check schemes, the HHSRS would be a statutory standard that district councils would be obligated to apply along with a range of enforcement options to ensure compliance. Although the HHSRS would not be able to address all the issues that can be covered by the advisory Home Safety Check schemes, there would still be a clear opportunity for these two processes to work effectively in tandem to reduce home accidents.

Also, because the HHSRS has already been operational for a number of years, enforcement officers in Northern Ireland would be able to make immediate use of existing resources in England and Wales for both training and enforcement purposes.

The relevance of the HHSRS has also been recognised by the Federal Government of the United States of America where it has been adopted as the National Healthy Housing Standard as the Healthy Home Rating System. This is clearly a significant endorsement of the system.

It is recommended that DHSPPS liaise with the DSD regarding the introduction of the HHSRS as an important complimentary tool in the prevention of accidents in the home.

## **8. Further information**

Housing Rights Service be pleased to provide additional information in support of this response. For further information contact:

Peter O'Neill

Policy & Participation Officer  
Email: [peteroneill@housingrights.org.uk](mailto:peteroneill@housingrights.org.uk)  
Tel: 028 90245640