

# **Housing Health & Safety Rating System (HHSRS)**

## **Official Definition and Purpose of HHSRS**

The Housing Health and Safety Rating System (HHSRS) stands as a pivotal risk-based evaluation tool employed by local authorities across England and Wales to scrutinise residential dwellings for potential hazards that could compromise the health and safety of occupants. Introduced under the auspices of the Housing Act 2004 and fully implemented in April 2006, the HHSRS marked a significant departure from the preceding Housing Fitness Standard, a system identified as having inherent limitations in its ability to effectively differentiate between minor property defects and genuine threats to well-being. The paramount objective of the HHSRS is to proactively identify and mitigate potential health and safety risks present within residential properties, thereby fostering safer living environments.

This system adopts a tenure-neutral stance, meaning its principles and assessment methodologies are applicable across the spectrum of residential housing, encompassing private rented, social rented, and owner-occupied properties. However, statistical evidence indicates that the majority of HHSRS-related work is concentrated within the private rented sector, a reflection of generally poorer housing conditions observed in this segment. The transition from a simple “pass or fail” criterion to a nuanced, risk-based evaluation underscores a strategic shift towards a more evidence-driven and targeted approach to housing standards. This refined methodology enables local authorities to channel their resources and interventions towards addressing hazards that pose the most substantial threats to the health and safety of residents.

It is important to note that the HHSRS primarily focuses on matters directly impacting health and safety, rather than issues of comfort, general quality, or mere convenience. While aspects of comfort or quality might indirectly affect a person’s physical or mental health, the core concern of the HHSRS remains the identification and assessment of genuine hazards. The system operates by evaluating two key factors: the likelihood of an event occurring that could cause harm within the subsequent 12 months, and the potential severity of the outcomes should such an event transpire. This temporal aspect provides a practical framework for assessment, aligning with typical tenancy durations and the planning horizons for property maintenance cycles, allowing for a realistic appraisal of potential risks, both immediate and those that may develop over a foreseeable period.

## **Context within the UK Social Housing and Retrofit Sectors**

Within the social housing sector in the UK, the HHSRS serves as an indispensable tool for social landlords in their ongoing efforts to maintain and improve their housing stock. Social housing providers are expected to conduct HHSRS assessments as an integral part of their routine stock condition surveys, enabling them to proactively identify and address any existing or potential health and safety hazards. This proactive utilisation of the HHSRS is considered a crucial element in ensuring that social housing properties meet the standards set forth by the Decent Homes Standard. Although local authorities are not empowered to take statutory enforcement action against their own housing stock, the expectation remains that they will diligently employ the HHSRS framework to assess the condition of their properties and ensure compliance with the Decent Homes Standard. This demonstrates a commitment from social landlords to provide safe and decent living conditions for their tenants, often exceeding the basic requirements of regulatory compliance.

For the retrofit sector, a comprehensive understanding of the HHSRS is of paramount importance. As the UK strives to enhance the energy efficiency and overall performance of its existing housing stock through retrofit initiatives, it is essential that these upgrades not only improve energy performance but also address any pre-existing HHSRS hazards and avoid the inadvertent introduction of new ones. Retrofit projects present a significant opportunity to tackle HHSRS hazards in a holistic manner. For instance, improvements to insulation can directly mitigate issues of excess cold and dampness, both of which are recognised hazards under the HHSRS. By integrating HHSRS considerations into the planning and execution of retrofit works, professionals can ensure that these projects contribute to creating healthier, safer, and more sustainable homes. This integrated approach maximises the benefits of retrofit interventions, ensuring that improvements enhance both the environmental performance and the living conditions within the dwelling.

## The 29 Hazards Assessed by the HHSRS

The HHSRS encompasses a comprehensive list of 29 specific hazards, categorised into four main groups:

1. Physiological Requirements,
2. Protection Against Infection,
3. Protection Against Accidents, and
4. Psychological Requirements.

Each hazard represents a distinct threat to the health and safety of occupants and is evaluated based on the potential for harm to the most vulnerable resident within the dwelling.

**Physiological Requirements** focus on conditions that directly impact the physical health of individuals. This category includes:

- **Damp and mould growth:** This refers to the health risks associated with the presence of dampness and mould, including allergic reactions, respiratory problems, and the potential effects of mycotoxins.
- **Excess cold:** This hazard addresses the detrimental health effects of living in dwellings with inadequate heating, leading to conditions like hypothermia and increased risk of cardiovascular and respiratory illnesses.
- **Excess heat:** Conversely, this hazard considers the health risks associated with excessively high indoor temperatures, potentially causing heatstroke and other heat-related illnesses.
- **Asbestos (and MMF):** This relates to the dangers of exposure to asbestos fibres and certain man-made mineral fibres, known carcinogens that can cause serious respiratory diseases.
- **Biocides:** This hazard concerns the health risks posed by chemicals used in the treatment of damp, pests, and other issues within a dwelling.
- **Carbon monoxide and fuel combustion products:** This addresses the potentially fatal risks associated with exposure to carbon monoxide and other harmful gases produced by the incomplete combustion of fuels.
- **Lead:** This hazard focuses on the health risks associated with lead exposure, often from old lead-based paint, which can be particularly harmful to children.
- **Radiation:** This pertains to the risks associated with exposure to radon gas and other sources of ionising radiation within a dwelling.
- **Uncombusted fuel gas:** This hazard considers the dangers of inhaling uncombusted fuel gas, which can lead to asphyxiation and explosions.
- **Volatile Organic Compounds (VOCs):** This relates to the health risks associated with inhaling VOCs released from various building materials, paints, and furnishings.

**Protection Against Infection** encompasses hazards that can lead to the spread of infectious diseases:

- **Domestic hygiene, pests and refuse:** This hazard addresses the risks associated with poor design, layout, and construction that make it difficult to maintain cleanliness, attract pests, and provide adequate waste storage.
- **Food safety:** This concerns the potential for foodborne illnesses due to inadequate facilities for storing, preparing, and cooking food safely.
- **Personal hygiene, sanitation and drainage:** This hazard relates to the risks of infection and impacts on mental well-being due to inadequate facilities for personal washing, clothes washing, sanitation, and drainage.
- **Water supply:** This addresses the health risks associated with contaminated water supplies used for drinking, cooking, washing, and sanitation.

**Protection Against Accidents** focuses on hazards that can cause injuries:

- **Falls associated with baths:** This includes the risks of slipping or falling while getting in or out of a bath or shower.
- **Falling on level surfaces:** This hazard addresses the risks of tripping, slipping, or stumbling on level floors and surfaces.
- **Falling on stairs and steps:** This includes the risks of falls on internal or external stairs, steps, and ramps.
- **Falling between levels:** This hazard concerns the risks of falling from one level to another, such as from balconies or unguarded windows.
- **Electrical hazards:** This relates to the risks of electric shock and burns due to faulty electrical installations or appliances.
- **Fire:** This hazard addresses the threats to health from uncontrolled fires and the inhalation of smoke.
- **Flames, hot surfaces:** This includes the risks of burns from contact with flames or hot surfaces and materials.
- **Collision and entrapment:** This hazard concerns the risks of injury from striking against or being trapped by parts of the dwelling.
- **Explosions:** This addresses the threats to health from explosions within or near the dwelling.
- **Position and operability of amenities:** This hazard relates to injuries that can occur due to the unsafe location, design, or operation of features like windows, doors, and appliances.
- **Structural collapse and falling elements:** This addresses the risk of the dwelling or parts of it collapsing or falling due to inadequate maintenance or structural defects.

**Psychological Requirements** consider hazards that can negatively impact mental well-being:

- **Crowding and space:** This hazard addresses the psychological distress and other negative impacts associated with a lack of adequate space for living and sleeping.
- **Entry by intruders:** This concerns the fear and anxiety associated with inadequate security measures and the risk of unauthorised entry into the dwelling.
- **Lighting:** This hazard relates to the potential negative effects on physical and mental health due to inadequate natural or artificial light.
- **Noise:** This addresses the threats to physical and mental health caused by exposure to excessive noise within or around the property.

The evaluation of each of these hazards involves a detailed consideration of the specific deficiency, the likelihood of an adverse event occurring as a result of that deficiency, and the range of potential harm outcomes for the individual most vulnerable to that particular hazard. Assessors rely on their

professional judgement, informed by comprehensive statistical data on the established links between housing conditions and health outcomes, to determine the severity of the risk. This structured categorisation ensures a systematic and comprehensive approach to identifying and addressing the diverse range of potential health and safety risks present in residential dwellings.

## **Utilisation of HHSRS by UK Local Authorities in Social Housing**

Local authorities in the UK play a crucial role in ensuring that social housing meets acceptable standards of health and safety, and the HHSRS is a fundamental tool in this process. Local authorities have a statutory duty to review the housing conditions within their districts to ascertain whether any Category 1 or 2 hazards exist. This review process can be initiated through various channels, including complaints lodged by tenants, referrals from other statutory agencies such as social services or the fire and rescue service, or as part of the local authority's own proactive stock condition assessment programmes.

Environmental Health Officers (EHOs) are typically responsible for conducting HHSRS inspections. During these inspections, EHOs meticulously examine the property to identify any deficiencies that could potentially give rise to one or more of the 29 hazards. Each identified hazard is then assessed using a formal scoring system that takes into account both the likelihood of harm occurring and the potential severity of the consequences. Inspectors may utilise handheld computer systems or make manual notes to record their observations and assessment data during the inspection process. This proactive approach to reviewing housing conditions underscores a commitment to early intervention and prevention, with the aim of addressing potential hazards before they escalate and cause significant harm to occupants.

When a Category 1 hazard, which represents the most serious and immediate risk to health and safety, is identified, the local authority has a general duty to take enforcement action. The range of enforcement actions available to the local authority includes serving an Improvement Notice, which mandates the landlord to undertake necessary repairs or remedial works within a specified timeframe to eliminate the hazard. Other potential actions include issuing a Prohibition Order, which prevents the use of the affected part or all of the property until the hazard is rectified, undertaking Emergency Remedial Action in situations where there is an imminent risk of serious harm, or serving a Hazard Awareness Notice to formally notify the landlord of the existence of the hazard. In the most severe cases, where a dwelling is deemed unfit for habitation and repair is not a viable option, the local authority may consider issuing a Demolition Order or declaring the area a Clearance Area.

For Category 2 hazards, which are considered less serious but still significant risks to health and safety, local authorities possess the powers to take enforcement action, but it is not a mandatory duty. In such instances, the local authority may choose to serve an Improvement Notice, issue a Prohibition Order, or serve a Hazard Awareness Notice. It is important to note that emergency measures are not available for addressing Category 2 hazards. Regardless of the category of hazard, local authorities are legally required to provide clear and detailed reasons for their decision to take any form of enforcement action and must give due consideration to the circumstances of the current occupants of the dwelling. Furthermore, in cases involving prescribed fire hazards within Houses in Multiple Occupation (HMOs) or the communal areas of buildings containing flats, local authorities are mandated to consult with the relevant fire and rescue authority before taking enforcement action. Failure to comply with a statutory notice issued by the local authority can result in prosecution and the imposition of significant fines. The distinction between Category 1 and Category 2 hazards is crucial as it dictates the level of urgency and the mandatory nature of the local

authority's response, ensuring that the most critical risks are addressed without delay. The requirement for local authorities to provide justifications for their enforcement decisions and to consider the well-being of the occupants underscores a commitment to fairness and proportionality in the application of the HHSRS framework.

## **Case Studies of HHSRS Implementation in UK Social Housing**

While the provided research snippets do not contain extensive specific case studies directly detailing the implementation of HHSRS by social housing providers, the information available strongly suggests that the system is a fundamental component of their operational practices and compliance with housing standards. The Decent Homes programme, for instance, which aimed to bring all social housing in England up to a defined standard by 2010, explicitly included the requirement for properties to be free from Category 1 HHSRS hazards. This ambitious undertaking necessitated the widespread adoption and application of HHSRS assessments across the social housing sector to identify and rectify any such serious hazards.

One relevant example, although from the private rented sector, illustrates the enforcement capabilities linked to HHSRS findings. Case Study 2 describes a six-storey block of privately rented flats where HHSRS assessments revealed significant Category 1 hazards, including a large number of internal bedrooms lacking natural light and ventilation, leading to issues like excess heat. This case demonstrates how HHSRS assessments can uncover widespread and serious hazards within a property, prompting local authority intervention to ensure the safety and well-being of tenants. While this example pertains to the private sector, it highlights the rigorous assessment process and the potential for identifying significant issues that would similarly apply to social housing.

The "Worked Examples" document provides model answers for rating each of the 29 HHSRS hazards. This resource is specifically designed to promote consistency in the application of the HHSRS and serves as a training tool for local authorities and other stakeholders involved in housing assessments, which would undoubtedly include social housing providers. This indicates the importance placed on a standardised approach to HHSRS assessments across all tenures.

Furthermore, the review of the HHSRS underscores its critical role in defining hazards under the Fitness for Human Habitation (FFHH) standards, which apply to all rented properties, including those in the social housing sector. This reinforces the idea that HHSRS is an integral part of ensuring a baseline level of safety and habitability in social housing.

Although specific, publicly available case studies detailing the intricacies of HHSRS implementation by individual social housing providers within these snippets are limited, the strong emphasis on meeting the Decent Homes Standard, which is directly linked to HHSRS Category 1 hazards, implies that social landlords routinely conduct these assessments and take necessary actions to address any identified hazards. Further targeted research into the operational practices of specific social housing providers would likely yield more detailed case studies.

## **Legal Framework and Regulations Mandating HHSRS in Social Housing**

The legal foundation for the Housing Health and Safety Rating System is primarily established by the Housing Act 2004. Part 1 of this Act is dedicated to housing conditions and explicitly introduces the HHSRS as the principal framework for evaluating and enforcing housing standards in England

and Wales. Section 3 of the Act places a statutory duty on local authorities to regularly review the housing conditions within their jurisdiction to determine if any Category 1 or 2 hazards exist, and to consider taking appropriate action under the Act to address them. Section 8 further mandates that local authorities must provide a clear statement of reasons for any enforcement action they decide to take.

Specifically concerning Category 1 hazards, the Housing Act 2004 imposes a general duty on local authorities to take enforcement action when such hazards are identified in any residential premises, including social housing. This duty compels local authorities to utilise the various enforcement options available to them, such as serving Improvement Notices, issuing Prohibition Orders, undertaking Emergency Remedial Action, or, in extreme cases, pursuing Demolition Orders or Clearance Area Declarations.

The detailed operational aspects of the HHSRS, including the specific scoring system used to assess hazards, are prescribed by the Housing Health and Safety Rating System (England) Regulations 2005 (SI 2005 No 3208). These regulations provide the necessary framework for EHOs to consistently and objectively evaluate the severity of identified hazards.

While local authorities do not have the power to directly enforce the Housing Act 2004 against their own social housing stock, there is a clear expectation that they will utilise the HHSRS as a key tool for assessing the condition of their properties and ensuring that they meet the requirements of the Decent Homes Standard. This self-regulatory approach underscores the commitment of social landlords to maintaining a high standard of housing for their tenants. The Housing Act 2004, therefore, provides the overarching legal framework that mandates the use of the HHSRS for assessing housing standards and empowers local authorities to take action to protect the health and safety of occupants in all residential tenures, including social housing.

## **HHSRS Scoring System and Hazard Bands**

The HHSRS employs a risk assessment methodology that evaluates both the likelihood of a hazard occurring and the potential severity of the harm that could result. Following a thorough inspection of a dwelling, a hazard score is calculated for each identified hazard by multiplying the assessed likelihood of an occurrence by the severity of the likely harm outcomes.

These calculated hazard scores are then categorised into ten distinct bands, ranging from Band A, which represents the most serious level of risk, to Band J, indicating the least serious. For enforcement purposes, these bands are further grouped into two categories. Hazards falling within Bands A to C are classified as Category 1 hazards, signifying a serious and immediate threat to health and safety. Local authorities have a statutory duty to take appropriate enforcement action to address all identified Category 1 hazards. Hazards that fall into Bands D to J are designated as Category 2 hazards, indicating risks that are considered less severe but still significant. While local authorities have the power to take action against Category 2 hazards, it is not a mandatory requirement in the same way as for Category 1 hazards. The banding system is designed to provide a clear and understandable indication of the relative seriousness of different hazards, avoiding any misleading impression of excessive precision in the scoring process.

The scoring system provides a quantifiable and consistent method for assessing and prioritising housing hazards. By assigning a numerical score and then placing the hazard within a specific band, the HHSRS moves beyond purely subjective evaluations, providing a more objective basis for determining the level of risk and the necessity for intervention. The distinction between Category 1 and Category 2 hazards is particularly significant for social housing providers, as it directly relates to their obligations under the Decent Homes Standard, which mandates that all social housing must

be free from Category 1 hazards.

**Table: HHSRS Hazard Bands and Significance**

| Hazard Band         | Hazard Category | Significance in Social Housing Standards                                                                                                                                                                                                                                 |
|---------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A, B, C             | Category 1      | Represent the most serious and immediate risks to health and safety. Social housing properties must be free from these hazards to meet the Decent Homes Standard. Local authorities have a statutory duty to take enforcement action.                                    |
| D, E, F, G, H, I, J | Category 2      | Indicate less serious but still significant risks to health and safety. While not automatically rendering a property non-decent under the Decent Homes Standard, these hazards should ideally be addressed. Local authorities have the power to take enforcement action. |

## HHSRS and its Role in Informing Repairs, Maintenance, and Upgrades in Social Housing

HHSRS assessments play a crucial role in identifying the specific remedial works required to ensure the health and safety of occupants in social housing. By highlighting deficiencies within a dwelling that pose a risk to well-being, these assessments directly inform the necessary repairs, maintenance, and upgrade programmes undertaken by social landlords. The identification of Category 1 hazards typically necessitates immediate action to rectify the issue, which may involve urgent repairs, enhanced maintenance procedures, or even significant upgrades to the property. Category 2 hazards, while less immediately critical, also indicate a need for intervention to reduce the level of risk, although the timeframe for these works may be less urgent.

Social housing providers are expected to integrate HHSRS assessments into their routine stock condition surveys to proactively identify and address potential hazards as part of their ongoing maintenance and upgrade strategies. This proactive approach is essential for maintaining the quality and safety of their housing stock and ensuring the well-being of their tenants. Even in the absence of tenant complaints, social landlords are encouraged to be vigilant in identifying and addressing potential hazards within their properties. While HHSRS assessments clearly indicate the presence and severity of risks, the specific remedial action required is ultimately a matter of professional judgement, taking into account the individual circumstances of the property, including its design, construction, and the most effective methods for mitigating the identified risks.

The HHSRS provides a systematic framework for social landlords to prioritise their repair and upgrade programmes based on the level of risk associated with each identified hazard. By focusing on addressing hazards rather than just general disrepair, social landlords can ensure that their resources are directed towards the most critical issues that could impact the health and safety of their residents. Integrating HHSRS findings into planned maintenance schedules enables a preventative approach, reducing the likelihood of serious hazards developing and ensuring long-term compliance with relevant housing standards. Regular inspections and assessments are therefore vital for the ongoing safety and well-being of tenants in social housing.

## Relationship between HHSRS and the Decent Homes Standard

The Housing Health and Safety Rating System is intrinsically linked to the Decent Homes Standard,

which sets the minimum acceptable living conditions for social housing in England. Criterion A of the Decent Homes Standard explicitly states that a dwelling must be free from Category 1 hazards as assessed under the HHSRS.<sup>5</sup> In 2006, the HHSRS replaced the previous Housing Fitness Standard as the statutory element used to determine whether a social housing property meets this fundamental criterion.

To be classified as decent, a home must not only be free from Category 1 HHSRS hazards but also meet three other criteria: it must be in a reasonable state of repair, have reasonably modern facilities and services, and provide a reasonable degree of thermal comfort. The Decent Homes Standard currently applies to all properties within the social housing sector, and compliance with this standard is a key performance indicator that social landlords are required to report to the Regulator of Social Housing. There are ongoing discussions and policy considerations regarding the potential extension of the Decent Homes Standard to include properties in the private rented sector as well.

The HHSRS, therefore, serves as a fundamental mechanism for determining whether a social housing property meets the core health and safety requirements of the Decent Homes Standard. Without a thorough HHSRS assessment, it would be challenging to objectively ascertain whether a property is free from the most serious category of hazards. The potential future application of the Decent Homes Standard to the private rented sector further underscores the significance of the HHSRS as a universal tool for ensuring a baseline level of housing quality and safety across all residential tenures in the UK.

## **Conclusions**

The Housing Health & Safety Rating System is a cornerstone of UK housing policy, providing a robust and risk-based framework for assessing and addressing health and safety hazards in residential dwellings. Its implementation has marked a significant advancement in ensuring a minimum standard of safety in housing, particularly within the social housing sector where it forms a crucial component of the Decent Homes Standard. The comprehensive nature of the 29 hazards covered by the HHSRS allows for a thorough evaluation of a wide range of potential risks, from physiological and infectious disease hazards to accident and psychological hazards.

Local authorities play a vital role in enforcing the HHSRS, particularly in addressing the most serious Category 1 hazards, thereby safeguarding the well-being of tenants. Social housing providers are expected to proactively utilise the HHSRS as part of their stock management and maintenance programmes, demonstrating a commitment to providing safe and decent homes. Furthermore, the integration of HHSRS principles into retrofit projects offers a valuable opportunity to enhance both the energy efficiency and the health and safety of the existing housing stock.

The scoring system and hazard bands provide a clear and consistent method for evaluating risk, enabling effective prioritisation of remedial actions. The direct link between the HHSRS and the Decent Homes Standard underscores the importance of this system in defining the minimum acceptable living conditions in social housing. As discussions continue regarding the potential extension of the Decent Homes Standard to the private rented sector, the HHSRS is likely to play an even more prominent role in shaping the future of housing quality and safety across the UK.