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Review of the Building Safety Workforce in Wales Final Report

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Building Safety Workforce Review in Wales: Final Report

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Views expressed in this report are those of the researcher and not
necessarily those of the Welsh Government

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Glossary

Housing Health and Safety Rating System (HHSRS)	The Housing Health and Safety Rating System (HHSRS) is a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It was introduced under the Housing Act 2004 and applies to residential properties in England and Wales ¹ .
Category 1 hazard	Category 1 hazards score highest on the HHSRS scale which is used to determine whether residential premises are safe to live in. Category 1 hazards pose the greatest risk. Where a condition is classified as a Category 1 hazard the local authority has a duty to take the appropriate enforcement action ² .
Category 2 hazard	Category 2 hazards score lower on the HHSRS scale and therefore pose a lesser risk. If it poses a Category 2 hazard the local authority may take enforcement action ³ .
Private sector housing	In this report, Private Sector Housing refers to all housing which is not owned by Local Authorities – this can include housing owned by Social Housing Associations.
Housing in Multiple Occupancy (HMO)	Shared houses or flats occupied by between three and six unrelated individuals who share basic amenities ⁴ .

¹ [Housing health and safety rating system \(HHSRS\): guidance for landlords and property-related professionals - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

² Source: [Category 1 and 2 hazards identified by hazard type, dwelling and category \(gov.wales\)](http://gov.wales)

³ Source: [Category 1 and 2 hazards identified by hazard type, dwelling and category \(gov.wales\)](http://gov.wales)

⁴ Source: [Houses in multiple occupation \(HMO\): guidance for local authorities \(gov.wales\)](http://gov.wales)

1. Introduction and background

- 1.1 This report sets out the findings of research to better understand the workforce tasked with ensuring residential building safety in the occupation phase in Wales, ahead of planned reforms for the sector. The research was commissioned by the Welsh Government as part of the Building Safety Programme, which was established in response to the tragedy at Grenfell Tower.⁵
- 1.2 The Welsh Government committed to a comprehensive review of the existing building safety system as part of the [Programme for Government](#) (PfG) 2021 to 2026. This will result in extensive reforms to the way multi-occupied buildings in Wales are designed, built, managed and lived in. The occupation phase reform is one element of the reform programme, alongside the design and construction phase reform.
- 1.3 The objectives of the Building Safety Occupation Phase Reform Programme are to:
- Oversee the development and implementation of primary and secondary legislation to reform the building safety regime in Wales, in order to improve safety and minimise the risk of fire and structural issues;
 - Set out aspirations for cultural change in the way buildings in Wales are designed, constructed and managed;
 - Oversee the establishment of the Joint Inspection Team and its ongoing work.

Policy Context

The [Hackitt Independent Review](#)

- 1.4 In July 2017, the UK government announced the Independent Review of Building Regulations and Fire Safety following the Grenfell Tower tragedy. Its purpose was to make recommendations that would ensure a sufficiently robust regulatory system for the future and to ensure residents feel safe in their homes. The review, conducted by Dame Judith Hackitt, examined building and fire safety regulations and related compliance and enforcement, with a focus on multi-occupancy high-rise

⁵ On June 14th 2017, a fire spread throughout Grenfell Tower and claimed 72 lives. This represents the [greatest loss of life](#) following a residential fire since the Second World War. The use of [combustible materials](#) on the exterior of the tower was found to be a “defining factor” in the rapid spread of the fire.

residential buildings. It identified five aspects of the culture of the current approach to building safety which underpinned negative outcomes:

- Ignorance (of the regulations/guidance);
- Indifference (the primary motivations being to do things as quickly and cheaply as possible);
- Lack of clarity on roles and responsibilities;
- Inadequate regulatory oversight and enforcement tools;
- Lack of clear up-to-date and transparent record keeping.

1.5 With respect to the occupation phase, the report (referred to henceforth as the Hackitt Review) notes that “the current regulatory system during occupation and maintenance is not fit for purpose for higher risk residential buildings (HRRBs).”

The Building Safety Programme

1.6 The Welsh Government’s Building Safety Programme Team published the [Safer Buildings in Wales](#) White Paper in January 2021. The White Paper observed that while the building safety system is largely the same in Wales as in England, the scale of the problem is very different, with Wales having only a fraction of the number of residential high-rise buildings (c. 148) as in England (c. 12,000).

1.7 The White Paper consulted on proposed changes to the building safety regime in Wales, covering the design, construction and occupation phases. The occupation phase covers inspections and enforcement of building safety in the period when a building is occupied. The White Paper included changes relating to regulation of the building safety regime during occupation which it states ‘*amount to a complete overhaul of the existing system*’ and ‘*require a significant cultural and behavioural shift from all involved*’.

Research aims

1.8 This research was conducted to understand more about the building safety workforce for residential buildings in the occupation phase (as opposed to the design and construction phase), provide a baseline for policy development and potential gap analysis. The focus was on the local authority workforce who are

responsible for the safety of certain types of residential building (namely, licensed houses in multiple occupation (HMOs), converted properties and multi-occupied residential purpose-built flats of 11 metres or more in height). These buildings will be in scope of the proposed Building Safety Regime.

1.9 The research objectives were as follows:

- Explore the profile of the building safety workforce, including regarding diversity and inclusion, and the workforce's current and future capacity across all 22 Welsh local authorities;
- Seek the views of key housing stakeholders on residential building safety workforce and regulation;
- Capture current local authority ability to meet the existing regulatory requirements in relation to resource, team capacity and skills;
- Explore the ways that local authorities meet existing regulatory requirements and identify barriers to carrying out inspections and enforcement actions.

1.10 This will provide a baseline of the current situation in local authorities and will be used to inform policy development, any future gap analysis if required and future requirements.

2. Methodology

Research structure

2.1 The research was conducted across four different phases: the Scoping phase, the local authority research phase, the Workforce research phase and the Qualitative Deep Dive phase. The write up of the Rapid Evidence Review which took place during the scoping phase, and research materials (survey questionnaires and qualitative interview topic guides) used for each phase of research are included in the Annex document. The timing and key elements of each phase are detailed below:

Table 2.1 Key research elements within each phase

Phase	Dates	Description	Purpose
Scoping	08/2022 – 11/2022	<ul style="list-style-type: none"> Inception meeting and Inception report; Topic guide design; 10 qualitative interviews with representatives from stakeholder organisations (inc. public sector); Rapid Evidence Review (RER). 	To understand the policy context and inform subsequent research tool design.
Local authority research	10/2022 – 05/2023	<ul style="list-style-type: none"> Questionnaire design; Testing of online survey by two local authority staff; Questionnaire redesign based on feedback; Online survey covering 21 of 22 local authorities; Recontact for data validation purposes. 	To explore existing processes relating to Building Safety at local authorities and assess any barriers to reform.
Workforce research	11/2022 – 05/2023	<ul style="list-style-type: none"> Questionnaire design; Online survey of the local authority building safety workforce in Wales. 	To explore the makeup of the Building Safety workforce, assess (future) capacity, explore current processes and assess (future) barriers) to reform.
Qualitative Deep Dive	01/2023 – 05/2023	<ul style="list-style-type: none"> Topic guide redesign based on previous findings; 11 in-depth interviews with managers and building safety workforce members covering nine of 22 local authorities. 	Similar purpose to the Workforce research, with an emphasis on exploring themes in depth.

Phase 1 – Scoping

2.2 The scoping phase, which included an inception meeting and design activities, was carried out in order to shape the research and ensure that it was directed toward existing gaps in evidence, and met Welsh Government requirements.

- 2.3 In order to inform further research tool design and the rapid evidence review, interviews were conducted with eight stakeholders whose contact details were provided by Welsh Government. Amongst these eight interviews, three individuals were from Welsh Government, and three were involved in national organisations in Wales, including Rent Smart Wales, a Registered Social Landlord, an organisation regulating private sector rent, and two of three Fire and Rescue Services⁶; the remaining two individuals were involved in both Welsh Government and national organisations. A semi-structured modular discussion guide was created for these interviews to ensure each interview focused on the most relevant topics. Interviewees were asked for recommendations of outputs to include in the rapid evidence review.
- 2.4 A Rapid Evidence Review (RER) was conducted to provide an overview of key policies and research relating to the building occupation workforce in Wales and (where relevant) in other countries. Relevant policy documents, research reports, grey literature, and appropriate survey/secondary data were identified. The majority of the documents examined were published in the last five years, in line with the intention to focus on documents published since the Grenfell tragedy. A review template was created to assess each document against key criteria/research questions. The evidence review informed the design of questionnaires and topic guides in phases 2, 3 and 4 of the research. The write up of the RER is included in the Annex document.

Phase 2 – Quantitative Local Authority Research

- 2.5 In Phase 2, an online survey of Welsh local authorities was conducted. The survey collected data on the scale and organisation of the workforce, capacity and skills gaps, training and Continuous Professional Development (CPD), and sub-contracting and freelancers. The survey was conducted between January and March 2023.
- 2.6 The questionnaire was tested with two local authority staff. Several modifications were made to the questionnaire as a result of these discussions; in particular, changes to terminology and classifications of employees and tasks to match those used internally at local authorities.

⁶ Some of the individuals interviewed were involved in both Welsh Government and national organisations.

- 2.7 Individualised survey links were set up for each local authority and distributed by email. The individuals to be sent these links were identified through a combination of contact details provided by Welsh Government, online sample building, and telephone contact with local authorities.
- 2.8 Those completing the survey were asked to consult with colleagues so that they could answer all the questions. The survey was completed by representatives from 21 out of the 22 local authorities in Wales, a response rate of 95%. Three of the local authorities responded as a shared service, so in total there were 19 separate responses to the survey.
- 2.9 Some challenges were encountered during this phase. The individuals who initially completed the survey for some local authorities were not able to provide full information. In these cases, they were asked to provide a referral. Several rounds of email reminders were used to obtain a sufficient survey response from some local authorities.
- 2.10 The section of the survey relating to assessing the size of the workforce (including number of staff and FTE roles) presented a particular challenge for many local authorities. In some cases, local authorities selected 'Don't know', and in other cases the information provided was unclear or inconsistent between survey questions.⁷
- 2.11 Given that obtaining information on the size of the workforce was key to the research, local authorities were recontacted and asked to confirm the total number of staff (and full time equivalent, or FTE, roles) involved in each building safety-related task.

Phase 3 – Quantitative Workforce Research

- 2.12 In Phase 3, an online survey was conducted with individual members of the building safety workforce in Wales. The survey was conducted between February and April 2023. It covered routes into the sector, capacity and skills gaps, sources of support, training and Continuous Professional Development (CPD), and demographics and diversity.
- 2.13 As for the local authority survey, an initial draft of the workforce survey questionnaire was tested with local authority volunteers before being sent out more

⁷ For example, the number of FTE roles among directly employed staff for a specific task (e.g. inspection of private housing) would be higher than the number of staff directly employed for this task.

widely. Some small modifications were made at this stage, primarily changes to terminology and wording to ensure it was better understood by staff.

- 2.14 In order to obtain responses from individuals within the building safety workforce in Wales, respondents to the local authority survey were asked to forward on the workforce survey (in the form of an open link specific to their local authority) to relevant colleagues. This was intended to cover individuals working on:
- Inspection of council housing
 - Inspection of private sector housing, including any other social housing
 - Taking enforcement actions
 - Providing legal advice for inspection and enforcement
 - Providing administrative support for inspection and enforcement
- 2.15 Respondents to the workforce survey included Environmental Health Officers (working on HHSRS), Technical Officers, legal advisers and housing officers. A total of 72 responses were received, including individuals working at 21 of 22 local authorities in Wales.
- 2.16 The local authority survey found that approximately 200 people are directly employed by local authorities to conduct tasks relating to private sector housing building safety in Wales. This group account for 65 of the 72 responses, suggesting a response rate of 32.5%. Given the good coverage achieved and limited population data available, a decision was made not to weight the workforce survey data.
- 2.17 As with the local authority survey, intensive follow up was found to be required to obtain responses to the survey. Where the local authority survey indicated a substantially higher number of individuals were in the workforce compared to the number of survey responses received, these local authorities were particularly targeted for follow-up.
- 2.18 In some cases, the specific individual who had completed the local authority survey was unavailable, in which case other individuals from that local authority were contacted to send the workforce survey to their colleagues.
- 2.19 In response to local authority feedback, the survey deadline was extended to maximise responses and allow for workload and time pressures among the workforce.

Phase 4 – Qualitative Deep Dive

- 2.20 In Phase 4, in-depth interviews were conducted with several members of the building safety workforce (including individuals in managing positions). The interviews covered recruitment and career paths, training and qualifications, and capacity and ways of working. These were conducted in April 2023.
- 2.21 The topic guide for the in-depth workforce interviews was developed cooperatively by IFF Research and Welsh Government, drawing on early survey responses and stakeholder interviews.
- 2.22 Interviewees for the deep dive interviews were recruited through the workforce survey in Phase 3. Respondents were asked for permission to recontact them for an in-depth interview covering the same topics discussed in the survey in greater depth. The 21 individuals who had given permission were recontacted by email and invited to take part in an hour-long interview⁸. Of these, 11 individuals participated in interviews, covering nine of 22 local authorities. A variety of roles were covered, including Housing and Environmental Health Officers across both senior and junior levels.
- 2.23 Initially, the intention was to conduct 20 interviews. However, the small number of individuals who gave permission to be recontacted meant that this was not possible. Nonetheless, the variety within the individuals interviewed and coverage of local authorities were considered sufficient for the Qualitative Deep Dive to perform its function of exploring the research questions in more depth and sense-checking quantitative findings.
- 2.24 Ahead of analysing the findings from the in-depth interviews, a bespoke thematic analysis framework was created. This enabled analysis to focus on the key research objectives, draw out recurring themes from the interviews and identify any notable differences across subgroups. An analysis session was conducted to discuss the evidence and interpret the findings with reference to the research questions.

⁸ IFF Research's partner organisation Arad were also involved in conducting interviews in Phase 4.

Role of phases

2.25 Each phase of the research was designed to help answer specific research objectives. The table below shows which elements of our approach covered each of the key aims and objectives of the research:

Table 2.2 Research objectives and associated research elements

Research objective	Data and evidence review	Stakeholder interviews	Local authority survey	Workforce survey	Workforce interviews
Capture current local authority requirements around the existing regulatory system in relation to resource, capacity and competence.	X	X	X		
Understand the make-up of the multi-occupied building safety workforce in terms of diversity and inclusivity.			X	X	X
Explore the current and future capacity of the workforce across all Welsh local authorities.	X	X	X	X	X
Explore how the existing systems function and any barriers to delivery of regulation and enforcement and sanctions.	X	X	X	X	X
Provide a baseline of the current situation in local authorities to inform policy development, future gap analysis if required and future requirements.	X		X	X	
Seek views of key housing stakeholders.		X			

About this report

2.26 This report summarises the findings of all of the research strands mentioned above. Throughout, evidence from the qualitative interviews is presented alongside survey results to illustrate, explain and expand upon the quantitative findings. The source of the data being referred to as evidence for findings covered in the report is indicated in the text and in tables.

Limitations

- 2.27 The quantitative surveys in this report are based on a small sample (19 local authorities⁹ and 72 workforce members). However, in each case these represent a significant proportion of the estimated population, which means that more can be drawn from these findings than would usually be the case with samples of this size.¹⁰ Consequently, the figures provided are best estimates and subject to non-response bias.
- 2.28 Where the findings from depth interviews are discussed, no percentages are given, as is standard practice with qualitative research. While words like ‘many’, ‘some’ and ‘few’ are used to indicate the strength of the message, this is not an attempt at quantification, and it would not be appropriate to generalise the findings from the qualitative interviews to the wider population. However, it is possible to use the in-depth interviews to bring together the range of opinions and experiences expressed to build up a thematic understanding of how individuals view the matters discussed.
- 2.29 In-depth interviews by their nature gather the perceptions and opinions of participants. Participants may, on occasion, say things which go against the general findings of the research, or which are factually incorrect. The inclusion of a quote does not imply the researchers agree with the opinion expressed. For example, factually incorrect quotes may be included in order to illustrate widespread views, even if these are misunderstandings.

⁹ Including one shared service representing three local authorities, taking the coverage of the population to 21 authorities of 22.

¹⁰ The error margin, for figures extrapolating to the whole population, is estimated at $\pm 4.7\%$ for local authorities, and $\pm 10.0\%$ for workforce members, at a 95% confidence interval and on a ‘worst case’ value of 50%. More information is provided in the Annex document.

3. Findings: Current workforce

3.1 This chapter provides an overview of the current workforce providing inspections and enforcement for safety in residential buildings in the occupation phase in Wales.

Structure of the sector workforce

3.2 For the purposes of this report, based on Welsh Government requirements and stakeholder interviews, the Building Safety workforce at local authorities was divided into the following key roles:

- Inspection of council housing;
- Inspection of private sector properties (including social housing not owned by the council);
- Enforcement on private sector properties (including social housing not owned by the council);
- Legal advice; and
- Administrative support.

3.3 This division was informed by the structure of building safety inspection and enforcement at local authorities. In many local authorities, inspection of council housing¹¹ is dealt with entirely separately to inspection of other housing, because this housing is owned by the council and there is no framework for a council to take enforcement actions on itself. Some local authorities also reported that legal advice and administrative support was separate from these other functions.

3.4 These functions were most frequently situated within Environmental Health departments (65% of the workforce interviewed) or else in Housing departments (35% of the workforce interviewed). No overlap was found with Planning Departments or Building Control, although these departments do handle similar functions regarding building safety in the construction phase. Fire Services also employ individuals who carry out inspections of residential buildings, but they

¹¹ Council housing refers to homes under the ownership of the local authority and is not present in all areas of Wales. In many local authority areas, a process of Large-Scale Voluntary Transfer (LSVT) has taken place where former local authority owned council housing was transferred to a Registered Provider of social housing (e.g., a Housing Association). In some areas council housing is administered by an independent ALMO (Arms' Length Management Organisation) but remains council owned and therefore subject to the same inspection and enforcement approach as other council housing.

generally have much wider remits, focusing primarily on non-residential building safety inspections, and of course having a strong fire safety focus.

- 3.5 Stakeholder interviews suggested that traditionally, Housing departments have handled building safety in the occupation phase for council housing, and Environmental Health departments have handled this for other housing. However, the workforce survey found significant overlap in practice; more than half of housing department staff working on building safety inspected private sector housing (56%) and many also took enforcement actions (40%), and some Environmental Health department staff inspected council housing (17%).

Profile of the sector workforce

- 3.6 The core Building Safety workforce, working on inspection and enforcement of private sector housing (including social housing not owned by councils), was estimated to be around 141 people¹², nearly all of whom were reported to work on both inspection and enforcement activities. The key reason reported in interviews for people not working on enforcement was that they were trainees. As shown in Figure 3.1, the total number of staff who were involved in *either* inspection or enforcement according to survey respondents was 128.
- 3.7 In contrast, Fire Services reported that an additional qualification¹³ was required to work on enforcement, meaning that a significant proportion of the workforce¹⁴ were focused only on inspection tasks.
- 3.8 Local authorities also reported employing a significant number of people in administrative support (an estimated 39) and legal advice tasks (an estimated 24). This brought the total workforce to around 200 people. In interviews, local authorities in North Wales reported that they did not employ legal advice staff directly, but had a shared legal advice service, employing around six legal advisors across the whole region.
- 3.9 It is worth noting that some local authorities reported that they had more FTE roles than staff fulfilling those roles, indicating difficulties in recruitment or funding of

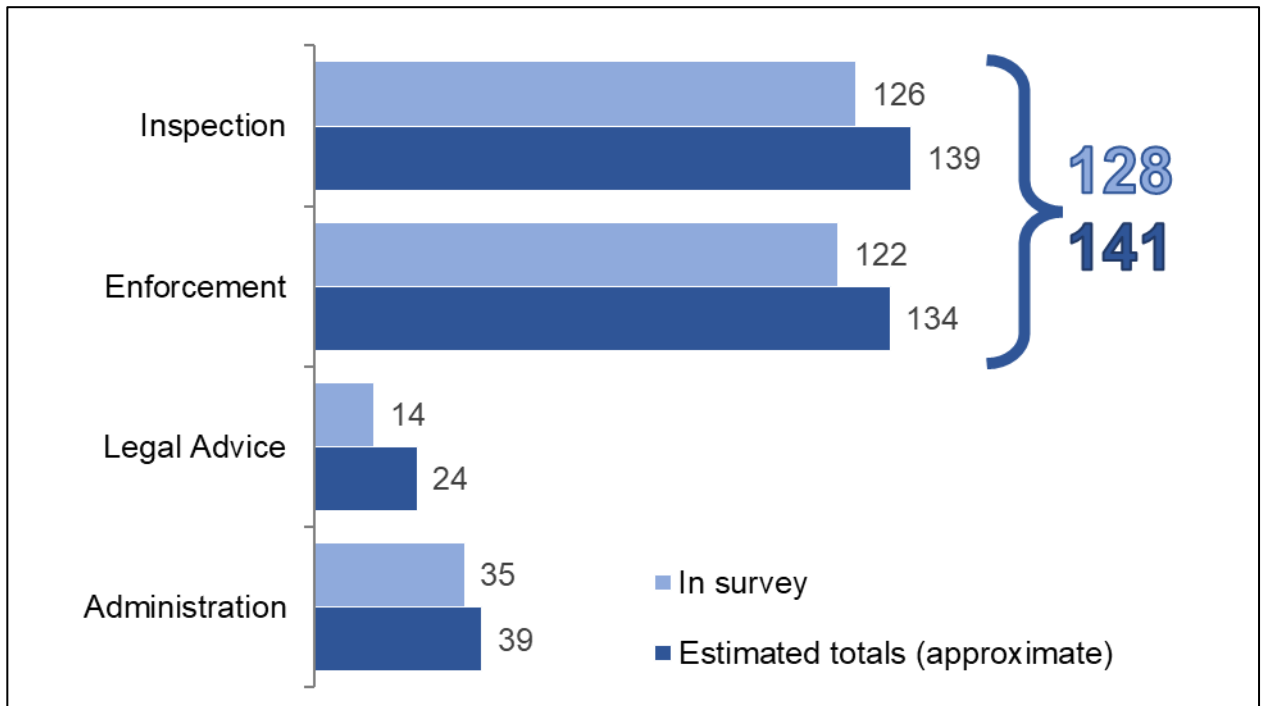
¹² 128 employees were counted in the local authority survey, these figures came from local authorities which combined cover 91% of the population of Wales. If the three non-responding local authorities had a similar ratio of staff to district population, this would equate to c.141 nationwide.

¹³ A Level 4 Diploma in Fire Risk Assessment, as opposed to a Level 3 or Level 4 Certificate.

¹⁴ This proportion is not known since Fire Services only participated in qualitative interviews as part of this

roles. This may be resulting in substantial overtime being worked, or a lower quality or less wide-ranging service being delivered.

Figure 3.1: Profile of the workforce working on inspection and enforcement for private sector housing – number of staff by function¹⁵



Base: All local authorities providing data on private sector housing staff numbers (17)

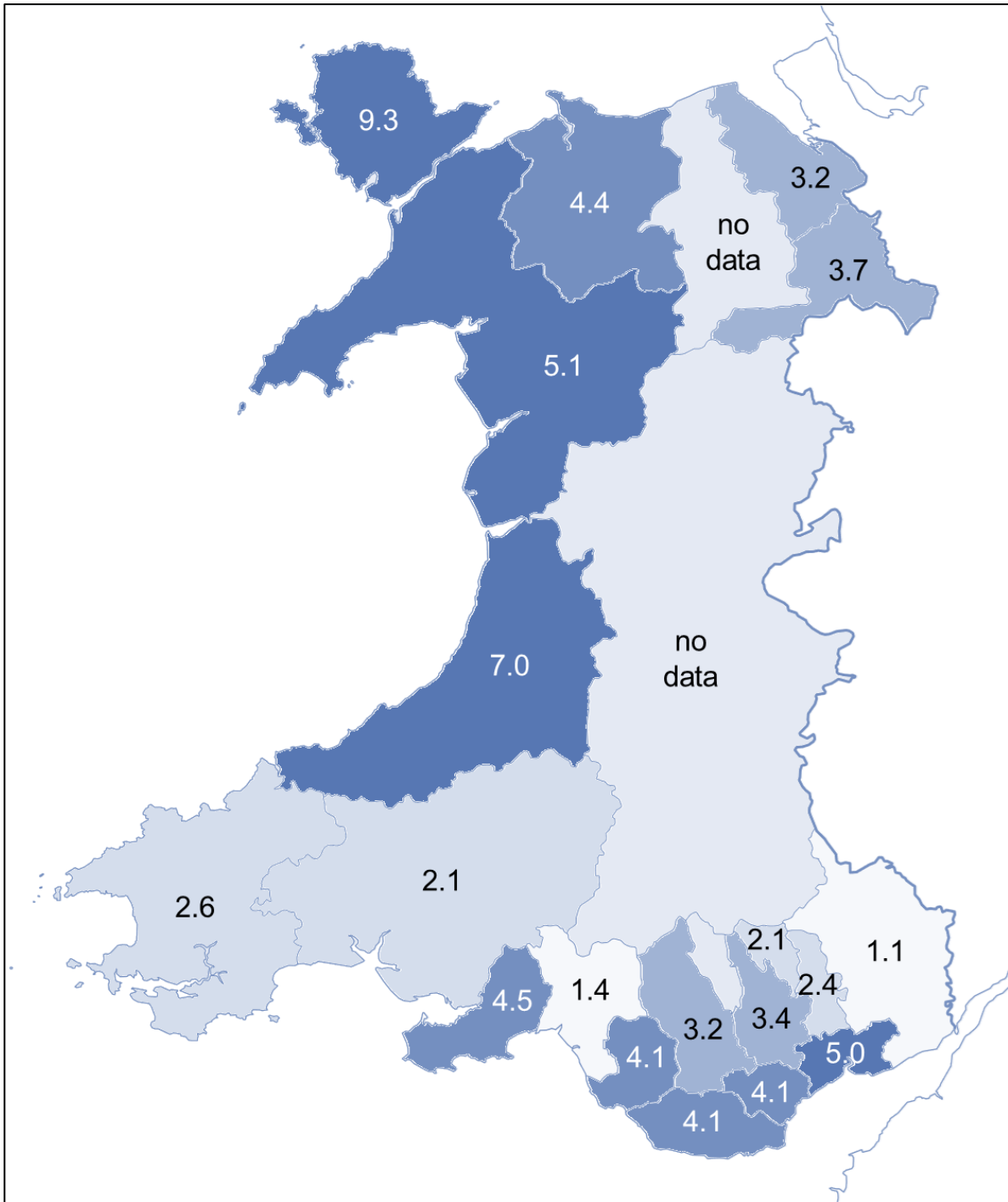
3.10 The workforce is not evenly spread across Wales, relative to the population of Wales. Figure 3.2 shows that there are far more staff (in terms of FTE roles) per 10,000 population in rural areas of Wales. Interviews with Fire Service managers suggest that inspection and enforcement requires higher levels of staffing in rural areas due to the need to physically attend locations at short notice, and therefore increased travel time.

3.11 Nevertheless, some areas – especially in South East and South West Wales - do have notably lower staffing per 100,000 people even allowing for this, in particular in Monmouthshire (1.1 staff per 100,000 people) and Neath Port Talbot (1.4 per 100,000). No information was available for Merthyr Tydfil, Powys, or Denbighshire on the number of staff directly employed by the local authorities who were involved in these tasks. Cardiff, Vale of Glamorgan and Bridgend are represented by a single

¹⁵ Estimated totals are calculated based on the assumption that the three non-responding local authorities had a similar ratio of staff to district population as the local authorities that responded to the survey. Staff working solely on inspection of council housing are not included due to difficulties estimating their numbers.

shared service, and staffing levels across these local authority areas have been averaged for the purposes of this analysis.

Figure 3.2: Profile of the workforce working on (or supporting) inspection and enforcement for private sector housing – FTE roles at local authorities per 100,000 population

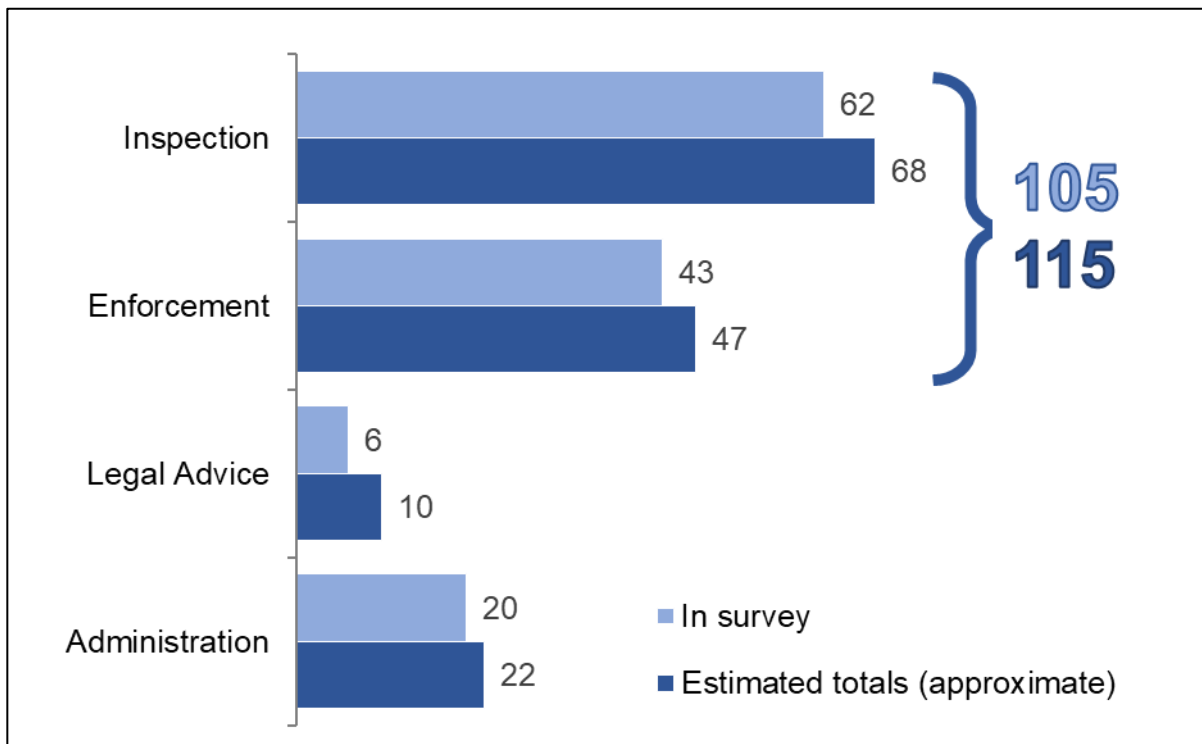


Base: All local authorities providing data on private sector housing staff numbers (17). Population data used for calculations sourced from ONS Census 2021.

Extent of multitasking

- 3.12 Staff working on Building Safety often have wider roles; no overlap was reported with the construction phase, but they often might have wider Housing or Environmental Health responsibilities. This did not apply at all local authorities; in some staff specialised in private sector housing activity in a small team; in some others responsibility was spread across a larger team but with wider responsibilities.
- 3.13 This was particularly notable in inspection of council housing. It was not possible to estimate a total workforce size for the inspection of council housing, as this tended to form a small part of a wider role. Several local authorities reported that all their Housing Officers had this responsibility among many other responsibilities, and thus had a large number of staff whose role involved building safety inspection (in one case 100).
- 3.14 Whilst this breadth of responsibilities was particularly evident in council housing inspection, it was also noted in other parts of the Building Safety workforce. In total, the estimated 141 staff working in inspection and enforcement accounted for an estimated 115 FTE roles. This was even more marked in supporting roles – there were estimated to be around ten legal advice FTE roles covered by 24 staff, and 22 administrative support FTE roles covered by 39 staff.

Figure 3.3: Profile of the workforce working on (or supporting) inspection and enforcement for private sector housing – number of FTE roles



Base: All local authorities providing data on private sector housing staff numbers (17)

Extent of involvement of private sector

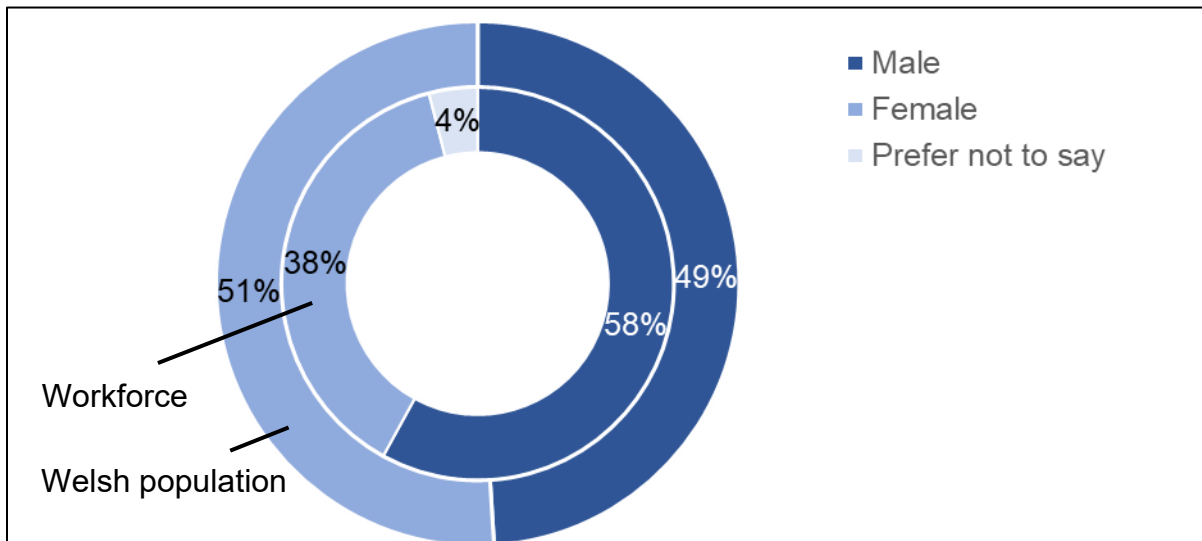
- 3.15 Outsourcing of building safety roles in the occupation phase to the private sector was very rare in local authorities. Although some local authorities reported that they did not know if outsourcing took place, only one council confirmed that they had brought in outsourced staff for private sector inspection and enforcement: two individual staff from a consultant covering one FTE role. This situation was explored in a depth interview; the interviewee felt this was a solution to an intractable resourcing difficulty, but involved high costs, which ideally would have been spent on training in-house staff to take the role.
- 3.16 Two local authorities reported that a large number of Housing Officer roles were outsourced. However, this is likely to relate to using an ALMO (Arms' Length Management Organisation) structure for their council housing, where housing they own is managed by an independent organisation. Reasons for sub-contracting were that local authorities had difficulty finding suitably skilled applicants and that they were experiencing high staff turnover or unexpected staff departures.
- 3.17 It was frequently reported in interviews that wages were significantly higher in the private sector for building safety consultancy; this suggests that the use of external

consultants and contractors would be more expensive than in-house roles in most circumstances.

Equality and diversity

3.18 Women were under-represented in the workforce, as shown in Figure 3.4. Men represented well over half (58%) of the total workforce. This is in contrast to the population of Wales as a whole which is 51% male and 49% female¹⁶. No respondents said their gender they identified with was different to their sex registered at birth.

Figure 3.4: Sex of the workforce, compared with Welsh population



Base: All (72). Population data sourced from ONS 2021 Census.

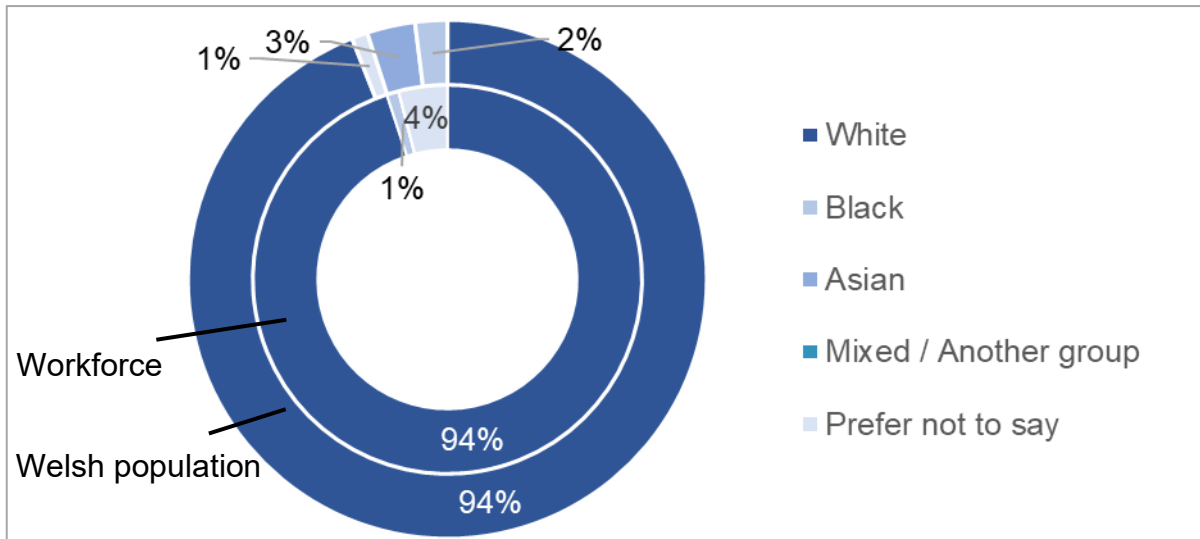
3.19 In relation to sexuality, most (88%) of the workforce said they were straight or heterosexual, and 4% stated they were gay or lesbian, with the remainder declining to answer the question.

3.20 In terms of ethnicity, as shown in Figure 3.5, the workforce was less likely to be from an ethnic minority (1%) than the population of Wales¹⁷ (6%).

¹⁶ Population and Household Estimates for Wales, 2021 Census, ONS

¹⁷ Population data sourced from ONS 2021 Census.

Figure 3.5: Ethnicity in the workforce, compared with Welsh population



Base: All (72). Population data sourced from ONS 2021 Census.

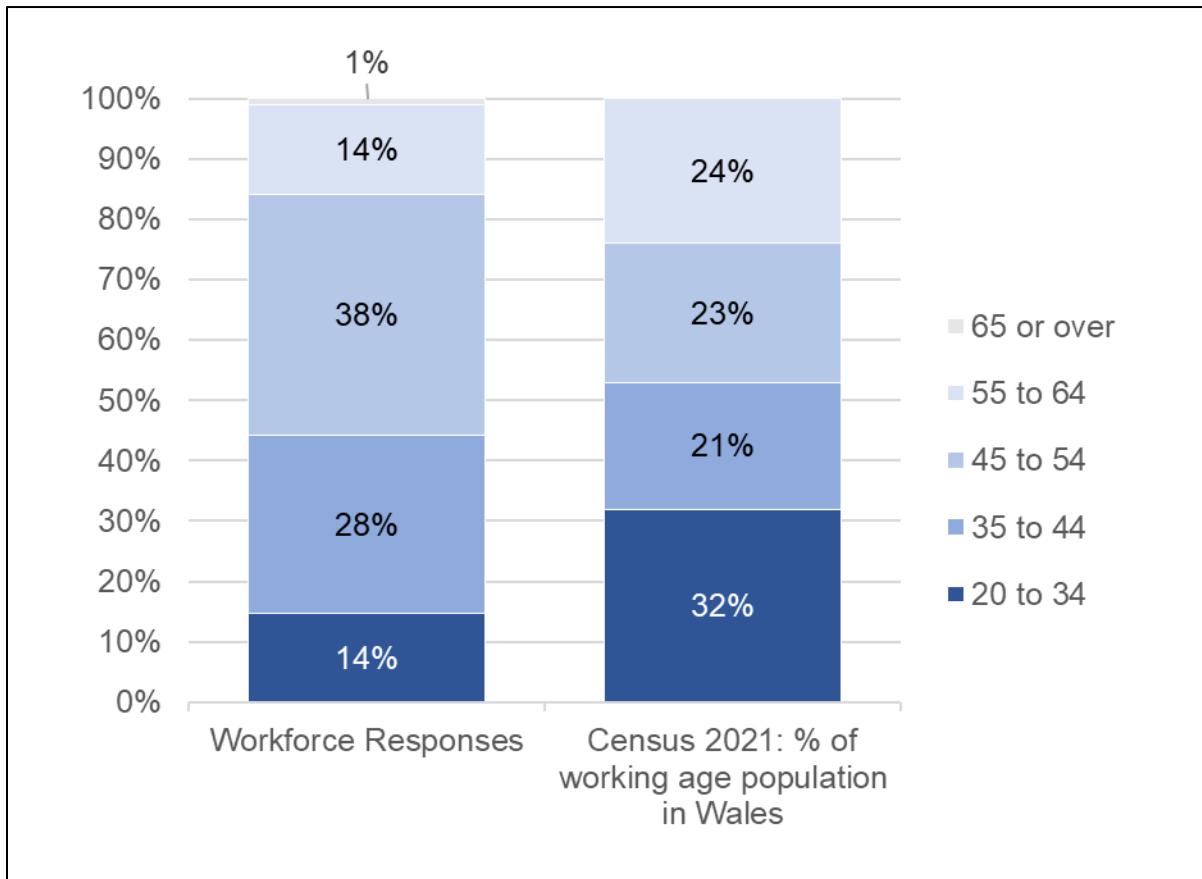
- 3.21 As well as the implications for equality, this lack of representation could potentially lead to missed opportunities, since those in under-represented categories may have skills which would be useful to the sector.
- 3.22 Around 17% of the workforce can speak Welsh, in line with the 18% of the population of Wales in this category. Around two thirds (65%) were born in Wales; about a quarter came from within the UK outside Wales (24%, compared to 29% in the population as a whole¹⁸), and a small proportion from elsewhere (8%).

Age and health

- 3.23 The largest age group within the workforce was individuals aged between 45 and 54 (38% of the workforce), followed by the 35 to 44 age group which made up 28 percent of the workforce.
- 3.24 Compared the wider population, people aged under 35 were under-represented in the workforce. They represent less than one-fifth of the total workforce (14%), compared to nearly one-third of the working age population in Wales (32%). This suggests a low volume of new recruits entering the workforce.

¹⁸ ONS (2022). *Demography and migration in Wales (Census 2021)*.

Figure 3.6: Age distribution of the workforce, compared with Welsh working age population

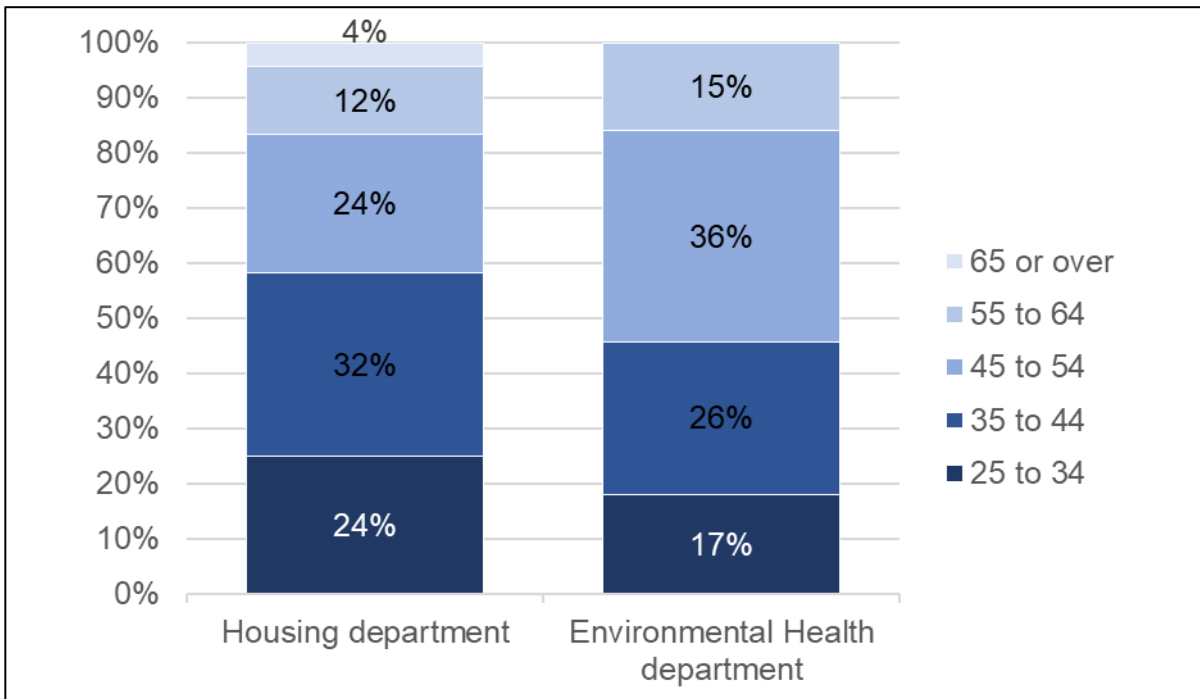


Base: All (72). Population data sourced from ONS 2021 Census.

- 3.25 There was a clear tendency for Senior Environmental Health Officer positions to be occupied by individuals of 45 years of age or older – more than half in this role. Meanwhile, the Environmental Health Officer role was predominantly occupied by people in the 35 to 44 age group, representing half of the total workforce in this role (50%). Even in the least senior Technical Officer role, the proportion of individuals under the age of 35 is only 7%.
- 3.26 By department, as shown in Figure 3.7, among those working in Housing Department roles, the age distribution was more balanced. These groups had a higher-than-average proportion of individuals from the 25 to 34 age group (24%), but also a similar proportion aged 45 to 54 (24%), and a few aged 65 or over (4%). This suggests that these roles are currently more attractive to new recruits, but this is balanced with the presence of more experienced senior individuals.
- 3.27 In contrast, the workforce in Environmental Health Departments (including, but not limited to, Environmental Health Officers) displayed a higher proportion of individuals aged 35 or over (77%). Less experienced employees, aged between 25

and 34 (17%), constituted less than 20 percent of the total workforce. This indicates fewer younger recruits are being brought into these departments across Wales.

Figure 3.7: Age distribution of the workforce – comparing Housing and Environmental Health departments



Base: Housing departments (25), Environmental Health departments (47)

- 3.28 Overall, most of the workforce (78%) considered themselves to be in good or very good physical health, and two thirds (64%) considered their mental health to be good or very good, with most of the remainder (22%) considering it to be 'fair'.
- 3.29 Overall, around a fifth (21%) of the workforce had a physical or mental health condition expected to last 12 months or more, most of whom (around three quarters) felt these conditions affected their day-to-day activities 'a little'.
- 3.30 However, most of those with these physical or mental health conditions were in Environmental Health departments. In Housing departments, 8% had a condition in this category, rising to 26% in Environmental Health departments. A possible explanation for this could be the age profile of the respective departments, as described in Paragraph 3.27 Environmental Health departments have a higher proportion of staff over the age of 35.

Case Study – ‘Daniel’, Senior Environmental Health Officer

‘Daniel’ is a Senior EHO for a Council in Central Wales. He manages a small team comprising of three EHOs and one empty property officer (also a qualified EHO). The team overall is very experienced and well established in their roles. Because of his seniority and experience his role involves overseeing inspections and a more strategic level rather than carrying inspection on location. Because of capacity constraints and the geographically dispersed nature of the area his team covers, their approach to inspections is reactive and are often carried out on a regional basis.

“We do cope, and we are just about coping but the work is primarily reactive. So we're more of a complaints-based response team rather than a team that goes out looking for issues that we can sort out.”

To help with the capacity issues Daniel has put in place a triage system by implementing a proforma which must be completed by complainants who are required to leave a name and address. In his experience this ensures that only the genuine and serious complaints are logged, and protects his team’s capacity against fictitious or vexatious claims, where a tenant may be upset with their landlord for various reasons.

The team of EHOs Daniel oversees work closely with Building Control and Building Regulation colleagues who carry out inspections during the construction phase; and the Fire Services visit commercial properties or HMOs.

Enforcement actions are relatively uncommon compared to the volume of inspections his team carry out – this is because they serve notices as a last resort where a landlord has refused to engage or make repairs. David has found that in situations where landlords don’t engage with his team it’s usually down to a lack of funding. To overcome this hurdle, his Council have implemented a mutually beneficial system of interest-free loans which landlords can use to make repairs. This approach requires working collaboratively with other departments.

“What we've done is we've blended the finance, so we've made sure that people can't access grants through the regeneration team unless they've first accessed our interest-free loan. So we work collaboratively with regen[eration] – if we didn't, then their grants would undermine our interest-free loan scheme.”

Current workforce: key findings

3.31 The key findings of this analysis were:

- There are a range of organisational structures in use at local authorities in Wales for ensuring building safety in the occupation phase. However, it was not within the scope of this research to determine which structures are most efficient or effective.
- Around 200 people work in building safety for private sector housing in the occupation phase in Wales, mostly (c.141) in inspection and enforcement roles. Data for individual local authorities indicates many have unfilled roles, suggesting overtime is being worked, or a lower quality or less wide-ranging service being delivered than intended.
- Staff working on building safety often have wider roles, particularly Housing Officers. This suggests that knowledge and skills could be better utilised, in a narrow sense, by ensuring they spend more time on inspection and enforcement.
- There is great variation in the number of officers relative to population across Wales, suggesting that there may be variation in the service delivered.
- Outsourcing of building safety roles is rare, and reportedly an expensive option.
- The workforce has some demographic skews (away from women and ethnic minorities). As well as the implications for equality, this lack of representation could potentially lead to missed opportunities, since those in under-represented categories may have skills which would be useful to the sector.
- The workforce is older than the Welsh working age population, especially in Environmental Health departments and roles, suggesting a low volume of new recruits entering the workforce.

4. Findings: Ways of working, skills and training

4.1 This chapter lays out how the processes of inspection and enforcement currently work in Wales and includes a discussion of the variation between local authorities. It incorporates suggestions from research participants around ways to improve current processes. The chapter also examines the current resourcing situation in Wales, particularly with regards to the availability of skills to ensure building safety and how qualifications and training within the workforce feed into this.

How inspection and enforcement currently operates

Volume of inspection and enforcement in Wales

4.2 The local authority survey found that on average approximately 250 complaints from the public regarding building safety in the occupation phase were referred to enforcement teams per local authority over the 2021/22 financial year. By contrast, approximately 500 properties were inspected per local authority over the same period; roughly twice as many inspections as complaints.

4.3 However, there is considerable variation between local authorities on these two measures and their respective ratios. This is illustrated by the following examples:

- One local authority reported having conducted approximately 4,000 inspections during this period; this local authority appears to be an outlier, with the next highest number of inspections reported being 545.
- Five local authorities had conducted under 100 inspections over this period, while four local authorities had conducted 300 or more.

4.4 When it comes to complaints, four local authorities reported having been referred fewer than 100 complaints during this period, while four reported having been referred more than 200.

4.5 Publicly available data, however, suggests that volumes of inspections in Wales are much higher than those suggested by the local authority survey (see Table 4.1). This is likely to be because these figures include inspections for other reasons, including in the building phase.

4.6 However, this data also suggests that there is a large amount of variation between local authorities regarding the relationship between inspections ('assessments' in Table 4.1) and enforcement actions (resolved hazards in Table 4.1). Enforcement

action is relatively uncommon, with only 11% of inspections over the 2021-22 financial year having led to improvement notices, 7% to hazard awareness notices and 3% to prohibition orders. Around half of local authorities take enforcement action in less than 10% of cases.

Table 4.1: Number of inspections and enforcement actions per local authority

	Total number of inspections(2021-22)	Number of HMOs and non-HMOs where all category 1 hazards have been resolved as a result of local authority action	Properties where all hazards resolved as a proportion of total number of inspections
Wales	4,363	797	18%
Denbighshire	557	15	3%
Swansea	542	17	3%
Conwy	380	0	0%
Pembrokeshire	369	56	15%
Cardiff	369	29	8%
Caerphilly	334	92	28%
Neath Port Talbot	327	161	49%
Gwynedd	289	70	24%
Powys	266	199	75%
Rhondda Cynon Taf	188	16	9%
Newport	154	8	5%
Carmarthenshire	115	12	10%
Flintshire	112	22	20%
Bridgend	73	10	14%
Ceredigion	66	17	26%
Blaenau Gwent	44	32	73%
Wrexham	42	10	24%
Isle of Anglesey	41	7	17%
Monmouthshire	37	8	22%
Vale of Glamorgan	34	2	6%
Merthyr Tydfil	18	9	50%
Torfaen	6	5	83%

Source: [Assessments and resolved hazards](#), taken from Hazards and licences data collection, Welsh Government (23 March 2023).

Processes of inspection and enforcement in Wales

- 4.7 The qualitative findings suggested inspections most often occur reactively in response to complaints from occupants (or in rare cases members of the public), or in response to HMO applications as part of the licencing process. Capacity appears

to factor into the frequency of inspections in practice, with one interviewee noting they were not doing any proactive work at the moment because they didn't have the necessary resource. As one interviewee put it, they were working on a '*complaints-based strategy*' due to lack of trained staff.

- 4.8 Once the decision has been made to inspect a property, inspecting officers use the Housing Health and Safety Rating System (HHSRS) to guide inspection and enforcement (this applies to private sector and Registered Social Landlord properties). The system enables them to identify hazards and bring them to the attention of landlords. They then use the legislation to 'work with' landlords and encourage them to comply with regulations. If landlords do not comply, officers can take appropriate enforcement action.
- 4.9 While most inspections appeared to be reactive, local authorities described various processes for proactive inspections. One interviewee mentioned they conduct HHSRS inspections on a '*block basis (flats and streets)*' and that inspections were scheduled by the manager of a department. However, they emphasised that repairs inspections were prioritised over HHSRS inspections.
- 4.10 Another interviewee stated that their local authority surveyed geographical areas for issues, and clarified that this was another way in which problems were identified (besides through receiving complaints). However, they didn't provide further detail beyond this. Finally, one interviewee mentioned they had pre-programmed inspections for HMOs which were organised through the licencing process. That said, this same process was framed as reactive by another interviewee due to it being guided by HMO applications.
- 4.11 The managers interviewed were more likely to report that proactive inspections were carried out than other staff. One manager reported that their team were on a 'rolling program' which detailed when routine inspections were due. In line with other interviewees, they mentioned that inspections based on complaints were more common than routine inspections. In some cases where grants or loans were being offered, their team would inspect properties before signing off on them. Another manager mentioned proactive formal inspections of HMOs.
- 4.12 For complex cases (e.g., cases where the legislation and guidance do not state specifically how to deal with the situation and are therefore open to interpretation) or cases that they haven't encountered before, officers may reach out to more experienced colleagues or even contacts at neighbouring local authorities for

advice. This sort of cooperation appears to work well, with many interview participants referencing this practice. Alternatively, officers can consult the information and guidance available to them or search for guidance online. Specific sources of advice mentioned by interviewees included the North Wales housing and technical panel, solicitors who specialise in the relevant legislation and a specialised online forum where officers from other local authorities can help with queries.

“If you've not used a specific piece of legislation that you now need to use, it might be worth speaking to a colleague in terms of making sure, or getting them to look at the notice that you serve to see if it's served correctly and that you've got the right section under that piece of legislation.”

Environmental Health Officer

“[My role involves] helping officers to determine the most appropriate course of action and giving them technical advice on issues that they may have queries about.”

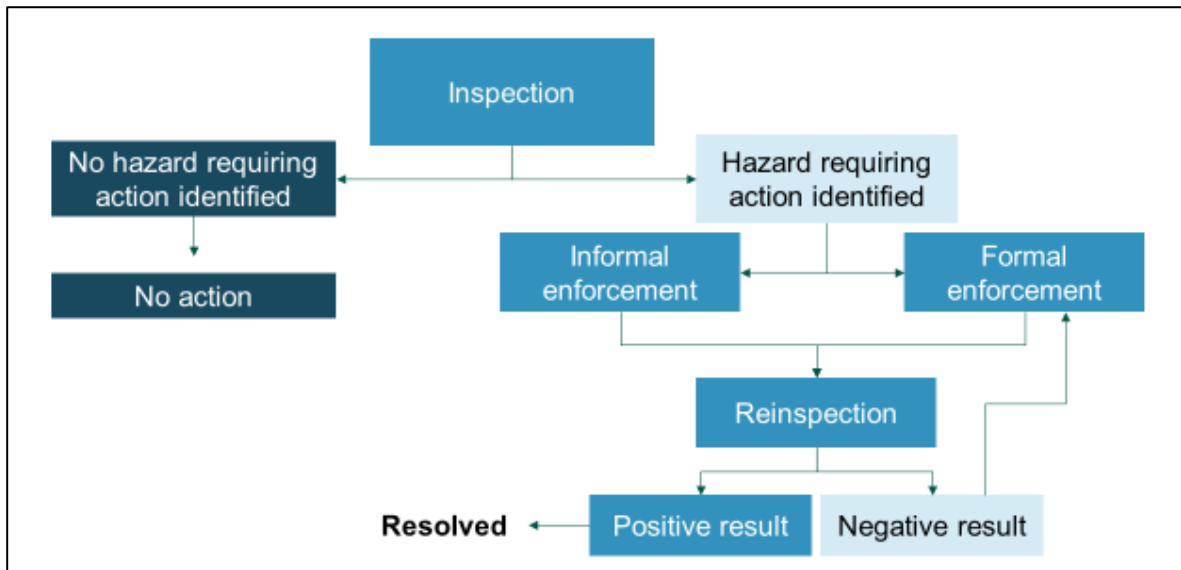
Senior Environmental Health Officer

Variation between local authorities in enforcement

- 4.13 There was some variation across local authorities regarding standard procedures of enforcement (see Figure 4.1). For example, in many local authorities the standard policy is to take informal action after an inspection (unless there is an imminent risk to health) and try to resolve issues ‘amicably’ rather than undertake formal action.
- 4.14 One interviewee clarified that informal enforcement did not amount to simply ‘giving advice’ (which local authorities do not have the resources to do in their view) but rather amounted to an enforcement response to a problem. Such an approach could involve providing the landlord with a report detailing the work that needs to be done within a certain timeframe (e.g. three months). In general, this approach involves working with landlords and interacting with them on a more informal basis.

“We'll go out to the property, carry out an inspection under the HHSRS and then our policy is to take informal action first unless there's obviously an imminent risk to health, in which case we would take one of the seven actions in the Housing Act, then we'll try and work with the landlord. If they don't comply, then it's an enforcement.”

Figure 4.1: Representation of process of inspection and enforcement in local authorities



4.15 In other local authorities, a formal type of enforcement action is usually carried out, for instance serving landlords with an improvement notice or a hazard awareness notice.

“Our enforcement attitude, particularly if it’s occupied property, is that if someone’s living in it, it needs to be remedied. Therefore, you’re almost always going to get an enforcement and inspect and improvement notice. At the very least.”

Senior Environmental Health Officer

4.16 In one local authority, improvement notices are the most common form of enforcement. After this, the inspector considers whether there is a need to escalate to a prohibition order, or de-escalate to an awareness notice.

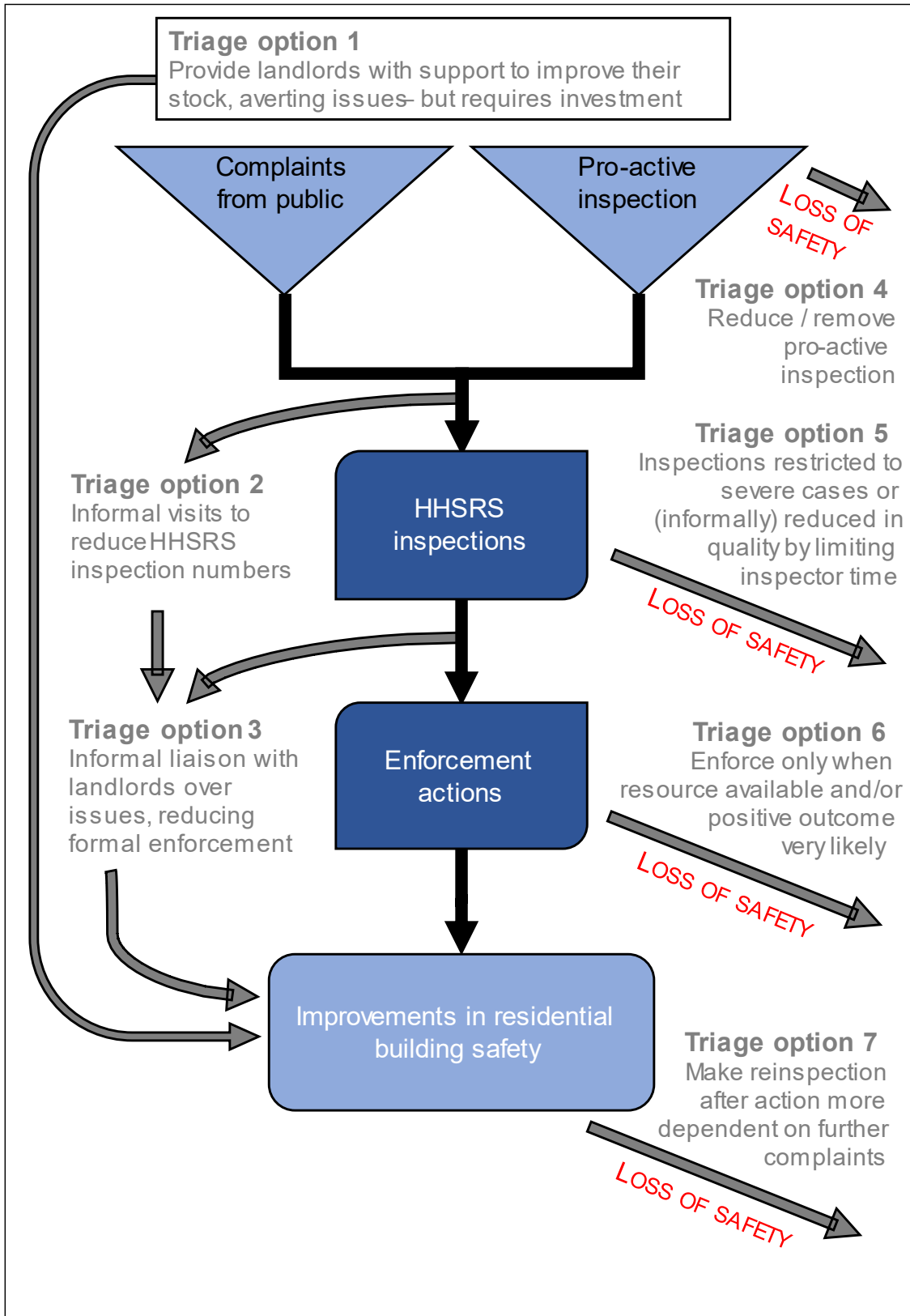
4.17 In another local authority, staff felt very little enforcement was required, because landlords are offered interest-free loans to conduct the required repairs or improvements, leading them to be able to meet safety standards. The building safety team in this local authority works collaboratively with their regeneration team to ensure that the latter’s grants do not undermine their interest-free loan scheme. The scheme is presented as a sustainable way of investing in housing infrastructure and improving building safety.

“We work with landlords to resolve issues rather than hit them over the head with a stick. If we need to, we do serve notices, but I see notices and going to court as a failure. [...] we’ve overcome [the money barrier for landlords] through the system of interest-free loans – which is a mutually beneficial arrangement for both the council and landlords.”

Senior Environmental Health Officer

- 4.18 All local authorities said they undertake formal enforcement action if there is an imminent risk to health.
- 4.19 Figure 4.2 shows the different triage options for inspection and enforcement used by local authorities in Wales. It displays possible intermediary steps between the receipt of complaints from the public or proactive inspections and improvements in residential building safety. The loss of safety caused by some triage options is flagged, for instance when inspections are restricted to severe cases due to a lack of resources. This figure is intended to illustrate the variety in the approaches taken by different local authorities and contextualise these choices.

Figure 4.2: Triage options for inspection and enforcement



Suggested improvements to inspection and enforcement processes

4.20 The qualitative findings suggested that some members of the building safety workforce in Wales found the HHSRS system to be outdated and impractical. One

member of the workforce noted that under HHSRS, it wasn't always obvious whether a formal action needed to be taken after an inspection had been conducted.

“That system is outdated. It needs a review. So, it's not fit for purpose in my opinion and it's a little bit unwieldy. It is difficult to make the right decisions when you find disrepair in properties, and categorising it correctly in terms of whether you should be taking action or not.”

Environmental Health Officer

4.21 In some cases, interviewees suggested that the HHSRS guidance was not practical and could be simplified.

“It is a great piece of work but the practicalities are not there... It is very important to do the write up as soon as you've done the survey and make reference to the documents you've been given to justify your actions... sometimes I think it could be simplified a lot.”

Housing Officer

4.22 The interviews further revealed that in practice, the inspecting officer's judgement, and often their level of experience, had an impact on whether or not further action was taken after a hazard had been identified.

4.23 Indeed, the qualitative findings suggest that inspecting officers would decide whether or not it was worth taking further action given the risk posed by the hazard and whether there was an associated need to prioritise action. This type of judgement call is something which staff felt got easier with experience.

“For a Category 2 hazard, next steps would depend upon the officer's professional judgment about whether more action was needed. Sometimes it's not worth taking any further action because no property is without any hazards. All properties have got some hazards. You have to prioritise.”

Environmental Health Officer

4.24 An issue that emerged in interviews with the workforce was that often the less experienced members of the team found it harder to make this sort of judgement call, and tended to rely on more experienced colleagues. The impact of lack of experience was also flagged when it came to being able to predict the outcome of an enforcement action.

4.25 The members of the building safety workforce that were interviewed suggested several ways in which the processes of inspection and enforcement could be improved:

- Increased efficiency through digitalisation

One interviewee reported they were pushing to modernise systems and processes, including using technology for inspections rather than pen and paper. This was expected to speed up processes.

- Clearer boundaries of responsibility

One interviewee noted there were grey areas of responsibility between departments, for instance, for the policing teams officer and the temporary accommodation officer. In their view, this can lead to individuals' "agendas" taking precedence when enforcing standards. In this case, the temporary accommodation officer will want to secure temporary accommodation for those who need it, while the policing teams officer will be concerned with accommodation standards.

- Enhanced cooperation with other organisations

One interviewee suggested that direct working relationships with other organisations would be useful, for example with the police.

- Improved relationships with landlords and promoting better outcomes

Some interviewees highlighted the importance of maintaining good relationships with landlords. Beyond favouring an informal approach to enforcement, one interviewee mentioned an interest-free loan scheme for landlords to pay for repairs as a successful way of dealing with enforcement and building trust with landlords.

4.26 In some cases, staff felt that the system worked well but that a lack of capacity was an issue. It meant that officers needed to prioritise the most urgent hazards (e.g., if there are several Category 1 issues in the same property) and delay taking action on less urgent hazards. Lack of capacity was also linked to the reactive nature of inspections.

"It all works well, the only problem is the lack of colleague capacity – we are currently over-stretched and the lack of budget and challenges to recruit and high turnover."

“A lot of the time it feels as though you're just fighting fire. You get a complaint, you deal with it, you get another complaint, you deal with it.”

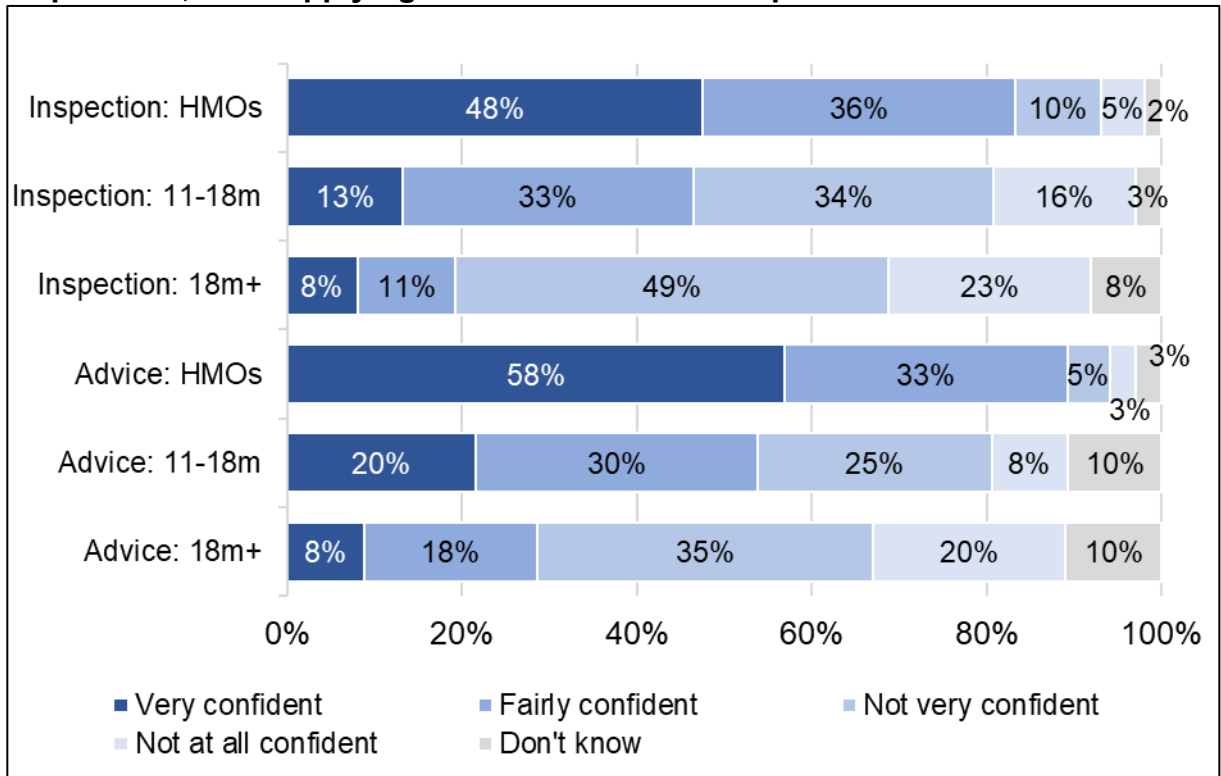
Environmental Health Officer

Skills and sources of support

Skills

- 4.27 In the workforce survey, respondents were asked how confident they felt carrying out inspections or supplying in-house advice on inspections or enforcement regarding HMOs and high-rise buildings.
- 4.28 Confidence regarding HMOs was much higher than confidence regarding high-rise buildings, with 84% indicating they were fairly or very confident in assessing the safety of HMOs (compared to 19% for buildings of 18 metres or above). Among those providing legal or technical advice, 91% indicated that they were fairly or very confident in supplying in-house advice on inspections or enforcement actions regarding HMOs, compared to 26% for buildings of 18 metres or more in height (see Figure 4.3).
- 4.29 This suggests there is a gap in knowledge regarding inspection and enforcement processes for tall buildings (11 to 18 metres tall or more than 18 metres in height), recognised by both local authorities and members of the building safety workforce.

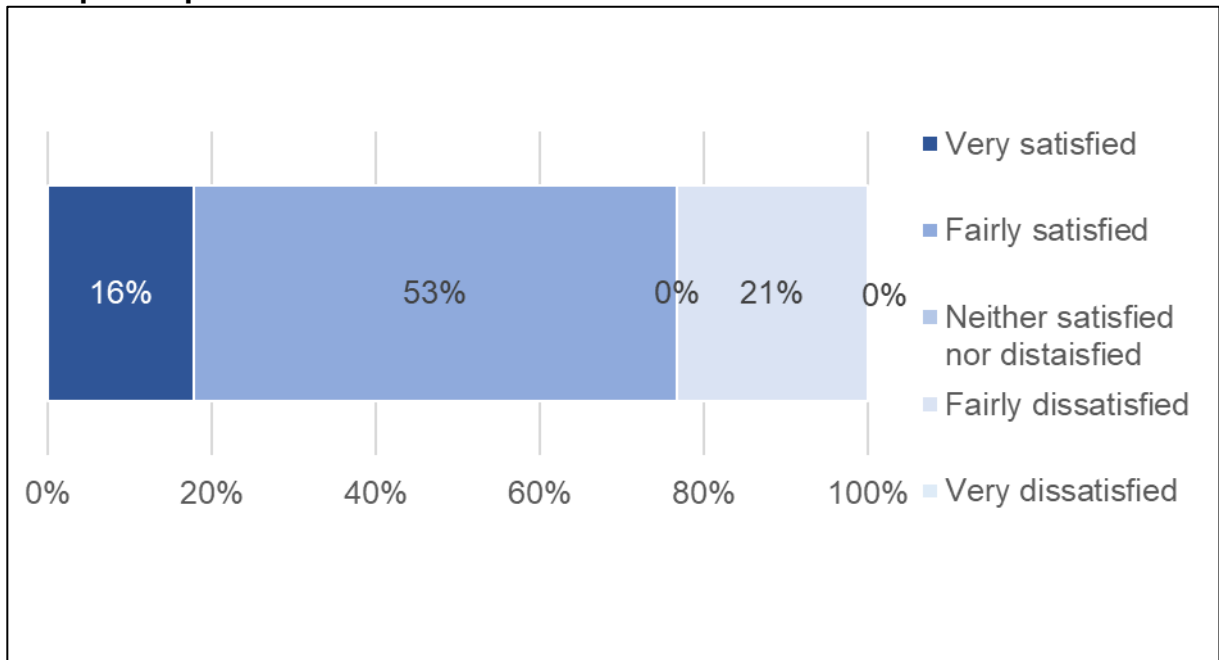
Figure 4.3: Workforce survey – Self-confidence among those doing inspections, and supplying in-house advice on inspections



Base: Workforce survey. All those working on inspection (61) All those working on legal or technical advice (40)

- 4.30 Generally, the workforce were confident that their team possessed the skills required of them. Two-thirds of the workforce said that they ‘agreed’ (47%) or ‘strongly agreed’ (17%) with the statement: “The wider team I work in has the skills and knowledge required to deliver the service needed”. However, this was not universal as just over a tenth disagreed (8% ‘disagree’ and 3% ‘strongly disagree’) and a quarter (25%) neither agreed nor disagreed with the statement.
- 4.31 Similarly, two-thirds (68%) of those answering the local authority survey said that they were satisfied that their team had the skills required to deliver the service needed (as shown in Figure 4.4) while a fifth (21%) felt dissatisfied that their team had the skills required.

Figure 4.4: Local authority survey – Satisfaction that team has the skills you need to respond adequately to the demand for building safety services in the occupation phase?



Base: Involved in inspection and enforcement of private sector housing (19)

4.32 From the qualitative interviews with the workforce, some had a perception that applicants and recruits who had completed qualifications in Environmental Health lacked practical experience and skills in housing and construction. So while they may have a good grounding in the legislation from their academic qualifications, they were felt to struggle in practical aspects of inspection and enforcement that were not covered in their studies.

4.33 This means that new recruits, who have the necessary qualifications, are having to learn the practical elements of their role on the job. They therefore need time to receive training and build up the necessary experience, rather than being able to immediately fulfil everything expected of them.

“There’ll always be training requirements for either inspection or enforcement... With graduates and post-grads, the practical technique around inspection of buildings is not being taught anymore. They’re losing the ability to look at buildings, to visually gauge what a building is and what to expect in terms of the practical vocation.”

Senior Environmental Health Officer

“We’ve had several people join the team who have done the master’s course – while they may understand the legislation and the rating system, they lack the practical experience of housing. Housing is a very practical area – it’s about how houses are constructed and if you don’t know enough about that, you’re going to struggle.”

Housing Enforcement Supervisor

Sources of support

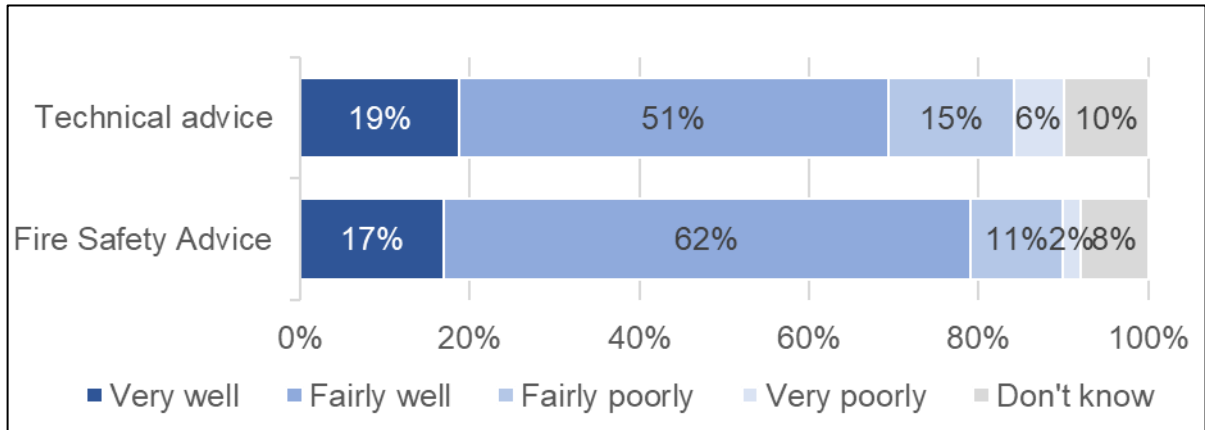
- 4.34 There was some variation in the extent to which the workforce felt the current advice available for HHSRS inspections met their needs (see Figure 4.5). The technical advice available met inspecting officers’ needs moderately well (70% said it met their needs very or fairly well), while the fire safety advice available met their needs to a slightly greater extent (79%¹⁹ said it met their needs very or fairly well).
- 4.35 That said, only 19% indicated the technical advice available met their needs very well (17% for fire safety advice), suggesting some room for improvement.

Views around the legal advice available were much less positive, with only half of the building safety workforce agreeing that the legal advice available to them for enforcement actions met their needs²⁰. Interviews with the building safety workforce suggested that legal training was something which would particularly aid in improving skills that were lacking in the wider team. This is in line with the primary work of Environmental Health Officers which is enforcing HHSRS through the Housing Act. One manager mentioned that the training available tended to focus on English legislation which doesn’t always apply in Wales.

¹⁹ Base: All who are directly inspecting when carrying out HHSRS inspections (53)

²⁰ Base: All working on activities related to Building Safety and involved in enforcement action (52)

Figure 4.5: Extent to which existing technical advice meets needs in relation to HHSRS



Base: All who carry out HHSRS inspections (53)

- 4.36 In order to understand local authorities' likely response to new legislation centred around high-rise buildings, they were asked how they would cover the additional technical knowledge required to inspect or take enforcement action on more buildings of 11 metres or more in height, if the need arose.
- 4.37 Findings suggest that local authorities would reach out to several sources for knowledge and support including the Fire and Rescue services (86%), internal experts (71%) or external experts (71%)²¹. They would also consider training staff to improve their knowledge (71%).

Qualifications and Training

Qualifications

- 4.38 The members of the workforce interviewed had a range of qualifications. Most commonly, Environmental Health Officers had a Bachelor's degree in Environmental Health – this could be a Bachelor of Technology (BTech) or a Bachelor of Science (BSc). This was sometimes followed by a Postgraduate degree in the same discipline. Several interviewees had undertaken an additional building qualification (an Ordinary National Certificate [ONC] or a Higher National Certificate [HNC]). Some interviewees added that they had a Health and Safety qualification or a Fire Safety qualification. One interviewee had a Building Surveyor qualification,

²¹ Base: All who require different skills for 11m+ buildings (14)

but did not specify what type. Another interviewee had previously done an Apprenticeship in joinery but then pursued ONC and HNC building qualifications before progressing into their current role.

Training

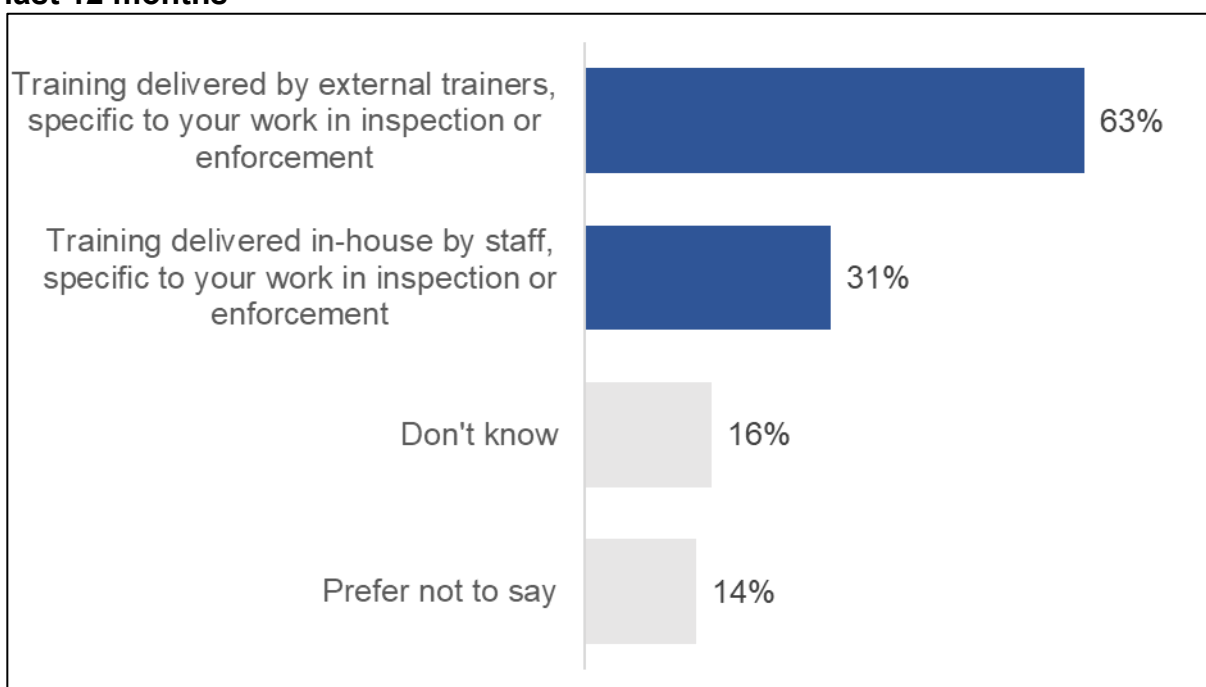
- 4.39 Figure 4.6 shows the types of training attended by the building safety workforce in Wales in the last year (March 2022 to March 2023). Just under two thirds of the workforce had attended training delivered by external trainers specific to their work in inspection or enforcement, while around a third had attended training delivered in-house by staff.
- 4.40 External training tended to be facilitated by local authorities as most staff were given paid time off from their normal work to attend this training (93%). A large proportion of those who had attended external training in the last year had attended a session that was funded or part-funded by employers (78%)²². Over a third of those who had attended external training had attended a session that was provided for free (e.g., funded by a professional body or central government) (35%).
- 4.41 The qualitative findings confirm that staff undertake a mix of internal and external training, and confirm that local authorities have a dedicated budget for external training. Knowledge-sharing is particularly encouraged in some local authorities.

“We have a bank of 'questions to the floor' that have been posed and answered over time so there is a bank of responses and support. A mix of formal and informal opportunities to share knowledge and experiences.”

Housing Enforcement Supervisor

²² Base: All who were attending training sessions delivered by external trainers (40)

Figure 4.6: Workforce Survey – Types of training attended by workforce over last 12 months



Base: All except non-technical advisers (64)

4.42 Around half of the workforce who had attended training funded by their employer or training delivered in-house had done so because it was a compulsory requirement for their current role (53%), and a similar proportion had (also) done so because it was essential or important for their team's work (55%)²³. This reflects that not all those involved are required by regulation to undertake CPD; unlike Environmental Health Officers, typically Housing Officers are not. Indeed, the qualitative findings support the idea that individuals with a surveying role attend a mix of compulsory and optional training courses.

“In terms of keeping my chartered status for different organisations such as the Chartered Institute of Environmental Health and the Institute of Occupational Safety and Health, I have to meet certain CPD criteria, undertake a minimum amount of around 30 hours CPD a year.”

Environmental Health Officer

4.43 The workforce reported spending an average of 23 hours on external training in the last year (whether it was compulsory or for planned progression or promotion).

²³ Base: All who were attending external training sessions funded by employer or training delivered in-house staff (40)

Satisfaction of the workforce with the training opportunities available

- 4.44 In general, the workforce felt there was room for improvement in the area of training and development. Only three out of seven individuals interviewed reported being satisfied with the training and development opportunities available to them in their role²⁴. Having the time to attend training emerged as a factor, with one third of those surveyed feeling they don't have enough time at work to receive all the training they need for their role²⁵.
- 4.45 One interviewee felt that there was not enough internal training available, and argued that their local authority needed to build their own training programs. Another found it difficult to gain access to specific training through their local authority, partly because of a lack of funding and partly because of the few trainers available in Wales.
- 4.46 Among the 15 individuals likely to leave their job voluntarily in the next 12 months, three individuals cited getting better training and development as one of the reasons²⁶, but more generally the qualitative findings suggest that the training available to staff, particularly external training, is of high quality.

“Training standards have been generally high across my career – I've developed a lot of experience and training over the years to lead to a high standard of competency.”

Environmental Health Officer

- 4.47 There was some variation across local authorities around how staff access training. One interviewee (a Housing Officer) described a standard process through which training was identified and allocated at their local authority. A Corporate Health and Safety team was responsible for overseeing and identifying staff training requirements. The team used a matrix of training opportunities mapped against job skill requirements and thereby ensured that those who need appropriate qualifications were able to pursue them.

²⁴ 43% were either Very or Fairly satisfied. From the Workforce survey: C7 How satisfied or dissatisfied are you with the training and development opportunities available to you in your role? Base: All (72)

²⁵ Workforce survey: D1-4 To what extent do you agree or disagree with the following statements? At work, I have the time needed to receive all the training I need for my role. Base: All (72)

²⁶ Workforce survey: D6 If you were to leave, what would be the main reasons for that? Base: All who are likely to voluntary leave their job in the next 12 months (15)

4.48 In another local authority, staff played a more active role in requesting training from their manager.

“If they, through their environmental health channels, come across something they are interested in doing, they put it to their manager. Their manager agrees yes or no, and it tends to go forward from there.”

Team Leader

4.49 That said, training that is required for staff to maintain their qualification was always enabled by local authorities according to both officers and managers or team leaders. Local authorities also appeared to offer internal refresher training.

“[...] if there is a need for the training, if it's a requirement, they do find the time to do it... It's required for them to maintain their qualification... And obviously they have to be kept abreast of new developments.”

Team Leader

Suggestions for improvement

4.50 Firstly, the cost of training was mentioned several times as a barrier to CPD; it was suggested that staff couldn't always do the training they wanted to do for this reason.

“The authority does provide some CPD training, but there isn't a big funding budget for that. So it's difficult to get any specific training through the authority.”

Environmental Health Officer

4.51 In general, staff found it harder to access training which was not specifically connected to their job role or not a requirement to maintain their qualification. One interviewee (EHO) was frustrated that their local authority wouldn't pay for any training for them to become more specialised in housing and buildings. The reason given was that the individual already had what they needed to fulfil their role so it would not be a good investment for the local authority.

4.52 Another interviewee noted that their local authority facilitated training so long as it was applicable to their role. One interviewee found it hard to access more 'niche' training as it is offered by a small number of training providers.

- 4.53 Satisfaction with training also varied across job roles. A Housing Support Officer found that there was no structured training for their role and no clear progression pathway or development plan. By contrast, EHOs were more satisfied with the training opportunities and CPD available to them.
- 4.54 One area for improvement mentioned by interviewees was training relating to new regulations, which 'in an ideal world' would be consistently available to staff. Keeping up with new legislation was seen as something which individuals could integrate into their professional development.

“Most of my professional development is in terms of how I keep myself current and up to date with changes in legislation and obviously enforcing that legislation through my current job role.”

Environmental Health Officer

- 4.55 Local authorities were rarely mentioned as a direct facilitator regarding training relating to new legislation. However, it is worth noting that one interviewee in a management position specified that some training was organised in response to a change in the Renting Homes (Wales) Act, suggesting this can depend on the local authority and on the relevance of the legislation to the roles of staff.
- 4.56 Finally, one interviewee felt there were opportunities for more informal learning given that they worked in a relatively small team.

Case study – ‘James’, HMO Licensing Officer

‘James’ works as an HMO Licensing Officer in South Wales. He used to work in the social housing sector but became a Licensing Officer as a next step in his career. As he is not qualified to carry out HHSRS inspections, due to not being an EHO, the majority of his role relates to coordinating enforcement actions. He also oversees the administrative tasks of the team. When James changed careers, he was not required to gain any additional qualifications, and his existing social housing experience was valued. Since becoming a Licencing Officer he has done additional third party training courses which have been very useful.

For the most part he finds his role fulfilling because of the positive impact that enforcing standards for landlords has on the local community.

"It's quite satisfying. There are so many empty derelict buildings to get back into use. It's also about making communities more vibrant, and upholding standards for landlords."

He does not enjoy the administrative side of his role, in particular having to deal with the archaic systems used to log and process inspections and enforcement actions. He believes the council he works for does not have enough budget to update their systems.

A lack of capacity across the team is also an issue – in particular the lack of qualified EHOs. Currently the team is lacking three EHOs and one technical officer, with several staff members set to be leaving shortly. To overcome this, the Council rely on agency workers to carry out inspections at a high cost. The lack of available budget also means that his employer is reluctant to pay for staff members to gain EHO qualifications, creating a negative cycle of relying on expensive agency staff whilst not being to recruit additional team members.

The lack of team capacity directly impacts the way inspection and enforcement actions are carried out. He believes an entirely reactive approach is taken to inspections because of the lack of qualified EHOs on the team. The Council is made aware that an inspection needs carrying out when a tenant raises a concern, and the EHO agency staff members responds accordingly. If the building is more complex, or the inspection relates to structural safety then they will collaborate with Fire and Rescue Services.

He feels his team will only carry out enforcement action if the case is clear-cut and the Council has a very strong chance of winning if legal action is required. However, his team will also provide landlords with an informal warning to inform them that their property needs licensing.

Ways of working, skills and training: key findings

4.57 The key findings of this analysis were:

How inspection and enforcement currently works

- The variation between local authorities around processes of inspection and enforcement suggest local authorities have adapted to different circumstances, whether this is different levels of capacity, different levels of experience and knowledge within the team, differences in oversight and management style or circumstances which are specific to each local authority.
- Informal enforcement actions are widely used in practice. Such actions include providing landlords with a report outlining the problems identified and setting a deadline for them to address them, at which point formal enforcement actions may ensue. There is a debate around the optimum balance between informal and formal approaches.

Skills and sources of support

- Around two thirds of the workforce and local authorities said that they were confident that their teams had the skills required of them. This suggests that in most instances the level of experience and training within current teams is adequate. However, the potential effect of experienced individuals leaving the workforce, and not being replaced by similarly experienced individuals, could be significant.
- There was a perception that applicants and recruits who had completed qualifications in Environmental Health lacked practical experience and skills in housing and construction. So while they may have a good grounding in the legislation from their academic qualifications, they were felt by some to struggle in practical aspects of inspection and enforcement that were not covered in their studies. They therefore need time to receive training and build up the necessary experience, rather than being able to immediately fulfil everything expected of them.

- Staff felt the technical and legal advice available to them was somewhat inadequate, and that individuals working on tasks relating to building safety could benefit from legal training.

Training

- The training available to the workforce is often provided by external training providers and is considered to be good quality. However, it was felt by participants that training could be made more accessible to individuals working in building safety, staff time for training could be ring-fenced more effectively, and opportunities to attend more 'niche' training could be promoted.

5. Findings: Recruitment and retention

5.1 This chapter covers local authorities' recruitment requirements and their approaches to recruitment and retention, as well as exploring the experiences and views of the workforce.

Workload pressures

5.2 The workforce survey indicates that there are individual and team-based workload pressures that impacted upon their ability to carry out the work required of them: this is a particular problem within Environmental Health departments.

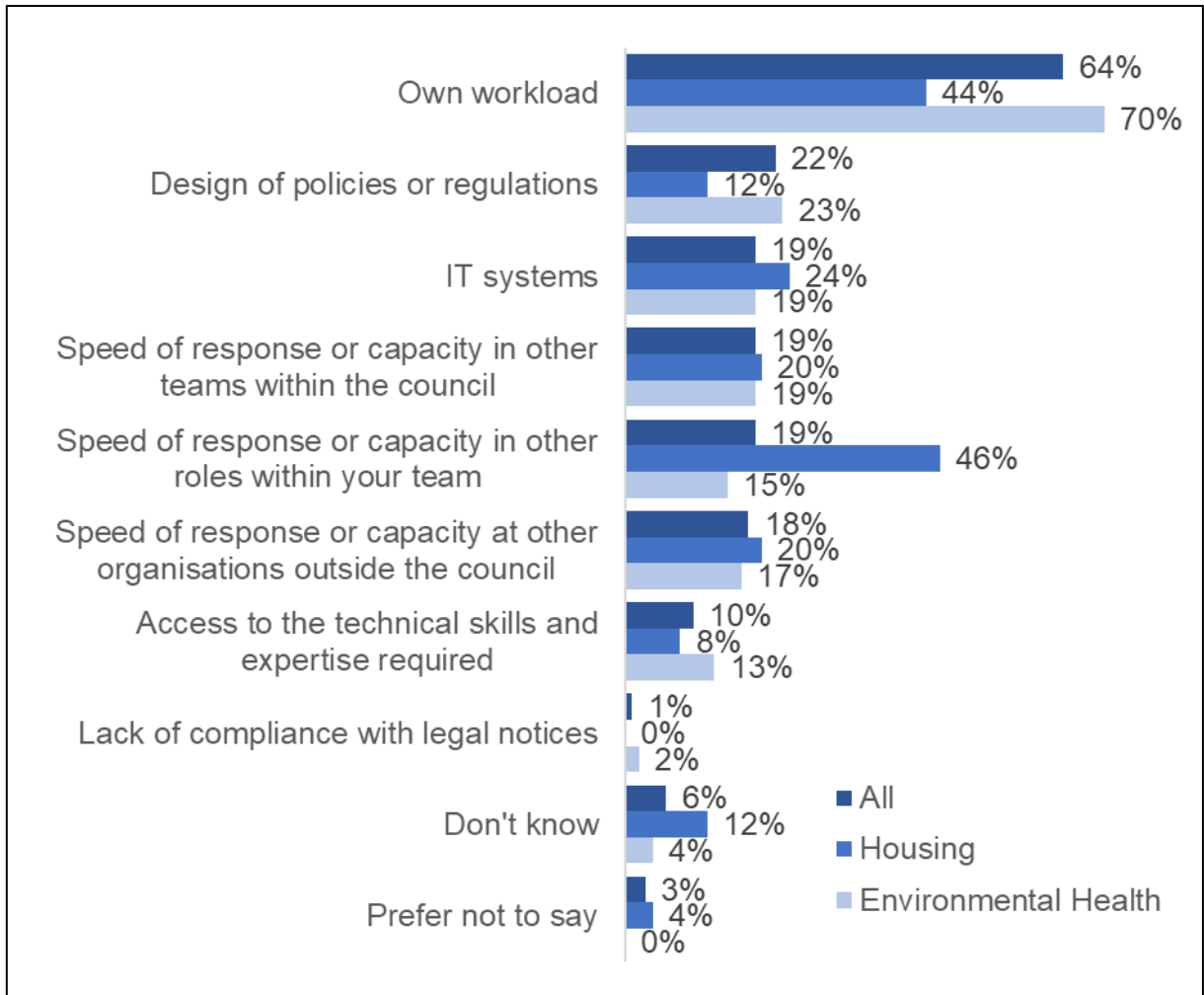
Individual workload pressures

5.3 When asked what the barriers were to conducting their work relating to building safety, two thirds of respondents (64%) to the workforce survey said that their 'own workload' was a barrier. This was by far the most common response. In comparison, the next most common barriers were experienced by roughly a fifth of respondents (as shown in Figure 5.1).

5.4 Workload pressures were more common for individuals working in Environmental Health departments, with 70% saying that their own workload was a barrier, compared to 44% working in Housing departments (also shown in Figure 5.1).

5.5 The second most common barrier was 'design of policies or regulation', which 22% of respondents said was a barrier. Based on the qualitative interviews with the workforce, this is most likely related to the HHSRS which includes 29 categories of hazards to be assessed during an inspection of a residential building. As discussed in the previous chapter, this is seen by some as onerous, and questions were raised as to whether it was still fit for purpose given it has been in place for almost 20 years and building construction has developed in that time. Additionally, the qualifications required to carry out the inspections mean that this responsibility cannot be shared across the wider team.

Figure 5.1: Workforce survey – Barriers to carrying out work related to building safety



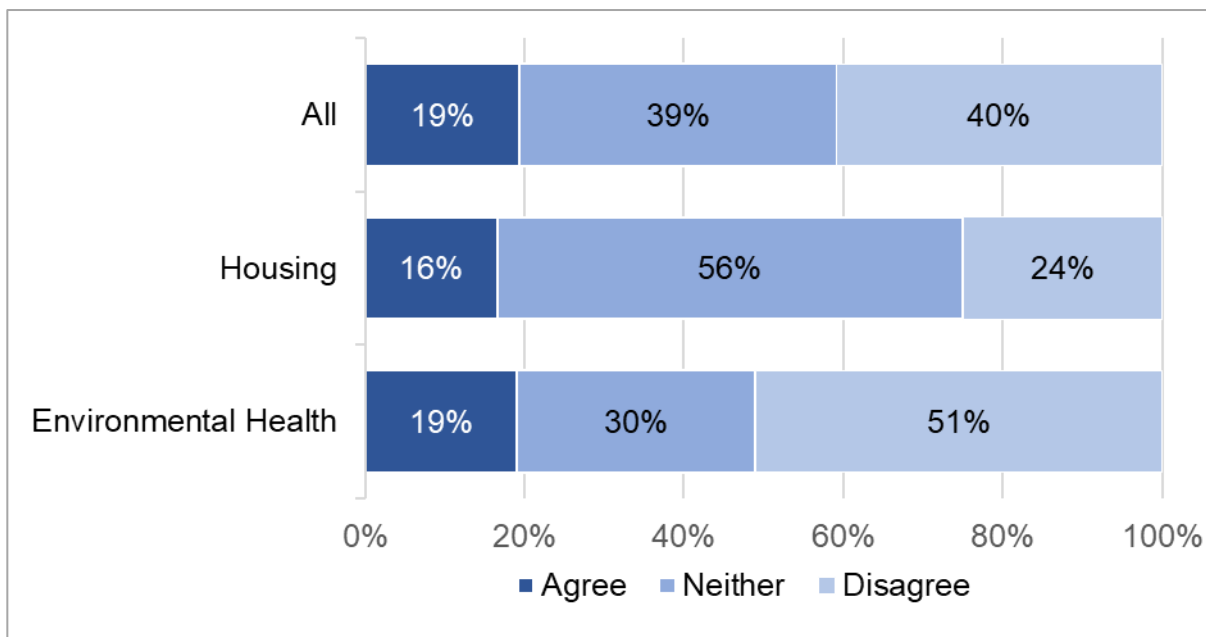
Base: All (72), work in Housing Departments (25), work in Environmental Health Departments (47)

Team workload pressures

- 5.6 As shown in Figure 5.2, the workforce were twice as likely to say that their team did not have the time to meet the demand for their services than to say that they did have the time. In response to the statement “the wider team I work in has the time available to meet the demands for our services”, 40% of respondents disagreed compared to 19% who agreed.
- 5.7 Among those who said their team does not have the time needed to meet the demand on their services, 28% said that ‘timescale for all tasks’ were affected; and more specifically 28% said ‘providing administrative support for inspection and enforcement’, and 24% said ‘responding to complaints’ were affected.

5.8 As seen with individual workloads, workload pressures were more evident in Environmental Health departments. Around half (51%) of those working in Environmental Health departments disagreed with the statement “the wider team I work in has the time available to meet the demands for our services”, compared to 24% working in Housing departments (also shown in Figure 5.2).

Figure 5.2: Workforce survey – Agreement with statement: The wider team I work in has the time available to meet demand for our services

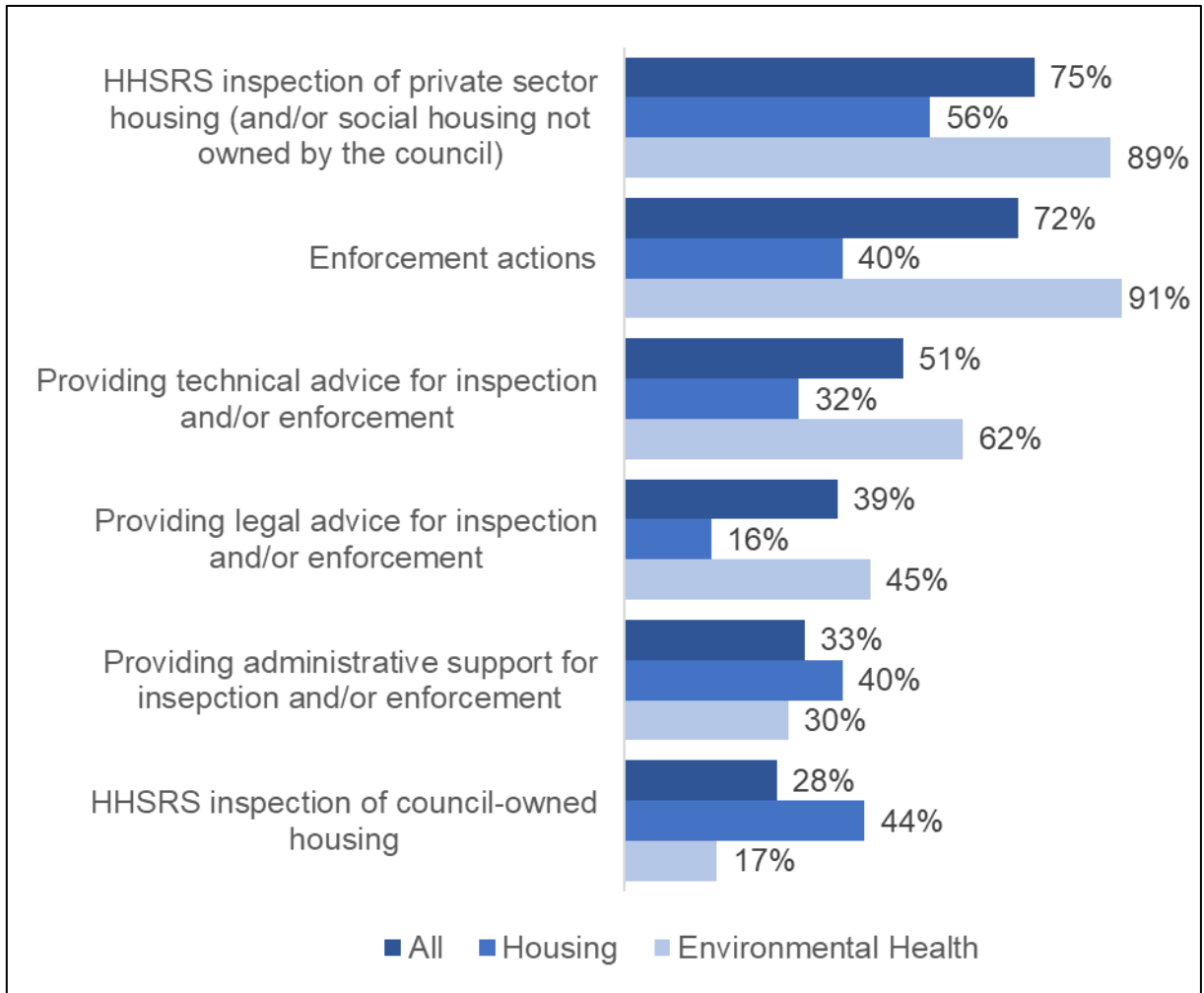


Base: All (72), work in Housing Departments (25), work in Environmental Health Departments (47)

Workload pressures in Environmental Health departments

5.9 As detailed above, those working in Environmental Health departments were more likely to say that they, and their team, were facing workload pressures. This may be due to having a wider variety of responsibilities in their role. As shown in Figure 5.3, respondents were asked whether they worked on six different activities related to building safety as part of their job. Those working in Environmental Health departments were more likely to be involved in ‘inspection of private sector housing’, ‘enforcement actions’, ‘providing legal advice for inspection’, and ‘providing technical advice for inspection’ than those working in Housing departments. On average, those working in Environmental Health departments worked on 3.3 different building safety activities, compared to an average of 2.3 for those working in Housing departments.

Figure 5.3: Workforce survey – Activities related to Building Safety that respondents work on



Base: All (72), work in Housing Departments (25), work in Environmental Health Departments (47)

5.10 From the qualitative interviews with members of the workforce, an additional challenge is that Environmental Health Officers and teams will have other responsibilities unrelated to building safety, such as food safety, which means there are competing priorities. It was also noted that there was a national shortage of Environmental Health Officers which could be contributing to a lack of capacity within teams and difficulty recruiting. Recruitment and retention are explored in more detail later in this chapter.

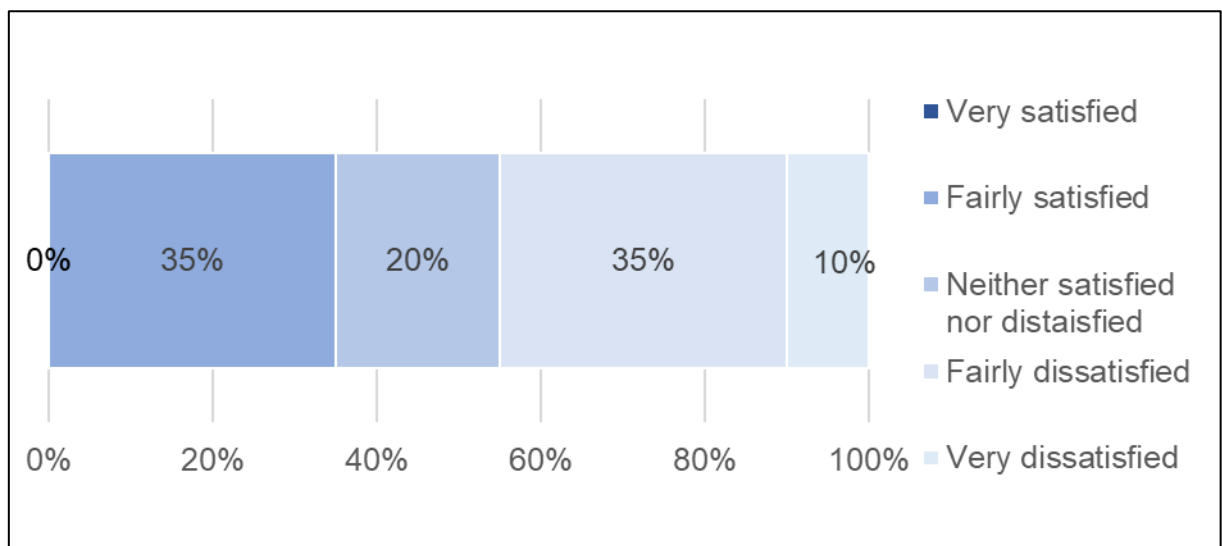
Resourcing needs and approaches

- 5.11 Most local authorities report that they are not satisfied with the size of their team working on the inspection of residential buildings and there appears to be a particular shortfall in experienced team members. Despite this, they are generally content that those working in the teams have the skills required to carry out their role.

Resourcing needs and approaches to carrying out safety inspections

- 5.12 Roughly a third of local authorities (35%) reported that they were 'fairly satisfied' that their team working on inspections of residential buildings was large enough to respond adequately to the demand for their services (no local authorities reported being 'very satisfied') (shown in Figure 5.4). Whereas just under half (45%) said they were dissatisfied with the size of their team, including a tenth (10%) who said that they were 'very dissatisfied'.

Figure 5.4: Local authority survey – Satisfaction that team working on tasks related to safety inspections of residential buildings is large enough to respond adequately to the demand for their services?



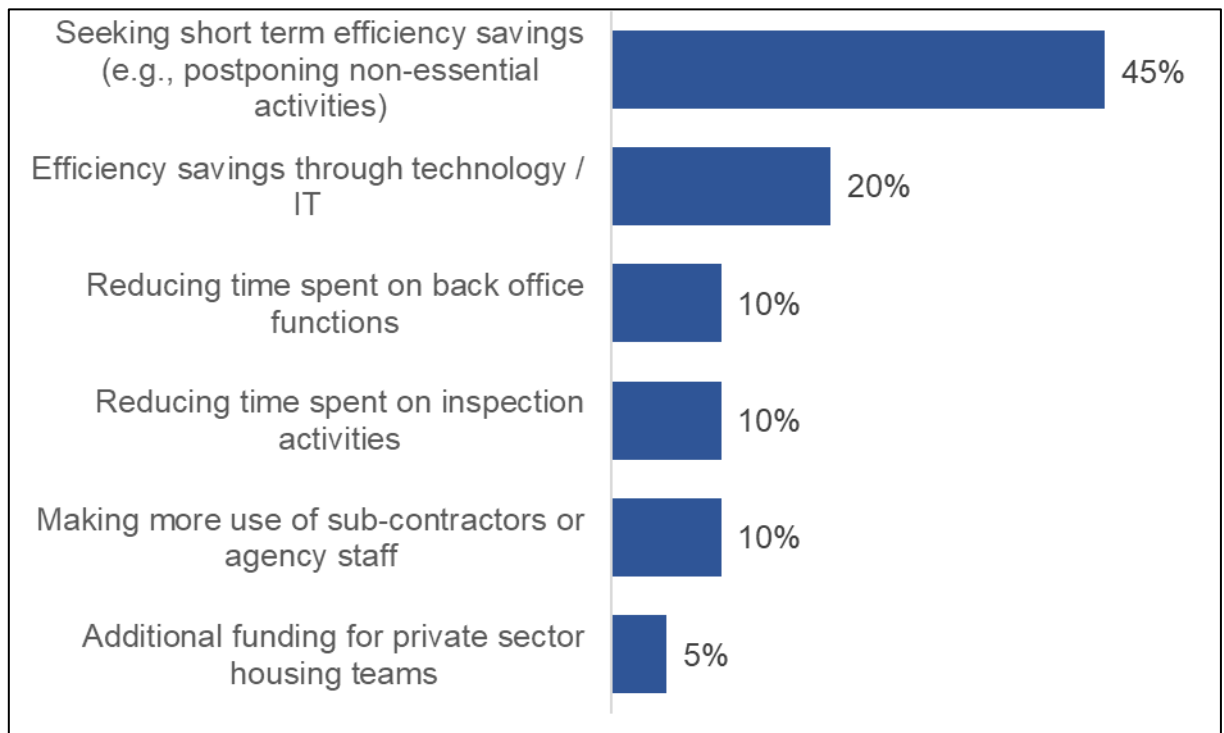
Base: All (20)

- 5.13 Local authorities were most likely to have shortfalls in staff numbers for 'experienced inspection / enforcement officers' (40% of local authorities reported this) and staff with 'specific technical knowledge' (30%). Only 2 of the 20 local authorities (10%) said that they did not have any issues with staffing shortfalls. The

shortfall in 'experienced' officers was linked to the perception that new recruits entering the workforce having completed academic qualifications, lacked the practical skills and experience required (as covered in previous chapter)

5.14 Local authorities were dealing with capacity issues through short term approaches. When asked how they would fill gaps in capacity, the most common response from local authorities was that they would seek 'short term efficiency savings' by postponing non-essential activities (45%). As shown in Figure 5.5, this response to filling gaps in capacity was more than twice as common as any other responses. Outsourcing the work was an approach used to deal with low capacity by a small number of local authorities, with two local authorities (10%) saying that they 'make use of sub-contractors or agencies' and one providing 'additional funding for private sector housing teams' (5%).

Figure 5.5 Local authority survey: Measures are likely to be used to fill gaps in capacity



Base: All (20)

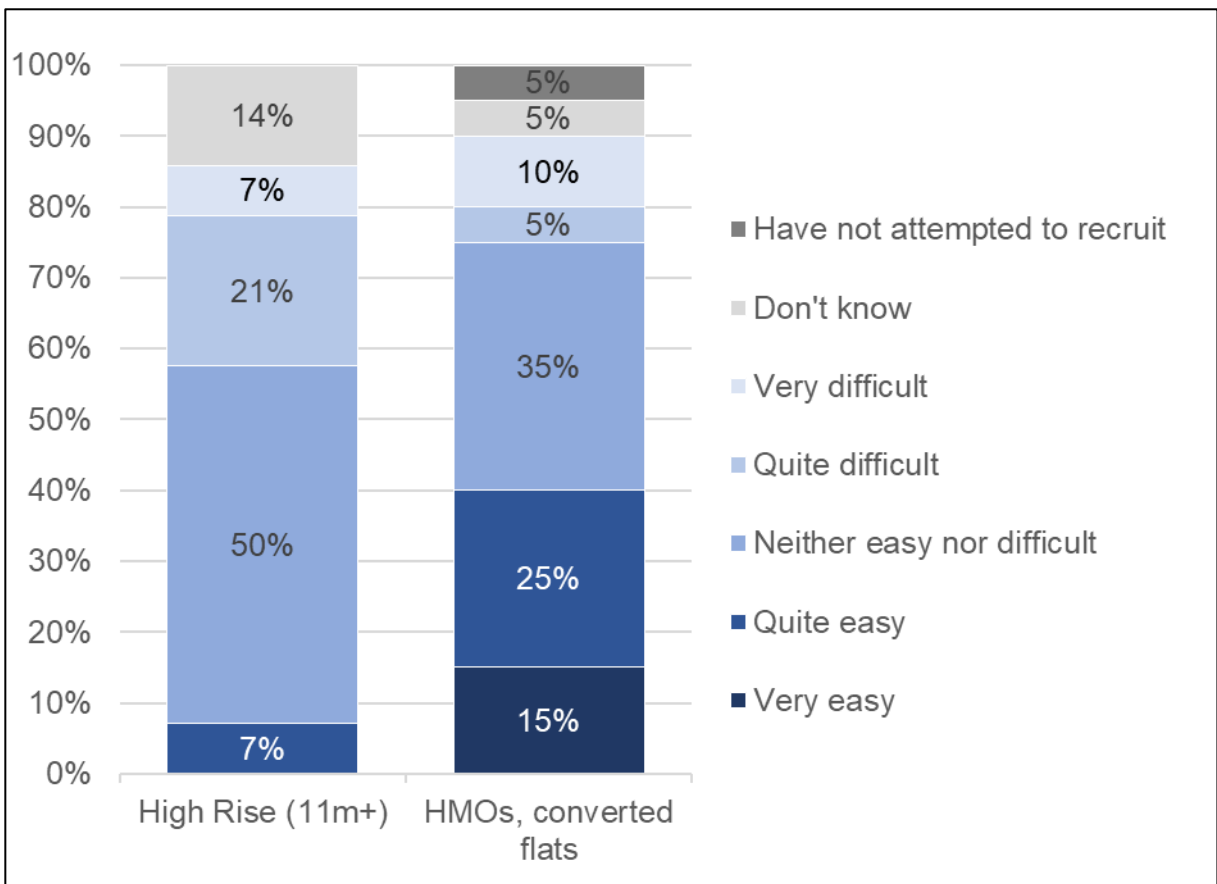
Recruiting skills for building safety services

5.15 As covered in the previous chapter, two thirds of local authorities (68%) said that they were satisfied with the skills in their team while a fifth (21%) were dissatisfied.

Among the four who said that they were dissatisfied with the skills in their team, three said it was difficult to find skills for ‘working with high rise buildings’.

5.16 As shown in Figure 5.7, only one local authority amongst those asked said it was easy to source these skills required for inspection and enforcement actions for buildings over 11 metres, and over one in four said it was difficult (29%). This is in comparison to HMOs and flats for which 40% of those asked said it was easy to access the skills and knowledge required, and 15% said it was difficult.

Figure 5.7: Local authority survey – Difficulty sourcing skills needed for inspection and enforcement actions in 11m+ buildings and for HMOs



Base: High Rise: Local authorities that have buildings over 11 metres in height (14),
HMOs: Local authorities that have HMOs (19)

Impact of lack of capacity

5.17 Lack of team capacity, and by extension the lack of time for individual team members, were seen as the biggest barriers to carrying out work related to building safety. Exacerbating this was an increase in the volume of work in recent years. The effect of this was that members of the workforce felt they were unable to deal with all the demands on their time.

"We just can't deal with everything. We can't deal with all the complaints we receive. That's the pressure and we've got no control over that. We had a record number of complaints in the last 12 months."

Housing Enforcement Supervisor

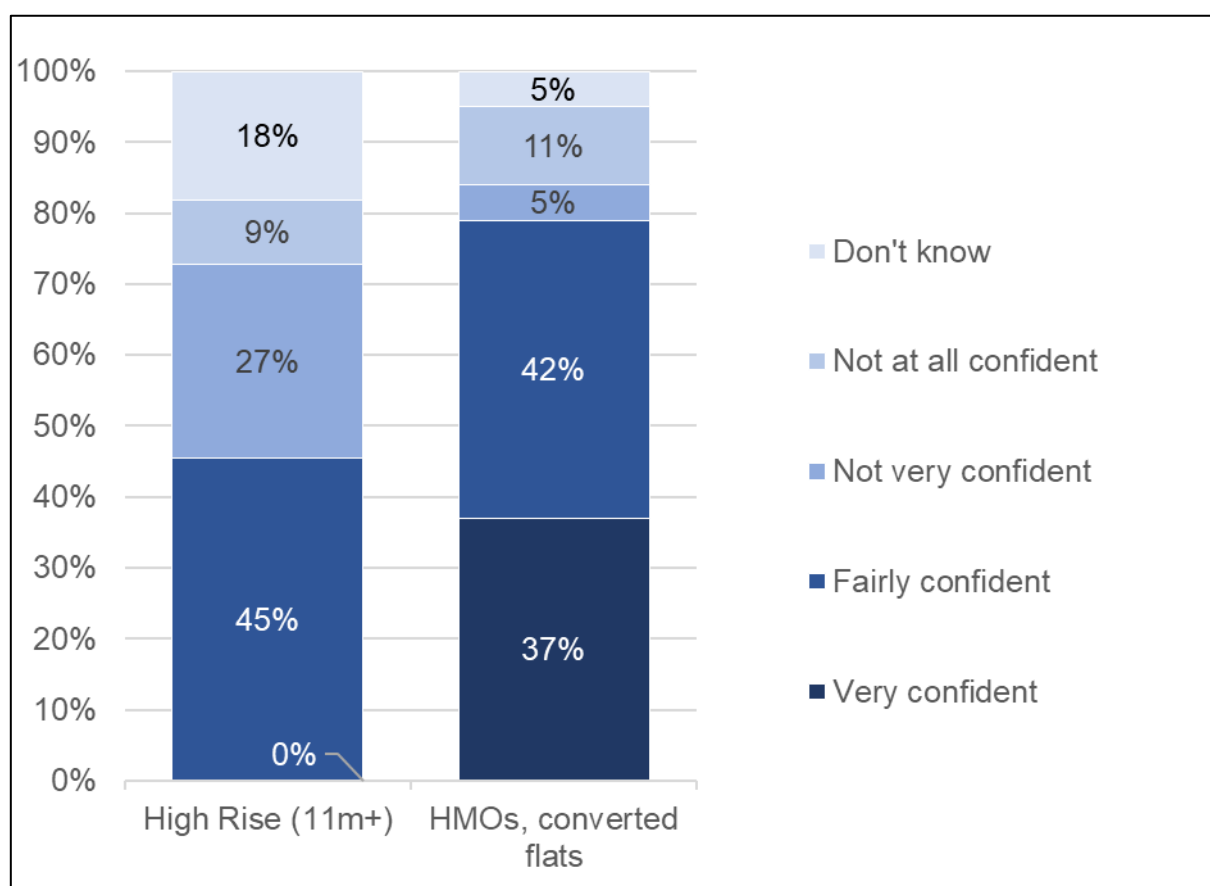
- 5.18 It was felt by some that capacity curtailed their team's ability to act pro-actively and they were forced to be reactive in meeting the demands of their service. If local authorities had the capacity to act more pro-actively, they would be able to identify problems or potential problems where there had been no complaint and resolve them before they became bigger, more time consuming, problems.

"We are just about coping but the work is primarily reactive. So we're more of a complaints-based response team rather than a team that goes out looking for issues that we can sort out."

Senior Environmental Health Officer

- 5.19 Related to lack of capacity, there was concern among local authorities that the 'system' was not capable of tackling building safety hazards, particularly in tall buildings. As shown in Figure 5.8, in response to the question 'how confident are you in the ability of the system locally to tackle building safety hazards in residential buildings', less than half of those answering in relation to buildings between 11 meters to 18 metres said they were confident (45%). Confidence was higher in relation to HMOs, where four fifths said they were confident the local system could tackle building safety hazards (also shown in Figure 5.8).

Figure 5.8: Local authority survey – Confidence in the ability of the system locally to tackle building safety hazards in 11m+ buildings and for HMOs



Base: High Rise: Local authorities that have buildings over 11 metres in height (14),
HMOs: Local authorities that have HMOs (19)

Current rates of recruitment and loss of employees

- 5.20 According to responses to the local authority survey, over the last three financial years (since March 2019 – February 2023), the net number of people working across five different roles within building safety has increased (this includes internal transfers from different departments, and relevant apprenticeships and traineeships). The numbers of people being recruited to and leaving these roles is shown in Table 5.1.
- 5.21 The biggest net increase was for ‘inspection of council houses’ where there has been an increase of 17 people carrying out this role, whereas the provision of administrative support and legal advice has remained relatively stable with an increase of two and one people respectively carrying out these roles. It should be noted that this is not a calculation of FTE roles, but rather the number of individuals

entering and leaving the workforce; also, as discussed elsewhere in the report, members of the workforce carry out multiple roles.

5.22 While the number of people carrying out each of these roles is increasing, the volumes being recruited and leaving, in proportion to the overall number of people carrying out these roles, could be construed as a relatively high turnover. This is particularly the case for the ‘inspection of private sector housing’ and ‘taking enforcement actions’. For each of these roles there was a higher number of recruits and people leaving than for ‘inspection of council housing’, despite having fewer people working in the role overall.

Table 5.1: Number of people recruited to, and leaving, building safety roles, March 2019 – March 2023

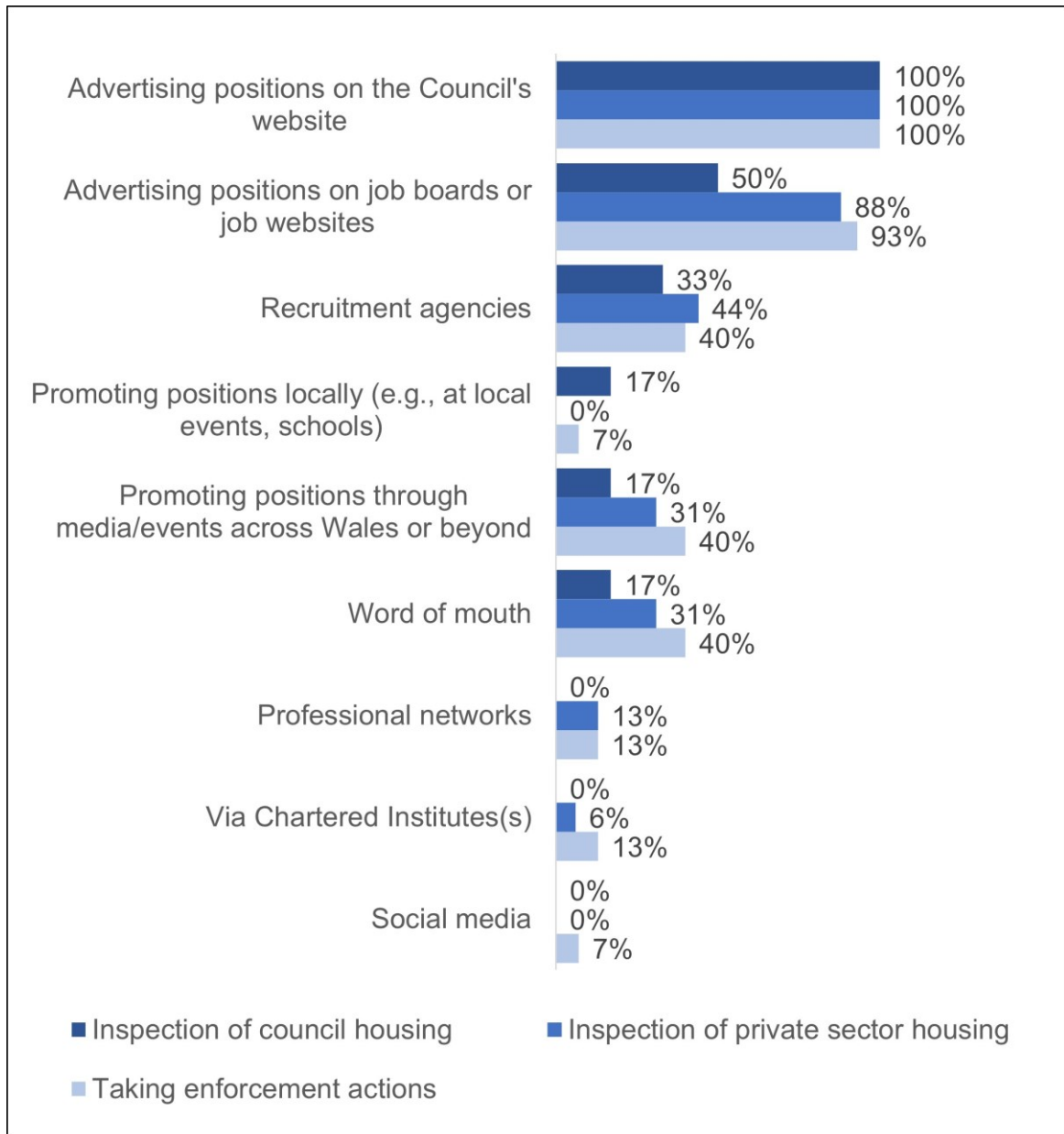
Roles	Number recruited: <i>Mar 2019 – Feb 2023</i>	Number of people left role: <i>Mar 2019 – Feb 2023</i>	Net change	Total number of people working in role: <i>Feb 2023</i>
Inspection of council housing	34	17	+17	156
Inspection of private sector housing	45	35	+10	111
Taking enforcement actions	42	34	+8	124
Providing administrative support for inspection and enforcement	12	10	+2	37
Providing legal advice for inspection and enforcement	11	10	+1	32

5.23 A fifth of respondents to the workforce survey said they were 'likely' (14%) or 'very likely' (7%) to voluntarily leave their job in the next 12 months; and just over half said they would be 'unlikely' (18%) or 'very unlikely' (35%) to voluntarily leave their job. Among those who said they were likely to leave their job were, just under half (7 of 15) said that 'better pay / benefits elsewhere' and 'increase job satisfaction' were reasons for leaving, and a third (5 of 15) said that 'better work/life balance' and 'opportunities for promotion' were reasons for leaving. Recruitment and retention challenges are explored in more detail later in this chapter.

Recruiting to the building safety workforce

Every single local authority advertised jobs related to building safety on the council's website and nearly every local authority advertised jobs on job boards and websites. It was less common to adopt alternative approaches such as using recruitment agencies, or promoting jobs more widely through media or jobs fairs. Methods of recruitment for three different roles are shown in Figure 5.9.

Figure 5.9: Local authority survey – How roles are generally recruited



Base: Inspection of council housing (6), Inspection of private sector housing (16), Taking enforcement actions (15)

5.24 Timing of recruitment and length of the recruitment window were seen as important factors in attracting interest from suitable candidates. For example, timing recruitment drives around university graduation for certain roles could result in a higher number of applicants than would be the case if recruitment was conducted at other timings of year.

“If job adverts go out in June or July we’ll get recent Environmental Health graduates applying which is good.”

“We recently just put a job out for housing enforcement officer and had 11 applicants. Spectacular turnout for this role, which is not normally the case. This time we put the closing date further back so got even more applicants.”

Environmental Health Officer

- 5.25 From the qualitative interviews, occasionally members of the workforce commented that some roles were filled by temporary or agency staff. This is seen as an expensive and short-term solution to recruiting the roles required.

Motivations for working in the sector

Pathways into the building safety workforce

- 5.26 From the qualitative interviews with the workforce, two main paths into the building safety sector were identified. The first was entering the building safety workforce at the beginning of their career. Typically they were told about the career path, usually by a family member, and decided it was a good opportunity for them. In these cases participants often based their education around their career choice from the outset.
- 5.27 A second path into the building safety workforce was to enter partway through their career. They may have felt like a career change and recognised that they had crossover skills which would help them enter the workforce. Often, they had moved from the private sector and were seeking greater job stability and a slower pace of life.

“At 34 I then joined the university polytechnic as a carpenter and they were offering training to staff to become a surveyor. I then started working in various Councils and social landlords before going into private practice for two years and then wanted something less stressful so joined the Council.”

Technical Officer

Appeal of the building safety sector

- 5.28 In the qualitative interviews, members of the workforce described the most appealing aspects of working in the sector:

- Not being stuck behind a desk

Being able to visit different properties and having a mixture of indoor and outdoor work was an appealing aspect of the role. Also linked to this are that many of the roles can be conducted remotely, meaning that they do not need to work in an office.

- Engaging with different people

Related to the mobile nature of the roles as described above, some of the workforce commented upon the many different people that they get to meet through their roles and that they enjoyed engaging with people from different walks of life. This relates to members of the public as well as to working with different organisations, such as the fire service or police. Strong interpersonal skills were seen by some as a key requirement for their role.

“You get to engage with a lot of different people. See different sides of society. How people are living in properties, et cetera. So that it is quite interesting from that perspective.”

Environmental Health Officer

- Variety in the day-to-day work

The mobile nature of the roles and the regular interactions with different people mean that, day-to-day, the work can be very varied. Also, depending on the role, the work can include both inspection and enforcement actions, including attending court.

“Every day is different and even if you plan before, by the following day something has come in and adapted the day for you.”

Housing Officer

- Having a positive impact upon the local community and environment

The feeling that they contributing to their community and the environment in a positive way was a motivating factor for working in the building safety sector. Working to uphold standards in building safety was felt to be intrinsically good, as it means that buildings can be occupied safely and used efficiently rather than being left empty.

“It's nice when we can get properties back into use, and it's really fulfilling when you're working with a landlord and getting a property back into use. It's

quite satisfying. There are so many empty derelict buildings to get back into use. It's also about making communities more vibrant, and upholding standards for landlords.”

HMO Licensing Officer

- 5.29 While the points made above were all seen as positives, it should also be noted that downsides to travel, engaging with different people, and variety were also discussed in the qualitative interviews. One member of the workforce specifically said that he left the private sector to cut down on the amount of travel he was undertaking in his day-to-day work, and another said that he missed the office since the work became predominantly remote.
- 5.30 As noted elsewhere in this chapter, another downside to interacting with a lot of different people is that some interactions become confrontational. For some, variety is not always a positive and attending court was highlighted as being a part of the job which could be particularly stressful.

Barriers to recruitment and retention

- 5.31 The main barriers to local authorities recruiting and retaining the staff they needed were the high entry requirements for candidates and, linked to that, the limited pool of candidates. Recruiting to rural areas and to temporary posts was particularly challenging, and there was a general acknowledgement that pay was not competitive. These barriers are explored further below.

High job qualifications and experience requirements

- 5.32 As covered elsewhere in this chapter, new recruits often have vocational undergraduate and master's degrees in environmental health when they enter the workforce. However, they may lack the practical experience required to carry out the roles for which there are vacancies. This combination of academic attainment and practical experience is a high bar for candidates to meet.
- 5.33 These requirements may be particularly difficult to meet for those seeking to change careers as they need to gain qualifications prior to entering the building safety workforce or seek a path that allows them to gain qualifications alongside their work.

5.34 For those taking the vocational route, there is a need to demonstrate that they have practical experience, which at an early stage in their career is difficult to do. Alternatively, their employer would need to allow them time and provide additional training for them to build up the practical skills and experience required.

Limited candidate pool

5.35 Related to the point above, it was acknowledged that there is a shortage of qualified candidates to fill the roles required to meet the demand upon services, particularly for the Environmental Health Officer role.

“There is a national shortage of environmental health officers, whether that's working in private sector housing or other areas of environmental health. That is a genuine problem for local authorities to get that technical expertise in.”

Environmental Health Officer

“It is very difficult at the moment. You have Environmental Health Officers that do purely Environmental Health and at the moment there is a national shortage of people wanting to do that degree. You have to have an in-depth knowledge of what you're talking about.”

Housing Officer

5.36 Participants to the qualitative interviews did not elaborate on why they thought there was a shortage of Environmental Health Officers but it is likely that the other points discussed in this section, in particular the high entry requirements and perceptions around pay, contribute to degree level qualifications being a less attractive option to pursue.

Recruiting to rural areas and recruiting to temporary posts.

5.37 Managers in the workforce commented that recruitment could be affected by the area in the country in which the role was based. Being based in Cardiff was seen as an advantage over more rural areas for recruitment as recent graduates either wanted remain in the city where they studied, or they wanted to move to a large city.

“We've noticed that a lot of recent grads want to stay in the Cardiff area [rather than work in their area], even though we're not that far from Cardiff.”

Senior Environmental Health Officer

5.38 Managers also commented that recruiting to temporary posts was more challenging than recruiting to permanent posts.

Pay

5.39 Pay was seen as a key barrier to recruitment and retention as salaries were not felt to be proportionate to the demands and stresses of the role.

“There doesn't seem to be sufficient money to bring extra officers in... There has to be a good financial reward. There is a lot of intimidation and aggravation. You've got two sides, a complainant and a perpetrator; it can be quite confrontational.”

Environmental Health Officer

5.40 Local authority salaries were also acknowledged to be lower than a potential recruit could demand in the private sector, and lower than other roles that do not require the same level of qualifications.

“The rate of my job scale, I could go to a neighbouring organisation and make £5k to £6k more annually... [it was] decided you did not need HNC for my role and held back the role increments so it devalued the job where tradespeople were earning more than me despite my qualifications. People are earning more doing trades than as qualified surveyors for the local authorities.”

Technical Officer

“I don't think the salary is as attractive as it would have been in the past.”

Housing Officer

5.41 As covered previously in this chapter, just under half of those saying they were likely to leave the workforce said the reason they thinking of leaving was because of pay.

Role for Apprenticeships

5.42 Based on the results of the local authority survey, apprenticeships were not widely considered part of a solution to addressing capacity issues. As has been discussed elsewhere in this chapter, the most common shortfall in staffing was for experienced staff which would not be filled through the hiring of apprentices. Only one

respondent (5%) to the local authority survey said that they had a staffing shortfall for trainees.

5.43 When asked how likely they would be to offer apprenticeships if a suitable framework were available, a third said they would be likely (16% 'very likely and 16% 'quite likely'), the most common answer was 'neither likely nor unlikely' which was chosen by 37%. Only 5% said they be 'quite unlikely' to offer apprenticeships. Nobody responded to say they would be 'very unlikely' to offer apprenticeships, although around a quarter (26%) said they 'didn't know'.

Case Study – Dave, Technical Officer

'Dave' qualified as a Technical Officer in 2009 and has been carrying out HHSRS inspections for a Council in South Wales since January 2023. He splits his time between the Repairs and Health & Safety department and the Energy department where he carries out assessments and auditing. He started his career as a carpenter with an apprenticeship for a different local authority after leaving school, where he worked for 9 years until he started a family and needed to earn a higher salary so moved into the private sector working for a national building company. He then got a role with a local University as a carpenter, where he was offered the opportunity to train as a surveyor.

Eventually he decided that he wanted a slower pace of life, with less responsibility and less travelling so secured a role with the council in South Wales. He finds working for a council less stressful than for the private building company in part because any travelling he does for this current role is regional rather than national.

When he first made the transition from carpentry to building surveying, he had to completely retrain in order to secure the necessary qualifications, which was very challenging as he was still working during the day. Difficulties managing his work-life balance during this time impacted his personal life. Since qualifying and joining the council he and his team frequently undergo external training in order to maintain their knowledge and their qualifications.

Capacity in his team is a constant issue, which is exacerbated by the fact that his employer struggles to recruit new Technical Officers. This is in part due to the lack of competitive salary that his council offers due to budget constraints.

Additionally, several members of Dave's team have opted for early retirement recently which has led to high turnover. He suspects that this is in part due to the new company policy which requires all staff to work from home, which has not been a popular decision. The subsequent lack of capacity creates a lot of pressure on his workloads.

"It all works well, the only problem is the lack of colleague capacity – we are currently overstretched and the lack of budget and challenges to recruit and high turnover. And changes to the office environment, they want people to work from

home, so I'm mobile now with the tablet [...] I really miss the office and I suspect it's why a lot of managers have left too."

Resourcing and recruitment: key findings

5.44 The key findings reported in this chapter are set out below.

Workload pressures

- Local authorities face significant capacity issues. The most common barrier to conducting work related to building safety inspection and enforcement were workload pressures, both on an individual level and across teams. These pressures impact upon teams' ability to meet the demands on their time and some are concerned about the lack of capacity to carry out proactive inspection.
- Workload pressures were a particular problem for Environmental Health departments whose staff often have multiple responsibilities - whereas Housing departments are under less pressure, in comparative terms.
- HHSRS is seen by some as onerous, and the responsibility for its implementation falls solely upon those with the requisite qualifications. This puts further pressure on these individuals' workloads.

Resourcing needs and approaches

- Local authorities were most likely to have shortfalls in staff numbers for 'experienced inspection and enforcement officers'. Further, some had a perception that Environmental Health graduates lack the practical skills and experience in building safety (i.e., they are unlikely to have ever worked in the construction industry or in housing) for the roles they are applying to.
- Skills for the inspection and enforcement actions for buildings over 11 metres in height were relatively weak. Local authorities and individual members of the workforce were more likely to say they were not confident in carrying out inspections and enforcement actions for tall buildings than they were for smaller buildings.

Impact of lack of capacity

- Lack of capacity can mean that local authorities adopt a more reactive than proactive approach to building safety. Increased capacity might mean that local authorities would be more likely to proactively search for problems which might not otherwise have been reported.

Motivations for working in the sector

- The key motivating factors for working in the sector were that the roles typically involved travelling to different sites rather than being stuck behind a desk, the day-to-day variety, the chance to engage with many different people, and the satisfaction derived from helping the community and environment.

Barriers to recruitment and retention

- High entry requirements in terms of qualifications and practical experience mean that there is a limited pool of candidates for local authorities to recruit from. These entry requirements may be particularly difficult to meet for those seeking a career change.
- Pay was a key barrier as there was a perception that candidates and the current workforce would be able to earn a similar amount, or more, in a role that had lower entry requirements and were less onerous.

Role for Apprenticeships

- Relatively few local authorities indicated that they would be likely to offer apprenticeships if there was a suitable framework available due to gaps at more senior levels. However, the large proportion of respondents who answered 'don't know' to this question suggests that local authorities might be open to the concept.

6. Conclusions

6.1 This chapter summarises the key findings of the research and their implications.

The workforce

6.2 At the time of the research, there were around 200 people working in building safety for private sector housing in the occupation phase in Wales; an estimated 141 of whom work in inspection and enforcement roles. In comparison to the working age population Wales, members of the building safety workforce were older on average, more likely to be male, and less likely to be from an ethnic minority. In particular, those working in Environmental Health departments were on average older than the working age population as a whole. As well as the implications for equality, this lack of representation could potentially lead to missed opportunities, since those in under-represented categories may have skills which would be useful to the sector.

Ways of working

6.3 Local authorities adopt differing approaches to inspection and enforcement, suggesting that they each adapt to their differing circumstances, whether this is different levels of capacity, different levels of experience and knowledge within the team, differences in oversight and management style or circumstances which are specific to each local authority.

6.4 It is common practise for local authorities to adopt informal enforcement actions. This includes providing landlords with a report outlining the problems identified and setting a deadline for them to address them, at which point formal enforcement actions may ensue. There is no agreed optimal balance between informal and formal enforcement actions but one of the benefits could be that a more informal approach helps to maintain positive and cooperative relationships with landlords.

Skills and resourcing

6.5 Local authorities were most likely to have shortfalls in staff numbers for 'experienced inspection and enforcement officers'. There was a perception that applicants and recruits who had completed qualifications in Environmental Health lacked practical experience and skills in housing and construction. So while they may have a good grounding in the legislation from their academic qualifications, they were felt by some to struggle in practical aspects of inspection and enforcement that were not covered in their studies. These recruits require time and training to be able to carry out their role in full.

6.6 Local authorities struggle to source the skills needed for the inspection and enforcement actions for tall buildings (over 11 metres). This is echoed by the workforce who were more likely to report that they were not as confident carrying out inspections and enforcement actions on tall buildings than they were for other buildings. The implication of this is that local authorities are not confident in the ability of the system locally to tackle building safety hazards in buildings over 11 metres.

Workload pressures

6.7 Local authorities face significant capacity issues. The most common barrier to conducting work related to building safety were workload pressures, both on an individual level and across teams. These pressures impact upon teams' ability to meet the demands on their time which leads to a predominantly reactive, rather than proactive, approach to inspections; meaning that there may be unreported safety hazards are not addressed.

6.8 Workload pressures were a particular problem for Environmental Health departments whose staff often have multiple responsibilities - whereas Housing departments are under less pressure, in comparative terms. This is likely caused by staff in Environmental Health departments, individually taking on a greater number of responsibilities related building safety.

6.9 HHSRS is seen by some as onerous, and the responsibility for its implementation falls solely upon those with the requisite qualifications. This puts further pressure on these individuals' workloads.

Recruitment and retention

6.10 The key motivating factors for working in the sector were that the roles typically involved travelling to different sites rather than being stuck behind a desk, the day-to-day variety, the chance to engage with many different people, and the satisfaction derived from helping the community and environment. However, high entry requirements in terms of qualifications and practical experience mean that there is a limited pool of candidates for local authorities to recruit from. These entry requirements may be particularly difficult to meet for those seeking a career change.

6.11 Another barrier to recruitment and retention was pay. There was a perception that candidates, and those currently working in the sector, could earn a similar amount, or more, in roles with lower entry requirements and that were less onerous.

7. Considerations

7.1 This chapter sets out several considerations for the Welsh Government and Welsh local authorities to take note of, including areas for potential future research to build upon the findings of this study. It is important to caveat that the considerations are based solely on interpretation of the findings of the research, and that IFF Research's involvement in, or exposure to, ongoing policy development does not extend beyond the scope of the research described in this report.

The current workforce – key challenges

7.2 The research identified a relative lack of diversity in the workforce, pre-existing capacity challenges within local authority teams, and highlighted that many staff felt less confident carrying out inspections and enforcement actions on tall buildings. These three findings represent the overarching challenges that the Welsh Government and local authorities face in relation to ensuring the building safety workforce is equipped to carry out their responsibilities.

1. At the time of the research, members of the building safety workforce in Wales were more likely than the overall Welsh working-age population to be male and were more likely to be over the age of 35. When recruiting, local authorities could consider how the sector can be made more appealing and attainable to parts of the population who might not otherwise have considered a career in the sector. Using the results of this research as a starting point, there is an opportunity for Welsh Government to open a dialogue with local authorities to identify and disseminate best practice advice for recruiting a more diverse workforce.
2. Local authority teams working on the safety of residential buildings during the occupation phase lacked the capacity to meet all of the demands upon their time. To maintain, and improve upon, current levels of service delivery, local authorities will need to ensure they are working efficiently, and/or increase the number of FTE roles in the teams working on building safety. It is also the case that some local authorities have larger teams working on building safety, and there are differences in the scale and type of demand. Local

authorities could explore opportunities to cooperate and share resources as a solution for the lack of capacity within individual teams.

3. Local authorities and individual members of the workforce were less likely to feel confident carrying out inspections and enforcement actions on buildings over 11 metres in height than for buildings that are lower than this. This indicates that there is a gap in the skills and knowledge required to help ensure the safety of tall buildings in Wales. Local authorities should monitor the skills gaps in their teams and, depending on the outcome, might find it useful to train existing or new staff in those skills. Welsh Government can aid local authorities by liaising and conducting research with local authorities, training providers, educational institutes, and the workforce to establish whether this skills gap requires new training or resources to be developed to ensure that the appropriate training and education is made available at the required scale (see paragraph 7.6).

Recruitment to the sector

- 7.3 Recruitment should be considered a key component when addressing the challenges outlined above, particularly in relation to diversifying the workforce to bring in skills and experiences from parts of the population that are underrepresented, and in increasing the capacity of the workforce.
- 7.4 The report broadly outlined two entry routes to the sector – an ‘early career pathway which usually involves higher education and gaining qualifications after leaving school, and ‘mid-career pathways which could involve a change in career at a later stage of life. Some considerations around recruitment are set out below. However, more research would be required to gain a detailed understanding of pathways into the sector, their relative importance as entry routes, any barriers and opportunities, and any other considerations which were not uncovered through this research.
 4. The key motivating factors for working in the sector were that the roles typically involved travelling to different sites rather than being stuck behind a desk, the day-to-day variety, the chance to engage with many different people, and the satisfaction derived from helping the community and built environment. When recruiting to the sector, these are key factors that local

authorities could emphasise in job adverts and other promotional materials or events.

5. High entry requirements in terms of qualifications and practical experience mean that there is a limited pool of candidates for local authorities to recruit from. These entry requirements may be particularly difficult to meet for those seeking a career change. Local authorities could explore ways in which job requirements, recruitment processes and promotional activities could be more open and attract interest from candidates currently working in other sectors (or in other teams within their Local Authority) who may possess relevant crossover skills. Welsh Government could aid local authorities by conducting more research into pathways into the sector and identify adjacent sectors which local authorities could recruit from.
6. There was a perception that it was difficult to recruit to the sector due to a limited pool of candidates with the requisite qualifications. Alongside the workforce being older than the Welsh working-age population, a potential long-term challenge for the sector is to attract young people in the required volumes and ensure they receive the education and training needed. Welsh Government can aid local authorities' recruitment efforts by promoting cooperation between local authorities and educational institutes, for example through training partnerships or work placements. Welsh Government could also conduct research with local authorities, educational institutions, and young people to better understand the dynamics between the educational opportunities available to young people, the current and projected size of the candidate pool, and local authorities' workforce requirements.

Skills, training and resources

- 7.5 Recruitment alone will not solve the key challenges for the building safety workforce sector, in particular the short-term needs for skilled and experienced workers. The considerations below cover training and resources for the current workforce, as well as considerations around equipping those entering the workforce with the skills and experience that would benefit them and their teams.
- 7.6 With all of these considerations, a first step would be to gain a greater understanding of the current training and educational landscape, in order to connect

the training required with those who would most benefit from it, in the appropriate volumes. It was beyond the scope of this research to map the current training landscape. Areas which could be addressed through further research include: which training modules and educational courses already exist and which would need to be established to address skills gaps; the volume of available places and their uptake; who in the workforce and wider population already take part or would benefit from such training; and the extent of any skills gaps and the volumes of training and educational places required to address those.

7. There was a perception that environmental health graduates lack the practical skills and experience required for the roles they are applying to. The Welsh Government and local authorities could explore opportunities for young people to gain exposure to the construction and housing sectors as part of their education and/or work experience. This could be through the promotion and establishment of partnerships between educational institutes and local authorities, for example through providing training or work placements.
8. Related to the point above, local authorities could explore ways in which recent graduates, who have joined the sector, can gain practical skills and experience in construction and housing as part of their onboarding and training.
9. The HHSRS standard was seen by some as time-consuming and complicated, and the responsibility for its implementation falls solely upon those with the requisite qualifications, which puts pressure on these individuals' workloads. Training additional staff in the use of HHSRS might bring long term efficiencies in local authorities experiencing these issues. Welsh Government can aid local authorities by liaising and conducting research with local authorities, training providers, educational institutes, and the workforce to ensure that the appropriate training and education is made available at the required scale (see paragraph 7.6).
10. Some staff felt the technical and legal advice available to them was inadequate, and that individuals working on tasks relating to building safety could benefit from legal training. While local authorities could usefully provide training to address this, this study found examples of local authorities sharing skills in this area. Where not already doing so, local authorities could explore

opportunities to share resources and sources of legal advice. Welsh Government could liaise with local authorities to identify and share best practice advice for accessing resources and legal advice.