



UK Mission to the  
United Nations  
in Geneva

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Geneva, Monday 12 January 2025

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland presents its compliments to the Office of the United Nations High Commissioner for Human Rights and has the honour to submit its response to communication AL GBR 15.2025, further to the letter dated 1 October 2025 from the Special Rapporteur on the Right to an Adequate Standard of Living and on the Right to Non-Discrimination in this context; the Working Group on the issue of human rights and transnational corporations and other business enterprises and the Special Rapporteur on the rights of persons with disabilities.

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland avails itself of this opportunity to renew to Office of the United Nations High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, 12 January 2026

Special Procedures Branch  
Office of the United Nations High Commissioner for Human Rights



UK Mission  
Geneva

**United Kingdom of Great Britain and Northern Ireland**

**Rapporteurs on the Right to an Adequate Standard of Living and on the Right to Non-Discrimination in this context; the Working Group on the issue of human rights and transnational corporations and other business enterprises and the Special Rapporteur on the rights of persons with disabilities**

Thank you for your letter of 1 October 2025 regarding the case of Mr. S. Ramburn, a social housing tenant of London & Quadrant (L&Q). We recognise the seriousness of the concerns raised in this case. The Rapporteurs also note concerns that this is indicative of wider failings in the quality of housing and tenant support services. While it would not be appropriate to comment on the specifics of the case, as doing so could risk influencing ongoing processes and undermine the independence of bodies established to oversee the sector, we have set out the broader context and measures taken to address issues across the sector.

Social housing tenants deserve to live in decent homes, to be treated with fairness and respect and to have their problems quickly resolved. In July 2025, the UK Government published a 5-step plan to [deliver a decade of renewal in social and affordable housing](#). The plan is focused on the delivery of the biggest increase in social housing supply in a generation, alongside a transformational and lasting change in the safety and quality of homes. The third step of the plan, to establish an effective and stable regulatory regime, confirms measures the Government is taking to ensure all social and affordable tenants can live in a safe, warm and decent home. Alongside this, the Government remains committed to ensuring that tenants' experiences and voices are at the heart of England's social and affordable housing system.

Housing policy is fully devolved in Wales, Scotland and Northern Ireland. The UK Government has overall responsibility for housing in England.

**1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations**

It would not be appropriate to comment on the specifics of the case, as doing so could risk influencing ongoing processes and undermine the independence of bodies established to oversee the sector.

In England, two operationally independent Arm's Length Bodies, sponsored by Government are largely responsible for oversight of the social housing sector and hold social landlords to account for delivering this for tenants. These are the Regulator of Social Housing ('RSH') and the Housing Ombudsman Service ('HOS').

RSH regulates registered providers to ensure there is a viable, efficient, and well governed social housing sector able to deliver quality homes and services for tenants. It is an executive non-departmental public body. All private registered providers of social housing in England, including housing associations like

L&Q, are required to deliver the outcomes of the regulatory standards set by RSH that apply to them. These standards cover both economic and consumer matters, and RSH assesses how far landlords are delivering the outcomes of their standards overall.

HOS is an impartial service that investigates complaints from social housing residents against their landlords (including private registered and local authority providers). If HOS finds severe maladministration, they can order the landlord to put things right, for example by fixing the problem, apologising and/or paying compensation. They can also issue orders to landlords that seek to prevent the recurrence of issues identified during an investigation, as well as publishing investigations into issues which go beyond an individual complaint or landlord, and good practice guidance. Their Complaint Handling Code sets out requirements for member landlords to respond to complaints effectively and fairly.

While RSH regulates performance at the landlord level, HOS focuses on individual complaints. If an investigation by HOS identifies failings at the landlord level, or a failure of a landlord to deliver the outcomes of the consumer standards, HOS can refer the matter to RSH. It is for RSH to decide whether landlords are delivering the outcomes of its standards and whether any action needs to be taken.

HOS works closely with RSH and, collectively, the changes to their powers and duties are beginning to drive systemic changes in policy and practice across the sector to deliver better outcomes for social housing tenants.

- 2. Please indicate what measures are being taken to ensure that Mr. S. Ramburn and his family are rehoused in housing meeting the criteria for adequacy, including accessibility, and that they are provided compensation which takes into account both the physical and mental harm suffered.**

While it would not be appropriate to comment on the detail of the individual case, we can confirm that we have reached out to the landlord to understand the detail behind the complaint.

- 3. Please indicate the measures, including legislative, regulatory, policy or oversight, that your Excellency's Government is undertaking to ensure that housing associations and developers offer housing option that meet the requirements for adequacy and accessibility, including for people with disabilities and families with specific support, care or health needs.**

All registered providers of social housing in England are held to account by the Regulator of Social Housing. Following the passage of the Social Housing (Regulation) Act 2023, RSH introduced a new, [proactive consumer regulation regime](#) on 1 April 2024. Under the new regime, RSH proactively seeks assurance that private registered and local authority providers are delivering the outcomes of the strengthened [consumer standards](#), which include:

- **Safety and Quality:** requirements to provide safe and good quality homes and landlord services to tenants.
- **Transparency, Influence and Accountability:** requirements to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints when necessary, influence decision-making and hold their landlord to account.
- **Neighbourhood and Community:** requirements to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.

- **Tenancy:** requirements for the fair allocation and letting of homes and for how those tenancies are managed and ended by landlords.

RSH conducts routine inspections of all providers with over 1000 homes over a four-year cycle to help form a view about how well landlords are delivering the outcomes of the standards set by RSH. RSH also carries out inspections of landlords that are not programmed if they judge it is appropriate. Following inspection, RSH issues a consumer grading to ensure that it is clear how landlords are performing against the new standards. There are four consumer grades, from C1 (reflecting RSH's view that overall the landlord is delivering the outcomes of the standards) to C4 (indicating that there are very serious failings in the landlord delivering the outcomes of the standards and that the landlord must make fundamental changes so that improved outcomes are delivered).

With regards to accessibility, RSH's Transparency, Influence and Accountability standard requires registered providers to take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants. In doing so, providers should use relevant information and data to:

- understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and
- assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.

Under the new consumer regulatory regime, RSH seeks assurance that social housing providers are delivering these outcomes.

The new regime ensures that social housing providers listen to their tenants and take action when they raise issues, including ensuring complaints are addressed fairly, effectively, and promptly. RSH works intensively with providers who are failing to deliver the outcomes of the standards so that they make self-improvements and address relevant failures. RSH also has a range of enforcement powers it can use where providers cannot or will not make the necessary changes, including issuing unlimited fines and to appoint and remove officers. This ensures there is a strong incentive for underperforming landlords to improve.

**4. Please provide information on investigations that have been carried out by competent authorities into the business practices of L&Q, and more generally into the compliance of housing associations and property management companies with their obligations in relation to the right to adequate housing and provide information on the number of sanctions that have in recent years been imposed for any irregularities carried out.**

RSH published a [regulatory judgement for L&Q](#) on 27 August 2025 following an inspection completed earlier in the month. This regulatory judgement confirmed a consumer grading of C2, a governance downgrade to G2 and a financial viability of grading V2. These judgements demonstrate RSH's view that there are some weaknesses in how L&Q is delivering the outcomes of the consumer standards and that improvement is needed, specifically in relation to the Safety and Quality standard and the Neighbourhood and Quality standard.

HOS published a [special report into L&Q](#) in July 2023. This was identified as part of an investigation undertaken in accordance with paragraph 49 of the Housing Ombudsman Scheme, which allows HOS to conduct further investigations to establish whether any presenting evidence is indicative of a systemic failing. The Ombudsman also published a [landlord performance report 2024/2025 for L&Q](#)

In addition, L&Q appear on the Ombudsman's list of [landlords with severe maladministration findings in 2024-25](#).

**5. Please provide more information about how your Excellency's Government is ensuring independent and safety inspections of housing rented in the United Kingdom? How many officials are employed to carry out such inspections, and how many inspections are actually carried out each year in relation to the overall housing stock rented out (percentage)?**

Under RSH's Safety and Quality standard, social landlords are required to have an up-to-date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants, for example through completing stock conditions surveys. RSH will assess how far landlords are meeting this element of the standards as part of their regulation of the social housing sector, including through its routine inspections of landlords with more than 1,000 homes. These inspections consider how well landlords are delivering the outcomes of the regulatory standards, but do not involve the Regulator physically inspecting homes.

The Housing Health and Rating System (HHSRS) is the cornerstone of health and safety standards in housing, setting out how to assess whether people's homes pose a danger to them. It is an advanced risk-based evaluation tool that helps local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. The HHSRS assesses 29 categories of housing hazard. It does not set a minimum standard but instead generates a score that falls into one of ten bands from A-J. Hazards scored at bands A, B or C are 'category 1' (serious), bands D to J are 'category 2' (other). Broadly, a category 1 hazard means where the hazard identified is an imminent and serious risk of harm to a person's health and safety.

It is used by local authorities when enforcing standards in homes of all tenures and underpins measurement of whether homes are compliant with the Decent Homes Standard (DHS).

The HHSRS also informs national data on housing and risks to health, as the English Housing Survey reports on the prevalence of category 1 hazards. This data has been used effectively by the Building Research Establishment, for example, in assessing the costs to society and the NHS of hazards in the home.

The HHSRS has been reviewed, in order that it is more intuitive and efficient to use. New regulations are required and will need to be laid before Parliament in due course to bring the review's recommendations into force. These will replace the existing HHSRS regulations which prescribe descriptions of hazards, the method for assessing their seriousness and the manner and extent of inspections of residential premises.

**6. Please describe the measures that your Excellency's Government has adopted, or intends to adopt, to ensure that housing associations including L&Q, provide adequate remedies for tenants affected by disrepair or unsafe housing conditions. In particular, please explain the steps taken to guarantee that affected households are promptly rehoused in conditions that meet international standards of adequacy, and that housing associations establish effective grievance mechanisms to address the adverse human rights impacts resulting from their activities.**

*Awaab's Law*

The first phase of the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025, commonly referred to as “Awaab’s Law”, came into force on 27 October 2025. It requires social landlords to address all emergency hazards and all damp and mould hazards that present a significant risk of harm to tenants within fixed timescales. If a social landlord has reason to believe a home is affected by a significant hazard, they must investigate it within 10 working days of becoming aware of the potential hazard. If the investigation identifies relevant safety work, the social landlord must complete this within 5 working days to make the property safe. They must make safe all emergency hazards within 24 hours even if a further investigation is pending. For both types of hazards, they must also provide a written summary of their findings to tenants within 3 working days of the investigation concluding.

As part of the reforms, landlords must also consider the circumstances of tenants which could put them at risk – including young children and those with disabilities or health conditions. Alternative accommodation must also be offered if homes cannot be made safe within the required timeframes.

Awaab’s Law will not only keep tenants safer in their homes but also hold landlords to account. Those who fail to comply with the rules face being taken to court, where they could be issued enforcement orders, forced to pay compensation and legal costs.

Awaab’s Law will be implemented through a phased approach to enable the government to test and learn so reforms work well in the long term. In 2026, government will extend the regulations to a wider range of hazards, such as excess cold and heat, falls (e.g. in baths or between levels), structural collapse, fire and electrical hazards, and hygiene hazards. In 2027, government will extend the regulations again so that all Housing Health and Safety Rating System hazards will be covered (excluding overcrowding).

The Government’s Renters’ Rights Act, which recently received Royal Assent on the 27 October 2025, will apply ‘Awaab’s Law’ to the private rented sector, setting clear legal expectations about the timeframes within which landlords in the sector must take action to make homes safe where they contain serious hazards.

### *The Housing Ombudsman Service*

If HOS finds that a landlord didn’t act properly (known as maladministration), they can order the landlord to take action to put things right. This could include:

- **Practical actions** - Such as fixing repairs or improving communication with the tenant;
- **Compensation** - The landlord might be asked to pay the tenant money for the trouble or harm caused;
- **Apology** - The tenant might receive a formal written apology from the landlord;
- **Service improvements** -The landlord might be told to improve how they work, for example, by updating policies or training their staff;
- **Recommendations** – HOS can also make recommendations which help prevent similar issues in future. While the landlord legally does not have to follow these recommendations, they are strongly encouraged to.

Further information on how HOS will investigate a complaint along with guidance on how long this may take can be found here: [Housing Ombudsman - How we will investigate?](#)

*Pre-Action Protocol for Housing Conditions Claims (England) (‘PAP’)*

If a home is in poor condition and the landlord hasn't fixed the problem after the tenant has reported it (despite the landlord having knowledge of the poor conditions), a tenant can issue their landlord with a letter of claim under the PAP. The PAP sets out specific procedures and timetables which must be followed by both the tenant and their landlord to help them try to resolve the issue(s) before taking court action. The PAP applies to all residential property in England.

The PAP is designed to:

- encourage the tenant and their landlord to communicate to resolve disputes in relation to poor housing conditions;
- help get any necessary repairs done quickly;
- make sure the tenant gets any compensation they are entitled to;
- avoid the time and cost of legal action where possible.

**7. Please provide more information on how your Excellency's Government in ensuring that renters in public or private housing have effective and timely access to justice, legal advice, and legal aid when housing rented out is insecure, faulty or poses health risks. What judicial and non-judicial complaints mechanism exist, and have they been sufficient to effectively and timely solve problems relating to the habitability of housing?**

If a landlord fails to meet their responsibilities under Awaab's Law, the named tenant can take them to court for breach of contract. If the court finds that the landlord is at fault, it can issue a specific performance order ordering them to:

- carry out the repairs;
- pay the tenant compensation;
- cover some or all of the tenants legal costs.

With regard to private rented sector, the Government's Renters' Rights Act 2025 the '2025 Act'), which recently received Royal Assent on the 27 October 2025, delivers our manifesto commitment to transform the experience of private renting, including the abolition of Section 21 'no fault' evictions. It will give renters much greater security and stability so that they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness.

The 2025 Act will also introduce a new Private Rented Sector Landlord Ombudsman that will provide quick, fair, impartial and binding resolution for tenants' complaints about their private landlord. This will bring tenant-landlord complaint resolution in line with established redress practices for tenants in social housing and consumers of property agent services.

**8. Please provide information on the measures that your Excellency's Government has put in place to address systemic issues in the social housing sector, such as delays in repairs, disrepair, overcrowding, lack of accessibility for persons with disabilities, and insufficient responsiveness to tenants' complaints, in order to prevent recurrence of the kinds of situations described above.**

The UK Government is clear that homes must, above all, be safe. Safety is a non-negotiable for all homes, and landlords must take urgent action to respond to issues when they arise.

The regulatory system has been strengthened by the Social Housing (Regulation) Act 2023, which aims to rebalance the relationship between tenants and landlords and improve housing standards in England.

The Act introduced a proactive consumer regulation regime for private registered and local authority providers and removed the 'serious detriment test' from the consumer standards, which enables RSH to take action on a wider range of material failures to deliver the outcomes required by their standards. The Act also gave RSH and HOS new powers, including powers for HOS to issue wider orders for issues beyond individual complaints and duty to monitor landlord's compliance with the Complaint Handling Code.

RSH's Safety and Quality standard requires registered providers to have an accurate record at an individual property level of the condition of properties based on physical stock checks and to provide an effective, timely repairs service. Under RSH's standards, social landlords are also required to ensure that all their homes meet the Decent Homes Standard, which plays a key role in providing a minimum quality standard that social homes should meet.

Social landlords also have statutory duties to keep homes safe by fixing disrepair, and keeping their homes fit for human habitation and free of dangerous 'category 1' health or safety hazards and must ensure they meet all the relevant legal health and safety requirements for the occupants in their homes.

In addition to these existing provisions and the introduction of Awaab's Law in October 2025 (discussed in response to question 5), the UK Government has introduced several new measures to improve the quality of the UK's existing housing stock.

#### *Electrical safety*

New regulations ensuring all landlords meet robust standards of electrical safety came into force on 1 November 2025 for new social tenancies and the regulations will apply from 1 May 2026 for all existing tenancies. To help tenants feel safe in their homes, these new laws will require social landlords to have electrical installations in their properties inspected and tested by a qualified person carry out at least every five years as well as mandatory appliance inspections on all electrical appliances that are provided by the landlord. The electrical safety regulations also increase the maximum fine for non-compliance for all landlords, private and social from £30k to £40k.

#### *Reformed Decent Homes Standard (DHS) and introduction of Minimum Energy Efficiency Standards (MEES) in the social housing sector in England*

Since 2001 when the DHS was introduced, the Standard has played a key role in providing a minimum quality standard that all social homes in England should meet. It was last updated in 2006 and needs updating to match modern expectations about what constitutes a decent home. The Government has reviewed the DHS and published a recent consultation that set out plans for a reformed DHS, which will set a new standard for safe and secure housing for social tenants and for tenants in the private rented sector for the first time. The consultation is closed but the content can be accessed [here](#) which including: strengthening the criteria on how components in the home are assessed and when they should be replaced or repaired, the installation of window restrictors to help prevent falls from windows by children, a new standard on damp and mould which is in addition to existing regulations (Awaab's Law) for social housing and the introduction of new minimum standards on energy efficiency to replace old and outdated criterion in the current standard on levels of thermal comfort expected to be provided by landlords.

As noted, the Government is introducing a Minimum Energy Efficiency Standard (MEES) to the social rented sector in England for first time whom the government consulted over the summer of 2025. The

consultation is closed but content can be viewed [here](#). Socially rented homes are not currently required to meet a minimum Energy Performance Certificate (EPC) standard, but it is proposed that, by 2030, all social housing providers must meet a standard of Energy Performance Certificate (EPC) C or equivalent in their properties. This will boost living standards for social tenants, delivering homes that are warmer and less susceptible to damp and mould, while also lowering their energy bills and lifting thousands of people out of fuel poverty.

Both consultation responses are currently being analysed and more information about future DHS and MEES will be released in the coming months as part of the Government response.

With regard to overcrowding, social landlords should refer to their allocations policies to support overcrowded tenants to move into properties that meet the specific size and needs of their household.

In addition, in July 2025, the UK Government published a long-term plan which set out the ambition to deliver the biggest boost to social and affordable housing in a generation, alongside improving safety and quality. The Chancellor announced at the Autumn Budget that the government will invest £39 billion in new social and affordable homes through the Social and Affordable Homes Programme over the next decade – whilst also raising standards for existing homes – so that more people have access to good quality homes they can feel proud of.

#### *Accessibility*

We are exploring how to better support the provision of accessible homes in all housing tenures through the planning system and fully recognise the importance of ensuring everyone has a home that meets their needs.

The Government is consulting currently on a new set of planning reforms that make the system clearer, more rules-based, and easier to navigate – providing certainty for developers and local communities alike.

**9. Please provide information on the measures taken by your Excellency's Government to ensure that businesses in the social housing sector respect human rights in accordance with the UN Guiding Principles on Business and Human Rights, in particular how does your Excellency Government requires and guides these businesses to conduct human rights due diligence.**

The UK Government is committed to the implementation of the UN Guiding Principles on Business and Human Rights (UNGPs), which are widely regarded as the authoritative international framework to steer practical action by Governments and businesses worldwide on this important agenda. The UK has a range of measures in place to promote human rights across the economy. The UK Government supports voluntary due diligence approaches taken by UK businesses to identify and prevent human rights abuses and environmental harms across their operations and supply chains, in line with the UNGPs and the OECD Guidelines for Multinational Enterprises.

The FCDO is carrying out a National Baseline Assessment (NBA) on the implementation of the UN Guiding Principles on Business and Human Rights. An NBA will contribute to the evidence base to inform the UK's approach to tackling business-related human rights abuses, including in global supply chains. In the Trade Strategy, the Government launched a review of its approach to responsible business conduct (RBC) policy. The review will focus on the global supply chains of businesses operating in the

UK and will be a neutral and objective appraisal of the UK's current RBC policy approach and alternative options which aim to enhance RBC.