

**Title: Damp and Mould Update**

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## **1. Background**

- 1.1 Tackling Damp and Mould remains an extremely high priority for the council, and for the wider social housing sector, and this remains at the heart of regulatory reform of the sector. Leeds have made significant progress over recent years in strengthening our 'zero tolerance' policy approach to damp and mould, and we have continued to build on the positive work that was last updated to this board in November 2023.
- 1.2 Since the last update was provided, central governments consultation on the new Awaab's Law legislation ([Awaab's Law: Consultation on timescales for repairs in the social rented sector - GOV.UK](#)) has concluded. The introduction of Awaab's Law will bring about a landmark change to the responsibilities on landlords to deal with damp and mould, as well as other property hazards. For the first time, this new legislation will prescribe timescales and standards for landlords to adhere to when dealing with damp and mould, along with new sanctions for not doing so.
- 1.3 Whilst we are yet to see the introduction of this new Awaab's legislation, due to the change in government this summer, the sector heavily anticipates that the new government will be implemented it in 2025. As part of central governments drive to tackle damp and mould however, they have updated their damp and mould guidance for landlords. The latest [government guidance 'Understanding and addressing the health risks of damp and mould in the home'](#) which was updated in August 2024, delivers on the government's commitment in response to the Coroner's 'prevention of future deaths' report on the death of 2-year-old Awaab Ishak due to mould in the home.
- 1.4 As part of the Housing Leeds preparedness for Awaab's law, and in-order to test the services current approach to damp and mould, a self-assessment against the latest guidance has been undertaken. This paper provides a summary of the key findings of this self-assessment, along with next steps.

## **2. Main Points**

- 2.1 This initial self-assessment has been made against the approach to damp and mould by Housing Leeds teams. The scope does not include the approach

taken by BITMO and the PFI contract areas. The 'Next Steps' section of this report covers the recommendation for these areas.

2.2 The self-assessment has identified several areas where our current approach to damp and mould aligns favourably against the expectations set out against the new guidance. In addition, the exercise has identified several areas where further development of the service is required. These key areas are summarised as:

### 2.3 **Areas that already align to the recommendations**

- Channels for reporting damp and mould D&M are well publicised and flexible,
- Procedures for responding to D&M are established and there is a dedicated D&M team,
- Training is robust, in-line with expectations and delivered across staff, support teams, contractors, and partners,
- Information and support for residents is well balanced, accessible, and has had scrutiny and endorsement from tenants,
- Hazards are remedied through the responsive repairs programme where there are clear timescales in-place, and procedures to decant residents where not possible in a timely manner,
- Stock condition surveys take place, and assess hazards (including D&M), and a plan is in place to meet the recommended 5 year rolling programme,
- Support for tenants in financial difficulty and struggling to heat their home is available,

### 2.4 **Areas requiring further development**

- IT systems do not currently enable recording, monitoring, or follow up action relating to D&M reports without manual intervention,
- The lack of digital mobile working impacts on the services ability to efficiently monitor and keep residents updated throughout the D&M journey, and restricts our ability to make every contact count,
- Stock condition data requires reconciliation to ensure that it is accurately informing investment decisions and Decency,
- Current gaps in person data restrict our ability to identify vulnerability factors and target measures proactively,
- We don't currently have a service to follow up completed D&M works (minimum 6 weeks after completion) as recommended in the guidance,
- Times to complete remedial works by service providers are not currently monitored outside of routine repairs,
- Our information to tenants lacks the message that they should contact a health professional if they are suffering health symptoms that could be D&M related.

### **3. Detailed Assessment:**

Further detail is provided here in relation to the assessment against the guidance (specific areas of the guidance in bold italics) and the areas that align to the guidance, as well as the areas where further development is required.

#### **3.1 Understanding Health Impacts / Risks (Physical & Mental, People/groups most at risk)**

- *Landlords and their staff and partners should have a good sound knowledge of the risks associated to damp and mould and those people and groups at most risk.*  
**Aligned** - This is covered well in our face to face and e-learning training packages and our information for staff, partners, and residents.
- *Landlords should advise any tenant who is concerned about the symptoms they are experiencing to consult a healthcare professional. Landlords should not delay action to await medical evidence or opinion - medical evidence is not a requirement for action, and damp and mould should always be addressed promptly to protect tenant health.*  
**Development required** - We do not currently expressly say this and have not included this in our training or information. This needs to be amended.
- *Landlords should understand and have records of their residents and their needs and vulnerability factors so that this can be considered when assessing damp and mould and appropriate action.*  
**Action required** - Improvements to our collection of, recording, and management of person data, is being prioritised through the 'Vulnerability Strategy' project which is underway.

#### **3.2 Housing conditions that increase tenants' risk of living in a home with damp and mould**

- *To meet the Decent Homes Standard, social housing must be free from dangerous 'category 1' hazards.*  
**Aligned** - Cat 1 hazards are dealt with via the responsive repairs programme.  
**Development required** - Further work ongoing to strengthen the identification of hazards through stock condition surveys and increase the frequency of surveys to a maximum 5 years. Training is being arranged to enable full HHSRS surveys to be undertaken by the service.

#### **3.3 People who are most likely to face barriers to reporting damp and mould**

- *Tenants may face barriers which may mean they struggle to report damp and mould to their landlord. This may be due to knowledge, language, literacy or communication barriers, personal circumstances, a lack of*

*awareness of legal standards and housing rights in England, or fear of eviction or discrimination, among other things*

**Aligned** – We provide good quality information about reporting damp and mould and residents can report to us through accessible channels. Information is readily available in the most common community languages and can be produced in other languages and formats. Staff have access to translators and interpreters.

**Development required** - Work underway through vulnerability strategy to develop more robust person data, communication preferences etc, and ensure systems able to store and use this to meet individual needs.

### 3.4 ***Legal standards for housing providers***

- *Social housing specifically must meet the Decent Homes Standard (DHS)*

**Aligned** – Asset Management Strategy and Capital Programme in place and aligned to maintaining the Decent Homes Standard (Decency). Decency is recorded in Keystone and reported as appropriate.

**Development required** – Work is underway to accelerate a five year rolling programme of Stock Condition Survey's and review the survey template.

### 3.5 ***Complying with the standards***

- *Landlords should regularly inspect their properties, remedy deficiencies promptly and ensure that they have a regular programme of maintenance and management.*

**Aligned** - Stock condition programme is in place. Robust responsive and void repair services operating alongside a just in time replacement programme. Category 1 hazards are remedied through the responsive repairs programme.

- *landlords should always respond promptly and address the issue as a matter of urgency when there is significant damp and mould and/or when there is a significant concern for tenant health.*

**Aligned** – We have a dedicated D&M team in place. Aligned responsive repairs service and minor works team to complete more complex remedial works.

- **Development required** – Times to complete remedial works by service providers are not robustly monitored outside of general repairs. New procedures are being developed to improve reporting. Contractor resources require review and re-alignment to the D&M team in-line with demand levels.

### 3.6 ***Understanding damp and mould***

- *landlords are legally responsible for addressing damp and mould (see 'Legal standards on damp and mould in rented homes') and should work with qualified professionals*

**Aligned** – Training material is robust and has been delivered to frontline housing teams, contractors and support services. Information for staff, contractors and residents is robust. The material has been audited and endorsed by the Tenant Voice Panel giving assurance that it meets residents’ expectations.

**Development required** – Significant training and equipment for staff has been invested in. As such, internal staff are relied on almost exclusively for assessing and diagnosing D&M. Further consideration needs to be given to where ‘specialists’ would assist in the process.

### 3.7 ***Responding with urgency and sensitivity, and taking tenants’ needs into consideration***

- *Tenants should be informed about what is being done to resolve the issue and what the likely timescales for the work will be Comms to improve.*

**Development required** – The guidance contains new reporting requirements, ahead of the implementation of Awaabs Law, which will best be delivered through a mobile digital working solution. Solutions are currently being appraised and interim solutions designed.

- *Any tenant who is concerned about any symptoms they are experiencing should be advised to consult a healthcare professional.*

**Development required** – This advice is not currently included in our training or information material. Review of material is to be undertaken and include as standard message in training, webpage etc.

- *Where landlords have been made aware of these [health] vulnerabilities, and especially if they are aware that the damp and mould is having an effect on health, landlords must ensure occupants are not left living with the damp and mould. When responding to tenants, landlords should take tenants’ personal circumstances and vulnerabilities into consideration.*

**Aligned** – This approach is included in standard procedures and training material.

**Development required** – Improving the quality of our person data through the Vulnerability Strategy project will strengthen this approach.

- *When a concern has been raised about tenant health (either by the tenant or a third party), landlords should consider whether tenants can be offered suitable alternative accommodation, subject to the tenant’s agreement, while the damp and mould is rectified.*

**Aligned** – This approach is included as part of standard procedures

- *Landlords should try to understand any barriers related to language, culture, disability, and/or neurodiversity that tenants may face. Landlords may wish to consider using Relay UK, a free national telephone service and app from BT and the Royal National Institute for Deaf People, for tenants who are deaf or hard of hearing.*

**Aligned** – This is a standard part of off all frontline procedures.

**Development required** – Enhanced person data, driven through the Vulnerability Strategy project, will enhance this approach.

### 3.8 **Identifying the root causes of damp and mould**

- *To address the underlying causes of damp and mould, and to prevent them from returning, landlords should identify and address all sources of water damage and condensation from both inside and outside the home.*  
**Aligned** – Dedicated D&M team in place. Significant programme of training and equipment invested in.
- *Simply removing surface mould will not prevent the damp and mould from reappearing.*  
**Development required** – We need to further review our approach to ensure we get the balance right between removing low level mould before it spreads and becomes a health hazard, and undertaking assessment and providing education and support. We are also reviewing our reporting to enable better proactive targeting of repeat occurrences.

### 3.9 **Removing mould**

- Once damp and mould have been identified, it is essential that the mould is removed promptly, reducing health risks for tenants.  
**Aligned** – This aligns to our policy and standard targets.  
**Development required** – We need to review our service standard timescales and agree robust delivery models/Key Performance Indicators (KPIs) with contractors.
- *While most tenants could reasonably be expected to remove condensation and very small amounts of mould using an appropriate mould and mildew cleaner, larger areas of mould should only be addressed by qualified professionals.*
- **Aligned** – We support residents to remove small areas of mould where they can do so but our standard approach is to remove mould through our contractors. We make available mould sprays and moisture traps free of charge.
- *When identifying an experienced contractor, landlords should check training, qualifications and references.*  
**Development required** – We do not currently do this and need to incorporate into standard contract management procedures and procurements.
- *Tenant management of condensation and small amounts of mould should not be a substitute for assessing and addressing the underlying issue, which should always be the priority.*  
**Aligned** – We have a good balance between supporting residents to remove small areas of mould themselves and taking action ourselves to

do the work. Residents have been involved and helped us shape our approach and provide support through free mould sprays.

### 3.10 **Addressing condensation**

- *There are a number of means to address condensation:*
  - *addressing building deficiencies (as above)*
  - *improving ventilation*
  - *improving energy efficiency and addressing inadequate heating systems*
  - *working with tenants to make small, reasonable adjustments to their behaviour, if appropriate, to reduce their damp and mould risk*

**Aligned** – Our approach ranges from self-help advice and support, professional assessment of defect, and design of remedial solutions, training for staff, and improvements through the capital programme.

### 3.11 **Improving energy efficiency and inadequate heating**

- *Investment in energy efficiency measures (such as improvements to heating systems, loft and wall insulation and glazing) can be an effective means of increasing indoor temperature but must be undertaken with consideration for any necessary additional ventilation.*

**Aligned** – Our capital improvement programme delivers energy efficiency improvements, and we actively seek external funding to increase our available resources.

**Development required** – Work is ongoing to increase our stock condition information and improve the quality of our data to ensure that we are targeting the right stock and meeting the 2030 target of all homes meeting Band C EPC rating.

- *Try to understand tenants' circumstances and consider signposting them to support with their energy costs or consider if there is any additional support that could be provided*

**Aligned** – We have good signposting in place to support residents for money advice and energy support. We have a track record of working with the British Gas Energy Trust to issue free fuel vouchers each winter to residents in most need.

**Development required** – Review where information around the various support strands is available and ensure this is easily accessible to staff.

### 3.12 **Working with tenants**

- *it may be beneficial to work with tenants to help them make small, reasonable adjustments to their behaviour, if appropriate, to reduce their damp and mould risk. It is essential that working with tenants must sit*

*alongside - and not be a substitute for - tackling the root causes of the issue*

**Aligned** – This aligns to our approach, which has been endorsed by the Tenant Voice Panel on behalf of residents. We have a good balance and recognise where to support, and where we need to act.

### **3.13 Following up to ensure the issue has been addressed**

- *To ensure that treatment has been effective, and damp and mould has not reappeared, any improvement work should be accompanied by a follow up visit to the property. Landlords should allow at least 6 weeks after the initial treatment to revisit the dwelling.*

**Action required** – We do not currently do this. Move to this approach will require many additional visits each year. A business case is currently under development to assess resources required to plug this gap.

### **3.14 Clear processes to report and monitor damp and mould**

*All landlords should have:*

- *clear processes for tenants to report damp and mould, which are easy for tenants to understand and use*

**Aligned** – Tenants can report direct to the D&M team via email or by telephone. These channels are clearly set out on the LCC website and handbook.

**Development required** – A review of LCC D&M policy is required in-light of the publication of this guidance. Review capability in Tenant Portal to accept detailed D&M reports through this channel.

- *having clear processes for other professionals (both internal staff and external contractors) to report concerns regarding damp and mould in a tenant's property*

**Aligned** – Established D&M team accessible to tenants and staff and also external partners through the Asthma Pathways and Breath Easy programmes.

- *having a system which makes it clear what will happen as a result of a damp and mould report, for example, when tenants may expect to be contacted following a report, an explanation that a home inspection may be required, and details of how to complain if so thing goes wrong*

**Development required** – Preparation for Awaab's law requires procedure and system change in-line with the reporting requirements of the new legislation. This will not be finalised until the details of the final legislation is known. The final legislation will also drive a further review of the Housing Leeds Damp and Mould webpage to ensure that serv

- *setting timescales to assess damp and mould and carry out remedial work, and reviewing these periodically*



- **Development required** – Whilst there are clear timescales for the completion of D&M remedial works, these are not monitored separately outside of routine repairs. A review of timescales and KPI monitoring is required with contractors and a separation of D&M remedial work and routine repairs monitoring requires assessing and appraising.
- *having a system which includes checks in between tenancies. This should include checking ventilation and heating systems are working effectively, and that signs of damp and mould are not apparent*  
**Aligned** – We have a robust void procedure during which these essential checks and remedial actions are completed.

### 3.15 **Property condition monitoring**

- *Landlords should periodically check properties for damp and mould, and for any risk factors such as inadequate ventilation and condensation (see above 'Identifying the root causes of damp and mould')*  
**Aligned** – We have a plan in place to return the service to a 5-year rolling programme of stock condition surveys and we have robust procedures in place for void servicing.
- *Landlords should also adopt a 'making every contact count' approach to identifying damp and mould.*  
**Aligned** – All frontline staff are trained to identify D&M and take appropriate action.

### 3.16 **Adopting a strategic approach to energy efficiency improvements**

- *A number of funding streams for improvement work are set out in Annex D: energy efficiency funding. It is advisable to prioritise the least energy efficient homes and homes with tenants who are struggling to adequately heat them.*  
**Aligned** – External funding opportunities are actively sought and bids for external funding are sourced in-order to maximise resources to the capital improvements programme.
- *Landlords should consider opportunities to implement energy efficiency improvement measures during routine maintenance and other improvement work, to minimise disruption and reduce costs.*  
**Aligned** – Opportunities are taken during essential refurbishment work to make improvements, such as installing thermal plasterboard where large areas of plaster require replacing, and installing EWI where essential work to the fabric of blocks is required.

### 3.17 **Training internal staff and external contractors**

- *All housing professionals, particularly those in tenant-facing roles, should have an understanding of damp and mould issues and why it is crucial to address them. Landlords and/or their workforce (internal staff, and where possible, external contractors) should be trained*

**Meeting** – Robust training packages have been developed internally and rolled out to staff, contractors, support teams, health partners and social care teams.

#### **4. Discussion Points**

- 4.1 Improving our monitoring and performance reporting against Damp & Mould activity is a high priority for us. Do Board have any thoughts on specific areas of performance reporting that would be useful to provide better oversight and assurance around our progress. Perhaps specifically around the customer experience?
- 4.2 The Tenant Scrutiny Board (TSB) have offered some incredibly helpful feedback and recommendations previously around specific areas of our Damp & Mould service offer. This has been particularly useful in helping us set the balance between what we need to do as a landlord and what residents can do themselves through support and education. Do Board have any thoughts about any further damp and mould areas of the service that the TSB could explore and make resident lead recommendations?
- 4.3 Whilst it is important that we meet the standards that the government set us around damp and mould, are there any other key areas relating to damp and mould not identified through this self-assessment that Board feel we should prioritise?

#### **5. Next steps**

- 5.1 A number of actions requiring development, which have been identified through this self-assessment, are already live actions which sit within the Consumer Standard Action Plans. An exercise is now underway to cross reference these action plans and ensure that all the actions from this self-assessment are accounted for and have targets set for completion, based on appropriate priority. Monitoring of the actions will continue.
- 5.2 This self-assessment has been shared with colleagues in the BITMO and PFI areas and a recommendation made that a similar self-assessment is undertaken, in-order to ensure a consistent citywide approach to dealing with damp and mould is taken and to identify areas for development where there are opportunities for collaboration.