

# Damp, mould and condensation (DMC) Self-Assessment

Following the recommendations made in the Housing Ombudsman’s Spotlight Report

Last reviewed: April 2024

- Further work is planned in order to meet full compliance
- Partial compliance and work is ongoing
- Fully compliant – monitoring and review required

Recommendation	Rating	Actioned and Achieved	Ongoing
<p>Landlords should adopt a zero-tolerance approach to damp and mould interventions. Landlords should review their current strategy and consider whether their approach will achieve this.</p>		<ul style="list-style-type: none"> <li>• A comprehensive approach has been implemented to identify, risk assess and remedy DMC issues</li> <li>• Revised our customer sign-up procedures, raising awareness of DMC, signposting and providing details on how to report concerns</li> <li>• A range of reactive and proactive approaches to DMC are utilised: programmed / periodic inspections - including any surveys associated with investment works, assessment at key points in the lettings process and through reactive repairs via customer reporting</li> <li>• A DMC policy has been created with the support of involved customers surrounding our zero-tolerance stance to the presence of DMC in our homes and our customer commitment and approach</li> <li>• In response to the call from the Secretary of State for DLUHC for a doubling down of efforts (December 2022) we have developed the following initiatives:               <ul style="list-style-type: none"> <li>➤ Included all operational provisions for dealing with DMC as a standard agenda item on repairs meetings</li> <li>➤ Established an active DMC working group</li> <li>➤ Delivered training and awareness for all front-line employees (inc. e-learning, toolbox talks and company-wide briefings)</li> <li>➤ Increased people resources and repairs budgets</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to monitor and review all data collection, current provisions / resources and regularly report progress to the Executive Management Team and Board, in addition to customers on our performance</li> <li>• We will provide a copy of the DMC Leaflet to all new customers at sign up with all relevant information and signposting on how to spot the signs of DMC / how to report concerns</li> <li>• We will review our policies, procedures and working practices following the outcome of the Awaab’s Law proposals</li> </ul>

<p>Landlords should consider whether they require an overall framework, or policy, to address damp and mould which would cover each area where the landlord may be required to act. This would include any proactive interventions, its approach to diagnosis, actions it considers appropriate in different circumstances, effective communication and aftercare.</p>		<ul style="list-style-type: none"> <li>• A DMC policy which has been developed with our involved customers is available to the public via our website</li> <li>• The main provisions of the policy are as follows: <ul style="list-style-type: none"> <li>➤ It demonstrates how we meet the relevant legislative and regulatory requirements in maintaining properties to a habitable standard and ensuring the health and safety of occupants</li> <li>➤ It provides a clear statement of intent of our zero-tolerance stance and how we resolve / address DMC</li> <li>➤ It offers clear and accessible routes for customers to report concerns and a proactive approach to identifying previously unreported occurrences</li> <li>➤ It outlines a risk-based and graded approach through a combination of reactive repairs and technical assessment (property surveys) in more complex cases</li> <li>➤ Information is provided on the types, causes, outward signs and possible remedies for DMC cases</li> <li>➤ The policy also includes a commitment to working in partnership with customers and providing support where there are extensive and persistent cases</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We will review the DMC Policy periodically and have this approved by the Executive Management (EMT) Team, to ensure its continuing suitability, adequacy and effectiveness, or as required by the introduction of new legislation or regulations that impacts on the obligations or changes to business practices</li> <li>• We will continue to involve customers in any review or revisions to the policy via the Tenants Policy Review Group</li> </ul>
<p>Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to 'find their silence'.</p>		<ul style="list-style-type: none"> <li>• We have carried out an analysis of known customer profile information against complaints and repairs reporting to help identify any under-reporting issues or certain groups of people that are not reporting repairs</li> <li>• We have also adopted a proactive approach to identify any previously unreported issues including: <ul style="list-style-type: none"> <li>➤ Our Customer Contact Centre are asking customers on each call, irrespective of the original call purpose, if they have any issues or suspect DMC in their home</li> <li>➤ We have implemented a process where frontline employees and contractors consult with customers in respect of any DMC issues during home visits</li> <li>➤ Reporting of DMC repairs on Active Housing (Online Portal) now developed to allow staff to report DMC repairs</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to monitor and review our repairs and complaints data to help identify areas of focus or potential improvement</li> </ul>

<p>Landlords should identify opportunities for extending the scope of their diagnosis within buildings, for example by examining neighbouring properties, to ensure the response early on is as effective as possible.</p>		<ul style="list-style-type: none"> <li>• We have improved our repairs logging and asset management systems to be able to disaggregate DMC repairs to allow for more accurate data capture</li> <li>• We continue to use our DMC data to identify and make proactive contact with customers where repairs reporting history and current reporting from similar property types / areas indicates there may be a likelihood of DMC</li> </ul>	
<p>Landlords should implement a data driven, risk-based approach with respect to damp and mould. This will reduce over reliance on residents to report issues, help landlords identify hidden issues and support landlords to anticipate and prioritise interventions before a complaint or disrepair claim is made.</p>		<ul style="list-style-type: none"> <li>• We collated information from a variety of sources utilising Power BI data analytics, to be able to produce 'heat maps' to help our understanding of where DMC issues are most likely to occur and to assist in the development of proactive programmes</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to monitor and review the effectiveness of our management arrangements to ensure they remain suitable and sufficient.</li> </ul>
<p>Where properties are identified for future disposal or are within an area marked for regeneration, landlords should proactively satisfy themselves that residents do not receive a poorer standard of service or lower living conditions, that steps are taken to avoid homes degrading to an unacceptable condition and that they regularly engage and communicate with these residents.</p>		<ul style="list-style-type: none"> <li>• We guarantee(d) to maintain the same repairs standard for all properties regardless of their status / identification for any potential disposal through operation of our 'Sustainability Index' or 'Options Appraisals Studies'</li> </ul>	<ul style="list-style-type: none"> <li>• We will maintain our standard / commitment going forward and will ensure we continue to assess customer satisfaction with all aspects of service delivery</li> </ul>

<p>Landlords should avoid taking actions that solely place the onus on the resident. They should evaluate what mitigations they can put in place to support residents in cases where structural interventions are not appropriate and satisfy themselves they are taking all reasonable steps.</p>		<ul style="list-style-type: none"> <li>• Our DMC policy contains a commitment to provide support and guidance to all customers who may have issues (either through direct support or signposting and referral mechanisms)</li> <li>• We reviewed our customer support section of our website to ensure supportive guidance was readily available, in addition to providing informative communications through letters, flyers, customer magazines and social media</li> </ul>	<ul style="list-style-type: none"> <li>• We are developing a ‘Vulnerable Persons and Reasonable Adjustments Policy’ to ensure we tailor our service delivery methods to the needs of the individual customer</li> </ul>
<p>Together with residents, landlords should review the information, materials and support provided to residents to ensure that these strike the right tone and are effective in helping residents to avoid damp and mould in their properties.</p>		<ul style="list-style-type: none"> <li>• We have written to all customers and produced a revised information leaflets and digital support that carefully considers tone and messaging. The prime message of both communications is for customers to make us aware of any concerns they have about damp and mould so that we may instigate corrective actions</li> <li>• We have worked alongside customer representatives and through customer wide surveys to ensure all communications including information available on the website and electronic newsletters, standard letters and information leaflets is customer approved</li> </ul>	<ul style="list-style-type: none"> <li>• We will ensure any revisions or updates to customer information leaflets are also customer approved</li> </ul>
<p>Landlords should be more transparent with residents involved in mutual exchanges and make the most of every opportunity to identify and address damp and mould, including visits and void periods.</p>		<ul style="list-style-type: none"> <li>• As part of the pre-inspection process for approving mutual exchanges we record (and raise jobs to remedy, where required) any incidences of DMC</li> <li>• Where mutual exchanges are approved (i.e. acceptance criteria is met and (if involved) are agreed with other landlords, we will inform incoming customers of any issues involving DMC and any actions that have been taken / or are planned to remedy them, to inform their decision-making process</li> </ul>	

<p>Landlords should ensure their strategy for delivering net zero carbon homes considers and plans for how they can identify and respond to potential unintended consequences around damp and mould.</p>		<ul style="list-style-type: none"> <li>• In line with the 'PAS 2035 Standard, all our current programmes to upgrade property energy performance including those part-funded by the Social Housing Decarbonisation Fund include measures to improve ventilation (natural and mechanical means), reducing the likelihood of unintended DMC issues</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to utilise our ongoing stock condition surveys, void surveys and any pre-entry surveys (for investment works) to review measures that have previously been installed (pre-PAS 2035) e.g. cavity and external wall insulation works to ensure there are no unintended issues with DMC</li> </ul>
<p>Landlords should review, alongside residents, their initial response to reports of damp and mould to ensure they avoid automatically apportioning blame or using language that leaves residents feeling blamed.</p>		<ul style="list-style-type: none"> <li>• We have reviewed our standard script prompts for call-handlers in Customer Contact Centre in repairs diagnosis to ensure questioning is appropriate and does not apportion blame in any way on customers who report DMC</li> <li>• We have provided DMC awareness training to all front-line colleagues and contractor services. Training includes an element on customer communications</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to utilise our involved customers to check and scrutinise applicable elements of customer relationship management and communications in regards to DMC and our handling of wider property hazard identification / mitigation measures. Communications are supportive with no blame placed on the customer</li> </ul>
<p>Landlords should consider their current approach to record keeping and satisfy themselves it is sufficiently accurate and robust. We would encourage landlords to go further and consider whether their record keeping systems and processes support a risk-based approach to damp and mould.</p>		<ul style="list-style-type: none"> <li>• We reviewed our methods for data capture and analysis to ensure there is integration between different systems e.g. Customer Relationship Management, Asset Management and Repairs Scheduling to enable a comprehensive view of the extent of DMC issues and to assist in the development of programmed works</li> <li>• We produced detailed 'heat-map' type infographics of properties that have DMC issues (from reporting or survey data) or are likely through archetypal information to experience these type of issues</li> </ul>	
<p>Landlords should ensure that their responses to reports of damp and</p>		<ul style="list-style-type: none"> <li>• Working alongside our in-house repairs and maintenance contractor we have developed a triage system for dealing</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to monitor performance and satisfaction with responses to meeting all repairs</li> </ul>

<p>mould are timely and reflect the urgency of the issue.</p>		<p>with DMC concerns that are either identified via direct reporting, are brought forward via the contractor when working on other jobs, are elicited via our own staff on customer contacts or that come about through survey information. This involves a job being raised via appointment with the customer and where works are more complex / extensive than first reported or a root cause cannot easily be identified this will trigger a technical assessment (property survey) and subsequent issue of further remedial work</p> <ul style="list-style-type: none"> <li>• Appointments are prioritised where it is known that the customer or a member of their households is vulnerable</li> </ul>	<p>responsibilities and will share collated results via our website and involved customer groups</p> <ul style="list-style-type: none"> <li>• We will review and respond accordingly to any dips in expected performance or satisfaction</li> </ul>
<p>Landlords should review the number of missed appointments in relation to damp and mould cases and, depending on the outcome of any review, consider what steps may be required to reduce them.</p>		<ul style="list-style-type: none"> <li>• We have reviewed our processes for dealing with reports (via all sources) of DMC. Previously if scheduled job / inspection appointments were missed by the customer then a calling card would be left at the property. The onus was on the customer to re-arrange and if no contact was made the job would be closed-off. We are now keeping all such jobs open until contact can be established and a new appointment can be made or we are advised by the customer that the job is no longer required</li> <li>• If the customer continually refuses access we will consider utilising legal methods (injunctions) to gain access, as a last resort</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to keep the revised process under review and will work with advocacy groups as required where the customer(s) may have additional support needs</li> </ul>
<p>Landlords should ensure that their staff, whether in-house or contractors, have the ability to identify and report early signs of damp and mould.</p>		<ul style="list-style-type: none"> <li>• We have provided mandatory DMC awareness training to all our front-line staff that are likely to attend customers properties</li> <li>• We have also conducted 'tool-box talks' sessions with all operatives from our in-house repairs and maintenance contractor on the same issue, outlining our organisational approach</li> <li>• We have trained our Property Surveyors in the use of electronic damp meter readers</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to provide internal communications to ensure employees remain vigilant about the importance of dealing appropriately with DMC</li> <li>• We will continue to ensure staff receive bespoke e-learning refresher training annually</li> </ul>
<p>Landlords should take steps to identify and resolve any skills gaps</p>		<ul style="list-style-type: none"> <li>• The issue of DMC will continue to be the subject of 'toolbox talk' sessions and contract monitoring meetings</li> </ul>	

<p>they may have, ensuring their staff and contractors have appropriate expertise to properly diagnose and respond to reports of damp and mould.</p>		<ul style="list-style-type: none"> <li>• A review of resources was conducted with additional resource in people and asset investment</li> </ul>	
<p>Landlords should ensure that they clearly and regularly communicate with their residents regarding actions taken or otherwise to resolve reports of damp and mould. Landlords should review and update any associated processes and policies accordingly.</p>		<ul style="list-style-type: none"> <li>• Our customer satisfaction ratings for dealing with repairs indicates we have strong and robust processes for customer communication</li> <li>• We have updated the customer support section of our website to include details on how to report damp and mould concerns alongside advice, hints and tips, FAQs and a customer leaflet on how to manage DMC in the home</li> <li>• A DMC policy which has been developed with our involved customers is available to the public via our website</li> <li>• Either directly, or through our in-house repairs and maintenance contractor we will regularly communicate with customers who have reported DMC issues throughout the process until the issue is resolved</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to consult and communicate with our customers on experiences and results regarding repairs and DMC issues</li> <li>• We will continue to explore other methods of communicating with our customers to understand the 'customer journey' and to ensure our response and resolution meets customer expectations</li> </ul>
<p>Landlords must ensure there is effective internal communication between their teams and departments and ensure that one individual or team has overall responsibility for ensuring complaints or reports are resolved, including follow up or aftercare.</p>		<ul style="list-style-type: none"> <li>• Our Complaints Coordinator is in place to ensure complaints are assigned to the correct person, to help teams communicate and provide relevant information to resolve the complaint in line with the Housing Ombudsman's Complaints Handling Code</li> <li>• A Complaints Tracker is in place for any post action work to be added, assigned and tracked through to completion</li> <li>• There are numerous cross-team forums established to ensure effective internal communications on all issues regarding DMC e.g. contract monitoring meetings, working groups and complaints analysis meetings</li> <li>• We have reviewed all internal Key Performance Indicator reporting to ensure there is cross-discipline involvement / responsibility of actions required to mitigate damp, mould and condensation issues</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to review internal Key Performance Indicators to ensure there is cross-discipline involvement / responsibility of actions required to mitigate damp, mould and condensation issues</li> </ul>

<p>Landlords should ensure that their complaints policy is effective and in line with the Complaint Handling Code, with clear compensation and redress guidance. Remedies should be commensurate to the distress and inconvenience caused to the resident, whilst recognising each case is individual and should be considered on its own merits.</p>		<ul style="list-style-type: none"> <li>• Our 'Complaints, Appeals and Feedback Policy' has been refreshed in line with Housing Ombudsman Code. A separate Compensation Policy is also in place</li> <li>• Our complaints and compensation processes / practices have been independently verified and have achieved the HouseMark Complaints accreditation standard and our regularly reviewed by our tenants Scrutiny Team</li> <li>• We have completed training with Investigating Officers utilising Housing Ombudsman case studies to share best or worse practice and comparison of any redress offered</li> </ul>	<ul style="list-style-type: none"> <li>• We will keep our policies under review and will ensure we take note of levels of compensation recommended by the Housing Ombudsman in DMC</li> </ul>
<p>Landlords need to ensure they can identify complex cases at an early stage, and have a strategy for keeping residents informed and effective resolution.</p>		<ul style="list-style-type: none"> <li>• Close partnership working with the in-house repairs and maintenance contractor ensures there is a rapid and consistent route for technical assessment of complex cases via on-site reporting via operatives attending a job</li> <li>• Where possible, we encourage customers reporting DMC to provide photographs of the affected areas. This can enable rapid diagnosis and prioritisation of technical assessments / joint visits with repairs contractors and expedient instructions on remediation works</li> <li>• Where a technical assessment is required and / or the case is complex, we will discuss in detail with the customer, the full schedule of agreed works, the likely timescales for completion and an accurate assessment of any disturbance that will be caused</li> </ul>	
<p>Landlords should identify where an independent, mutually agreed and suitably qualified surveyor should be used, share the outcomes of all surveys and inspections with residents to help them understand the findings and be clear on next steps. Landlords should then act on accepted survey recommendations in a timely manner.</p>		<ul style="list-style-type: none"> <li>• We observe strict adherence to the Pre-Court Protocol and will work alongside any independent surveyors that are required (normally only applicable in cases of disrepair)</li> <li>• We have established a dedicated Disrepair Team to ensure all property hazards identified through this route are dealt with as expediently as possible – regardless of any on-going legal actions</li> <li>• We provide information to all customers on the benefits of early and direct reporting of DMC as the most effective and rapid way of achieving lasting resolutions</li> </ul>	



<p>Where extensive works may be required, landlords should consider the individual circumstances of the household, including any vulnerabilities, and whether or not it is appropriate to move resident(s) out of their home at an early stage.</p>		<ul style="list-style-type: none"> <li>• We review each complex or extensive case of damp, mould or condensation on its merits and will consider the vulnerabilities of any household members</li> <li>• Our DMC policy dovetails with provisions in other policies to enable temporary rehousing of customers in cases where the remedial works are extensive or there are ongoing health and wellbeing concerns</li> </ul>	<ul style="list-style-type: none"> <li>• We will, in any cases where temporary or permanent rehousing is required, conduct a full review to identify any lessons learnt and improvements to make the process more effective / eliminate the need for this course of action in future (where possible), through effective management / early intervention measures</li> </ul>
<p>Landlords should promote the benefits of their complaints process and the Ombudsman to their residents as an appropriate and effective route to resolving disputes.</p>		<ul style="list-style-type: none"> <li>• Our accessible means of registering complaints are promoted to customers in a variety of ways e.g. at the sign-up process for new customers, via contacts made over the phone, in person with any staff member and via information on the website</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to publish 'you said – we did' feedback on our website on a quarterly basis to demonstrate the learning from complaints information and how we improve our policies and procedures as a result</li> <li>• We will also continue to promote awareness of the Housing Ombudsman via our website and in all correspondence in dealing with complaints</li> </ul>
<p>Landlords should continue to use the complaints procedure when the pre-action protocol has commenced and until legal proceedings have been issued to maximise the opportunities to resolve disputes outside of court. Landlords should ensure their approach is consistent with our jurisdiction guidance and their legal and complaint teams work together effectively where an issue is being pursued through the complaints process and protocol.</p>		<ul style="list-style-type: none"> <li>• We revised our 'Complaints, Appeals and Feedback Policy' to make it clear that where customers choose to pursue legal action we will continue to do all that is reasonably possible to resolve any repair issues that are outstanding (This includes pursuing injunction actions for access where this is denied by the customer)</li> </ul>	<ul style="list-style-type: none"> <li>• We will continue to advise customers on the best avenues to resolve complaints i.e. via our internal processes up to the point where legal papers are filed with the courts (as stated over leaf this will not stop concerted efforts to continue to remedy any property defects / hazards)</li> </ul>
<p>Landlords should consider how best to share learning from complaints and the positive impact of changes made as a result within</p>		<ul style="list-style-type: none"> <li>• We have a multi-discipline complaints group to share learning from collated complaints information / data and responses offered</li> </ul>	

<p>the organisation and externally. Systems should allow the landlord to analyse their complaints data effectively and identify themes, trends and learning opportunities.</p>		<ul style="list-style-type: none"> <li>• We have in place tools that allow extensive ‘drilling down’ into complaints received to show trends and aid analysis for business improvement</li> <li>• We benchmark complaints handling information with peer providers and will adopt any best practice that is identified</li> </ul>	
<p>Landlords should ensure they treat residents reporting damp and mould with respect and empathy. The distress and inconvenience experienced by residents in this area is some of the most profound we have seen, and this needs to be reflected in the tone and approach of the complaint handling.</p>		<ul style="list-style-type: none"> <li>• We have provided training and awareness for all front-line colleagues to deal with customers reporting DMC with respect and by using appropriate forms of questioning to lead to accurate diagnosis / effective mitigation measures</li> <li>• We monitor customer satisfaction with all aspects of our service delivery to lead to improvements, where required and to ensure our standards remain high</li> </ul>	