Reference	Recommendation	Update April 23			
Section 1: From	Section 1: From reactive to proactive				
1.	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.	Policy Our Damp and Mould Policy, April 23, explains our zero-tolerance approach, which is delivered by inspecting all reported cases of damp and processing associated works. Self-reporting Tenants can report damp through any contact channel. There are standard questions to diagnose, ensuring a consistent approach / service. We also identify potential damp and mould issues when carrying out property visits (via ForHousing staff or operatives) and if the property is part of a planned scheme address through the works. Staff /operative reporting As an additional measure, when any ForHousing staff or operatives visit properties through day-to-day activities, they are required to report any instances of damp and mould that have not been reported to the asset team (through the team email account which is monitored daily). This enables damp inspections and assessments to be raised directly by front line staff. This proactive approach has resulted in 177 staff/operative requests for damp inspections during 22/23 as a direct result of property visits. From 23/24 we are also planning to undertake an annual damp and mould check of all properties through compliance visits and record this and the date on the QL housing management database. Service Standards Our service standards, introduced 1st October 2021, commit to 10 working days (or sooner) to inspect damp. Other standards include scheduling and issuing the works (within 24 hours) and a further 40 working days (in 90% of cases) to complete the works. We are currently finding it challenging to meet the 40 working day completion date due to our proactive approach, the complexity of the issues and availability of the supply			

chain, but we are looking to secure additional resources to address this issue. There have been 3134 damp inspections, undertaken as at 31.3.23.

Number of damp inspections completed	21/22 (from October 21)	22/23	Total
(Some properties may have been inspected more than once)	920	2214	3134

Performance 22/23	%	Calculation
Inspect 10 working days	51.04%	2214 with 1130 completed in target
Complete works 40 working days (90% target)	49.57%	1152 with 571 completed within target.

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.

Procedure

The procedure, introduced October 21, sets out the approach structured in the following stages:

- 1. Diagnostic and Repair Raising
- 2. Inspection
- 3. Remedial Repairs
- 4. Repairs Completion

Proactive interventions

• Condensation - To diagnose condensation, where necessary humidity sensors are installed during the inspection with the consent of the tenant.

- Resources We have put in place a dedicated workstream and team of specialist damp inspectors and operatives (4 inspectors and 29 operatives), which is delivered and monitored outside the routine responsive repairs service.
- Inspection The damp and mould inspection is carried out by trained damp inspectors and includes a technical assessment to identify the source of the issue and an assessment of any associated Category 1 and 2 hazards to determine any remedial works that are required. This is done using the prescribed Housing Health and Safety Rating System (HHSRS) which looks at the statistical likelihood of harm, contributory causes and those matters affecting the harm likelihood and potential harm outcome, such as age and vulnerability. There have been no Cat 1 hazards, and 221 Cat 2 hazards (217 in 21/22 and 4 in 22/23), all of which have been resolved.
- Early intervention for tackling mould If the inspection identifies mould, which
 could be detrimental to the health of the tenant and their family, this is actioned
 immediately to remove any potential risk in advance of any necessary remedial
 works. This is undertaken within a maximum of 5 working days through a
 specialist mould growth treatment contractor that we have engaged specifically
 for this purpose.
- LiveWell Fund Our LiveWell fund provides support to tenants who may be
 experiencing financial difficulties due to rising energy and fuel costs and the costof-living crisis. There is a proactive marketing campaign to promote access to the
 LiveWell Fund to support tenants to adequately heat their homes. We have also
 directly targeted all tenants who live in EPC Band D properties with this support
 and are referring tenants to the fund if issues are identified by front line staff.

Different circumstances

The inspection also involves completing a health and vulnerability assessment of the tenant and their family. This assessment enables the required works to be prioritised accordingly, identify if any immediate actions are required and determine if any support is required for the tenant and their family to facilitate the works.

Communication

		Tenants receive an automated message when a damp inspection is raised with an appointment; works are raised with target date (40 working days); 7 days prior to works commencing or sooner depending on appointment and reminding the tenant of the appointment date and any instructions i.e., move furniture if required. Aftercare To ensure that the damp and mould service is effective, each tenant, whose home has received works, is contacted 3 months following completion to verify that the completed works have addressed the reported problem.
3.	Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to 'find their silence'.	Accessibility All access methods were redesigned to be consistent including all digital reporting methods. The website has been recently updated to encourage tenants to report issues "immediately" through our repairs reporter, which is quick and easy to use, walking the tenant through the process, step-by-step. It also offers the alternative of speaking to staff on the service centre free phone number if this is their preference. As all staff are trained to spot/understand damp and condensation, including how to act, this can be reported even if the tenant isn't aware of the issues.
4.	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.	Opportunities to extending diagnosis In 23/24 we have set aside a revenue provision of £2.4m to deal with the damp and mould works that have been raised and are awaiting to be completed plus those reactive cases that we also expect to receive during this period. As we aim to be pro-active, using the data collated through our new damp process, we have set aside a capital budget of £900k to commence in 24/25 which enables planned works schemes to be developed and packaged in 23/24 to address those properties with a higher likelihood of experiencing damp issues. The schemes will be put together using the data of areas/property type/age and SAP rating to direct the works accordingly and will naturally pick up neighbouring properties to those that have had damp related issues.

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.

Stock condition surveys

Identification of Categories 1 and 2 damp and mould hazards is a key element of the stock condition surveys undertaken when assessing the compliance of homes against the decent home standard and determining associated future investment needs. The latest stock condition survey was concluded and issued in December 2021 by Savills and involved a 10% representative sample of ForHousing's properties. We also use the same survey methodology and criteria for assessing the compliance of homes against the decent home standard when carrying out in house stock condition surveys, which annually covers 5% of ForHousing's properties. Our proactive approach to dealing with damp and mould cases since May 2021 has provided us with further insight into our properties, based on data from 2952 properties. We are using this data and insight to analyse the prevalence and types of issues within our stock and to inform how we will address these going forward.

Risks identified through stock condition surveys

Damp and mould related risks within our stock were reported as follows:

Question	Slight	Typical	Moderate	Severe	-
Damp/Mould	5%	90%	5%	0%	

This

assessment concluded that there was the potential for moderate risks associated with damp and mould in 5% of our properties, but importantly, there were no severe cases in the survey sample. Savills also noted that "where hazards cannot be measured by a stock condition survey, these are assumed to have a normal risk" and that "the level of reported hazards, in proportion to the number of surveys completed (across all hazards), was amongst the lowest they had experienced and is a strong indicator of the relatively good condition of the housing stock". All potential hazards identified as part of this exercise have been resolved through our repairs service.

Risks identified through damp reports

We also undertake analysis of damp and mould cases that are reported directly by tenants or when identified by those visiting homes. Between May 21, when the Damp and Mould Taskforce was established, to March 23 (year end 22/23), 2,952 homes with

damp and mould cases have been reviewed, raised and completed. This data equates to 16% of our 18,125 homes and enables us to analyse the frequency, prevalence and causes of damp and mould related cases. It also enables the organisation to map cases by area, age and property type enabling more targeted interventions.

Similar to the Savills findings, none of these directly reported cases of damp and mould were categorised as a Category 1 Hazard, but the overall number of cases as a proportion of stock were higher due to our proactive approach to addressing condensation, which we fully accept as a landlord responsibility.

Findings from analysis of damp reports

The analysis of all damp cases back to January 2020, identifies that there is a higher frequency of damp, condensation and mould related issues within older properties (pre-1945), which are not as well insulated as newer properties. Also, due to the nature of the construction, these properties may have cold spots which can exacerbate condensation and/or technical issues, potentially leading to cases of rising or penetrating damp.

From our analysis of cases, we also know that our less energy efficient properties (EPC Band D homes which represent 9% of properties) have a higher frequency of damp, condensation and mould issues and that over occupying within homes will likely exacerbate any condensation issues.

Analysis of the 2,952 properties/cases have improved procedures and service standards, and provided further insight into the main causes of damp, condensation, and mould in our properties. These are as follows:

Causes of damp and mould	As at 31.3.23 - Number and %
Condensation/ventilation and heating issues	1434 – 49%

		Penetrating damp from breached cavity or roof leak Rising damp	925 – 31% 593 – 20%	
6.	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.	Regeneration Any tenant can report a damp issue and this is dealt with consistently, including where properties could be potentially identified for disposal or marked for regeneration, as there is no differentiation between property category/type/area for damp/condensation reports. In those instances, works would still be completed as per the damp policy and procedure to support the health and wellbeing of the tenant. Where there are major damp works the tenant may decide to be temporarily decanted or permanently rehoused and the tenant will be supported through this process to ensure all associated costs are fully covered.		
7.	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.	been reviewed to ensure no of lifestyle' assumptions in proof. We no longer send a damp le instead we book a damp insp	Development campaigns focusing is placed on the tenant. cedures, training materials and eaflet to advise tenants how to ector to visit and diagnose.	d customer information. o manage the issues, and
8.	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	Information for tenants on da The new process was co-des staff across ForHousing.	mp and mould signed by a dedicated task for	ce of tenants, partners, and

	helping residents to avoid damp and mould in their properties.	The group included colleagues within Assets, Neighbourhoods and Marketing and our website information was updated and refreshed to reflect our new approach in November 2021. Damp inspectors also provide advice to tenants when surveying properties and carrying out a pre-inspection prior to raising the required remedial works.
9.	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.	Mutual exchanges In 22/23 we did not carry out any damp and mould assessments on mutual exchanges, only safety checks. This will change in 23/24, to align to the void inspection process outlined below. Voids
		All voids have a full visual technical inspection at survey stage, should issues of potential damp/mould be identified then a full damp inspection is undertaken.
10.	Landlords should ensure their strategy for delivering net zero carbon homes considers and plans for how they can identify and respond to potential unintended	Net zero carbon homes This is considered within the new green strategy and all insight received from the damp improvement cycle is being utilised within the Decarbonisation, Repairs and Maintenance and Forward Together projects.
	consequences around damp and mould	Examples include, air tightness can be a contributory factor of damp and mould and as such and deep retrofit such as that being carried out in Irlam is complemented with a heat recovery ventilation system in accordance with PAS2035.
		Additionally, prioritisation and future decarbonisation activities consider current SAP ratings along with other factors such as the prevalence of damp through historic reporting.
Section 2: From	m inferring blame to taking responsib	pility
11.	Landlords should review, alongside residents, their initial response to reports of damp and mould to ensure they avoid automatically apportioning	Engagement 1500 tenants were surveyed at the start of our review of how we deal with damp and mould (improvement cycle), with over 300 tenants spoken to personally to enable a full understanding of the incumbent process prior to discussing any opportunities for

	blame or using language that leaves	improvement. The findings and broad recommendations were considered and approved
	residents feeling blamed.	by the Customer Committee, who will, have a role monitoring its success going forward.
12.	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.	Monitoring Since the introduction of the new service standards in October 2021, the investment in damp and condensation inspections and remediation works to the 2,952 homes is £3.95m (£1.25m for the 6 months in 21/22 and £2.7m in 22/23). Due to the importance of this area, we have robust processes in place for recording and monitoring damp and mould jobs and are aware of the status of all 1,090 (live at year end 22/23) reported cases including any associated tenant vulnerability issues (relates to 495 households). We also have a status/progress report of all live cases which is
		Governance Addressing damp and mould is a key priory for ForHousing and in addition to directing significant resources to this area, performance information is regularly reported to the Board and Executive Management Team. There is also stronger scrutiny and governance with 3 PIs agreed with Audit and Risk Committee to monitor this area (value of works, average time to complete work, number of unique properties inspected in response to damp reports).
		Risk based approach Our capital budget of £900k to commence in 24/25, uses data collated through our new damp process to enable planned works schemes to be developed and packaged in 23/24. The schemes use the previous insight and data regarding damp issues that have been addressed including areas/property type/age and SAP rating to direct the works accordingly.
13.	Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.	Time to respond Completing works within the 40-day period is currently proving challenging due to the impact of our proactive approach on demand which is not currently being matched by available resources. However, contractor resources have increased at year end, enabling more cases to be appointed.

		Twenty new operatives have been recruited to the damp team since January 2023 with ongoing recruitment to a further required 24 posts, dedicated to the damp and mould team, also taking place. ForHousing are also making continued attempts to add additional contractors to our framework to call off directly.
		Vulnerabilities Vulnerabilities are identified both during the raising of the inspection and when the inspection takes place. Works required to those properties are prioritised and where required liaison with our Neighbourhood team to temporarily decant or permanently rehouse tenants, where needed.
14.	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.	Appointments As part of the new service standards that were introduced from 1st October 2021 and as part of continuous learning, when any damp and mould related works are subject to a "no access" these are now always reappointed with the tenant until the works are completed. A full review of no access is ongoing to ensure that there are no underlying issues or vulnerabilities creating no access. This links into the systems and data sharing work currently being undertaken.
		Information for sharing data uploads has been agreed and ForHousing and Liberty ICT teams are currently developing this for implementation as soon as possible. Notifications AWS automated updates (text messages to tenants) have been introduced for all damp inspections and continue throughout the repair lifecycle.
15.	Landlords should ensure that their staff, whether in-house or contractors, have the ability to identify and report early signs of damp and mould.	Staff training We highlight the importance of this area to all staff through intranet articles and staff webinars and have live staff dashboards highlighting current performance. All staff also receive a comprehensive, mandatory e-learning. Logging damp and mould

16.	Landlords should take steps to identify and resolve any skills gaps they may have, ensuring their staff and contractors have appropriate expertise to properly diagnose and respond to reports of damp and mould.	Tenants can report an issue to any member of staff, without being passed to another team member, so reporting repairs and issues will no longer run solely through the service centre. Staff gain a good understanding of what causes damp from the elearning session, but our repairs Keyfax system will also guide them through the correct questions to ask. There is also a process guide on Microsoft Forms which walks staff through the process step-by-step, showing them the right questions to ask so we can provide the best possible customer service, every time. Skills We have recruited a dedicated in-house team who'll oversee all damp repairs and ensure they're addressed as high priority. Liberty (our contractor) have also recruited a damp lead who will be accountable for all ForHousing repairs, so the process is seamless and consistent, every single time. We ensure that even if staff do not have the skills to diagnose, they have a process to refer for an inspection. This means anyone visiting a home who identifies any damp and mould issues that has not been reported can refer the property for inspection. Through our Fuel Poverty Taskforce, we have recently reiterated to all colleagues and operatives who are visiting properties to be vigilant of any damp or mould issues that have not been reported and pass the information through to the maintenance team to raise an inspection.
17.	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	Communication on resolution The website has a page dedicated to damp and mould, providing examples with photos to aid understanding, whilst also explaining the service and its standards. Tenants whose homes are diagnosed as requiring works will receive a schedule of works to ensure they are clear of what will take place, the timeframe to complete and an understanding of the related disruption. The job will not be closed down until the tenant
18.	accordingly. Landlords must ensure there is effective internal communication	is in full agreement that the remedial work is successful. Internal communication and coordination The team leading on damp is expanding with the operatives carrying out post
	between their teams and	inspections transferring from the contractor in April 23 to ensure full internal control of

	departments and ensure that one individual or team has overall responsibility for ensuring complaints or reports are resolved, including follow up or aftercare.	quality assurance. The introduction of the damp works pack to coordinate the works will ensure the tenant and all staff are fully informed. A member of staff is being recruited to coordinate decants if these are required and will effectively be the go between for all parties.
19.	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 that each case is individual and should be considered on its own merits.	Complaints handling The Complaints Policy was reviewed in October 22 to align to the revised Housing Ombudsman Complaint Handling Code. The current Compensation Policy already sets guidelines for compensation, and this has been externally reviewed to ensure it reflects Housing Ombudsman guidelines. The new Compensation Policy should be available by April 23. At Stage 2 complaint review meetings, compensation is agreed once all evidence is reviewed. Where possible we ask the tenant what compensation they think is appropriate including damage to property, lack of facilities and personal impact. We continually monitor feedback from tenants including any complaints associated with any damp and mould issues and take all necessary action to resolve these to the full satisfaction the tenant. The levels of complaints and resolutions are also reported monthly to the Executive Management Team to ensure that performance is effective, and learning is identified and incorporated.
Section 3: From	m disrepair claims to resolution	
20.	Landlords need to ensure they can identify complex cases at an early stage and have a strategy for keeping residents informed and effective resolution.	Early diagnosis As each damp report is being inspected at first point of contact, this will be overseen by a dedicated damp manager and weekly operational reviews will take place between Liberty and the new ForHousing damp/disrepair lead, where individual cases will be discussed and monitored. Mould clean
		124 mould cleans took place in 22/23 to remove any potential health risk whilst associated remedial works to address the source of the damp are awaiting appointment/completion. Decants

		The introduction of a post to manage decants will support more complex cases where the tenant has to move out for works. Our Damp and Mould Policy states "We will complete a health and vulnerability assessment for the household as part of the damp and condensation inspection, to enable the required works to be prioritised accordingly and determine if any support is required to facilitate the works. This can include a temporary decant or being permanently rehoused. The tenant will be supported through this process to ensure all associated costs are fully covered."
21.	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.	Where required a third-party surveyor will be utilised and this will likely arise from cases discussed at the weekly operational meetings.
22.	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.	Vulnerabilities Handheld PDA functionality for the contractor includes the ability to escalate welfare, safeguarding, vulnerability, unreported repairs back to ForHousing. Decants If the remedial works are extensive or could affect the health of the tenant and their family, we will offer to decant them temporarily while these are undertaken or alternatively arrange a permanent move to a suitable alternative property. All costs associated with decanting tenants to facilitate the works are borne by ForHousing. In 2022/23, we moved 81 tenants on a temporary basis while remedial works take place, plus 9 moves have taken place on a permanent basis.
23.	Landlords should promote the benefits of their complaints process and the Ombudsman to their	Raising awareness about options to make a complaint There is a page on the website for complaints and feedback. This invites complaints as an opportunity for ForHousing to fix and learn. The page includes a form to report

	residents as an appropriate and effective route to resolving disputes.	complaints online. (We have put a request in to have damp added as an option for enquiry type). Tenants can also report by phone or through the My Account app. The website explains the stages for complaint handling, which aligns to the Housing Ombudsman Complaint Handling Code, includes ForHousing's Complaints Policy and self-assessment against the code, and promotes how to escalate to the Housing Ombudsman, explaining its role and service. Complaint response letters also promote the service.	
24.	Landlords should continue to use the complaints procedure when the preaction 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.	Legal action In February 23, our Legal team were consulted on the most appropriate way to update our Complaints Policy to ensure it offers opportunity to resolve disputes outside of court. This has also been applied to our Damp and Mould Policy which states "If we receive any indication of damp or mould through a Disrepair Claim, in addition to responding accordingly in line with the Pre-Action Protocol, we will take all necessary actions to inspect and undertake necessary remedial works to address the source of the damp or mould issue including seeking all available means to gain access."	
Section 4: From a complaints to a learning culture			
25.	Landlords should consider how best to share learning from complaints and the positive impact of changes made as a result within the organisation and externally. Systems should allow the landlord to analyse their complaints data effectively and identify themes, trends and learning	Power BI The new complaints dashboard, introduced on 15.11.22, provides a breakdown of different types of complaints by service type (including damp), issue reported and response rates. This enables trends in high demand complaint types and issues to be identified and actioned quickly. There have been 253 Stage 1 complaints about damp between 15.11.23 to 31.3.23. Stage 2 meetings	
	opportunities.	If a complaint escalates to Stage 2 a meeting of the central complaint handling team and the service provider team meet to consider whether all matters with the original	

	complaint have been addressed. A PowerPoint presentation is used to report the complaint position from the original tenant report to resolution in Stage 1. During the meeting learning points are discussed, to prevent the issue(s) recurring. "Learning points" in the first 4 weeks of this process are as follows: You Said - Tenants complained that kitchens removed for damp works were reinstalled after works when they were damaged and not fit for purpose We Did – Whether the kitchen needs replacing is identified when the damp work is diagnosed, taking into account the remaining lifespan of the kitchen. The tenant signs
	they agree to the decision. If a new kitchen is required, this is prioritised to ensure it does not hold the work up. The supplier visits the tenant and provides choices of the kitchen, to ensure a consistent service with planned works. If a kitchen is to be reinstalled but on removal (when the full condition can be viewed) this is in question, an inspection will be made by the planned maintenance team to assess.
	You Said – Tenants complained that works were outstanding following damp works when they moved back after a decant. We Did – Tenants will have a viewing, similar to that delivered for newly allocated homes, to confirm the home is ready to relet.
26. Landlords should ensure they treat residents reporting damp and mould with respect and empathy. The distress and inconvenience experienced by residents in this area	Surveys Transactional surveys will be carried out in 23/24 specifically for damp works, similar to what we already do for repairs and gas servicing. There are currently arrangements in place to survey tenants through an online survey but to date this has had low results.
is some of the most profound we have seen, and this needs to be reflected in the tone and approach o the complaint handling. V2 5.4.23 for ForHousing Board Web Version	Staff training on customer care A lengthy and in-depth HEART campaign has been carried out to align with customer service week in 2022 and an Executive Led staff webinar. The training is being reinvigorated and will be incorporated into the damp training.