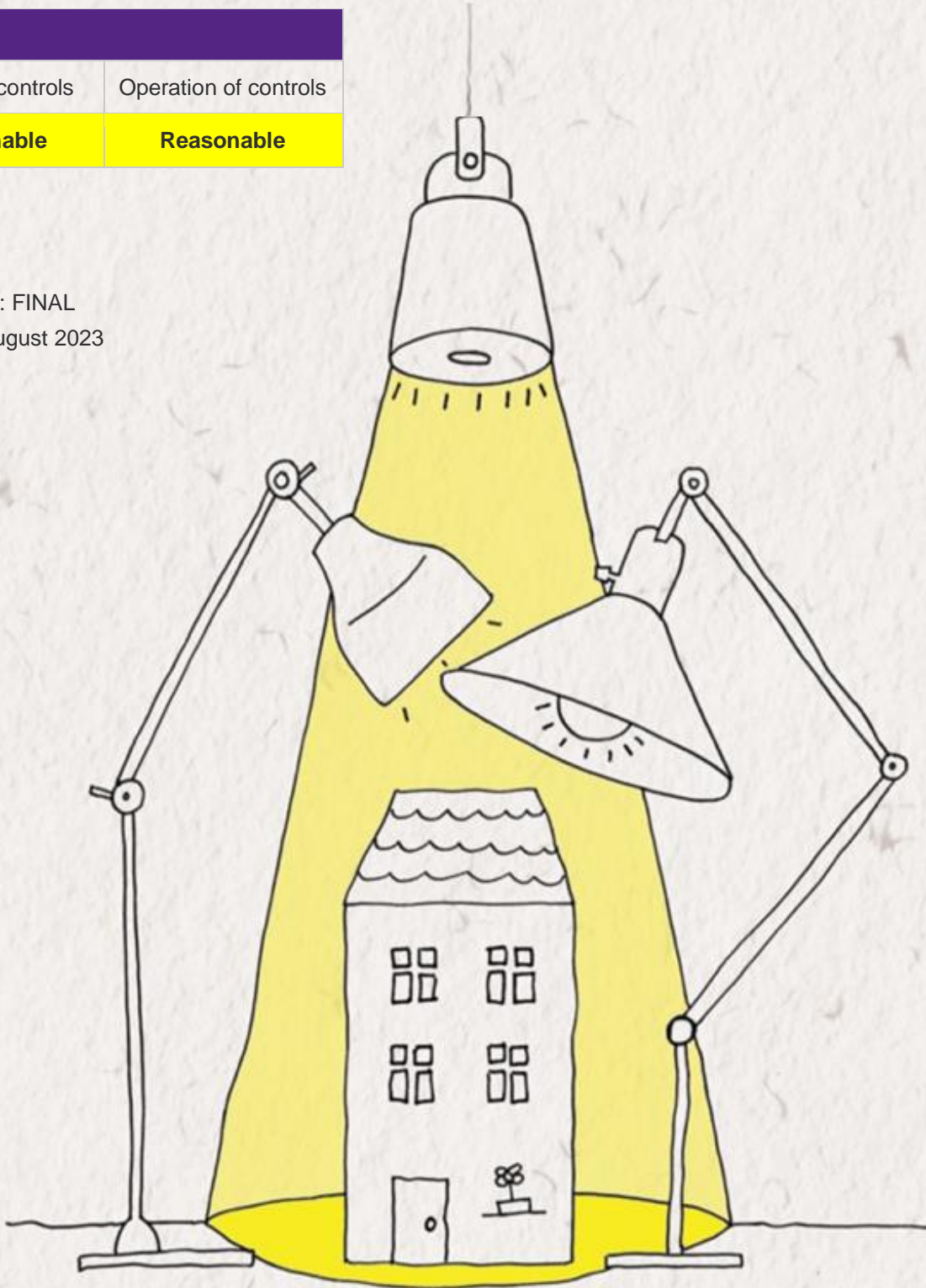


DAMP, MOULD AND CONDENSATION INTERNAL AUDIT REPORT

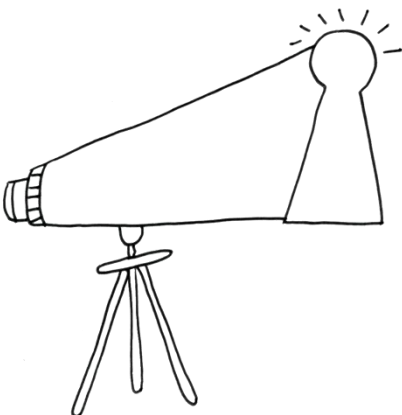
Assurance	
Design of controls	Operation of controls
Reasonable	Reasonable

Report Status: FINAL
Issued: 02 August 2023



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Disclaimer: Our reports will be delivered to you on the understanding that reliance will only be placed upon them by management and by the Board members in the normal course of their duties and that they will not be made available to persons other than as stated in these terms of engagement.

No responsibility is accepted by us for any reliance that may be placed on our reports by any third parties unless our permission is sought for the provision of such reports to specified third parties and such permission is given by us in writing prior to the provision of the reports to the third parties specified.

INTRODUCTION AND BACKGROUND

As a Registered Provider (RP), ForHousing has a responsibility under the Landlord and Tenant Act of 1985 and the Housing Act of 2004, to carry out repairs where damp and mould has caused structural damage and exterior defects. Damp and mould can cause serious health problems for tenants, and impact on existing health problems. Therefore, it is important for RPs to resolve causes of damp and mould promptly. Whilst it is a landlord's duty to repair and maintain a property, the tenant also has a responsibility to highlight any property issues as soon as they notice them.

Damp can arise from condensation (or excessive moisture) and cause mould, moisture in buildings can be caused by leaking pipes, rising damp in basements or ground floors, or rain seeping in because of damage to the roof or around window frames. Condensation occurs when the air and/or surfaces are cold and when the moisture content of the air is high. A lack of air movement tends to be in corners, on or near windows, in or behind cupboards or wardrobes.

According to the NHS, having damp and mould in your home can increase the likelihood of respiratory problems, respiratory infections, allergies, or asthma, and it can also affect the immune system. The issues around damp and mould have entered the spotlight across the social housing sector (in particular) following the coroner's report in November 2022 relating to the tragic death of Awaab Ishak, caused by damp and mould in a Rochdale Boroughwide Housing's property. In February 2023, the Regulator of Social Housing (RSH) published a summary report of initial findings into the extent of damp and mould issues in homes owned by RPs. This is expected to be followed by new guidance for the housing sector, published by summer 2023 and an amendment to the Social Housing (Regulation) Bill, which will require landlords to fix reported health hazards within specific timeframes.

Our review focussed on ForHousing's actions taken to date in respect of the proactive management of damp and mould across its stock and is not solely focussed on the case management of damp and mould repairs.

ForHousing completed a self-assessment against the 26 recommendations in the Housing Ombudsman's Spotlight Report on Damp and Mould and has been published to the ForHousing website. ForHousing's initial self-assessment was undertaken in October 2021, and a subsequent update on the self-assessment was completed in April 2023, with an update provided to the Group Audit and Risk Committee (GARC).

Damp and mould repairs are categorised at ForHousing using the Housing Health and Safety Rating System (HHSRS), which uses three categories:

- Category 1: Severe.
- Category 2: Moderate.
- Category 3: Slight.

In October 2021, ForHousing service standards introduced timescales for undertaking damp inspections and completing repairs. ForHousing timescale to undertake damp inspections is within 10 working days. 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.

ForHousing records in QL (Housing Management System) whether a tenant is a priority tenant (e.g. has a known vulnerability, is over 65, has a disability or has a child under the age of six). At the time of the audit ForHousing had 1,257 live damp repairs, with 584 of those being for priority/vulnerable tenants. In the 12 months from May 2022, 806 repair jobs relating to damp and mould had been cancelled due to no access. ForHousing has experienced a high volume of damp and mould repairs in the last 12 months and an action plan is in place to reduce this backlog, which involves securing external contracting resources and using voids operatives to complete damp works. Regular reports are provided to Executive Management Team, GARC and Board.

The management of damp and mould cases is led by the Head of Maintenance who is supported by four Damp Supervisors. Damp and mould repairs are currently completed by Liberty, who have a dedicated Damp and Mould team to oversee inspections and associated repairs. Liberty subcontracts damp works to four other contractors, Kast Design and Build Ltd, TJB Morris Ltd, Fishers Cleaning and Citrus. At the time of the audit, ForHousing was in the process of a legal TUPE to bring the Damp and Mould inspection team in house by July 2023, therefore giving ForHousing more control over damp works, post inspections and times for completion.

ForHousing is undertaking a pilot with HouseMark to install 100 smart monitoring systems at void properties in three neighbourhoods with the highest number of reports of damp, mould, and condensation issues. Training on the installation and monitoring of the sensors will be undertaken and ForHousing will receive the monitoring equipment in July 2023 to commence the pilot. This pilot will also trial the use of handheld devices (Tramex ME5 moisture detection metres) which capture high moisture readings within properties where damp, mould, and condensation might not be visibly identified. Handheld devices will be used during routine visits by Neighbourhood Officers.

INTRODUCTION AND BACKGROUND

Audit Scope and Objectives

To provide assurance on the controls in place to ensure that ForHousing complies with the Decent Homes Standard, plus the expectations of the Ombudsman and Regulator, focusing on how issues relating to damp, mould, and condensation are addressed once identified, and processes to support vulnerable tenants.

This review is linked to the following risk register entry:

- 01 Tenant safety compromised by weak landlord compliance and/or building safety issues.

Executive Lead

Executive Director of Homes – Nigel Sedman.

EXECUTIVE SUMMARY

Overall Opinion

Our testing has highlighted that ForHousing has established an effective framework to identify and manage damp and mould cases, though there has been a large volume of related repairs which is impacting on service delivery. There are effective processes to highlight resident vulnerabilities, and clear processes to communicate these as part of the delivery of works. Damp and mould cases have been managed in line with procedures, and there are processes to follow in respect of referring residents to the LiveWell fund when concerns around a lack of heating are identified.

We have raised recommendations around the no-access approach, reporting of cancelled damp and mould repairs and the timescales for completion of damp and mould works.

Assurance		Recommendations			
Design of controls	Operation of controls	High	Medium	Low	Total
Reasonable	Reasonable	-	1	2	3

Overview of issues noted	Priority
Although ForHousing actively seeks to gain access to properties using multiple phone calls, cards and no access letters, ForHousing does not use all avenues available to gain access to properties as part of its no-access process. There is no reporting of cancelled damp and mould repairs or inspections.	Medium
ForHousing's Damp and Mould inspection and repair targets for damp and mould are not in line with sector practice.	Low
Whilst ForHousing is embarking on a pilot with smart devices, there are non-smart devices being used at other Registered Providers across the sector to help tenants identify high levels of moisture in their property which are not utilised by ForHousing.	Low

Scrutiny Panel

The Scrutiny Panel were involved as part of this audit review and undertook their own separate testing. The findings from their review are outlined below, under **Scrutiny Panel Findings**. The scope of their work is outlined in Appendix B and included a review of communications to residents on damp and mould and contacting residents who have had damp and mould repairs in the previous 12 months.

Based on our review of their work, we have raised additional actions for ForHousing to consider.

EXECUTIVE SUMMARY

Positive findings

ForHousing has established a framework for the management of damp and mould which includes a Damp and Mould Policy, Procedure, and process map.

ForHousing has completed a self-assessment against the recommendations raised in the Housing Ombudsman's Spotlight Report on Damp and Mould in October 2021 and refreshed this in April 2023. This is published on the ForHousing website.

For a sample of 20 damp and mould repairs raised between April 2022 and March 2023, our review confirmed that all repairs were handled in line with ForHousing's Damp and Mould Policy and Procedure. Where tenants were recorded as priority tenants, we confirmed that this was communicated to relevant persons as part of the management of the damp and mould.

For a sample of 15 properties, our review confirmed that post inspections were completed in line with ForHousing's post inspection procedure, including photographic evidence of repairs.

ForHousing has processes to ensure that tenants who struggle to heat their homes are signposted to the LiveWell Fund.

ForHousing records details of vulnerable tenants as a 'priority tenant' within QL. Visits to assess the extent of damp and mould at a property include the completion of a health and vulnerability assessment of the tenant and their family to allow effective prioritisation of damp and mould works.

Advice on identifying and preventing damp and mould is available to residents through the ForHousing website, leaflets and social media and is in line with sector practice; the tone of messaging is in line with recommendations raised by the Housing Ombudsman.

ForHousing has provided damp and mould eLearning to all staff (including non-front-line employees) with further guidance available on the intranet; interviews with seven staff (including income officers) confirmed that staff were aware of signs of damp and mould and how to raise a concern around damp and mould appropriately.

ForHousing is undertaking a pilot to install smart devices into void properties to monitor humidity levels to help prevent damp and mould, with over 60 properties to be included in the pilot.

Positive ventilation units and windows with adjustable trickle ventilators are being installed as standard into all new build properties to reduced moisture levels in homes to help prevent damp and mould.

ForHousing undertake damp and mould trend analysis based on the results of stock condition surveys, resident vulnerabilities, property type and age and geographical location, and include this as part of reports to GARC.

Liberty operatives are provided with damp and mould wash treatments to allow immediate mould wash treatments to be undertaken prior to damp works being raised.

Sector Insights

At the request of management, we approached other RPs to gather information on the following:

- Other RPs timescales for completing damp inspections and damp repairs and their performance against this.
- How other RPs prioritise those with vulnerabilities.
- Technologies others are using to provide intelligence-based services.

EXECUTIVE SUMMARY

Sector Insights (continued)

We have undertaken benchmarking against other RPs in the sector to determine timescales for completing damp inspections and damp repairs (see **Recommendation 2**). Below we have outlined RP target response times:

Registered Provider	Size and location	Timescales for completion of damp and mould inspections and associated repairs
ForHousing	c. 17, 600 units in Greater Manchester and Merseyside	<ul style="list-style-type: none"> Damp inspection completed within a 10-working day target. Identified damp and mould repairs raised within 24 hours of inspection being completed. All damp and mould works to be completed within 40 working days.
RP1	c. 19,000 units in Staffordshire and Shropshire.	<ul style="list-style-type: none"> Inspection (damp survey) - within 14 calendar days Raise the associated works orders – within 3 calendar days.
RP2	c.18,000 units in the East Midlands.	<p>If cause is obvious, then the damp and mould repair is dealt with in line with responsive repairs timescales:</p> <ul style="list-style-type: none"> Emergency – 24 hours Less urgent – within 3 months <p>If cause is not obvious a pre inspection is required within 21 days.</p>
RP3	c.10,000 units across West London.	<p>Damp and mould repairs are completed in line with responsive repairs timescales:</p> <ul style="list-style-type: none"> Emergency – responded to within 3 Hours. General – completed in 10 working days
RP4	c. 12,000 units across Greater Manchester	<ul style="list-style-type: none"> Inspection within 5 working days of the initial report of damp and mould. Urgent repairs within 5 working days of the receipt of the inspection report. Non-urgent repairs follow responsive repair timescales.
RP5	c. 12,000 units across Merseyside	<ul style="list-style-type: none"> Attend and complete an inspection within 24 hours where there is a known vulnerability. Attend and complete and inspection within 5 days where no vulnerability. Complete works within 20 days following inspection.
RP6	c. 24,000 units across Greater Manchester, Lancashire, and Yorkshire.	<ul style="list-style-type: none"> Damp inspection is completed within 10 working days. All recommended damp and mould repairs are completed within 20 working days.

Our review identified that like ForHousing, other RPs are attempting to prioritise those with vulnerabilities by distinguishing repairs reported at properties with vulnerable residents and expediting the damp and mould works. Furthermore, RPs are setting identification and support triggers within Housing Management Systems for residents who fall into ‘vulnerable’ groups and are prioritising them for surveys. Alongside other RP’s ForHousing’s vulnerable tenants are also being sign posted and referred to supporting agencies to ensure that the repairs are handled on a case-by-case basis with adjustments made where necessary.

EXECUTIVE SUMMARY

Sector Insights (continued)

At ForHousing, vulnerabilities are identified both during the raising of the inspection and when the inspection takes place. Inspections involve completing a health and vulnerability assessment of the tenant and their family, which enables the required works to be prioritised accordingly, and determine if any support is required for the tenant and their family to facilitate the works. Handheld PDAs used by Operatives includes the functionality to escalate welfare, safeguarding, vulnerability, unreported repairs back to ForHousing.

In relation to technologies used by other RPs, our review confirmed that like ForHousing, other RPs are taking steps to start to proactively monitor conditions within homes by installing smart monitoring systems into properties that have previously suffered from damp and mould. These systems include the ability to monitor the temperature of the house and the humidity level within the property. We noted RPs are installing devices in properties which they had previous problems with damp and mould.

Furthermore, many RPs are placing smart monitoring systems into properties based, in part, on EPC scores. Based on the cost of smart monitoring devices, some clients surveyed are also utilising, as a cheaper alternative to reach more residents, hygrometer devices which are portable devices (that do not link into a monitoring hub) that allow residents to understand when a room has higher than normal levels of humidity and to monitor this themselves. ForHousing does not provide these devices but has begun a project to install smart monitoring devices into void properties to monitor conditions.

In February 2023, the Regulator of Social Housing (RSH) published its initial findings into the extent of damp and mould issues in homes owned by large registered social housing providers. This review acquired data from the larger housing associations into damp and mould levels in their properties and their approach to management of damp and mould. The report estimates:

- 0.2% have the most serious damp and mould issues. This equates to roughly 8,000 homes that do not meet the Decent Homes Standard.
- 1-2% have serious damp and mould issues.
- 3-4% have notable damp and mould issues.
- The RSH stated that some of the poorer responses to their queries of RPs contained the following:
- Relied heavily on reactive approaches to identifying problems than proactively looking for evidence of damp and mould through surveys of their homes. Our peer comparison identified RPs that had used innovative methods to identify these problems, such as asking tenants about the condition of their home when telephoning to report an unrelated repair.
- Held less data or refreshed their data infrequently.
- Weaker evidence about their assurance, oversight and understanding of the condition of homes.

The Housing Ombudsman has confirmed that, in 2021-22, 13 of the 31 severe maladministration decisions made were regarding the handling of damp and mould reports. Six were local authority landlords and seven were housing associations. The landlords ranged in size from just over 1,000 homes to almost 110,000, underlining this to be a widespread sector issue. Such cases and conclusions from the Housing Ombudsman continue to arise, indicating this is still an ongoing sector issue and a high priority for the Housing Ombudsman and the RSH. The Housing Ombudsman's Spotlight Report also included examples of damp and mould prevention, good practice in handling damp and mould reports and areas of concern reported by RPs, detailed below:

Damp and Mould Prevention

- A risk algorithm that helped identify and prioritise where health and safety is implicated.
- A predictive artificial intelligence model to identify properties at risk – with an 80% accuracy rate.
- Equipping surveyors with equipment capable of identifying cold spots, thermal bridging, and high thermal bypass rates.
- Modelling the potential for mould growth by using humidity and temperature sensor data

EXECUTIVE SUMMARY

Sector Insights (continued)

Handling Damp and Mould Reports

- Removing the sole focus on expected resident action from policies and being more open to the consideration of wider factors.
- Retrospective risk assessments and prioritisation exercises on the existing reports.
- Dedicated apps/video calling services for reporting issues.
- Humidity and temperature sensors.
- Property MOTs.
- Specialist damp and mould teams or 'task forces.'
- Root cause analysis modelling.
- Dedicated damp and mould dashboard.
- Staff training/refresher training.
- Voids teams working closely with specialist damp contractors.

Areas of concern

- Replacing the word lifestyle with euphemisms. For example, "internal environmental factors."
- Considering advice to residents to be sufficient action taken on damp and mould reports.
- Examples of wording in guidance; "get yourself a mould remover kit" and, "always keep your home warm", without consideration of individual circumstances.

Through our work, we confirm that ForHousing has taken appropriate steps such as the creation of a damp and mould taskforce, use of smart devices, staff training and the provision of devices to Operatives.

RECOMMENDATIONS AND ACTION PLAN

Recommendation Reference	Recommendation Priority	Identified by
Recommendation 1	Medium	Internal Audit
	No Access Procedure and reporting	

Observation

ForHousing uses the Repairs and Maintenance Procedure when it comes to access issues relating to damp and mould repairs. Where Liberty operatives attend a property and are unable to gain access, a no access card is left at the property and the contractor will cancel the repair order. The no access card requests that the tenant ring the Service Centre to re-issue the repair and arrange another appointment. The operative then cancels the job with the reason “no access.” The repair is closed until the resident contacts ForHousing.

The procedure does not provide recourse to legal injunction for any breach of tenancy agreement, although discussion with Management highlighted that this has been used in the past on occasion for other, non-damp and mould related repairs, and would be used as a last resort following individual assessments. Evidence has been provided during the audit of where injunctions have been used. Whilst the use of injunctions can be costly and also possibly damage relationships with residents, leaving a resident in an unsafe property could result in intervention from the Regulator of Social Housing.

Discussion with Management outlined that the no access procedure is in development and once the backlog of damp and mould repairs has been reduced, ForHousing will look into the feasibility of coordinating other visits (such as gas servicing) to complete damp and mould works, and would reflect the use of legal injunction where it is appropriate to escalate to this stage.

Management advised that ForHousing actively reschedule any cancelled appointments due to no access. Notwithstanding this, in the twelve months from May 2022, 410 damp and mould repair jobs had been recorded as cancelled and whilst Management advised that jobs may be cancelled for a variety of reasons, including those raised in error or duplicates, reports to EMT and to GARC do not currently include details of missed appointments (by tenant not being present or access refused), which relates to recommendation 14 of the Housing Ombudsman’s Spotlight Report on Damp and Mould.

Risk

ForHousing does not use all avenues available to gain access to a property and damp and mould issues exacerbate resulting in negative opinion from the Housing Ombudsman and Regulator of Social Housing.

Executive Management Team and Board has insufficient oversight of cancelled damp and mould repairs.

Recommendation (DESIGN of system controls)

ForHousing should:

- Update the Damp and Mould policy and procedure to include ForHousing no-access process.
- Update reports to the Executive Team and GARC / Board to include numbers of cancelled damp and mould repairs due to no access.

(continued on page 9)

RECOMMENDATIONS AND ACTION PLAN

Recommendation 1 (continued)

Management Response:

We accept that the reporting on cancellations due no access and follow up actions will improve and enhance performance reporting and assurance.

Assessments are required on an individual basis as to when and where legal injunctions for access is prudent. We have on occasions started proceedings for injunctions for access and during the process the tenant then allowed access to complete works. In instances where tenants are vulnerable we try every avenue to attempt access as demonstrated in the evidence provided during the audit in relation to 11 Wichbrook. Liaison with Neighbourhood teams takes place and where available we utilise support workers to gain access. Our option to exercise tenancy action including legal injunctions for access, will be included along with the no access arrangements when updating the damp policy and procedure.

We have expanded the Maintenance team with 2 administration officers from 10th July 2023, an element of their role is to review all no access cases, review whether a gas service or EICR is due, make contact with tenants, liaise with neighbourhood and support teams to make every attempt to gain access before referring for further action. The range of actions can be breach of tenancy cases or where significant risk is identified a referral to legal for an injunction.

- Included in tender for programme works packages is to carry out any minor remedial damp repairs and/or refer to ForHousing for a damp inspection. The question is asked during the pre-entry survey and should the item identified be cyclical, i.e gutters, pointing, sealing of windows then the works will be carried out. This is included in the tender for all planned works schemes.
- Annual gas service checks include a referral directly to the ForHousing Maintenance team to investigate where damp and mould issues are identified. These are reviewed by the team and relevant action undertaken. As advised during the audit this process commenced in June 2023 and the referrals are now coming through on a weekly basis.

Responsible Officer:
Head of Maintenance

Action Date:
31 August 2023

Follow Up Evidence:

- Updated damp and mould reports to Executive Team and Board.
- Updated no-access process.

RECOMMENDATIONS AND ACTION PLAN

Recommendation Reference	Recommendation Priority	Identified by
Recommendation 2	Low	Client
	Timescales for Completion	

Observation

We noted ForHousing have a target completion of 40 days for 90% of all damp and mould repairs. However, our benchmarking identified that across the sector some RPs are completing damp repairs in line with their Repairs Policy, with a range of associated target timescales.

Discussion with Management outlined that the targets in the Damp and Mould Policy were set back in October 2021 and that these will be reviewed once the backlog has been reduced.

Risk

Delays to repairs completion resulting in increased risk of tenant harm, dissatisfaction, and Housing Ombudsman scrutiny.

Recommendation (DESIGN of system controls)

As planned, once the backlog of damp and mould repairs has been resolved, ForHousing should review the documented timescales for inspection and damp repairs completions.

Management Response:

Timescales provided from the benchmarking exercise are not necessarily explicit towards damp repairs and can be vague in relation to timescale for repairs. Some do not necessarily carry out a specialist inspection or provide service timescales for this and some RP's have not been explicit in terms of dates for completion of associated follow on works.

Notwithstanding we will keep fully abreast of changes in relation to Awaabs Law and review and amend our processes and timescales as required including a detailed review of service standards when we are back in target, which is anticipated to be the end of October.

Responsible Officer:
Head of Maintenance

Action Date:
29 December 2023

Follow Up Evidence:

- Updated timescales within the Damp and Mould Policy.

RECOMMENDATIONS AND ACTION PLAN

Recommendation Reference	Recommendation Priority	Identified by
Recommendation 3	Low	Internal Audit
	Use of monitoring devices	

Observation

We noted ForHousing is embarking on a pilot programme to install smart monitoring devices at void properties and to provide handheld devices to operatives that will identify areas of condensation.

These devices can be expensive, and therefore it may not be feasible to install these across entire stock. Across the sector, RPs are investigating the use of hygrometers. These are devices that indicate high levels of moisture in a building and can be set up in residents houses. Whilst these are not smart devices that can be monitored remotely it does allow the tenant to understand when their property has high levels of humidity.

Risk

Tenants are unable to identify when their properties have high humidity levels, resulting in increased cases of damp and mould.

Recommendation (DESIGN of system controls)

ForHousing should undertake a feasibility study into the provision and use of hygrometer devices. If agreed, a formal approach and criteria to allocating these devices to tenants should be agreed and outlined as part of the damp and mould process.

Management Response:

We are part of the Greater Manchester Housing Partnerships group and a subgroup of this is the recently formed damp and mould technical group consisting of 26 registered providers in the area. An action plan has been developed which includes the use of monitoring devices and sharing of best practice in relation to this due to the amount of different products on the market. This larger joint feasibility will enable ForHousing to devise a sector led approach to issuing and installation of devices particularly in those properties that we anticipate may be susceptible to condensation and devices will allow the tenant the opportunity to manage this.

Whilst hygrometers do advise on levels of humidity within a property, in most cases they still lead to a reliance on tenants to contact us to report issues.

Responsible Officer:

Head of Maintenance

Action Date:

31 March 2024

Follow Up Evidence:

- Feasibility study into use of hygrometer devices.
- Updated Policy approach as appropriate.

APPENDIX A: SCRUTINY PANEL FINDINGS

Scope of Work

The scope of the Scrutiny Panel involvement was discussed with the panel on the 01 June 2023, and was agreed as follows:

Scrutiny Panel

Scrutiny Panel to review the content and format of current guidance and information relating to damp and mould and feed back regarding:

- Clarity of messaging.
- Accessibility of information.
- Whether contact information is clearly signposting residents to the correct teams within ForHousing.

Scrutiny Panel to contact a selection of residents to seek their feedback on current guidance and information.

Scrutiny Panel to contact residents who have had repairs relating to Damp and Mould completed in the last 12 months to ascertain:

- Satisfaction with the completed works.
- Whether the resident felt that ForHousing took the notification of damp and mould seriously and completed the repair within an appropriate timeframe.
- Whether the resident felt that they were dealt with in a courteous manner when raising the repair.

Summary of Scrutiny Panel Findings

The Panel's fieldwork took place in the fortnight following a follow up meeting on 12 June 2023. Following a review of the Panel's finding, it was concluded that:

- The Scrutiny Panel found that the information published externally (e.g., newsletters, website, social media) was good, although it was felt through contacting residents that there is a reliance on website communication when not all residents use the internet.
- The panel were able to contact 19 residents who have reported damp and mould to ForHousing in the past 12 months. All residents felt that the report of damp and mould was taken seriously. However, this feeling was impacted by the delays in completing the associated works leaving most who were contacted dissatisfied. All operatives were courteous when they attended a property, in the views of those contacted.

We have reviewed the Scrutiny Panel's findings and have raised three additional actions, which are outlined below. As this work was not undertaken by Internal Audit, we are not considering these as part of our assurance opinions, but the Group Audit and Risk Committee should consider these findings in the context of the wider report. We note that the final finding may be related to the backlog of damp and mould repairs experienced by ForHousing.

APPENDIX A: SCRUTINY PANEL FINDINGS

Actions

No.	Recommendation	Management Response
Online Communication		
SP.1.	<p>The Scrutiny Panel have highlighted that whilst the information on the website is clear and easy to access:</p> <ul style="list-style-type: none"> Advice around heating homes differs between the website and leaflets on damp and mould. Given the current cost of living and heating bills that there should be additional explanation as to why heating homes constantly at a low level would reduce damp and mould, given the cost implications. The website sets out that ForHousing has consulted with residents and what has changed but doesn't clearly set out what residents can expect; the website heading should be updated to 'what we have changed', or more explicit reference made to service standards. The website page on damp and mould states to 'contact us' but no contact number is provided. <p>ForHousing should review the content of external publications and ensure that there is consistency in messaging where possible.</p> <p>Further information should be provided around heating properties and potential cost implications. The website should provide a contact detail under 'contact us' in respect of damp and mould.</p>	<p>Comment: A working group is currently being set up including community voice members, marketing and ForHousing Maintenance Team. The joint review will be in relation to all publications tenants receive and the information we provide on our website.</p> <p>Owner: Damp Void and Disrepair Maintenance Lead and Maintenance Lead</p> <p>Date: 31 October 2023</p>
Effectiveness of communication		
SP.2.	<p>The Scrutiny Panel were able to contact 19 residents who had experienced a damp and mould repair in the past twelve months. Of these, 13 stated that they had not seen any publication on damp and mould from ForHousing.</p> <p>ForHousing should review the use of communications and explore alternative methods to signpost residents to guidance and information on damp and mould.</p>	<p>Comment: Same as above.</p> <p>Owner: As above. Date: As above.</p>
Resident experience of damp and mould repairs		
SP.3.	<p>The Scrutiny Panel were able to contact 19 residents who had experienced a damp and mould repair in the past twelve months. Of these, 13 were unhappy with the length of time taken to complete repairs, with five highlighted that repairs relating to damp and mould were still incomplete, some after four or five months.</p> <p>ForHousing should investigate the repairs above and confirm that all necessary actions have been taken to resolve issues of damp and mould. If additional works should be required, these should be prioritised.</p>	<p>Comment: The 5 addresses have been checked and in 4 cases it can be verified that these have been actioned appropriately and in the other case, the property address is still trying to be identified.</p> <p>Owner: Maintenance Contract Manager</p> <p>Date: 31 August 2023</p>

APPENDIX B: CONTROL EFFECTIVENESS SUMMARY

We have undertaken a review to confirm the operation of the following documented controls, as relevant to the areas in scope. The ForHousing assessments were accurate as at the time of the review.

	Control	ForHousing	Internal Audit	Internal Audit Comments
1	01 Tenant safety compromised by weak landlord compliance and/or building safety issues			
	Compliance Framework and detailed Policies and Procedures in all compliance areas			ForHousing has a Compliance Framework which encompasses the Damp and Mould Policy, Procedure and Process Map.
	Performance Management Framework used to report to Board quarterly and EMT monthly.			ForHousing produce weekly EMT metrics which go to the Board and EMT.
	Ongoing monitoring of all contractors and their operatives, to ensure qualified, experienced staff and appropriately accredited contractors are in place; this includes weekly labour sheets submitted by contractors to enable us to check that the right resources are on site, with the necessary level of training and competence.			We noted the ongoing monitoring of Liberty is undertaken by ForHousing through monthly contractor meetings. This includes monitoring of damp and mould cases.
	Quality and accreditation checks are carried out when contractors are procured, as part of PQQ processes.			Review of the sub-clauses used within the Liberty contract with ForHousing confirmed that Liberty are responsible for the quality of any subcontractors used.
	Report on KPI Position Big 7 to every Board meeting.			ForHousing report on KPI position Big 7 to the Board at each meeting. This includes damp and mould metrics.
	Weekly reporting on damp and mould to EMT and monthly to Board.			As part of the performance framework, ForHousing undertake weekly reporting on damp and mould to EMT and report monthly to the Board.

APPENDIX B: CONTROL EFFECTIVENESS SUMMARY

Assurance	1 st Line	2 nd Line	3 rd Line	ForHousing	Internal Audit	Internal Audit Comments
Risk 01 - Tenant safety compromised by weak landlord compliance and/or building safety issues						
Monthly Icon Reports provided to management.	✓					We noted that monthly Icon Reports are provided to management.
Weekly reporting on damp and mould to EMT and monthly to Board	✓					As part of the performance framework, ForHousing undertake weekly reporting on damp and mould to EMT and report monthly to the Board.
Report on KPI Position Big 7 to every Board meeting.		✓				We noted ForHousing report on KPI position Big 7 to the Board at each meeting. This includes damp and mould metrics.

APPENDIX C: TERMS OF REFERENCE

Audit Objectives

The purpose of this audit work was to provide assurance on the controls in place to ensure that ForHousing complies with the Decent Homes Standard, plus the expectations of the Ombudsman and Regulator, focusing on how issues relating to damp, mould and condensation are addressed once identified and processes to support vulnerable tenants.

1	Risk Register Controls
1.1	<p>This audit relates to the following ForHousing Risk Register entries.</p> <ul style="list-style-type: none"> • 01 Tenant safety compromised by weak landlord compliance and/or building safety issues. <hr/> <p>Auditor to undertake testing to confirm the operation of the following documented controls, as relevant to the area under review.</p> <ul style="list-style-type: none"> • Compliance Framework and detailed Policies and Procedures in all compliance areas • Performance Management Framework used to report to Board quarterly and EMT monthly. • Ongoing monitoring of all contractors and their operatives, to ensure qualified, experienced staff and appropriately accredited contractors are in place; this includes weekly labour sheets submitted by contractors to enable us to check that the right resources are on site, with the necessary level of training and competence. • Quality and accreditation checks are carried out when contractors are procured, as part of PQQ processes. • Report on KPI Position Big 7 to every Board meeting. • Weekly reporting on damp and mould to EMT and monthly to Board.
2	Strategic Approach to Damp and Mould Management
2.1	<p>ForHousing has formally documented standards for the prevention, management, and resolution of damp, mould and condensation (DMC) issues, which ensure properties meet the Regulator of Social Housing (RSH) Homes Standard and are in line with sector good practice.</p> <p>This has been cascaded into associated procedures and action plans (where relevant)</p> <hr/> <p>ForHousing has undertaken an assessment against the Housing Ombudsman's 26 recommendations as set out in its Spotlight Report.</p> <hr/> <p>ForHousing can demonstrate (through action plans or updates to existing procedures) that shortfalls in the above assessment have been addressed or are proactively being addressed</p> <hr/> <p>Obtain a list of DMC repairs in the last 12 months, both open and closed. Undertake data mining, supported by sample testing to ensure DMC issues have been handled in line with documented policies and procedures.</p>
3	Identifying damp and mould
3.1	<p>Identify the mechanisms that ForHousing employs to identify issues with damp and mould.</p> <hr/> <p>Undertake testing, including interviews with relevant staff, to confirm operation of channels of communication and controls identified, above.</p> <hr/> <p>ForHousing has provided training to in-house front-line staff (and guidance to Liberty, and external) to identify signs (and warning indicators) of DMC and on how to raise these to ForHousing</p>
3.2	<p>Where issues relating to a lack of heating are highlighted, ForHousing monitors these to ensure the risk of DMC do not materialise.</p> <hr/> <p>ForHousing is reviewing DMC issues to identify trends used to develop proactive approaches to dealing with DMC.</p>

APPENDIX C: TERMS OF REFERENCE

Audit Objectives (continued)

3	Identifying damp and mould (continued)
3.2	Undertake data mining to identify: <ul style="list-style-type: none">• Outstanding repairs relating to DMC.• Whether completed repairs have been done in target time.• Properties with multiple DMC repairs.• Trends with properties which are getting DMC issues. (e.g., levels of rent arrears, property type, number of occupants, time of year, known vulnerabilities such as hoarding).
4	Damp and Mould remediation
4.1	ForHousing has engaged suitably experienced contractors for DMC issues across its stock.
	ForHousing has defined an approach to post inspections of repairs relating to DMC.
	ForHousing undertakes post-inspections on remediated DMC repairs. Issues with the quality or completeness of work are raised with the contractor for rectification.
	Regular contract management meetings are held with contractors, where complaints from residents regarding DMC (once rectified) are highlighted.
5	Damp and Mould prevention
5.1	ForHousing considers the use of air vents in windows and similar construction methods to promote airflow throughout a property.
	The specification of windows agreed are installed at properties.
6	Resident Communication
6.1	ForHousing provides residents with guidance and information on how to prevent DMC at their properties.
	ForHousing has a suitable communications plan to respond to press coverage of DMC issues at its properties, including authorised personnel to respond to press releases / requests for comment.
7	No Access
7.1	ForHousing has appropriately approved policies and procedures in place with regard to accessing properties in the DMC process, ensuring controls are in place to maximise access rates. Give consideration to the following: <ul style="list-style-type: none">• The no access or refusal process (i.e., escalation process) is clearly documented and includes timescales.• The responsibilities of key staff are documented.• Details of management review and monitoring.• Use of systems to record no access issues.• How approaches are managed where tenant vulnerabilities are known, or subsequently highlighted.
7.2	Identify cases from DMC claims in the last 12-24 months where ForHousing has failed to (or struggled to) gain access.
	Confirm that: <ul style="list-style-type: none">• ForHousing has made attempts to gain access in line with Policies and Procedures.• Identify whether ForHousing has been able to complete planned maintenance or other responsive repairs at that property during the no access period.• Where tenant vulnerabilities are highlighted, that necessary adjustments were made to processes.

APPENDIX C: TERMS OF REFERENCE

Audit Objectives (continued)

8	Reporting
8.1	Issues with DMC across ForHousing stock are reported to Executive Management Team and Committees / Board. DMC information reported to senior management and the Board is accurate.
9	Value for Money
9.1	Auditor to assess whether Management have established value for money objectives to drive value in the area under review. Where relevant, auditor to review management's value for money assessments in the delivery of services and test to confirm the robustness of these assessments.
10	Data Governance
10.1	As part of the testing and expected controls above, we will make review and comment on control arrangements in relation to: <ul style="list-style-type: none">• Use of systems and spreadsheets to record and monitor initiatives and budgets.• Quality assurance controls over reporting and monitoring.• The extent to which roles and responsibilities around data input, extraction, reconciliation, and quality assurance are understood.
11	Sector insight
11.1	We will undertake the following sector insight/benchmarking/peer review: <ul style="list-style-type: none">• Other RP timescales for completing damp inspections and damp repairs and their performance against this.• How other RPs prioritise those with vulnerabilities.• Technologies others are using to provide intelligence-based services.

APPENDIX D: AUDIT MILESTONES

Reporting Deadlines		
Milestone	Target Date	Actual Date
Audit Fieldwork	W/C 05 and 12 June 2023	
Issued Draft	30 June 2023	04 July 2023
Updated Draft Issued	26 July 2023	
Management Comments received	21 July 2023	14 July 2023
Issued Final	28 July 2023	02 August 2023
Date of Group Audit and Risk Committee	16 August 2023	

The Team	
Head of Internal Audit	Lee Cartwright
Engagement Partner	Narinder Sandher
Service Delivery Manager	Simon Marsh
Auditor	Sarah Hadland

ForViva Lead(s)	
Director of Assets and Sustainability	Mark Lowe
Head of Maintenance	Lee Ferendenus
Maintenance Contract Manager	Mark Fildes
Head of Community and Tenant Involvement	Tori Buzza
Customer Scrutiny Partner	Jacqueline Holmes

We confirm that, in delivering the above work, we have maintained our independence and objectivity as required by the Chartered Institute of Internal Auditors' Global International Professional Practices Framework (IPPF). We also confirm that we have no conflicts of interest in delivering this work.

APPENDIX E: ASSURANCE OPINION DEFINITIONS – DESIGN/ OPERATION OF CONTROLS

Assurance	Design of system controls	Operations of system controls
Substantial	<p>Minor or no weaknesses were noted in the design of the internal control framework.</p> <p>We evaluated the controls as being designed to be able to provide substantial (but not absolute) assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Minor improvement is required.</p>	<p>Minor or no weaknesses were noted in the operation of the internal control framework.</p> <p>We evaluated the controls as operating in a manner which is to be able to provide substantial (but not absolute) assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Minor improvement is required.</p>
Reasonable	<p>One or more significant weaknesses or several minor weaknesses were noted in the design of the internal control framework.</p> <p>We evaluated the controls as being designed to be able to provide reasonable (but not absolute) assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Improvement is required.</p>	<p>One or more significant weaknesses or several minor weaknesses were noted in the operation of the internal control framework.</p> <p>We evaluated the controls as operating in a manner which is able to provide reasonable (but not absolute) assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Improvement is required.</p>
Partial	<p>Several significant specific weaknesses were noted in the design of the internal control framework.</p> <p>We evaluated the controls as being designed to be able to provide only partial assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Significant improvement is required.</p>	<p>Several significant specific weaknesses were noted in the operation of the internal control framework.</p> <p>We evaluated the controls as being operated in a manner which is able to provide only partial assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Significant improvement is required.</p>
Limited	<p>Systemic and/or material control weaknesses were identified in the design of the internal control framework.</p> <p>We evaluated the controls as not being designed to be able to provide even partial assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Major improvement is required.</p>	<p>Systemic and/or material control weaknesses were identified in the operation of the internal control framework.</p> <p>We evaluated the controls as not being operated in a manner which is able to provide even partial assurance that the activity covered is subject to adequate risk management and control and that objectives should be met.</p> <p>Major improvement is required.</p>

APPENDIX F:

RECOMMENDATION GRADING DEFINITIONS

Recommendation priority	Definition
High	<p>Anything that represents a risk so great that it could cause an organisation to cease to be a going concern or seriously damage its reputation. For example:</p> <ul style="list-style-type: none">• Not having a disaster recovery plan.• If a major error or omission within a Business Plan model was found.• Undertaking a large investment or change programme without performing any risk assessments.• Breaches of the law or regulations in areas such as health and safety.
Medium	<p>Anything that presents a significant risk to the organisation, but where the implications are not sufficient to meet the definition of a “High” priority recommendation as set out above. These usually arise because an important control we would expect to find is not in place, or because the control is found to have failed to operate. For example:</p> <ul style="list-style-type: none">• A control process exists but is designed in such a way that an important control is missing.• A suitably designed control process exists, but an important control is found not to be operating as expected.
Low	<p>These are relatively minor issues, usually where a procedure has not been complied with, but the non-compliance has not exposed the organisation to a significant level of risk or financial loss. For example:</p> <ul style="list-style-type: none">• Not evidencing reconciliations as having been reviewed.• Failing to perform petty cash counts regularly.• Bad debts not being written off regularly.



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