

Spotlight on Damp and Mould: Self-Assessment (November 2024)

Housing Ombudsman Service Recommendations to Senior Managers:	Current Position:	Future Ambitions:
<p>Recommendation 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.</p>	<p>The City of London understands that it has a duty to investigate and manage damp & mould issues that our residents may experience in their homes. However, we recognise that this is an area for continuous improvement.</p> <p>Currently all reports of damp and mould are assessed on an individual basis in terms of cause and appropriate resolution. Due to the diversity, age and construction of our housing stock, some properties may need more attention than others, regarding maintenance and varying levels of management for damp and mould conditions.</p> <p>We are currently reviewing our strategy and are developing a damp and mould action plan to ensure we continue to take a zero-tolerance approach to damp and mould and that our service complies with current legislation and industry best practice.</p>	
<p>Recommendation 2: 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</p>	<p>We have created a draft damp and mould policy for submission to our committee for approval.</p> <p>The policy includes.</p> <ul style="list-style-type: none"> • Approach to diagnosis • Actions we will take in different circumstances including complex cases 	<p>The Damp and Mould policy will be subject to annual review.</p>

<p>different circumstances, effective communication and aftercare.</p>	<ul style="list-style-type: none"> • Resident communication, including support advice and aftercare • The effective use of data • Training • Quality assurance and performance monitoring <p>The aims of the policy aims are to.</p> <ul style="list-style-type: none"> • Meet our landlord repairing responsibilities as detailed within our Tenancies, Leases and our Repairs Policy. • Maintain our homes so that they meet the Decent Home Standard and are free from any hazards including those identified in the Housing Health and Safety Rating System (HHSRS). • Comply with legislative, regulatory and contractual obligations. • Treat residents reporting damp and mould with empathy and respect • Conduct timely and thorough investigations and implement appropriate corrective measures and improvements. • Support residents in resolving damp and mould and provide appropriate, clear, sensitive, practical and accessible advice. • Ensure staff are trained to spot potential causes of damp, mould and condensation so they can advise residents, diagnose problems and provide solutions. 	
<p>Recommendation 3: Landlords should review the accessibility and use of their systems for</p>	<p>Residents are currently able to report repairs by phone, email or MS forms. We encourage residents to submit photos wherever possible to</p>	<p>Updated Housing Complaints leaflets have been produced and are being distributed in October 2024. A simplified version of the leaflet has been</p>

<p>reporting repairs and making complaints to ‘find their silence’.</p>	<p>assist with initial diagnosis. We also display information and advice about repairs and damp and mould management on our website.</p> <p>We embrace a positive complaints culture in which residents are supported in and encouraged to make complaints if they experience dissatisfaction with the City of London’s service.</p>	<p>produced to enhance the accessibility of the service to a wider population.</p> <p>Resident online repairs reporting is to be implemented in future phases of our IT systems deployment and in conjunction with our new repairs & maintenance contract. In addition to standard repairs, we will also explore the viability of residents reporting damp and mould issues online.</p>
<p>Recommendation 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.</p>	<p>Our current approach diagnoses report of damp and mould issues on a case-by-case basis. Where solutions have been effective, these are also adopted in neighbouring properties.</p>	<p>We will develop a heat map of current and historic cases to inform likelihood of occurrence in neighbouring properties and to help inform where longer term investment is required.</p>
<p>Recommendation 5: 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>	<p>Reports of damp and mould and related data are currently recorded in our in-house repairs management system.</p> <p>Further refinements are in progress to improve specific categorisation of damp and mould cases and their severity, to aid risk management, monitoring and reporting of active cases.</p>	<p>The deployment of our new asset management module in 2025 will support the capture and use of specific damp and mould data to identify other properties that may be at risk.</p> <p>We are procuring a new stock condition survey for 2025, that will support the independent identification and risk assessment of damp and mould cases and enhance our existing data</p>
<p>Recommendation 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</p>	<p>All residents, along with frontline staff and contractors are encouraged to look out for and report damp and mould issues and we aim to respond to those issues within policy target timescales, irrespective of whether there is future major works or regeneration proposed.</p>	<p>Our updated stock condition survey will give greater visibility of the current condition of our stock, existing hazards and level of risk, highlighting where urgent intervention is required outside of any major works programmes.</p>



<p>condition and that they regularly engage and communicate with these residents.</p>	<p>We appreciate that residents' homes with significant reoccurring issues, may require a longer-term action plan to provide resolution and this may include periodic inspections, mould treatments and planned investment work.</p> <p>Where significant repairs or future regeneration are essential to affect a long-term resolution, temporary or permanent alternative accommodation is considered.</p>	
<p>Recommendation 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.</p>	<p>We know there can be a range of factors that contribute to damp and mould issues in a home and that a holistic approach to diagnosis and remediation is important.</p> <p>Where issues relate to condensation and an imbalance between heating, ventilation and insulation, we will always consider the current effectiveness of building components alongside any practical measures that residents can take to help manage damp and mould.</p> <p>As part of our service, we typically undertake a mould wash of areas affected and appropriate follow up redecoration, checking the total air flow and upgrade of extractor fans in bathrooms and kitchens, as well as fixing any leaks and repairing defective heating, windows and doors that may contribute to heat loss.</p> <p>We also have tenancy support officers that assist residents across our estates. Support includes tenancy management and internal signposting to</p>	

	our City Advice page for help with issues such as fuel poverty, or signposting to external agencies.	
Recommendation 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 helping residents to avoid damp and mould in their properties.	FAQs, website information and guidance booklets have been reviewed internally to ensure the right tone and are in line with industry guidance.	We will consult with residents via our updated engagement strategy, to ensure our communications remain appropriate and helpful.
Recommendation 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.	<p>A mutual exchange inspection is conducted prior to any exchange taking place. The inspection records any identified issues with damp and mould and action to be taken, so this is fully visible to any incoming resident. If damp and mould issues are significant a mutual exchange may be delayed until appropriate remediation has taken place.</p> <p>We have recently updated our void lettable standard which includes ensuring that any damp and mould issues are properly diagnosed, and repairs actioned during the void period. We also check that extractor fans are operational and meet performance requirements and that heating systems are fully functional. We undertake a 'settling in' visit 6 weeks after occupation, which ensures any new repair and maintenance issues are addressed at an early stage.</p>	
Recommendation 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 consequences around damp and mould.	In line with the 'PAS 2035 Standard, all our projects and programmes to upgrade property energy performance include measures to improve ventilation, reducing the likelihood of unintended Damp, mould and condensation issues.	

	<p>As some of our housing stock has listed building status, we employ a range of consultants who specialise in heritage buildings, to ensure that any design considers unintended consequences around damp and mould, whilst ensuring we comply with specific planning requirements.</p>	
<p>Recommendation 11: 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>	<p>We encourage and listen to resident feedback through a range of channels, which includes satisfaction surveys, complaints, focus groups and resident associations.</p> <p>Our published ‘Service Standards - Involvement & Communications’ document explains how we will treat residents when they engage with us and how we will respond to feedback.</p> <p>We act upon feedback and capture lessons learned to help inform continuous improvement plans for the service. This extends to feedback about the content and tone of our communications</p>	<p>Our updated resident engagement strategy will include consultation around our approach to damp and mould, including the content and tone of our communications, to ensure that our residents do not feel blamed.</p>
<p>Recommendation 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.</p>	<p>When a resident reports a repair, a record is created in our inhouse repairs system and is recorded as either a repair job or an inspection, depending on the details of the initial report.</p> <p>Water leaks resulting in dampness are initially directed to our contractor for assessment and urgent repair and our in-house property services officers always inspect reports of dampness where there is mould present.</p>	<p>Repairs diagnostic training for frontline non-technical teams in 24/25, to support with assessment and appropriate prioritisation of damp and mould issues at the first point of contact.</p> <p>Implementation of a bespoke damp and mould inspection template to ensure that essential information is captured consistently and is easily accessible.</p>

	<p>Where we identify an immediate risk to the resident, immediate action is taken which may include an emergency repair, mould treatment and inspection, or a move to temporary accommodation until appropriate action has been taken to reduce the risk.</p> <p>Job and inspection records are updated with information such as the outcome of the investigation, work completed, along with photographic evidence.</p>	<p>Assigning a severity rating after an initial report of damp and mould has been investigated, based on the extent and duration of exposure to damp and mould, along with resident vulnerability. This is expected to support a risk-based approach and help inform the next actions to be taken.</p> <p>As part of our new asset management system role out in 2025 we will explore how a damp and mould risk rating system could be applied to individual assets, to assist with proactive management and long-term investment planning.</p>
<p>Recommendation 13: Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.</p>	<p>All repair jobs and inspections are assigned a specific priority and target timescale based on the urgency of the issue and in accordance with our repairs policy. Performance against timescales is actively managed both internally and with our contractors.</p> <p>When reports of damp and mould are identified through the Housing Complaints Service, they are acknowledged within 5 working days and escalated to a manager for investigation.</p> <p>The Housing Complaints Team has a weekly meeting with the Property Services Team to discuss each complaint, flagging any specific concerns or high importance cases.</p>	<p>Our new repairs and maintenance contract commencing in April 2025 sets out a streamlined set of repair priorities and timescales. This should improve the accuracy of prioritisation at the first point of contact and delivery against target timescales.</p> <p>The Housing Complaints Team is in the process of improving measures for flagging certain complaints as high profile. Complaints are already flagged in the tracker, but more work is being done to ensure that investigation guidance templates clearly outline the severity of certain issues.</p>
<p>Recommendation 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.</p>	<p>We have a no access process in relation to repairs. We make 3 attempts at access before a job is closed and we request evidence of the access attempts made. No access information is recorded</p>	<p>As part of our new repairs and maintenance contract commencing April 2025, we will improve the visibility and reporting of missed appointments and investigate reasons for missed</p>

	in our repairs system, but it not currently scrutinised in any further detail.	appointments in relation to damp and mould cases, to reduce them.
Recommendation 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.	<p>Our contractors, housing and estate staff are our 'eyes and ears' and there is an existing process in place for them to report concerns about damp and mould.</p> <p>Most of our resident facing teams have received damp and mould awareness training in the last 12 months.</p>	
Recommendation 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.	<p>Individual training and qualifications are recorded in our people management system and our property services officers have extensive experience and training in damp and mould diagnosis.</p> <p>As part of continuous improvement and because of several staff and role changes, we are currently undertaking a competency review for current staff to identify any skills or knowledge gaps.</p>	<p>A departmental training matrix is being developed that will include role based mandatory damp & mould awareness training for resident facing teams and enhanced training for our Property Services Team.</p> <p>Wherever possible, awareness training will be delivered jointly with our repairs and maintenance contractors.</p>
Recommendation 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 accordingly.	<p>We have a damp and mould policy and documented damp and mould process, which includes communication with residents.</p> <p>Our Property Services Officers are responsible for specific geographical areas and are the designated point of contact for residents once a report of damp and mould is received.</p>	Implementation of a new CRM system in 2025 to improve case management, will enable better record keeping and provide greater visibility of customer communications regarding damp and mould, from the time of first contact until resolution.

<p>Recommendation 18: 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>	<p>Our teams are made aware of the correct reporting procedures for repairs and damp and mould issues and overall responsibility for resolution of reports or complaints resides with our Property Services Team.</p> <p>We currently aim to post inspect 10% of all repair orders via a system generated random sample. In January 2025 we intend to implement a 6 month follow up inspection after all damp and mould related jobs, to check whether actions taken have been successful or whether further actions are still required to resolve the issue.</p> <p>The Housing Complaints Team and Property Services Team have a weekly meeting to discuss any complaints and ongoing cases. There is an allocated staff member (Property Services Complaints Officer) responsible for tracking the progress of repairs following on from complaints. The teams have shared trackers.</p>	<p>Improvements are being made in terms of clarity around the responsibility for following up on certain complaints. The teams are now working to specifically agree individual ownership to maintain follow-up contact with the resident. This responsibility typically lies with either the Property Services Officer, or Property Services Complaints Officer, but occasionally the Housing Complaints Team will take primary responsibility for continued communications with the resident.</p>
<p>Recommendation 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.</p>	<p>The Housing Complaints Policy was updated in 2024 in line with the Complaints Handling Code. Please see Housing Complaints Policy:</p> <p> 2024 - housing-complaints-p</p> <p>Each case is considered on its own merit, and when compensation is offered, a discussion will be had between the complaint investigator, the Housing Complaints Manager and any other staff with knowledge on the specific case.</p>	<p>There is an existing compensation policy which is in the process of being reviewed to ensure that it is in line with the recommendations of the HOS. Please see draft document:</p> <p> compensation-policy. docx</p>

<p>Recommendation 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.</p>	<p>We acknowledge that where complex cases arise because further investigation and diagnosis is required or because resolution may involve major repairs or planned improvements, providing updates and maintaining regular communication with residents can be challenging.</p> <p>We currently utilise our property services officers as the main point of contact for residents where complex damp and mould issues exist, however this is supported by our housing and estates teams.</p>	<p>Implementation of a new CRM system in 2025 is expected to improve case management and customer communication, as well as providing greater visibility of damp and mould cases, especially those of a complex nature, requiring both short term and longer-term measures to resolve.</p>
<p>Recommendation 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.</p>	<p>Whilst most of our damp and mould investigations are undertaken by our inhouse property services team and specialist suppliers, we have access to external qualified surveyors through membership of frameworks.</p> <p>For disrepair cases, which sometimes include damp and mould issues, we always aim to mutually agree a joint expert wherever possible and will act upon their findings. Their reports are shared with residents for transparency.</p>	
<p>Recommendation 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.</p>	<p>Where extensive works are required, we consider vulnerabilities and whether it is appropriate to provide alternative accommodation as part of our works planning.</p> <p>Should a case reach the complaint stage, the Housing Complaints Team keep a log of any reasonable adjustments required for the Household. These factors are taken into</p>	

	consideration in discussions about extensive works or household moves.	
Recommendation 23: Landlords should promote the benefits of their complaints process and the Ombudsman to their residents as an appropriate and effective route to resolving disputes.	The Housing Complaints Team promotes a positive complaints culture and encourages residents to use the service. All communications with residents contain a direct link to the Housing Ombudsman Service, and all complaint response letters detail the availability of the service. Residents are informed that they can contact the Housing Complaints Service at any point during the complaints process.	Updated leaflets to be published in October 2024 will contain a QR code directly linking residents to the Housing Complaints Service and the Housing Ombudsman Service for easy access. The Housing Complaints Team are planning a schedule to attend Housing Estate Drop Ins for increased visibility and promotion of the service. A complaints training day has been scheduled for a wider group of Housing Staff to develop a stronger understanding of the complaints service, and the importance of promoting a positive complaints culture.
Recommendation 24: 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.	The Housing Complaints Team are in regular communication with the City of London’s legal team to ensure that there is no cross over between legal cases and active complaints. Residents are made aware of the exemptions in relation to legal action. Cases that have started with the Housing Complaints Team and moved on to legal proceedings are monitored in weekly Housing Complaints meetings with the Property Services Team, to ensure that works are continuing irrespective of whether the Housing Complaints Team have the authority to manage a complaint.	
Recommendation 25: Landlords should consider how best to share learning from complaints and the positive impact of changes	A two-monthly Complaints Learning Panel has been established with members of Housing Management involved. In these meetings,	A power BI dashboard is in development to allow easy visualisations of trends and patterns in Housing Complaints.

<p>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 opportunities.</p>	<p>Housing Complaints Statistics are reviewed in detail and any high-profile cases are flagged to senior management and discussed.</p>	<p>A bi-annual meeting will be implemented from January 2024 to delve deeper into complaints learning statistics, reviewing patterns and trends and implementing ambitions for change across the Housing Division.</p>
<p>Recommendation 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 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>	<p>Last year, approximately 60 staff from the Housing team attended customer service training to support with this ambition.</p> <p>Our draft damp and mould policy and our existing service standards commit to treating residents with respect and empathy and we regularly review our performance against these standards.</p>	<p>Further Housing Complaints Handling training has been scheduled, including specific training in communicating with residents with additional needs and neurodiversity.</p>