

Appendix D - Damp and Mould Self-Assessment

Spotlight on: Damp and Mould

Chapter 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.

A revised damp and mould procedure has been developed and confirms our zero-tolerance approach to damp and mould and sets out our current strategy for achieving this. Our aim is to ensure every tenant feels confident in how they can take steps to prevent damp and mould and they have trust in us as a landlord to resolve damp and mould issues as a priority.

Our procedure is underpinned by a comprehensive approach to identifying and tackling damp and mould and outlines all relevant channels and interventions we have in place, this includes;

- *Investing in training for both technical and non-technical staff to raise the competence of our workforce and their ability to identify damp and mould*
- *Home visits, specifically tenancy audits which include a full inspection of a home and use of our contractors who carry out responsive repairs to report any issues they identify*
- *Utilising the expertise of the local authorities private housing team to carry out independent inspections of 10% of homes each year*
- *Using data to identify homes that could be more susceptible to damp and mould including energy efficiency, stock condition surveys and the life-cycle of major works required*
- *Maintaining contact with all tenants who have experienced damp and mould to ensure they feel supported to report any re-occurrence.*
- *Collaborating with NHS practitioners to revise the advice on how to better manage moisture within homes and the publication of a new look damp and mould leaflet*
- *Attending a live radio show called 'Brent Health Matters' on The Beat 103.6FM and sharing the things we are doing to help residents tackle issues around damp and mould in their homes, providing advice on how residents can positively influence and improve the spread of mould and what to do if they are suffering with mould.*

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 different circumstances, effective communication and aftercare.

The response in question 1 sets out our position for taking a proactive approach to intervening for damp and mould.

If a concern is identified, a qualified surveyor from the Housing Property Service will inspect the property. We can prioritise and carry out an inspection within 48 hours if we are provided with photographic evidence and the issue is deemed as severe and within 28 days if it is deemed to be minor issue such as a small patch of mould, this is in line with NHS advice.

The policy also sets out the support and care provided for tenants during this time. The Housing Officer will be responsible for carrying out an assessment of the tenant and household members and any lifestyle factors they may need support with. An example of this is if the home is cold or the tenant is struggling to pay utility bills then a referral to the Brent Hub will be carried out and our outreach service Green Doctors who provide independent advice on staying warm and saving money will assist. The Council also operates the resident support fund which officers in housing can fast track applications for tenants for if they are experiencing financial hardship.

(see D8 9259 Damp and mould Leaflet - Karen Luke D8). We carry out post inspection of all damp and mould remedial works to confirm works have been carried out as specified. We also provide literature in the form of an advice sheet that provides useful information on how to manage moisture within our residents' homes. All work orders related to D&M carry a tagged code to enable us to have 100% visibility of all D&M jobs completed.

Leaks in homes, particularly leaks that occur over a long period and are unreported contribute to damp and mould within a home. We have strengthened our forced entry procedure to ensure we are able to resolve leaks as quickly as possible even if there is no engagement from the tenant. This is proved an effective intervention and there have been over 200 forced entry warnings issues and five forced entries carried out in the past 12 months. All successfully led to entry being gained.

3. Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to 'find their silence'.

We have a wide range of channels to report damp and mould, in order to make the service as accessible as possible. These include;

- *Telephone to the in-house call centre*
- *Online portal My Account*
- *Dedicated email address for damp and mould dampandmould@brent.gov.uk*
- *Five hubs across the borough for those who need face to face support to report issues*
- *Elected members who can advocate on behalf of tenants and report issues where required*
- *Translation services*

The Council's website and portal My Account, which allows tenants to report all types of repairs including damp and mould has been assessed for accessibility. This has been carried out by companies such as The Shaw Trust, THco and All Able. All recommendations to improve accessibility have been implemented and key features of these platforms includes options for audio, larger font and translation services where required.

The Council has also produced standard accessibility guidance to help officers produce information that is accessible to all, this includes guidance on written communication, face to face and telephone.

Officers carrying out visits and inspections know how to contact interpreting services, this can include video interpretation for a British Sign Language Interpreter.

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.

We have reviewed the need to upgrade existing trickle and timer operated mechanical extraction and decided that a humidistat fan will be the best way to automatically manage excess levels of moisture within homes, this is regardless of the condition of the existing fan because we acknowledge that fans are an integral part of managing moisture and a 'smart' fan will be more effective.

We also review and consider inherent building defects in similar archetypes and neighbouring properties. We arrange inspections where there are multiple issues within a block, this approach is to confirm that there are no residents 'suffering in silence' and unaware that we are here to assist with any defects that they are living with.

We carried out a review of the data held on our systems relating to historical reports of damp and mould. The information gathered created a list of 880 properties that had reported suffering from damp and mould over the last seven years. We contacted all residents by various media such as letters, emails and text messages and requested the opportunity to visit and carry out a follow up inspection to those still suffering from damp and mould in their homes. We prioritised inspections based on photographic evidence and have implemented a programme of remedial works to eradicate the presence of damp and mould in our residents' homes.

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.

We are committed to using the information we hold to proactively identify re-occurring cases of damp, mould or condensation or properties that could be more susceptible to these issues. This could include the energy efficiency of a building, stock condition and when major works are due to be carried out such as windows and roofs.

We have recently concluded a pilot utilising smart technology to better enable us to effectively combat damp and mould in our residents' homes. We worked with Vericon Systems and Bosch to install IOT (Internet of Things) smart sensors that detect high levels of condensation within homes and data on air flow and a sensor linked to the boiler. This information is sent to an online portal and flags and emails an alert when homes exceed safe parameters, and the conditions are likely to cause mould related issues. A surveyor will then contact the resident to discuss and provide advice on how to better manage moisture issues within their home. We have now taken the bold decision to install sensors in to all current and future void properties as part of the void lettable standard.

When we identify trends within a block or similar archetypes such as street properties, we will contact residents and will investigate issues that residents may be suffering from – door knocking with Technical and Tenancy colleagues. Low and high users of the repairs service are also highlighted by our data team, and tenancy audits are arranged.

We are now installing the sensors as part of our voids refurbishment. We are also considering a potential change in our tenancy agreements, to facilitate the use of sensors in residents' homes.

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.

We will always look to maximise the income from our housing stock and this may mean reviewing empty homes such as those on regeneration sites for various types of short term relet including temporary decants. If we highlight potential decant property within a regeneration scheme, we will carry out a cost analysis to determine the viability, If it is not viable to return the property to a lettable standard we will not do so.

When we have confirmed the viability of a property within a regeneration scheme, we have an enhanced lettable standard for viable properties. This includes full decoration and carpets and the same overall zero-tolerance approach to damp and mould, the specification mentioned above is for all homes owned and let/managed by Brent as a minimum standard.

Before a property is considered for Temporary Accommodation, Emergency Accommodation or decant we thoroughly inspect and carry out any repairs required to meet the Housing Health and Safety Rating System (HHSRS) and our own Lettable standard.

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.

As a landlord it is our responsibility to keep the homes we manage safe and well maintained. We adhere to Housing Ombudsman advice, tackling damp and mould at the earliest opportunity and proactively. When we identify or receive a report of damp and mould, we will have a qualified surveyor attend the property to carry out a thorough inspection.

We recruit qualified surveyors and prioritise their ongoing professional development to ensure knowledge and skills are kept up to date and reflective of best practice.

If the home is confirmed to be affected by damp and mould following an inspection, we will then:

- *Upgrade any existing extractor fans to humidity-controlled extractor fans*
- *Carry out a three stage mould treatment in the property and;*
- *Follow up with full redecoration of any affected rooms.*

These works will take place whilst tenants remain in their home. There may be occasions where tenants are offered a temporary decant e.g. due to vulnerability, this would need to be agreed by the Brent Housing Management Panel.

As stated, the Housing Officer will be responsible for carrying out an assessment of the tenant and household members and any lifestyle factors they may need support with and can contribute to damp and mould growth e.g. heating the home.

All the surveying team have had further training on the causation and treatment of D&M, as well as contractors. We have also implemented training around Building Regs, HHSRS and the difference between masking D&M or eradicating it, using correct treatments, ventilation and in-depth diagnosis.

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.

The materials that have been produced to date to support our approach to damp and mould have enabled us to act quickly to contact tenants. The tenant engagement team however have committed to hosting a focus group with tenants who have been impacted by damp and mould to review the materials and their experience of the process so we as a landlord can make improvements and strike the right tone.

This review will be completed by October 2023.

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.

When a resident contacts the council to request a mutual exchange a health and safety visit is arranged by the tenancy officer and a surveyor is invited to carry out a HHSRS inspection. The surveyor will address any repairs required that fall with the council's responsibility and any repairs that are deemed to be residents damage will be listed and the resident will be required to complete these repairs before the mutual exchange is signed off. The HHSRS survey will highlight all repairs that are required to satisfy us that a property is fit for habitation.

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.

Our standard specification includes eradicating mould issues and improving airflow, where we improve thermal efficiency, we will also educate residents on how best to use and manage energy consumption and moisture management as a direct result of the improvements we deliver.

If there is a fundamental building fabric failure within a home such as a failed damp-proof course or damp proof membrane, we have consulted with residents and taken the decision to rehouse, this can be a temporary or permanent move and will consider the disruption and timeframe to complete works.

We have identified a mixture of period as built or converted street properties and medium height blocks. These homes will benefit from a programme of works to increase their energy performance to a C rating. This will be achieved by installing external, internal or cavity

insulation and loft insulation, we will also be upgrading or installing mechanical ventilation and renewing more efficient windows.

Chapter 2: From inferring blame to taking responsibility

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.

As a landlord it is important to us that tenants do not feel blamed for damp and mould in their home. We recognise damp and mould is a complex issue and there are many contributing factors. Our priority, once it is identified, is to act swiftly to treat the problem no matter how it was caused and then work with the tenant to explore and understand contributing factors both structure and non-structural. As mentioned this can include offering support.

There will be instances where knowledge and education play a part, but this will be made clear in the advice given when communicating with residents.

Officers are trained to ensure they are empathetic and respectful to the tenant when discussing or communicating with them about damp and mould. The tenant experience focus group will give us more in-depth insight in the how successfully this is being implemented and we are committed to continuing to learn from tenants.

We have also introduced a 2-stage review of written responses to tenants to ensure that when advice is offered, in a response, it is done very sensitively and appropriate language is used.

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.

We record all interactions with residents on our CRM system, this includes all communication, specifications and works orders. We communicate in various forms to make sure residents receive important information relating to damp and mould surveys, this can be by email, text message and hard copy letters.

All damp related service requests and/or inspections and follow-on works are recorded by inspection type and a prefix of 'Damp and Mould' is included in job description. All inspections or work orders that include an element of damp and mould are monitored and tracked and require a physical post inspection on completion of works. We run weekly reports that include every single instance of damp and mould and discuss at weekly meetings with our repairs contract provider.

We deliver a rolling programme of stock condition surveys that consider the Housing Health and Safety Rating System (HHSRS), all HHSRS failures are recorded and fed back to the repairs team. This will result in a works order being raised to remedy the failure, or an inspection being arranged for a surveyor to visit to investigate further if is a category 1 failure.

13. Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.

We will visit all homes where there has been a report of damp and mould. We aim to visit a home within 28 days, this can be brought forward if it is a severe case, in order to determine the severity we will ask for photographs to be provided so we can carry out a desktop assessment.

We have the resource to arrange an inspection at our resident's convenience and can scale up this resource to meet the demand. We are conscious that there are many residents suffering from damp and mould that we may have failed in the past, this is why we have reached out to almost 900 residents and requested clarification if they are still suffering from damp and mould in their homes. We will be piloting a patch-based surveying approach to improve ownership and relationships with key stakeholders, this will also include a buddy system whereby we always have cover for patches where a patch surveyor is absent. This will go live when we have brought all surveyors up to the required level on all aspects of surveying, including void, disrepair, damp diagnosis and structural surveys. This is envisaged to go live on Monday 4th December 2023.

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.

Residents are awarded £100 compensation if a contractor fails to attend a confirmed appointment. If a resident fails to provide access for a confirmed appointment our contractor will contact the resident and attempt to gain access up to a maximum of 3 attempts. If access is not provided, we will liaise with colleagues in Tenancy Services and will seek an injunction. We work closely with colleagues in review the data we hold to identify vulnerable residents and residents that may have a preferred language other than English.

We meet our current service provider on a weekly basis and missed appointments are discussed and measures have been put in place such as prefix to all works order descriptions to advise of works and post inspection requirement on completion of works.

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.

We have delivered in-house training for Brent Surveyors and Contract Supervisors on a number of key areas such as;

- *HQN - An introduction to HHSRS inspections for Repairs Surveyors*
- *Mould Growth Solutions training on the causes and remedial works for damp and mould*
- *Tool box talks for our repairs contractor operatives regarding how to diagnose mould within homes and the correct eradication process.*
- *Housing Quality Network (HQN) delivered Understanding the new safety regime — the Building Safety Act and Social Housing Regulation Bill*

We regularly review best practice and changes to legislation and provide the required training when required.

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.

We have taken the actions listed above in 14 but are also supporting staff to become qualified in their field. In 2022 the Council commissioned the Housing Quality Network to deliver damp and mould training for non-technical staff which was attended by 74 staff members all of whom come into contact with residents and or carry out home visits. These included; housing officers, contact centre operatives and front line managers. The purpose of this training was to upskill officers to identify damp and mould in residents home and the consequences on residents quality of life if not addressed. This training set out the expectation for all officers in contact with residents to ensure they report concerns if damp and mould is highlighted in any form of communication with residents or physically seen in the property. This training will form part of an annual refresh and be rolled out to all relevant officers each year.

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.

We have provided clear guidance to our repairs team and repairs contractor regarding the requirements and action required if damp and mould is found within a resident's home.

We communicate with residents throughout the journey from the initial scheduling of an appointment and during a surveying visit through to the contractor making an appointment to carry our remedial works. This includes sharing knowledge on how to manage moisture within the home to avoid an issue such as condensation-based damp and mould returning on completion of repairs. We share information such as the importance of not blocking ventilation points and making sure fans are not switched off and the reason why.

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.

The Property Services Resolution team deliver this service, the Resolution Team Manager is tasked with ensuring that actions included in a complaint resolution are tracked and that agreed deadlines are met. The information is collated by the Resolution Team and the complaint file is updated This information has been shared with residents, staff and Councillors.

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.

There is a dedicated resolution team in place who deliver this service and they will always follow the Complaints Handling Code. Brent Council's complaints policy is also inline with the

Code and the Council follows the remedies guidance from the Housing Ombudsman when considering compensation and redress.

On an annual basis we work closely with the corporate complaints team to complete the self-assessment against the complaints handling code to ensure we are compliant and in keeping with the requirement of the housing ombudsman.

Our complaints service also offer regular feedback on stage 2 complaints and or cases that have escalated to the ombudsman to managers in the service in order to learn from complaints.

Chapter 3: From 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.

Please refer to point 13 above.

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.

We work closely with several consultancies though the Fusion21 Framework and always deliver works where recommendations have been provided. We explain the outcome of the independent inspection and the recommended course of action, what this entails, and what the expectation is on completion of works.

We have shared reports with residents when there has been a challenge relating to the cause of damp or mould and will continue to do so. When we appoint a consultant, the outcome is impartial and independent and if there is a requirement to carry out remedial works we will always act on those recommendations and share the outcome with our resident.

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.

Our procedure outlines this position clearly stating...

If the home is confirmed to be affected by damp and mould following an inspection, we will then:

- *Upgrade any existing extractor fans to humidity-controlled extractor fans*
- *Carry out a three stage mould treatment in the property and;*
- *Follow up with full redecoration of any affected rooms.*

These works will normally take place whilst tenants remain in their home. There may be occasions where tenants are offered a temporary decant e.g. due to vulnerability, this would need to be agreed by the Brent Housing Management Panel. Note a panel meeting can be called at any time if an urgent response is required.

Tenants who live in homes where there are repeated or serious cases of damp, mould or condensation and extensive structural works are required will be considered for either a temporary or permanent decant depending on the length of time works are likely to take. This in line with the Housing Allocations Scheme.

The dedicated patch housing officer will support any household who is decanted due to damp, mould or condensation.

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.

There is a dedicated resolution team in place who investigate and resolve complaints and they follow the Complaints Handling Code.

When a complaint is identified outside of the 'official system', we ask for it to be logged and inform residents of the need to create an escalation pathway for the complaint to go through the Council's complaints process.

As part of the resident engagement strategy, we encourage our surveyors to promote feedback whether it is a compliment or a complaint as there is always opportunity to learn and staff are all aware of our complaints policy and can advise residents how express dissatisfaction.

The complaints process is advertised Via the council's website, by word of mouth through officers and via focus groups and residents associations.

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.

This procedure has been shared with colleagues and where possible we will always separate the elements correctly and deal with complaints alongside disrepair complaints.

We do not differ in our approach to dealing with damp and mould whether it is because we have received a pre-action protocol, or a resident has contacted us to advise they are suffering from damp and mould.

Our complaint team and legal team are kept informed of any action taken and responses sent out and works are tracked through to completion and then post inspected to confirm we have resolved all of our residents concerns.

Chapter 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 opportunities.

In conjunction with our damp and mould programme, which has been running since April of this year, we have rolled out a robust leak process which has shown collaboration in place

between Brent Surveyors, Contractors, our Housing Officers and an external Security contractor, in order to resolve uncontrollable leaks.

Even in situations where multiple dwellings are affected, and access is required to multiple flats in order to trace and remedy.

After a tentative start, we are now hitting 100% success rate, which in turn is resolving leaks, heading off potential complaints and disrepair cases at source as well as making important savings on the extraordinary costs and heartache involved in resolving these in a more protracted way. We have attached a Journey Map which describes the protocol in detail.

This is now part of the contractor's induction for new staff, as well as members of the property services team.

This approach has not changed and has seen circa 200 leaks that could have escalated if not for the robust leak process that has been rolled out to all escape of water instances. This not only improves our residents experience but saves on future litigation costs and enabling us to channel that budget to our residents' homes and not legal costs.

Our quarterly service area meetings create the opportunity to share learning with the wider team. In addition, positive good news stories in relation to complaints management/handling are shared. We have a localised system of tracking trends. This is shared with our principal contractors monthly so any flagged areas can be promptly addressed.

Our repairs provider has arranged and delivered TPAS customer service training got their trade operatives and back officer support, this was highlighted following a complaint around an operatives behaviour.

The Leak/Asbestos Process was introduced following a review of a complaint received from 10 Dickens Court, the complaint centred on the time taken to affect a repair because of delays caused by suspected asbestos in an access panel. The new process has help cut down on the bureaucracy of the standard asbestos process which was having an impact on the timely resolution of repairs and subsequent complaint.

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.

We have completed a review project on Housing Management complaints and provided criteria to assess complaint responses on, which included tone and empathy. This was shared with officers within Housing management and provided the individual officers with our assessment of their responses so that improvements could be made.

Officers working on Complaints drafts are provided with weekly bite size training to ensure that all areas identified as falling short of expectations are addressed. Going forward, it will be linked to performance.

Once a damp and mould complaint is reported, an urgent inspection is arranged to assess the situation. If children or elderly are identified in the affected property, a dedicated officer is assigned to the case to help to track the process to completion, ensuring that regular phone calls and visits (if required) are made to the resident to keep them updated.