

London Borough of Brent

Damp and Mould Policy

This policy provides a framework for meeting the requirements of Awaab's Law and associated guidance, and defines how Brent Council will investigate, resolve and prevent occurrences of damp and mould within its managed housing stock.

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Foreword

This Damp and Mould Policy sets out Brent's commitment to ensuring that every resident has access to a safe, healthy and well-maintained home. The policy provides the framework through which we will meet our statutory obligations under Awaab's Law and establishes a clear approach to preventing, identifying and resolving damp and mould across our housing stock.

This is fundamentally about resident safety and wellbeing. Damp and mould are not simply property management issues; they are significant public health concerns that can have serious consequences for residents, particularly children, older people, pregnant women, disabled residents and those with respiratory conditions. The policy adopts a zero-tolerance approach and makes clear that we will not unfairly attribute damp and mould to residents' lifestyles.

Alongside compliance with the law, this policy supports our wider ambition to provide safe, decent and sustainable homes, reduce health inequalities and improve outcomes for residents.

It reflects the lessons learned nationally and locally and demonstrates our determination to put residents at the centre of everything we do.

Councillor Robert Johnson

Cabinet Member for Housing, Homelessness & Renters

Regulatory Standards, Legislation and Codes of Practice

Regulator:	The Regulator of Social Housing
Legislation:	Brent Council recognises and acknowledges its legal duties and obligations under legislation relating to damp and mould. The areas of law that are relevant to this policy include: • Social Housing (Regulation) Act 2023. • Awaab's Law (2025 Regulations). • Housing Act 2004. • Housing Health and Safety Rating System (HHSRS). • Homes (Fitness for Human Habitation) Act 2018. • Environmental Protection Act 1990. • Landlord and Tenant Act 1985. • Building Regulations 2010 – Part C. • Equality Act 2010. • UKHSA Damp and Mould Guidance. • Decent Homes Standard. • Housing Ombudsman's Spotlight Report on Damp and Mould (2021). • BS 5250:2021. • Approved Document F – Ventilation. • RSH Safety and Quality Standard (Apr 2024).
The policy also operates in the context of:	• Complaints Policy • Compensation and Remediation Policy • Fire Safety Policy • Gas Safety Policy • Electrical Safety Policy • Legionella Policy • Repairs Policy • Vulnerable Residents and Reasonable Adjustments Policy • Asset Management Strategy • Tenant and Leaseholder Engagement Strategy

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1. Purpose

Brent Council is committed to providing safe and well-maintained homes for our tenants. This policy provides a framework for meeting the requirements of Awaab's Law and

associated guidance, and defines how Brent Council will investigate, resolve and prevent occurrences of damp and mould within its managed housing stock. We recognise the significant impact damp and mould can have on the lives of residents and this policy reflects our commitment to tackling this in a consistent and robust way.

2. Scope

This policy applies to:

- All residential properties owned or managed by Brent Council, including general-needs housing, supported and sheltered schemes and temporary accommodation.
- All Brent Council staff, contractors and partners involved in housing management, maintenance, asset management or compliance functions that affect the condition of dwellings.

2.1 Definitions- Understanding damp and mould

Damp is the accumulation of moisture within a property. It can affect building materials (such as walls, floors, ceilings and foundations) and/or home furnishings and belongings (such as carpets, curtains, furniture and clothing). Damp can also lead to the growth of mould.

Damp can occur for a variety of reasons:

- i. Condensation damp- occurs when moisture within the home cools and condenses onto colder parts of the buildings. This is the most common form of damp. Conditions that can increase the risk of condensation are – inadequate ventilation, inadequate heating, inadequate thermal insulation, high humidity and poor building design and construction.
- ii. Penetrating damp- water that gets into the building from outside due to defects in the walls, roof, windows or floors.
- iii. Rising damp- is moisture from the ground that rises up through parts of the buildings in contact with the ground (walls and floors). It is usually found in older properties and is often it is due to defective damp proof courses and membranes.
- iv. Traumatic damp- can be caused by leaking water from waste and heating pipes, overflowing baths or sinks, burst pipes or defective water storage vessels inside the building. Traumatic damp can also originate from outside the property, for example from another building or from environmental flooding
- v. Mould- a type of fungus which grows in moist environments. It frequently appears alongside condensation on cold outside walls and surfaces and in places where the air does not circulate well. The moisture created can also damage clothes, furnishings, and decoration, and leaves a musty smell.

Exposure to mould spores can cause a wide range of symptoms including rashes, itchy eyes, sneezing, coughs, dizziness, and nausea.

The long-term effects of mould exposure can be more severe for vulnerable people, people with respiratory conditions and those with a weakened immune system.

3. Our Values

3.1 Equality, Diversity and Inclusion Strategy

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: [brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf](#)

This policy aims to ensure that all reports of and resulting remediation works for damp and mould are treated consistently and fairly regardless of age, disability, gender re-assignment, race, religion, belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity, care experience, socio-economic status and other relevant characteristics such as carer status or immigration status.

Brent Council will ensure that damp and mould management measures consider the diverse needs of residents and staff, including those with language barriers or additional vulnerabilities. This includes ensuring communication and information are accessible, with translation and interpretation services and alternative formats available as needed. Officers will proactively identify communication barriers and make reasonable adjustments as necessary.

This policy has been subject to an Equality Impact Assessment which found no adverse impact on residents with protected characteristics.

4. Policy Statement

Brent Council recognises that damp and mould represent significant health and safety risks, particularly to vulnerable residents. Exposure can contribute to respiratory illness, structural deterioration, and non-compliance with statutory housing standards.

Our policy is to:

- Comply with all legislation, codes of practice and guidance relevant to damp and mould in domestic premises, including the Social Housing (Regulation) Act 2023 and Awaab's Law.
- Take action to prevent damp and mould by maintaining homes in good repair and addressing defects promptly.

- Ensure Competence and Accountability through qualified staff and clear governance and monitoring arrangements.
- Engage Residents and Stakeholders so that residents understand how to report concerns, what to expect from investigations, and how they can help maintain healthy environments.

This policy supports Brent Council's wider commitment to safe, decent and sustainable homes in line with the Housing Health and Safety Rating System (HHSRS) and the Decent Homes Standard.

Brent Council adopts a zero-tolerance approach to damp and mould, in line with Housing Ombudsman recommendations, and will not unfairly attribute these issues to residents' lifestyles.

5. Guiding Principles

Brent Council's approach to implementing this policy is guided by the following principles:

A. Damp and Mould Management

- Damp and mould prevention will be considered throughout the building lifecycle—design, construction, handover, occupation, refurbishment and end-of-life.
- Designs and specifications will consider ventilation, insulation, heating and moisture pathways. We ensure that ventilation systems and design comply with Approved Document F (2021) and relevant ventilation maintenance guidance.

B. Risk-Based and Proportionate Control

- A proportionate, evidence-based approach will be applied. Properties will be prioritised by risk, considering factors such as age, construction type and occupancy density.
- Resource is targeted where the risk to health or asset condition need is greatest.
- Vulnerability factors (e.g, children, older people, respiratory conditions) must be considered in line with UKHSA guidance.

C. Governance and Accountability

- Clear lines of accountability underpin effective damp and mould management. Established governance boards including the Building Safety

Compliance Project Board and the Audit & Assurance Committee review damp and mould.

D. Competence and Training

- All staff and contractors responsible for property inspections, repairs, or resident engagement are trained in identifying, assessing and responding to damp and mould.
- Competence is verified and maintained through ongoing CPD and independent accreditation where applicable.

E. Resident Engagement and Inclusion

- Residents will receive clear information on how to recognise and report damp and mould, what actions the Council will take, and expected timeframes.
- Residents will receive communications in line with Awaab's Law.
- Brent Council communicates in accessible formats and languages, provides targeted support for vulnerable residents, and engages residents in consultation on improvement programmes.

F. Monitoring, Audit and Continuous Improvement

- Performance is monitored through regular KPI reports to the Brent Housing Compliance Board, focusing on response times, recurrence rates, and resident satisfaction.

6. Public Health, Inequalities and Safeguarding

Brent Council recognises that damp and mould are not solely housing condition issues but also significant public health and safeguarding concerns. Exposure to damp and mould can have serious consequences for physical and mental health, particularly for babies, young children, older people, pregnant women and residents with respiratory conditions, disabilities or compromised immune systems.

We acknowledge that housing conditions can contribute to wider health inequalities and that the impact of damp and mould can be disproportionately experienced by residents facing socio-economic disadvantage, overcrowding, language barriers or other vulnerabilities.

Our approach is therefore grounded in prevention, early intervention and equity, ensuring that support is targeted to those at greatest risk of harm.

Where damp and mould issues may place a child, young person or adult at risk of harm, Brent Council will adopt a safeguarding-led approach.

Staff and contractors will remain alert to potential safeguarding concerns, make referrals where appropriate, and work in partnership with health services, children's services, adult social care and other agencies to protect residents and improve outcomes.

Through this policy, Brent Council aims not only to comply with statutory requirements and Awaab's Law, but also to improve health outcomes, reduce inequalities and ensure that every resident is able to live in a safe, healthy and dignified home.

Housing services will work collaboratively with NHS partners, Public Health, Adult Social Care, Children's Services and other agencies where a resident's health or welfare may be affected.

7. Damp and mould remediation process

This section of the Policy sets out our approach to tackling damp and mould once it has been reported.

7.1 Triggers for the repairs process, including how residents can report damp and mould

Residents can report damp and mould by using [My Account](#), by calling 020 8937 2400 or by emailing dampandmould@brent.gov.uk

A referral may also be made by a contractor or a Brent Council member of staff if they identify damp and mould at the property or are concerned that damp and mould may be present.

7.2 Investigation Protocol

Every report of damp or mould will trigger an investigation. Each case will be immediately risk-assessed considering any vulnerabilities, property type and severity of the issue. The outcome of the risk assessment will determine how a case is categorised in terms of severity and the next steps the council will take.

In line with Awaab's Law, the following categorisation of severity applies:

- Significant hazard that poses a serious risk of harm that a reasonable landlord would treat as urgent. A 'significant risk of harm' is defined in the regulations as 'a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would take steps to make safe as a matter of urgency'.

- An emergency hazard that poses an imminent risk of harm, which must be made safe within 24 hours. An 'imminent and significant risk of harm' is defined in the regulations as 'a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would take steps to make safe within 24 hours'.

Examples of hazards that could be emergency hazards requiring emergency action include, but are not limited to:

- gas or carbon monoxide leaks
- broken boilers
- total loss of water supply
- electrical hazards such as exposed wiring
- significant leaks
- broken external doors or windows that present a risk to home security
- prevalent damp and/or mould that is having a material impact on a tenant's health
- significant structural defects or disrepair

Any vulnerabilities are considered at the point of triage and this will inform how the case is categorised if appropriate. Factors that make an individual especially vulnerable to the effects of damp and mould include (but are not limited to):

- Age (children and the elderly)
- Pregnancy
- Disability
- Respiratory illness or condition (for example asthma)

For further information on addressing vulnerabilities, please see the Vulnerable Residents and Reasonable Adjustments policy.

The table below explains the process Brent Council will take once a case of damp and mould is reported:

Stage	Action	Timescale
Report Received	Logged and triaged immediately.	Immediate
Emergency Hazard investigation	Investigate potential emergency hazards and make the property safe. Interim measures implemented (for example mould	within 24 hours

	wash, dehumidifiers) if full repairs cannot commence immediately.	
Significant Hazard investigation	Inspection Scheduled and Conducted – visual inspection and property assessment completed.	within 10 working days
Written summary to the tenant	Written summary provided to resident confirming actions.	within 3 working days of inspection
Relevant safety works	Complete repairs to make the home safe	within 5 working days of inspection (or sooner if risk high)
Preventative works	To stop the hazard from recurring	Began as soon as was reasonably practicable and complete within 12 weeks

7.3 Initial Response and Interim Measures

Where immediate repair cannot be completed, the Council will implement interim measures such as:

- Temporary removal of surface mould using safe cleaning agents. A 2-stage mould treatment will be undertaken within 5 days of the report to remove the immediate hazard.
- Deployment of dehumidifiers.
- Increasing ventilation or heating.
- Temporary relocation if the health risk is significant.

7.4 Identifying the root cause

Our surveyors will take actions to identify the underlying cause of damp and mould (for example a leak, condensation, thermal bridging or drainage defect) which could include using moisture meters, thermography or inspection.

7.5 Repair and Remediation Works

Repairs are completed using approved materials and methods that address both the cause and effects of damp. All works will be recorded with before-and-after evidence. Improvement works will consider energy performance improvements to prevent recurrence (for example insulation, heating or ventilation upgrades).

7.6 No Access Process

If access is refused, at least two attempts must be made. Following two attempts, the case will be reviewed and if appropriate recategorised to a priority 4 action. A letter will be sent to the resident to ask that they get in touch to arrange a re-visit. They will have 60 days to do so, after which time the case will be closed.

Should there be extenuating circumstances or vulnerabilities, these will be considered before a case is closed.

7.7 Complaints

Where a resident is unhappy with the council's response to a report of damp and mould in their home, they may wish to make a complaint in line with the council's Complaints Policy. In some circumstances, including where there has been a service failure, they may be entitled to receive compensation in line with the Housing Compensation and Remedies Policy.

8. Ongoing damp and mould management

This section details how Brent Council will manage damp and mould throughout the lifecycle of a property.

8.1 Design and Construction

- All new homes must meet Building Regulations Part C and F and include as-built information (ventilation type, air permeability, insulation standards).

8.2 Refurbishment and Change of Use

- Before refurbishment or change of occupancy, existing damp and mould risks will be reviewed.
- All properties will be let free from damp and mould.
- Refurbishment projects will include ventilation upgrades or insulation improvements where surveys identify deficiencies.

9. Resident engagement and communication

Brent is committed to clear communication with residents on damp and mould. This includes providing them with the information they need to both prevent and react to incidents of damp and mould. We encourage residents to report safety concerns as soon as they appear so that they can be promptly addressed.

Information Provision

Residents receive information on:

- How to report damp and mould issues.
- What actions the Council will take and expected timescales.
- Advice on heating, ventilation and condensation control.

Communication Methods

Information will be distributed through many channels, including resident newsletters, noticeboards, digital channels and resident meetings. Resident information will be provided in accessible formats and translated where required in line with the Equality Act 2010.

10. Tenant responsibilities

Brent Council is committed to working with residents to help maintain a safe living environment. It is a shared responsibility between tenants, staff and contractors to make sure that incidents of damp and mould are reported and acted upon in a timely manner. Tenants should proactively report damp and mould, including where it has reoccurred.

Tenants should take all reasonable steps to prevent damp and mould, including through ventilating the property, drying clothing outside and keeping the home warm where possible. Brent Council will support residents in doing this by regularly providing information on prevention and responding promptly to reported issues.

11. Monitoring and Compliance

11.1 Review

Brent Council has monitoring and governance processes to ensure this policy is effectively implemented and remains in place. The following monitoring and audit mechanisms are used:

- The Building Safety Compliance Project Board and Housing Tenant Satisfaction Improvement Programme Board each receive reports on damp and mould on a regular basis.
- Key performance indicators (KPIs) include timeliness of inspections and repairs, completion rates, recurrence levels and resident satisfaction.
- Damp and mould repairs and remedial actions are tracked through NEC.
- Weekly meetings are held with contractors where damp and mould is reviewed.

- All case data, photographs, and reports are digitally stored, retained for a minimum of six years. This ensures visibility and traceability throughout the building lifecycle.

This policy is reviewed every 2 years, unless otherwise required and version control can be found in the footer of the document.

11.2 Monitoring process

KPIs reported monthly include:

- % emergency repairs completed within target
- % emergency repairs follow on works completed within target
- % urgent repairs completed within target
- % standard repairs completed within target
- Resident satisfaction with the repairs

Complaints

Complaint meetings are held weekly to analyse trends and to take forward any lessons learnt. These inform ways of working and will result in changes to process as required.

11.3 Training

Brent Council is committed to ensuring that all staff and contractors involved in damp and mould remediation and prevention are competent to perform these tasks. We invest in training to maintain knowledge and skill regarding Building Safety, and in this context specifically damp and mould.

Our overarching goal is to have an organisational culture where safety is embedded, and everyone knows their role in keeping our residents safe in their homes.

Training Framework

All staff, managers, and contractors involved in activities related to damp and mould must receive training proportionate to their duties. Training will cover the requirements of this and other inter-related council policies, site-specific procedures, and emergency arrangements. Training will meet the competency requirements defined under the Awaab's Law 2025 regulations.

Training Responsibilities

- Managers are responsible for ensuring that all team members receive training on the council's statutory duties
- Contractors must provide and be able to evidence training for staff in line with their contractual obligations

Manager and Executive Training

Senior managers receive regular training to ensure our leaders understand Building Safety at a strategic level and can competently direct resources and make informed decisions.

Contractor and Partner Training

We require that any contractors working on damp and mould are qualified to do so. Contract terms stipulate competency requirements. Staff induction documents for both new external contract staff and council staff are shared reciprocally to ensure alignment of process and a collaborative approach to tackling damp and mould.

Competence Monitoring

The Council keeps records of training completed by staff. We also encourage formal qualifications for relevant staff. We consider staff competent when they possess both the training and experience necessary for the task. CPD (Continuing Professional Development) is supported, such as staff attending external seminars, Building Safety conferences, or attain membership in professional bodies.

12. Roles and Responsibilities

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for keeping all housing assets free from damp and mould.

Internal and Councillor Oversight

Accountability is supported through the Council's governance framework includes the Building Safety Compliance Board, internal audit, and reports to the Cabinet Executive, Scrutiny Commission and Audit & Assurance Committee.

Area Tenancy Managers

Area Tenancy Managers are responsible for supporting the local delivery of this policy within their areas. This includes maintaining a general awareness of property conditions through routine estate activity and engagement with residents, facilitating access for inspections and works, keeping appropriate records, and promptly reporting and escalating any suspected damp and mould issues. Area Tenancy Managers are not responsible for diagnosing or assessing technical causes, which remains the responsibility of qualified technical officers.

Contractors

Brent Council engages qualified contractors for inspection, testing and remedial works. All contractors must be appropriately accredited and demonstrate competence in damp and mould diagnosis, sampling, and remediation. They must notify Brent immediately if serious health risks or structural issues are identified and ensure resident safety during all works.

Brent Council Employees

Surveyors and technical staff must be appropriately qualified to diagnose the causes of damp and mould and to develop suitable remedies to address those causes.

All employees must cooperate with the Council's Damp and Mould safety arrangements, follow safe systems of work, complete relevant training, and report hazards or defects promptly.