



Llywodraeth Cymru
Welsh Government

Tai ac Adfywio
Housing and Regeneration

Local Authority Leaders (Stock Holding)
Local Authority Chief Executives (Stock Holding)
Local Authority Chief Housing Officers (Stock Holding)
RSL Chairs
RSL Chief Executives

27 July 2023

Dear Colleague,

Damp and Mould Assurance

Social landlords responded to our request for information, providing returns earlier this year, thank you for your ongoing cooperation.

The responses varied in approach, with some landlords directly answering the questions while others chose to explain their systems and processes in more detail. As a result, the length of the responses also varied significantly, ranging from 300 to 6000 words. The responses provide insight into the approaches to the management of damp and mould across the sector which we are sharing to promote learning and improvement with examples of current practices employed by different social landlords in Wales to ensure the safety and well-being of tenants.

It is important to note that our feedback is based solely on the information provided to us, the detail of which has not been validated. Whilst this feedback offers useful insights, it is crucial to consider that the lived experiences and perceptions of tenants may vary significantly and may well present a different perspective to the data and information provided to us.

The term 'governing body' has been used throughout to refer to the governance structures of both RSLs and LAs, acknowledging they are very different in nature. Summary feedback to the four key questions we asked about are set out below:

A) Whether you had carried out a review of damp and mould issues in recent weeks and if so, what this had told you.

The majority of landlords said they had carried out a review recently. Several RSLs indicated that the Awaab Ishak case had motivated them to initiate the review, even though some had carried out reviews relatively recently, perhaps prompted by our previous feedback. The scope and nature of the reviews varied but included:

- **Analysis of complaints** – including how initial reports of damp & mould from tenants are addressed at the first point of contact and analysis of historical complaints from tenants.



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- **Reviews of processes & procedures** – including reviewing procedures with reference to tenant and landlord responsibilities (i.e., who is responsible for what) and updating case management processes to improve scrutiny of all cases received.
- **Desk top surveys** – including developing a ‘building risk matrix’ based on historical damp & mould issues, the model includes building typologies, locations & property ages.
- **Approach to inspecting properties** – developing a damp & mould process map to guide site inspections for staff and guidance on how to identify contributory factors (e.g., failed extractor fans, blocked up ventilation).

Some of the themes that landlords identified as learning from the reviews included:

- **Staff training** – several landlords identified a lack of staff training in reference to damp & mould and many had already introduced new training.
- **Communication with tenants** – some landlords updated websites and relevant literature. Others were looking at the customer experience when reporting damp and encouraging staff to avoid assumptions about tenant’s lifestyles.
- **Use of technology** – many landlords were looking to expand or implement use of technology to monitor or alleviate damp, this included air monitoring in properties, mould treatment packs, positive input ventilation units and humidity-controlled extractor fans.
- **Reporting to governing body** – some landlords have introduced new or extra damp & mould reporting to their governing body to provide more comprehensive assurance.
- **Access** - Some landlords identified prevention of access as an issue in resolving damp & mould. One landlord said they have changed the no access procedure in line with gas servicing to ensure access is gained.
- **Collaboration** – improving collaboration across different teams is seen as a way of improving landlord response to damp & mould, for example improving the specificity of jobs to be completed. Also ensuring there are clear lines of responsibility and/or providing dedicated resources to deal with damp/mould. Some landlords said they were allocating additional resources to deal with damp/mould.
- **Specialist Skills** - A number of landlords cited lack of qualified building surveyors as a barrier and recruitment & retention were cited as issues.

B) If there are any damp and mould cases which were not being dealt with effectively, what is the scale of this and what are your plans for remediation?

Determining the scale of the issue in Welsh social housing is challenging. Recognising this, we have included a new data request on the quarterly RSL regulation survey in relation to damp and mould and disrepair cases and will be discussing with the WLGA how to gather the same data from local authorities. Additionally, I will be inviting WLGA and CHC to further discuss data, its collection and use more widely in the coming weeks.

Notwithstanding that, it is clear many landlords are making changes to deal with damp & mould problems in their stock. Common themes identified included:

- **Resources** – A number of landlords are allocating additional resources and some report they are employing specialist damp contractors and reallocating existing staff.
- **Use of technology** was mentioned previously in relation to provision of equipment to tenants. Additionally, many landlords were looking to utilise technology in different ways, for example utilising new analytical software to enable a more proactive and predictive approach and installing remote monitoring environmental sensors.
- **Fuel Poverty** - Some landlords identified fuel poverty as an issue with tenants unable or unwilling to put the heating on. Mitigations included hardship funding, employing financial support officers, partnering with Warm Wales, and employing energy wardens.

C) Explain the data you hold in relation to damp and mould, including the level of stock coverage and how often the data is scrutinised and refreshed.

Most responses referred to stock condition survey data. A 5-year rolling programme was most common, but some landlord's indicated data could be 10 years old. Some landlords said they review and refresh complaints data daily, others weekly and many monthly. Themes which emerged were:

- Some landlords have instigated or are planning **dedicated damp surveys** across their stock.
- Several landlords cited **disrepair and complaints data**. It wasn't always clear how comprehensive this data was, and difficulty extracting information was identified as an issue.
- A number of landlords mentioned they had or were improving their **management systems** to improve the interrogation of data on damp & mould and ensuring details get to the right teams quickly.
- Some landlords appear to be relying predominantly on **reports from tenants** to identify damp & mould issues. These landlords may wish to consider the frequency of stock condition surveys or instigate other initiatives to detect damp & mould. We expect landlords to be **proactive** in dealing with damp & mould in their stock.

D) Explain the assurance the governing body has scrutinised to give them confidence the organisations' systems and processes are the best they can be and do not discriminate in any way, to ensure damp and mould issues are dealt with promptly and effectively.

Most landlords referred to some sort of reporting mechanism to the governing body, executive management or both. Many were looking to strengthen their current arrangements.

- **KPIs** – a number of landlords have developed damp/mould specific KPIs or were planning to implement them which would be reported to the governing body or executive team for assurance purposes.

- Some landlords explained they were taking **specific damp & mould reports** to the governing body, one has introduced a standing agenda item at its governing body meetings.
- Some landlords had sought assurance through the introduction of **new structures** and/or processes. Examples included a damp and mould working group, commissioning an external audit of the current process, and joint working with Environmental Health teams.
- Disappointingly, many landlords did not address the question of whether they are assured their systems and processes do not discriminate in any way. Of those that did, some landlords mentioned their policies had been through an **Equality Impact Assessment** and some indicated they were an accredited **QED** (Tai Pawb accreditation) organisation. Last year the Welsh Government published it's [Anti-racist Wales Action Plan](#). The plan includes the following action which we expect social landlords to deliver.

“Housing Associations, local authority housing departments and third sector support organisations to demonstrate how they will ensure anti-racism and race equality are to be embedded within their organisations both as employers and service providers.....”

Whilst we hope this feedback provides some useful feedback, it is worth a further reminder of “think point 9” of [Social housing conditions and disrepair](#) publication states:

“social landlords should ensure measures are in place to specifically identify and address reported issues with damp and mould. This should include investigation/inspections by default, ensuring condensation and its causes are accurately diagnosed, rectifying any defects as promptly as possible and supporting tenants with help and advice, including fuel poverty”.

Whilst we are working with a sector stakeholder group to determine what further guidance or other support would be useful to assist the sector to deliver better outcomes, we are already of the view that every policy and procedure should be subject to an Equality Impact Assessment in any event.

Should you have any questions or require further clarification, please contact the HousingConditions@gov.wales mailbox.

Yours sincerely



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