



Craigdale
HOUSING ASSOCIATION

Damp and Mould Policy (New)

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Craigdale Housing Association can provide this document on request, in different languages and formats, including Braille and audio formats.

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1. Introduction

- 1.1 Craigdale Housing Association is committed to maintaining its homes to a high standard which adds value to the homes. Maintaining high quality, secure homes can improve the lives of the tenants and their families.
- 1.2 This policy has been written following the tragic death of another RSL tenant's child. The Coroner cited untreated damp as contributing to the child's death. The Coroner report also clearly states that communicating clearly and listening to tenants around reports of damp and acting to treat and/or prevent the causes must be a lesson taken forward.
- 1.3 Estimates in the UK are that up to 50% of homes could be affected by damp, mould growth and/or condensation. The incidence has been found to be higher in Social Housing and lower-income communities. The main causes are overcrowding, lack of appropriate heating, lack of ventilation, lack of insulation and a lack of support from landlords. This is especially relevant at the moment due to the energy price crisis.
- 1.4 Craigdale's aim in this policy is to take a proactive rather than reactive approach to preventing and treating damp in the stock. Craigdale will use better recording of issues to look for trends, improved identification and better support, guidance, education and advice.

2. Legal and Regulatory Framework

- 2.1 Whilst this Policy sets out to explain Craigdale 's approach to preventing and treating damp and mould it must do so in the context of legal and regulatory requirements. Therefore, the following relevant legislation has been considered in the development of this Policy:

- Housing (Scotland) Act 2014.
- Health and Safety at Work Act etc. 1974.
- Scottish Housing Quality standards (SHQS)
 - *Meet the Tolerable Standards.
 - *Be free from serious disrepair.
 - *Be energy efficient.
 - *Have modern facilities and services.
 - *Be healthy, safe, and secure.
- Energy Efficiency Standards in Social Housing (ESSH 1&2).
- Housing Ombudsman Report – Spotlight on Damp and Mould October 2021 (App 1)
- Inquest Report – Awaab Ishak (App 2)
- Better Social Housing Review Report – December 2022 (App 3)

2.2 The Scottish Social Housing Charter

- 2.2.1 The Social Housing Charter came into effect in April 2012, and this sets the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Charter replaces the Performance Standards and the outcomes relevant to this Policy are:

1. Equalities

Social landlords perform all aspects of their housing services so that:

- *they support the right to adequate housing*
- *every tenant and other customer has their individual needs and rights recognised, is treated fairly and with respect, and receives fair access to housing and housing services.*

2. Communication

Social landlords manage their businesses so that:

- *tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.*

3. Participation

Social landlords manage their businesses so that:

- *tenants and other customers are offered a range of opportunities that make it easy for them to participate in, and influence their landlord's decisions at a level they feel comfortable with.*

4. Quality of Housing

Social landlords manage their businesses so that:

- *tenants' homes, as a minimum, when they are allocated are always clean, tidy and in a good state of repair, meet the Scottish Housing Quality Standard (SHQS), and any other building quality standard in place throughout the tenancy; and also meet the relevant Energy Efficiency and Zero Emission Heat Standard.*

5. Repairs, maintenance, and improvements

Social landlords manage their businesses so that:

- *tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.*

13. Value for Money

Social landlords manage all aspects of their businesses so that:

- *tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.*

2.2.2 Social landlords are responsible for meeting the standards and outcomes set out in the Charter. The Scottish Housing Regulator is responsible for monitoring, assessing, and reporting on how well social landlords, individually and collectively, achieve the outcomes.

2.2.3 In line with the regulatory principles, the Regulator's approach to monitoring landlords' achievement of the outcomes and standards in the Charter will be based on each landlord's performance information and their own assessment of their performance. Therefore, for each year ending on 31st March, we will be expected to:

- Measure and assess our performance in progressing towards or achieving the Charter outcomes and standards
- Provide the Regulator with some key performance information on our achievement of the outcomes and standards
- Report our performance to tenants and other service users who use our services.

2.3 Organisational Values

Our Vision: *“Changing Lives for the Better”*

Our Values:

- *Respect: We will treat people with courtesy, politeness, and kindness: recognising that people have rights, opinions, and experiences.*
- *Openness: we will be transparent and accountable in all our actions and decision making.*
- *Trust: we will be honest, objective, consistent, open and lead by example in everything we do.*
- *Listening: we will listen actively listen to what people tell us and we will remain neutral.*

3. Proactive Approach

- 3.1 Historically landlords have not prioritised reports of damp, mould and condensation very highly. Many landlords have looked at these problems and blamed the lifestyle choices of tenants rather than working proactively to fully explain what is meant by this. Craigdale's aim is to be proactive and work with tenants to either prevent or identify problems quickly.
- 3.2 All staff will undertake training on understanding the causes of damp, mould growth and condensation in properties.
- 3.3 A full analysis of our stock data and repair information will inform any problem areas in the stock and identify any areas where better ventilation, insulation and support are needed.
- 3.4 Craigdale currently undertake tenancy audits where each property is visited on a cyclical basis. The focus of these visits will move to include probing questions to ascertain any indicators for damp problems. Such as fans not working or condensation issues.
- 3.5 Staff will analyse repair information and will visit properties where there are high repair reports but also where no or few repair reports have been received.
- 3.6 CHA will make better use of the website, app, portal, social media and the newsletter to educate the tenants around the importance of ventilating and heating their home. Ongoing campaigns of educational material will be provided to support tenants with the understanding of methods used in reducing the impact of damp, mould and condensation.

4. Reactive Approach

- 4.1 Whilst CHA will strive to be as proactive as possible in preventing damp and identifying possible risk areas, there will still be occasions where tenants will report problems to us.

- 4.2 When a report is received the Housing Services Team will visit within 2 working days and identify the problem. Relevant repair work will be issued or support offered to the tenant as per the current Repairs Policy, if required specialist support can be sought.
- 4.3 Any reports received will be recorded in the Damp and Mould register so that any trends in reports can be identified.

5. Data Analysis

- 5.1 On a monthly basis the CEO will extract data from the Associations Damp and Mould register to establish what properties require further investigation/investment. This data will be used to review the types of property, location and reports from tenants, were damp and mould issues are more prevalent, or have a history of such issues. This information will be used to inform future major investment programmes e.g external insulation of tenemental blocks etc.
- 5.2 To ensure that CHA have a full picture of any problem areas within the stock and to ensure that a full picture of stock condition is achieved a recording system will be developed within our compliance register. This will bring together all information stored from:
- Reactive Repairs System (repairs that have been recorded as damp and mould).
 - Stock Condition Survey Data.
 - Energy Performance Certificate (EPC).
 - Specialist survey data commissioned by the association.
 - Tenant's records and reporting historical damp and mould issues.
- 5.3 CHA will seek to secure external funding (where available) to assist in improving the thermal efficiency of the stock and reduce the risk of future problems.

6. Education and Support

- 6.1 There may be occasions where behaviours by the tenant are making matters around damp, mould and condensation worse. For example drying washing on radiators, hoarding or not using adequate heating. It is no longer acceptable to just tell tenants to change their lifestyle full support to do this must be offered.
- 6.2 CHA currently have a leaflet that explains the causes of condensation and damp. This will be reviewed and refreshed to ensure that it is fit for purpose. Information will also be placed in a prominent position on the Company Website and regularly promoted on social media channels.
- 6.3 For some tenants just a clear explanation is enough but for tenants who need extra support CHA will ensure that this is made available either internally or through an external referral.
- 6.4 Overcrowding can also be a cause, we will ensure we support affected tenants to apply for a transfer and also through the process.
- 6.5 Any tenant struggling to afford to heat heir home will be offered support through the Welfare Rights Service to ensure that their income is being maximised and that any fuel support available is being accessed.

- 6.6 Staff will also be given adequate training on the identification of mould and damp as well as the preventative measures and the support they should be offering to affected tenants.

7. Equal Opportunities

- 7.1 We are committed to ensuring equal opportunities and fair treatment for all people in its work. In implementing this Policy, we will provide a fair and equal service to all people, irrespective of factors such as gender, race, disability, age, sexual orientation, language or social origin, or other personal attributes.

8. Performance Management

- 8.1 Damp and Mould will form part of the Tenants Health and Safety Compliance report, which will be reported to the Board quarterly. Reports of damp and mould will be monitored as part of our tenant safety and compliance report.

9. Tenant Participation

- 9.1 We are a tenant focussed organisation and as such we are committed to involving tenants in all aspects of our work and ensuring that tenants are included, informed, and consulted about decisions that have an impact on the way their homes are managed.
- 9.2 As part of this commitment we will involve our tenants in the development of our policies and seek feedback where appropriate. We will ensure that any significant changes to this Policy and other Policies which will affect our tenants will be the subject of consultation.

10. Risk Management

- 10.1 In all the key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our material risks which are regularly monitored by our Management Team and Audit & Assurance Committee.
- 10.2 Key to the mitigation of the risks associated with Damp and Mould Management is having a comprehensive policy in place to manage the process. This policy sets out Craigdale's approach to the management of the risk associated with damp and mould and its effect on health and the fabric of buildings.
- 10.3 To ensure we continue to manage the associated risks we will periodically review this Policy to ensure compliance with all legislative requirements and regulatory and best practice guidance.

11. Complaints Procedure

- 11.1 We aim to get things right first time and provide a good quality service to our tenants and other customers. However, we acknowledge that things can go wrong and that some tenants or other customers may be unhappy with the service provided.

- 11.2 We promote our Complaints procedure through our website and periodic articles in our newsletters. This information leaflet is also issued to all new tenants as part of the signing up pack.
- 11.3 We are required to report specifically to both our Board and the Scottish Housing Regulator on any complaints concerning equalities issues.

12. Data Protection

- 12.1 On the 25th May 2018 the legislation governing data protection changed with the introduction of the UK General Data Protection Regulation (GDPR).
- 12.2 We hold a variety of Personal Data relating to individuals including tenants, waiting list applicants, factored owners, other service users, employees, and Board. Our Privacy Policy sets out the basis on which we can process and share such data with third parties, it also sets out how we will securely store individuals' data, whether electronically or in paper format. It also provides information on individuals' rights under GDPR including: to view personal data held about them by us; to request a restriction of processing of their data; the right to be forgotten and a right to object to us processing their data. In terms of the rights to be forgotten and to restrict or object to processing of Personal Data, any such requests will require to be considered on their own merits and legal advice will need to be obtained in some circumstances. We have the responsibility for accepting or refusing such requests and will do so in writing.
- 12.3 Under GDPR we are required to provide all customers whose Personal Data we hold with a Fair Processing Notice (also known as a Privacy Notice). The Notice sets out the Personal Data we process and the basis for doing so.
- 12.4 We will only keep and process Personal Data for the original purpose we gathered it for, and we will not keep it for any longer than necessary. Attached to our Privacy Policy is a table of Retention Periods for Personal Data held and processed by us. We recognise that not all Personal Data can be processed and kept for the same period of time, and this will vary depending on the individual circumstances of each person whose Personal Data we hold.
- 12.5 The Privacy Policy sets out what should happen in the event of a Data breach e.g., does the breach require reporting to the Information Commissioner's Office and whether the individual affected should be notified. Timescales are set out for dealing with data breaches.
- 12.6 Full copies of our Privacy Policy are available upon request at our office or from our website www.craigdaleha.co.uk

13. Policy Review

- 13.1 This Policy will be reviewed at least every three years or sooner to ensure it continues to reflect current thinking and practice and to comply with legislative requirements and regulatory guidance.

**Spotlight on:
Damp and mould**

It's not lifestyle

October 2021

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Foreword



When I started as the Ombudsman, one of the first cases I saw concerned damp and mould. The issues we investigated, and the experiences of residents living with it are now all too familiar.

I feel strongly these cases can be different. There are many and varying root causes that lead to damp and mould in the cases we investigate; but the impact on the resident is a thread that runs between them. You can see the distress, disruption, even embarrassment, felt by the resident. You can see the evident concern about their health and well-being, especially mental health; the impact on any children. Whether or not we uphold their complaint, this experience is real, and it is profound. It also reveals the strain on the resident and landlord relationship; the loss of trust and reputation.

These are circumstances that no one working in social housing should want to see. We decided to produce this report because of the high uphold rate and reoccurring reasons leading to maladministration. In the context of Covid-19, looking at housing conditions felt important, and the media stories we have seen throughout this year has reinforced the need for an examination. I know many housing professionals, who are passionate and committed to improving housing conditions, are alarmed by the stories they have seen. I recognise the challenges sometimes presented for landlords in tackling this problem; overcrowding, poverty, the age and design of homes. That's why this report, more than any other investigation we have done, identifies best practice and innovation within the sector.

Yet evidently there are also other deep-rooted reasons why landlords are sometimes falling short, evidenced by our high maladministration rate. These require changes in culture, behaviour and approach by them; from being reactive to proactive, and from inferring blame to taking responsibility. Our unique and entirely independent perspective as an Ombudsman provides important lessons and practical recommendations that are within the landlord's control. Our 26 recommendations are based on hundreds of investigations across 142 landlords – a really powerful body of evidence – more than 500 responses to our call for evidence and candid discussions with residents and landlords. It contains learning for everyone whatever their role. Nor is any landlord exempt from this learning; yes, urban high-rise presents more challenges, but one of the landlords we investigated manages fewer than 50 homes.

Our view is that landlords should adopt a zero-tolerance approach to damp and mould. This does not mean zero cases. But it does mean less fatalism. Fatalism that can sometimes result in a loss of empathy. The policy and legislative basis for taking a zero-tolerance attitude is compelling. It is clear many landlords are reacting to

residents rather than proactively reviewing the homes and buildings they manage or lease. Landlords should be on the front foot identifying potential issues which, given the age of some social housing, are likely to be more extensive than we have seen. Intelligence, data, and complaints should inform this strategic approach, which we know that some landlords are successfully taking. When there is a problem, effective diagnosis is critical. My view is landlords would also benefit from a consolidated and comprehensive policy in relation to damp and mould if they have not already adopted one. Establishing a clear and transparent framework on the landlord's approach to diagnosis and use of independent expertise; the steps they would take depending on whether the issues are structural or not; timescales, effective communication and appropriate mitigations; and after care. This approach would give the landlord and its residents insight and clarity. If such a comprehensive policy already exists, it may be time to review it.

This leads to the most sensitive area – the inference of blame on the resident and the associated onus on them when it is often not solely their issue. Our call for evidence revealed an immense frustration and sense of unfairness at the information residents are sometimes provided by landlords about issues like condensation and mould. This reoccurred so often it is appropriate to call it systemic. I met with residents who spoke about feeling patronised, even stigmatised. While I appreciate this is not intended, I would urge engagement with residents to review communication and literature, working together with them to co-design meaningful advice that shares responsibility and supports them at a distressing time. In doing so I hope the word 'lifestyle', when it may be a consequence of limited choices, is banished from the vernacular.

Although these steps may reduce complaints, it remains critical for complaint procedures to be accessible and responsive. Landlords need to 'find their silences' where complaints are not being raised when all indicators suggest there may be issues. It is profoundly wrong for any resident to feel their best option is to resort to the courts or media. Effective complaint handling is preferable to increasing disrepair claims, which may take longer or leave the issue unresolved. It is also important to remember the Ombudsman may order an independent inspection following an investigation and actions to resolve repair issues. It remains the individual's choice to pursue legal action, but the pre-action protocol on housing conditions encourages the use of alternative dispute resolution. Yet we have seen the complaints process being closed once the protocol commences. This is a missed opportunity to use the complaints process to its fullest potential and resolve issues in a less adversarial way. It is my opinion that the protocol does not constitute proceedings. Our jurisdiction guidance for landlords has been revised to make this clear and how complaint procedures and the protocol should work together is set out in this report. This should empower complaints teams to resolve issues, and I am also asking the Ministry of Justice to strengthen the protocol further to promote the use of the complaint procedure.

When we took the decision to conduct this investigation, damp and mould was not yet the focus of debate about social housing, but we have seen attention shift over the course of the last six months. Alongside building safety and net zero, it is clear

that a strategic response to damp and mould is required, particularly in the context of decarbonisation. The Decent Homes review is also an opportunity to consider these issues afresh. A better, fairer, more reasonable approach can be achieved and I would encourage landlords to share how they may do things differently with residents over the coming months.

Richard Blakeway
Housing Ombudsman

Our jurisdiction

We can consider complaints from the following people¹

- A person who has a lease, tenancy, licence to occupy, service agreement or other arrangement to occupy premises owned or managed by a landlord who is a member of the Housing Ombudsman Scheme
- An ex-occupier if they had a legal relationship with the member at the time that the matter complained of arose
- A representative or person who has authority to make a complaint on behalf of any of the people listed above

This means that, as well as considering complaints from tenants, we can also accept complaints from leaseholders and shared owners. The only category of homeowners who are not eligible to bring a complaint to the Housing Ombudsman about a member landlord are those who own the freehold of their home.

However we cannot consider complaints where:

- The landlord/managing agent is not a member of the scheme
- The complainant does not have a landlord/tenant relationship, including leaseholders and shared owners, with a member landlord/managing agent
- The landlord complaints procedure has not been exhausted
- They concern matters that are, or have been, the subject of legal proceedings and where the complainant has or had the opportunity to raise the subject matter of the complaint as part of those proceedings
- That involve the level of service charges or costs associated with major works
- They fall within the jurisdiction of another Ombudsman, regulator or complaint handling body.

¹ Para. 25 of the Housing Ombudsman Scheme lists the people who can make a complaint to the Ombudsman.

Summary of recommendations for senior management

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

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.
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.

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

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.
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.
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.
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.
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.

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.
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.

Background and methodology

Overview

No one can have failed to have been shocked by the conditions some residents evidenced in media coverage earlier this year. While most social housing is of a decent standard it is clear this is an area where, compared to others, residents feel a great deal of frustration and dissatisfaction. Cases like those shown in the media are thankfully a minority, however, even one such case is one too many. The recent media coverage clearly demonstrates the significant impact on residents when things do go wrong, complaints are not responded to appropriately, and lessons are not learned.

There is a strong legislative and policy basis to prevent these issues arising but it is clear that despite this, residents are still facing problems, sometimes extreme problems, and landlords are struggling to resolve these. This means we need a fresh approach.

This report is published as we move into the time of year when damp and mould is more prevalent and a rise in reports of damp and mould is probable this year as people have been spending more time at home due to the Covid-19 pandemic and subsequent changes to working patterns.

Following each news report, we reviewed our own casebook and identified that none of the cases featured had been referred to us for consideration. We are deeply concerned that we did not see any of those cases where we could have helped. The call for evidence helped us ‘find our silence’ and we have since seen a 50% increase in complaints about damp and mould.

The media investigation and our call for evidence highlight how vital it is that landlord complaint processes are accessible and effective for residents. Clearly there is also an awareness issue with our own service, and we have initiated a project to widen access to complaints in response².

The nature of an Ombudsman’s role means that we are more likely to see cases where things have gone wrong than cases where they have gone right. We also know that some landlords are doing excellent work in this space. As such we have highlighted examples of good practice throughout this report to help landlords make improvements to both their services and residents’ lives.

This report prompts learning for three groups within landlords. Our case studies provide learning points for case handlers. Our recommendations are aimed at senior management to consider their organisation’s approach. In our final chapter we ask a series of questions for governing bodies to discuss and seek assurance on, and

² [Housing Ombudsman launches project on widening access to complaints - Housing Ombudsman \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk)

strongly encourage any learning as a result of this report, or wider work by the landlord, be shared with residents.

Legislative requirements

There are legislative requirements setting out what is considered to be a decent home. The Decent Homes Standard was updated in 2006 to take account of the Housing Health and Safety Rating System (HHSRS), which replaced the Housing Fitness Standard¹. According to the Standard, for a home to be considered 'decent' it must:

1. Meet the current statutory minimum standard for housing
2. Be in a reasonable state of repair
3. Have reasonably modern facilities and services, and
4. Provide a reasonable degree of thermal comfort.

However, the Government's Social Housing White Paper identified that the Decent Homes Standard does not "reflect present day concerns".

The Homes (Fitness for Human Habitation) Act 2018 amended the Landlord and Tenant Act 1985, with the aim of ensuring that all rented accommodation is fit for human habitation. While it did not create new obligations for landlords, it required landlords to ensure their properties are fit for human habitation at the beginning of, and throughout, the tenancy. The Landlord and Tenant Act does not define "fit for human habitation", but consideration should be given to repair, stability, freedom from damp, internal arrangement, natural lighting, ventilation, water supply, drainage and sanitary conveniences, facilities for preparation and cooking of food, the disposal of wastewater and any prescribed hazard.

The Act also strengthened tenants' means of redress where landlords do not fulfil their obligations, with the expectation that if tenants are empowered to take action against their landlord, standards will improve. The Act gives the tenant the right to take their landlord to court and can therefore be costly if the court does not find in the landlord's favour. For registered providers, it has led to an increase in speculative disrepair claims from solicitors on a "no win no fee" basis. This is not necessarily the most effective route to resolution for residents as some registered providers will settle the claim out of court while the underlying disrepair issue remains outstanding.

Social housing compared to the private rented sector

According to the 2019-20 English Housing Survey³, serious condensation and mould problems were present in at least one room in 133,000 (3%) social sector homes and 192,000 (5%) of homes lacked thermal comfort. Homes built between 1981 and 1990 were most likely to fail the decent homes standard for thermal comfort.

Although damp and mould is not specifically mentioned in relation to private rented sector (PRS) properties, the survey does note that the PRS had the highest proportion of non-decent homes (23%, 1.1 million). In comparison, the social housing sector had the lowest proportion of non-decent homes (12%, 504,000). We heard

³ [English Housing Survey 2019 to 2020: headline report - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/681117/english-housing-survey-2019-to-2020-headline-report.pdf)

from private tenants in our call for evidence, many facing problems with damp and mould. Given our mandatory membership consists of social landlords, the PRS is considered outside the scope of our recommendations but private tenants' responses evidence the need for redress to be strengthened across the housing market.

Health and well-being

One of the areas where we see damp and mould having the greatest impact is on health and wellbeing. This came across repeatedly in our casework and in our call for evidence, with distress and health issues referenced in almost every case. While our investigations do not find causation with health conditions, we do consider the detriment, and this is a reoccurring factor where we find maladministration.

Residents living in homes with damp and mould may be more likely to have respiratory problems, allergies, asthma, and other conditions that impact on their immune system⁴. This, set against the context of the COVID-19 pandemic, highlights the potential seriousness of this issue for residents. There are also other broader impacts on the mental health, education and career prospects of residents living with damp and mould, highlighting why there is a real urgency for change.

Methodology and structure of the report

In addition to reviewing our casebook for the last two financial years, we also conducted a call for evidence that ran for seven weeks during April to June 2021, asking for assistance from both the public and sector professionals to inform our understanding. We held discussions with landlords and with several representative bodies, including the National Housing Federation, the G15 organisation and the Northern Housing Consortium. We also held discussions with our Resident Panel and the Tenant Participation Advisory Service.

This report will set out the data from our casebook before moving onto the insight we gathered from the call for evidence. We will then explore the four themes identified by the datasets and our discussions, making recommendations, and using case examples to illustrate our findings, before drawing conclusions and setting out the next steps.

⁴ [Can damp and mould affect my health? - NHS \(www.nhs.uk\)](https://www.nhs.uk/health-topics/damp-and-mould/)

Key data

Overall complaint volumes and outcomes – April 2019 to March 2021



1,595 complaints from residents about damp and mould were reported while within the landlord's complaint process and were assisted by our Dispute Support Team



410 damp and mould complaints were formally investigated because the resident was dissatisfied with the landlord's response



56% of cases we investigated resulted in findings of maladministration



976 individual findings were made within those complaints



501 orders were made to put something right with 288 additional recommendations



£123,094.57 in compensation was ordered across 222 cases, with sums over £1,000 being ordered in 21 cases

Maladministration findings related to landlord size

We investigated 142 landlords within our formal remit, finding maladministration against 92 of them; nearly two thirds of the landlords we investigated. As would be expected, the majority (52%) of the landlords we investigated were large landlords who account for the majority of social homes.

Landlords investigated by size			
	Under 1,000 homes	Between 1,000 and 10,000 homes	Over 10,000 homes
Number	8	60	74
Percentage	6%	42%	52%

The following table shows a breakdown of complaints maladministration findings by landlord size.

Maladministration findings by landlord size			
	Under 1,000 homes	Between 1,000 and 10,000 homes	Over 10,000 homes
Number	3	39	50
Percentage	3%	42%	55%

The following table shows the maladministration rate – the proportion of their cases that we find maladministration on – by reference to landlord size.

Maladministration rate by landlord size			
	Under 1000 homes	Between 1000 and 10,000 homes	Over 10,000 homes
Percentage	38%	65%	67%

While the data may appear to indicate that there is less of a problem for smaller landlords, this is not necessarily the case as will be discussed in later chapters.

Landlord performance

The following table shows landlord performance in relation to cases concerning damp and mould.

The table is ordered by maladministration (mal) findings per 10,000 homes to make a fairer comparison that accounts for the size of the landlord. The table also includes other important factors including amount of compensation paid and the maladministration rate as a percentage of all cases investigated by the Ombudsman.

All of these landlords are large landlords with more than 10,000 homes and this correlates with the perception that local councils and landlords covering high density urban areas, with a greater prevalence of flats and converted properties, have the highest maladministration rate.

Overall						
Landlord	All damp and mould cases	Cases with mal	% mal	Number of homes	Total compensation	Mal per 10,000 homes
Hammersmith and Fulham Council	20	13	65	12,022	£8,785.00	10.8
A2Dominion Housing Group	11	10	91	33,106	£10,037.22	3.0
Camden Council	10	8	80	32,351	£11,692.00	2.5
Lambeth Council	10	5	50	24,051	£2,882.00	2.0
Southwark Council	13	10	77	53,800	£3,450.00	1.9
Leeds City Council	14	8	57	56,654	£1,967.00	1.4
Clarion Housing Association	21	14	67	109,545	£5,557.00	1.3
Birmingham City Council	13	8	62	65,600	£525.00	1.2
Sanctuary Housing Association	12	6	50	75,831	£9,375.15	0.8
London & Quadrant Housing Trust	12	6	50	79,811	£3,382.47	0.8

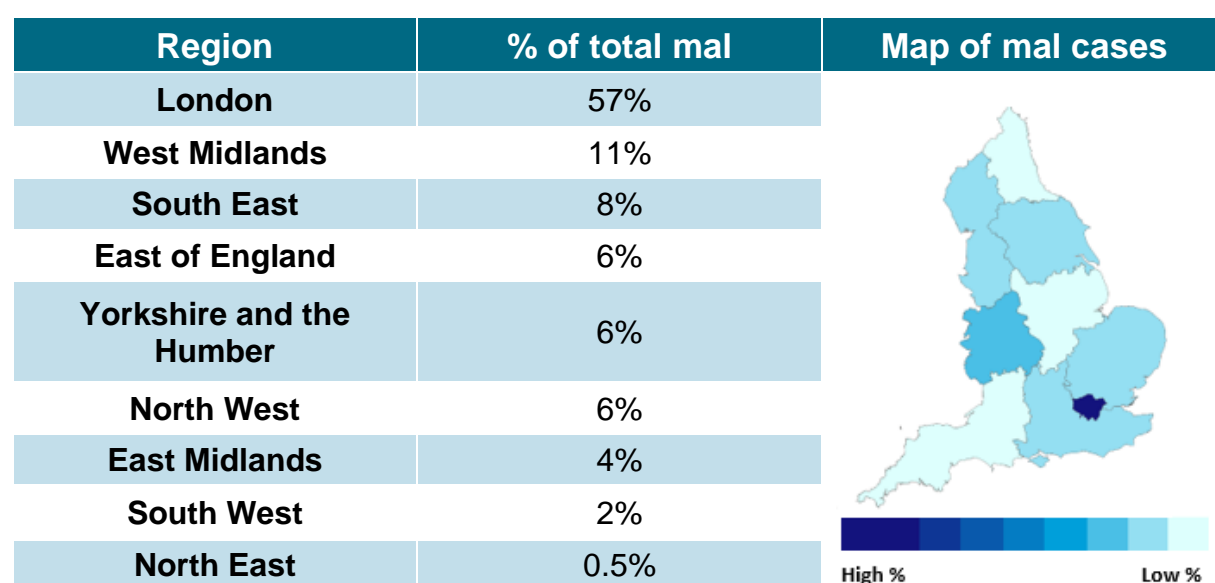
The following table shows landlord performance in relation to cases concerning damp and mould for landlords with between 1000 and 10,000 homes.

1,000 to 10,000 homes						
Landlord	All damp and mould cases	Cases with mal	% mal	Number of homes	Total compensation	Mal per 10,000 homes
Harrow Council	4	3	75	5,969	£774.00	5.0
Newlon Housing Trust	4	3	75	7,241	£4566.50	4.1
Waltham Forest Council	5	1	20	9,653	£1,130	1.0

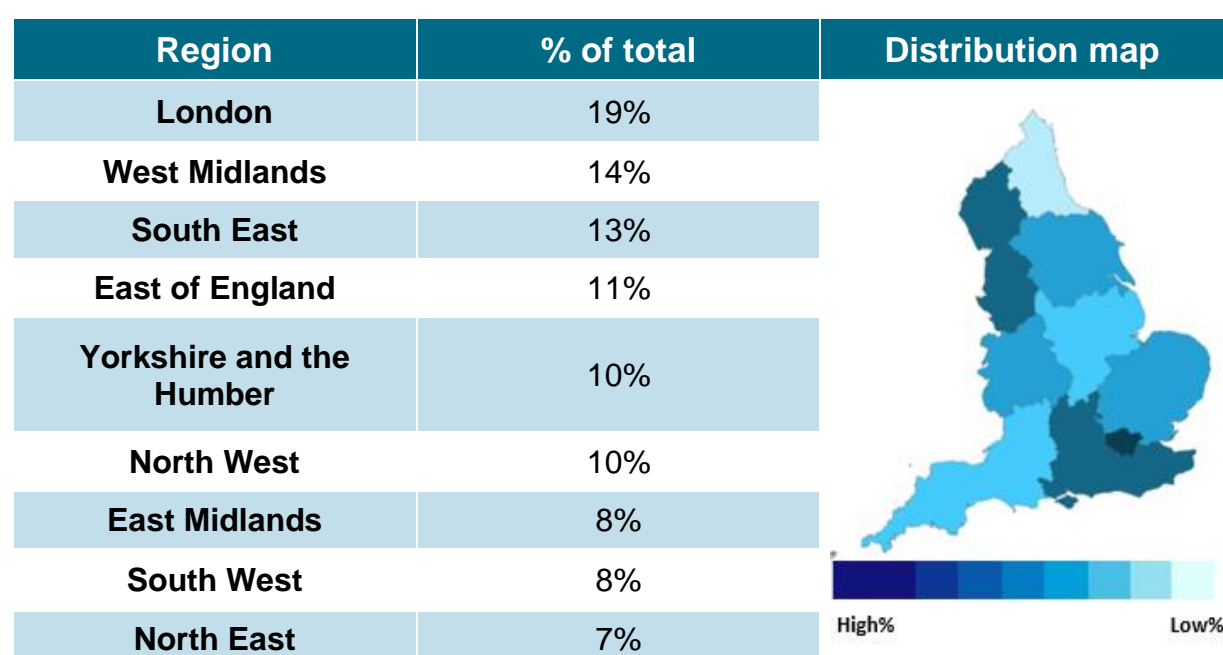
No table has been produced for landlords with less than 1,000 homes as the data for this group is highly variable and does not enable meaningful comparisons to be made.

Heat map of maladministration cases

The maps below show the geographical locations of all damp and mould cases with findings of maladministration and the geographical distribution of social housing. Although this clearly demonstrates a disproportionately higher proportion of cases in London, this could be influenced by other factors such as age profile and occupancy levels (i.e. overcrowding) of homes.




Heat map of distribution of social housing⁵



⁵ We have been unable to find postcode data for leasehold properties where the freeholder, head leaseholder or managing agent is a social landlord. Consequently, the number of homes represented are for social rent only.

Landlord response to fixing damp and mould problems

This data is a subset of the overall data above showing landlord performance in relation to dealing with reports of damp and mould. This analysis uses individual findings from the cases we investigated; a single case may have one or more findings associated with it.



We found maladministration on issues related to damp and mould in **40% of cases**



373 findings



286 orders with 189 additional recommendations



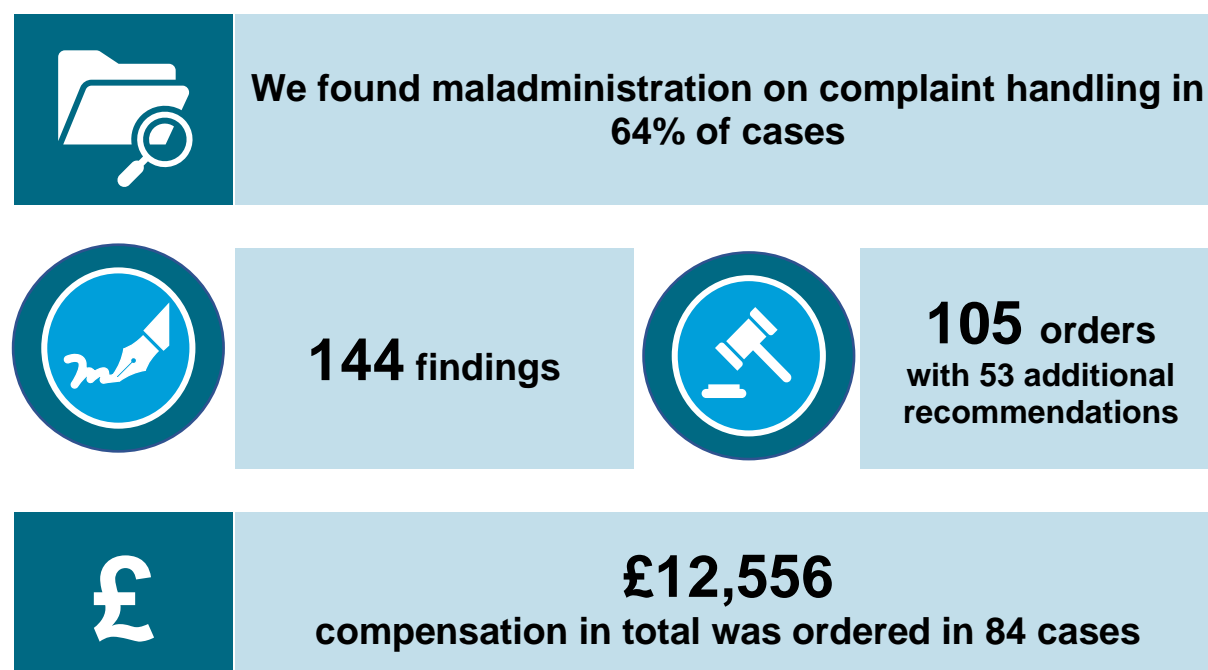
£87,553.97
compensation in total was ordered in 177 cases

The table below shows landlords with findings in relation to damp and mould. Again, local councils and landlords with portfolios in high density urban areas have the highest maladministration rate.

Landlord	All damp and mould findings	Mal findings	mal %	Number of homes	Mal rate per 10,000 homes
Hammersmith and Fulham Council	23	15	65%	12,022	12.5
Haringey Council	10	6	60%	15,106	4.0
A2Dominion Housing Group Limited	12	11	92%	33,106	3.3
Camden Council	12	9	75%	32,351	2.8
Lambeth Council	11	6	55%	24,051	2.5
Southwark Council	13	10	77%	53,800	1.9
Leeds City Council	16	9	56%	56,654	1.6
Birmingham City Council	14	9	64%	65,600	1.4
Clarion Housing Association Limited	21	14	67%	109,545	1.3
Islington Council	11	4	36%	34,594	1.2
Sanctuary Housing Association	16	8	50%	75,831	1.1
London & Quadrant Housing Trust	14	8	57%	79,811	1.0
Notting Hill Genesis	10	4	40%	50,466	0.8

Landlord complaint handling performance

This data is a subset of the overall data above showing landlord performance in relation to complaint handling when the substantive issue was damp and mould. This analysis uses individual findings from the cases we investigated; a single case may have one or more findings associated with it.



The table below shows landlords with findings in relation to complaint handling with respect to damp and mould, which is a universal factor and not directly related to the location of the landlord portfolio. Local councils generally have the highest maladministration rate.

Landlord	All findings	Mal findings	Mal %	Number of homes	Mal rate per 10,000 homes
Hammersmith and Fulham Council	7	4	57%	12,022	3.3
Camden Council	8	6	75%	32,351	1.9
Lambeth Council	6	4	67%	24,051	1.7
Southwark Council	6	6	100%	53,800	1.1
Birmingham City Council	5	5	100%	65,600	0.8
Clarion Housing Association Limited	7	6	86%	109,545	0.6
Sanctuary Housing Association	5	4	80%	75,831	0.5

Call for Evidence insights

Under the new Housing Ombudsman Scheme, we can conduct investigations into potential systemic and thematic issues. In March 2021 we published our systemic framework setting out how we look beyond individual disputes to identify key issues that impact on residents and landlords' services. A review of our case data identified that damp and mould featured significantly in our work and that compensation levels are proportionately higher, reflecting that damp and mould can have a significant impact on residents.

We used our new powers to issue a call for evidence. We invited submissions from all stakeholders, including member landlords, their residents and relevant housing professionals. The call for evidence opened on 13 April 2021 and ran until 4 June 2021.

Increased awareness

Prior to the call for evidence, we received an average of 6-7 damp and mould cases per week. This has increased by approximately 50%. During the call for evidence itself, we received 523 cases relating to damp and mould, 464 of which were from member landlords with the rest from the private sector. We referred 76 responses to the call for evidence to our dispute support team for follow up action as these were of concern.

Call for evidence survey responses



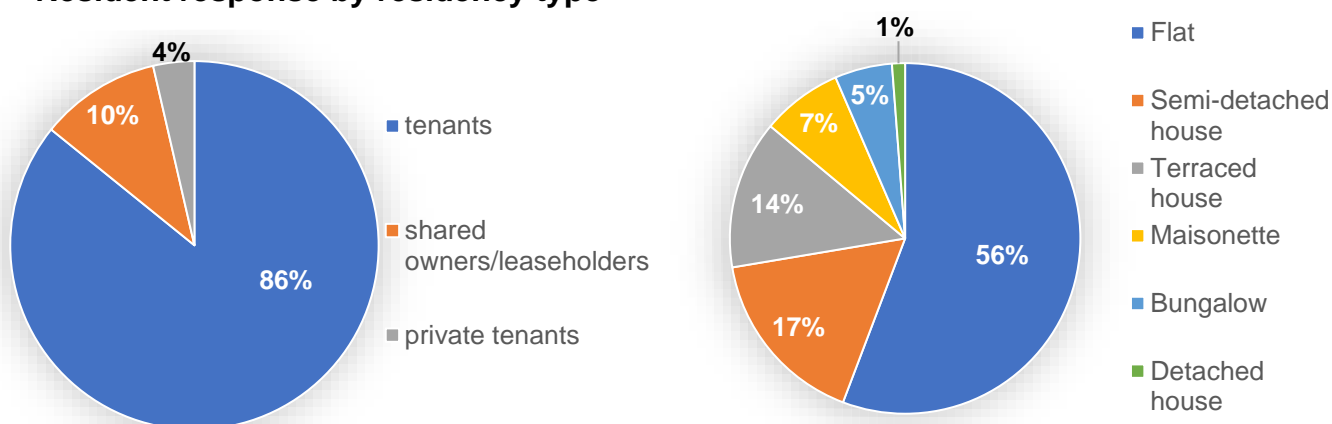
We also received 20 written responses from landlords and other relevant agencies including Citizens Advice, the National Housing Federation (NHF), the Chartered Institute of Public Health, and the National Federation of ALMOs. While these written submissions have been considered and insights from them do feature throughout the report, they have not been included in our data tables.

According to survey responses, the top three causes of damp and mould are:



Condensation was fourth with 18%. It should be noted that these causes are often not mutually exclusive, and our respondents acknowledged that some or all of the causes may be present in any particular case.

Resident response by residency type

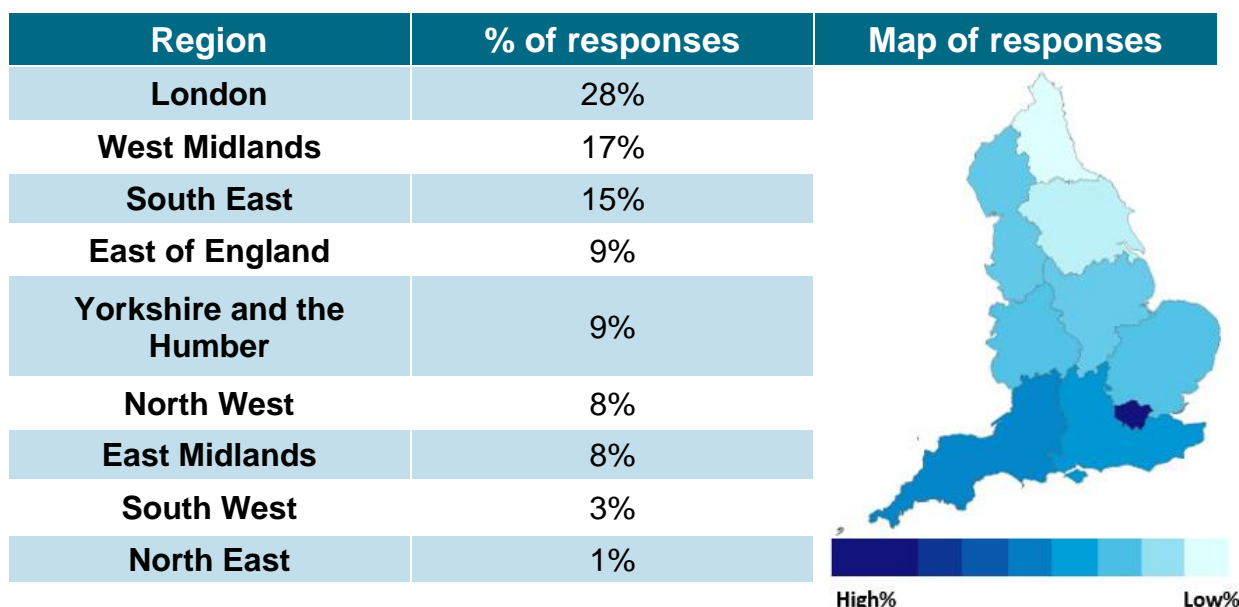


Of the 416 residents that responded to the survey, 357 said they were tenants, 44 said they were shared owners/leaseholders and 15 said they were private tenants. The Ombudsman can only consider complaints from private tenants where their private landlord has opted to be a voluntary member of the Scheme.

Most residents responding to the survey lived in a flat and are therefore likely to experience issues in addressing damp and mould issues that residents in houses do not experience, such as landlords requiring access to other properties to locate the source of a leak.

Heat Map of Call for Evidence respondents

This heat map shows the geographical location of the respondents to our call for evidence. Notably, although London is top, by comparison to the location of social housing and our maladministration findings we received proportionately more responses from the South West, which may be indicative of an emerging issue for providers in that area.



Quotes from respondents

Most people surveyed did not think the root causes of damp and mould were difficult to identify but did think they were difficult to address.

The general sense of frustration felt by residents who did not feel that they were being heard or their landlord did not seem to them to be taking their repair reports or complaints seriously was apparent from several responses.

The selected quotes below are proportionate and reflective of the responses to the call for evidence.



"It is very tiresome trying to explain to tenants it is not rising damp, time consuming and they don't believe it"

Landlord



"Most landlords will tend to blame the issue on condensation created by the tenants unless the damp has reached the water stain stage."

Contractor



"There are obvious holes and cracks in the walls. I keep the property heated properly and let out condensation ... I spend hours cleaning off mould and I can smell it when I sleep at night."

Resident



"They have been steadfast in insisting that you ventilate, open windows and keep the heating on low. I have been put off bringing it to their attention because ... there was a hostile attitude towards tenants. It brow beats you down. When even care coordinators and social workers repeat ... that the council won't do anything, you just give up."

Resident



"Landlords I feel don't care ... according to them and the person that came to my property, it's the tenant's responsibility. Which I found was an easy way out for them."

Resident



"It appears to be an issue that is dismissed ... The inspector [that came to the house] said he doesn't know why the council are doing this inspection as they are unlikely to take any action."

Resident



"There is a culture of not caring as they hear it all the time. There is a lack of involvement with their tenants which leads to a them and us culture and where issues could be dealt with quickly and efficiently, the lack of communication means things take much longer."

Resident

Chapter 1: From reactive to proactive

Zero-tolerance approach

The building safety crisis and the challenge of net zero is leading many landlords to proactively examine the homes they rent or lease. This is an opportunity for landlords to improve their approach to damp and mould by adopting a zero-tolerance approach. Both our casework and call for evidence suggest that landlords miss opportunities to address issues early on either because of a protracted diagnosis or by failing to extend their investigations to other properties within a block after a problem is reported. Moving from a reactive to proactive approach to tackling damp and mould is essential to improving the experience of residents.

The need to address damp and mould has been raised in successive policy measures, including legislation, seeking to improve the conditions of homes. The Government has also said it will review the Decent Homes Standard, as it does not fully reflect present day concerns.

Our investigation indicates that addressing damp and mould needs to be a higher priority for some landlords. A proactive attitude needs to be the bedrock of a revised approach. We are aware that some landlords are revising their approach, but this is not necessarily universal.

Nor is it evident that all landlords have a clear, comprehensive, and consolidated framework, or policy, to respond to damp and mould. This means that landlords may need to rely on different policies or procedures to inform their response to the resident, such as their repairs policy if there are structural issues. This can lead to a lack of clarity and inconsistency and make it harder to manage the resident's expectations. Such a policy or framework would ensure a shared understanding and approach across different teams within the organisation, to reduce the risk of silos.

Good practice – a consolidated, comprehensive policy

One council has implemented a specific damp and mould policy with the key principles of ensuring they provide dry, warm, healthy homes for their tenants, and to ensure that the fabric of the buildings are protected from deteriorating due to damp and mould.

The policy also outlines their approach to proactive and reactive investigations, planning of resources in anticipation of periods of higher demand, budget management to reduce instances of damp and mould and ensuring staff have the correct equipment to assess cases.

The policy clearly sets out how they will achieve those aims with a focus on reducing condensation, recognising the health risks of living with damp and mould, staff training to enable them to spot risk factors and understand the stock portfolio. They are also committed to seeking out and adopting best practice from other organisations.

Recommendation 1 for senior management

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.

Recommendation 2 for senior management

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.

Reducing over-reliance on residents to report issues

It is evident that many landlords have been too reliant on residents reporting issues. We have also heard from landlords that many of their customers complained after having to chase missed appointments and report recurrence of damp and mould in their homes. Landlords should consider proactive actions to identify homes that have, or may be at risk of, developing problems rather than waiting for their residents to report issues.

The challenges which some residents face in accessing complaints procedures may also mean issues are not being addressed. Responses to our call for evidence suggest some residents may simply give up reporting issues to their landlord where trust has been eroded. This means there is likely to be a gap between what is known by the landlord and the true extent of these issues. By taking steps to 'find your silence' landlords can reduce the size of that gap.

Options include surveying residents, especially where there have been previous reports of damp and mould, or identifying underrepresented groups who are not approaching the landlord.

Recommendation 3 for senior management

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

Understanding and managing risk

Where we have found maladministration, it is often because the landlord missed opportunities to identify and address problems earlier in an individual case. This lesson can be applied across all the homes for which the landlord has responsibility. We have found some landlords are proactive in their approach and use information held about the homes and households on their systems to ensure they understand the risk profile in relation to damp and mould. This includes exploring to see if there

are wider problems within a building or linking reports to other cases thereby avoiding additional time, cost, and impact on their residents at a later stage.

Crucially the way we use our homes has changed significantly over the last 18 months as a result of the COVID-19 pandemic and this change may extend into the future, potentially altering the risk profile of properties for damp and mould.

Landlords should consider how they incorporate these changes into the intelligence they hold about their stock.

There are a range of factors that will affect the risk profile of a property which we have divided into two categories: structural and occupancy. Structural factors include property age, design, and modifications. For example, certain types of properties such as converted street properties, buildings of concrete construction or traditional solid type construction are more susceptible to damp and mould than others and can require significant investment to address the issues.

Occupancy factors may include overcrowding and the availability and use of heating and ventilation systems. They also include individual circumstances such as disability, financial hardship, and health conditions. Proactive management could potentially involve checks from landlords to assure themselves about the condition of the property. While the upfront cost may be significant, this can aid resolution and reduce the time and cost of repeat visits to the same properties to respond to damp and mould issues.

Good practice – Adopting a data led, proactive approach

Following a review of current approaches and interventions in response to damp and mould, one large landlord adopted a data-led, proactive approach and have implemented eight key changes. They have building reports based on where they have known issues with damp and condensation to help identify building typologies, locations, property age and tenancy types that are more vulnerable to condensation, damp, and mould. The model will be used to proactively target properties for specialist interventions before problems arise.

In 2018, another large landlord undertook a pilot scheme in one of their estates. They completed a risk assessment of nearly 300 homes to classify properties as low, medium or high risk of condensation, damp, and mould. Interventions for the homes included:

- Low risk: 1-to-1 energy advice and anti-mould paint applied to affected room(s).
- Medium risk: as low risk plus a smart heating controller.
- High risk: as medium risk plus a centralised mechanical extract ventilation system.

On review a year later 100% of residents reported that their condensation, damp, and mould issues had been rectified. The landlord concluded that the use of risk assessments enabled targeted interventions.

Recommendation 4 for senior management

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.

Recommendation 5 for senior management

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.

Case study – Landlord failed to take proactive action to ensure property was of a decent standard

Within three months of moving into his home, Mr A reported that the wall in his bedroom was wet and there was extensive mould. On inspection, the landlord found wallpaper that had been put up a week earlier was already peeling off, the underside of the carpet was mouldy, and the wardrobe and drawers were also mouldy. A damp survey indicated there was no evidence of damp in or around the bedroom wall. Mr A submitted a claim for damage to his belongings, which the landlord acknowledged and advised it would respond to on receipt of a technical survey.

Following a further inspection, the landlord noted the ventilation brick had been blocked by expanding foam, which it attributed to the previous tenant. The landlord ordered the installation of additional air bricks in three rooms and offered Mr A £250 for the damage to his belongings which he accepted. Mr A was decanted for remedial works to start but an inspection a week later noted the remedial works had not solved the problem and the property was uninhabitable due to the *“foul smell and sheer amount of mould growth.”* The landlord ordered further air bricks and left the property to dry out.

Three months later, the landlord ordered further remedial works including the removal of plaster in the hallway and bedrooms, and the installation of foil-backed plasterboard. It subsequently fitted new flooring, a new radiator and adjusted the internal doors which had swollen due to the amount of moisture in the property.

Mr A submitted a complaint and received two letters from the landlord on the same day. One acknowledging the complaint and outlining the timeframe for a response, the other summarising the complaint and advising an offer of compensation would be made shortly. After not receiving an offer of compensation, Mr A asked for his complaint to be escalated. In its response the landlord offered to pay a cleaning company to clean his sofa, carpet, and cushions, to replace Mr A's bed and bedding and £500 in recognition of the disruption caused.

Mr A accepted the offer apart from the cleaning of furnishings, as he wanted to replace the sofa instead and brought his complaint to the Housing Ombudsman.

Outcome

We found service failure in the landlord's response to the reports of damp and mould and its complaint handling. We found the landlord had not adequately inspected the property prior to re-letting it and had failed to inspect the ventilation bricks. The landlord acknowledged the property was in such a poor state that it should not have been re-let. We also found the landlord delayed unreasonably in responding to Mr A's reports and that it did not follow its complaint policy. We ordered the landlord to pay the £870 to Mr A directly instead of the cleaning company so Mr A could replace his sofa. We also ordered the landlord to replace the items and pay the £500 in compensation as per its final offer.

Learning

Landlords should ensure that they thoroughly inspect empty properties before re-letting them and consider whether the property is suitable for re-letting in its current state. If a property is not suitable for re-letting, landlords should ensure works are completed to bring it to a reasonable standard before it is re-let. If this is not possible, landlords should manage the property in accordance with its disposal policy.

Questions for landlord complaint handlers

- What processes do you have in place to ensure properties are of a reasonable standard before being re-let?
- Does your void checklist cover the repairs history of the property as well as checking ventilation such as air bricks and extractors?

Disposal and regeneration

Landlords should be especially mindful of how they respond to reports of damp and mould in stock that may be nearing the end of its life or is within an area earmarked for future regeneration as this may influence how staff deal with such reports. The regeneration process can be complex and costly, but landlords still have an obligation to ensure the homes they provide are of a decent standard.

Landlords should consider the condition of properties identified for regeneration and that ensure appropriate steps are taken to mitigate against the risk of homes degrading into an unacceptable condition through reduced investment and maintenance. This includes regular resident engagement and communication to manage expectations and enable open dialogue. Crucially, landlords should remember that their asset is someone's home, and they should not receive a lesser service than residents living in other areas.

Recommendation 6 for senior management

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.

Occupancy

Where the cause of damp and mould is non-structural it can be too simplistic to blame residents for drying their laundry on radiators if there is no space in their home for a tumble dryer or the weather is poor, other than those residents fortunate enough to have outdoor space.

Occupancy factors do not mean that the landlord has no responsibility, and landlords should recognise that some homes were not designed with modern living in mind. Landlords should take reasonable steps in partnership with residents in these circumstances including considering improving ventilation or other appropriate measures.

Insight from the Call for Evidence

“Change the thought process from an industry consideration that it’s always condensation and lifestyle – instead of seeing how the lifestyle needs to be adapted to suit the property – how can the property be adapted to suit the lifestyle.”

Landlord

Recommendation 7 for senior management

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.

Communication with residents

Throughout this investigation, residents expressed strong reservations about the tone, suitability, and practicability of some of the advice and information they were provided by landlords. Landlords have also acknowledged to us that some of the information they are providing is not having the impact they expected. This aspect is considered in more depth in Chapter 2.

Advice can be a useful tool in a landlord’s response, but the advice should be unambiguous and easy to understand; for example comparing the cost of running mechanical ventilation to the cost of running everyday appliances rather than stating “6p per hour” and clearly stating how long a window should be left open or a fan should be turned on after cooking. Providing customised advice to residents at

tenancy sign up about how to best manage the environment within their home can help to prevent damp and mould occurring.

Landlords should ensure that any information available for residents is accessible to all. Several landlords reported they had specific damp and mould mini-websites which, whilst a good preventative tool, could be inaccessible to some residents.

Landlords should use their resident engagement mechanisms to involve residents in the design of their information resources to ensure they are accessible and easy to understand. Where a particular format is not working for a resident, landlords should consider how they can adapt their approach to ensure a positive outcome for both parties.

Recommendation 8 for senior management

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.

Maximising opportunities for intervention

Periods of time where the house is not inhabited (known as void periods) are an ideal time to proactively respond to damp or mould issues before the incoming resident moves into the property.

Whilst landlords may have re-let targets, this should not drive poor service provision to the incoming resident. Our casebook shows that this is a particular problem for mutual exchanges where residents are expected to accept the property “as seen”. If landlords are already aware of reports of damp and mould, they should be transparent with the incoming resident at an early stage to make them aware and to resolve the matter as soon as possible.

Insights from call for evidence

“...I had it suggested to me by a housing officer to do a property swap with someone else and hope they don’t notice it. Desplicable.”

Resident

We have investigated complaints where the landlord has argued that the resident accepted the property in its current condition and therefore, they have no obligation to resolve their complaint of damp, or mould. This is unreasonable, and landlords have an obligation to provide a decent home that is fit for human habitation regardless of the condition of the property at the start of the tenancy.

Good Practice - Using the void period

One landlord’s void standard requires the replacement of all faulty fans or upgrading existing fans with improved design trickle-fed humidistat units. They also ensure doors and windows are serviceable and can effectively ventilate the property and apply mould treatments where necessary.

Another landlord's void standard requires operatives to clean extractor fans to ensure they are working well, and they install mechanical ventilation to any void property that shows signs of condensation or mould.

A council completes a damp profile survey during the void period whilst another completes works during the void period to bring properties up to an EPC B rating.

Case study – Landlord policy prevented resident from reporting inherited damp and mould issues

Ms F moved into her home following a mutual exchange and immediately raised several repair issues with the landlord including damp and mould. The landlord told her that as she had taken the property under the mutual exchange process, she would have to wait six months before repairs to be actioned, except for emergency repairs.

Ms F submitted two complaints to the landlord, approximately five months apart. She complained about the outstanding repairs including that she could not use her lounge due to damp and mould, missed appointments, dissatisfaction with repairs and in the second complaint, the landlord's handling of the complaint. The landlord responded acknowledging that its service had fallen below the standard expected, apologised for the inconvenience, and outlined a list of repairs it had completed and those outstanding.

Ms F asked for her complaint to be escalated, stating some repairs listed as completed had not been and that as she had not been able to live in her home properly for a year, she was seeking legal advice regarding compensation. She subsequently confirmed that she was seeking compensation for the inconvenience, stress, delays, not having full use of her home, the impact on her health and the damage to her belongings.

The landlord arranged a survey which stated Ms F was living in damp rooms; mould growth behind the wallpaper in the bedroom was inevitable and was already evident in the lounge. The report recommended internal waterproof tanking and plastering was completed *“as soon as possible to allow a decent standard of living.”* Ms F was subsequently decanted from the property for six weeks while works were completed. After returning to the property, the landlord offered £512.92 in compensation for belongings that had been damaged. Following negotiations between the landlord and Ms F, this was increased to £1,827 in recognition of the damage to her belongings and the gas and electricity costs incurred during the time she was decanted. The landlord also offered a goodwill gesture of £750. Following contact from the Ombudsman, the landlord explained its compensation policy had changed and increased its goodwill gesture to £1,275.

Outcome

We found that it would have been appropriate for the landlord to apply its compensation policy and provide a refund of 20% of the rent for the period in question. We found maladministration for the landlord's response to Ms F's compensation request and ordered the landlord to pay the resident an additional

£1,075 in compensation relating to the period the property did not meet the decent living standard.

Learning

Landlords should ensure that their policies do not treat residents who have accepted a property through the mutual exchange process differently to residents who have been allocated a home through the usual allocation process. Regardless of how a resident came to reside in their home, landlords have the same legal obligations to maintain the home to a reasonable standard and respond to reports of repairs in a reasonable manner.

Questions for landlord complaint handlers

- Does your policy treat residents differently depending on how they came to live in their home?
- How do you ensure that homes allocated through mutual exchange are of a reasonable standard?

Recommendation 9 for senior management

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.

Fit for the future

The social housing sector has significant challenges ahead on its journey towards net zero carbon. Updated building regulations will require all new homes to reduce carbon emissions by 31%, but the question for landlords is how to bring ageing homes, and residents who live in them, on the journey. This was a point which came across strongly during our evidence session with landlords.

Landlords have already been retrofitting modern solutions to homes in the form of double glazing, upgraded heating systems, modern insulation, and ventilation. Retrofitting homes with modern technology can prevent damp or mould and can improve the efficiency of the home, but evidence indicates that it can also have unintended consequences, particularly where adequate mechanical ventilation is not installed to counter the building being “sealed”. There are also significant issues with the higher costs of running electrical heating, compared to gas. Some landlords have committed to contributing to heating costs to mitigate against the higher cost of electrical heating for their residents.

Landlords need to be confident their net zero carbon strategy considers and plans for how they can identify and respond to these unintended consequences which may increase the prevalence of damp and mould in their residents’ homes.

Insights from Call for Evidence

“Older properties where we have retrofitted new windows and doors or central heating systems cause the property to sweat.” [Landlord response]

“Retrofitting energy efficiency measures such as double glazing over the last 30 years designed to make houses more efficient and lower energy bills have improved the airtightness of our homes but are making this situation worse, there has been no requirement to assess the ventilation strategy employed which means the home cannot breathe and the moisture-laden air can’t escape. As a result there is a build-up of water vapour causing condensation and increasing the risk of mould forming.”

Ventilation manufacturer, installer and surveyor

Recommendation 10 for senior management

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.

Chapter 2: From inferring blame to taking responsibility

Avoiding blame

Our investigation found that complaints about the landlord's response to reports of damp and mould are more likely to occur where the landlord has not taken responsibility for resolving the issue. Where landlords do not take responsibility, their response is unlikely to be effective or timely. There is also usually poor communication with the resident and associated remedial works can become protracted.

An effective response begins when the resident first contacts the landlord. It is crucial that landlords avoid paternalistic attitudes, automatically apportioning blame or using language inferring blame on the resident. We have seen examples of this with landlords initially assuming that the cause is condensation due to the resident's 'lifestyle'. The term 'lifestyle' suggests that it is a resident's choice to live in that way. As noted in the previous chapter, this was a common and reoccurring theme in the call for evidence and can lead to the relationship between the resident and the landlord deteriorating and result in missed opportunities to address the problem.

Insights from Call for Evidence

"...most common mistake is assuming that condensation will be resolved by adjusting heating, ventilation, or 'atmospheric moisture input' – serves to focus blame on the tenant or their 'lifestyle'."

Chartered Institute of Environmental Health

"...they talk about the problem being caused by cooking/breathing/bathing/lack of air circulation. All of which is possible and factual but when foundation bricks are literally breaking down into dust and brickwork on outside is in need of repointing with visible green mould growth and a history of leaking roof and gutters unblocked for several years which all cause greater damage and problems..."

Resident

It is clear some landlords are revising their approach in response to residents raising these concerns. For instance, one landlord explained how their perspective had changed and it now recognises that in many cases 'lifestyle' issues are *"more about the challenging realities of modern life in social housing settings than quick behavioural fixes: families grow but available space doesn't"*. Its research has also shown a strong link between fuel poverty and damp and mould, with 44% of 10,000 homes surveyed experiencing fuel poverty, and over 25% experiencing mould issues.

Good Practice - Taking a holistic approach

One landlord's programme seeks to tackle issues of damp and mould by looking at a property as a whole and the pattern of mould, installing humidity and temperature sensors, and supporting behavioural change where necessary. As part of the programme, during visits the landlord identifies any factors that may lead to mould rather than just cleaning the mould. It identified fuel poverty as often an understandable cause of residents neither heating nor ventilating their homes adequately and, therefore as part of this programme, support is offered to help people manage their heating costs in a way which avoids the risk of damp and mould issues.

Recommendation 11 for senior management

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.

Record keeping

It is evident from across our casework that some landlords struggle with record keeping, even at a basic level, and damp and mould complaints are no exception. Improving record keeping would result in significant benefits for both landlords and residents.

For individual complaints it would enable accurate information to be shared across teams and with residents which would improve the landlord response. It would also assist our investigations by improving our understanding of the situation at the time of the landlord response. More broadly, it would allow the landlord to better understand the resident, the history of the property and previous actions in relation to both so that they can consider the most appropriate response.

For landlords to have an effective proactive and risk-based approach to managing damp and mould across their homes – as outlined in the previous chapter – it will need to be data-driven and heavily reliant on accurate records. For some landlords this will mean significant investment in their systems.

Recommendation 12 for senior management

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.

Timely response

It is imperative that residents are not left living with damp and mould for an extended period. However, a consistent theme identified through our casework is a lack of timely response from landlords. This not only increases the frustration and

discomfort of the resident but can lead to problems worsening and becoming more complex and intrusive to resolve. This reinforces the importance of focussing on an accurate diagnosis at an early stage.

Good practice – urgency of response

One landlord aims to respond to reports of damp and mould on the day they are reported with works such as mould washes completed, and advice provided at the visit. If the job is likely to take longer than two hours or is more complex, it is referred to the supervisor who will also attend the same day or at a time agreed with the resident. The supervisor will identify any work required and if the resident's circumstances appear to be a contributory factor, advice is given along with a hygrometer. Any contributing factors are referred to the housing management team. If the supervisor is unable to identify the cause, or the cause is disputed by the resident, the matter is referred to the asset management team for a survey or to a third party if a solution cannot be agreed upon.

Landlords should recognise that issues can have an ongoing detrimental impact on the health and well-being of the resident and should therefore be responded to in a timely manner. Landlords should consider appropriate timescales for their responses to reflect the urgency of the case and set these out clearly for residents so their expectations can be managed. In addition, landlords should ensure that any follow up appointments are booked for as soon as possible.

Recommendation 13 for senior management

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

Missed appointments

Missed appointments are a frequent reason for an ineffective response, resulting in jobs being closed prematurely or residents having to repeatedly chase the landlord.

Landlords must ensure that jobs are not closed before they are fully resolved and that new appointments are booked quickly. If landlords are aware an appointment will be missed, they should inform the resident early on and rearrange it at the same time.

We are aware that there will be instances where appointments are missed because it is not possible to gain access to the property. Landlords should have processes in place to follow up with the resident to rearrange the appointment promptly.

Case study – Landlord took five years to resolve report of damp

Ms B first reported damp in 2014 and subsequently made a complaint. The landlord's final response in December 2015 confirmed it had found damp in broadly the same areas as those found in an earlier inspection in 2014. It noted the persistent or reoccurring damp had existed at the property for a considerable amount of time. The landlord accepted that the need for a specialist damp report had repeatedly been identified but not actioned and during this time Ms B had been left

for extended periods of time without bathing facilities or with no water supply to the kitchen. The landlord recommended that a programme of outstanding works was produced, a member of staff was identified as a single point of contact and Ms B was kept informed of intended actions and timescales.

In 2016, Ms B expressed dissatisfaction that little progress had been made in six months, and by February 2017 the outstanding works were still extensive. Ms B complained about the length of time works were taking and raised concerns that she had been paying rent for a property she could not live in since 2015.

In its response to Ms B's second complaint, the landlord advised that the rent rebate was in dispute and noted she had arranged her own accommodation rather than waiting to be decanted by the landlord. It explained how it would calculate any rent rebate owed, taking into account the period of time Ms B could not reasonably have been expected to live in the property and the estimated cost of alternative accommodation if it had been provided by the landlord. The landlord also advised the resident that she should claim for any damage to her belongings on her own contents insurance or under the landlord's policy if liability was accepted.

The matter of compensation for the periods Ms B considered the property to be uninhabitable remained under dispute. Ms B stated she had to vacate the property on three occasions between 2014 and 2017, and at the time of her complaint to the Ombudsman, she was still not residing at the property. The landlord's position was that Ms B only needed to vacate the property between April and July 2017 when damp work and occupational therapy adaptations were completed. The landlord maintained that whilst it accepted Ms B could not live in the property alone, it was not unfit for habitation. In November 2018, the landlord asked Ms B to confirm when she would return to the property.

Following further works that would ordinarily have been the resident's responsibility, the landlord confirmed in May 2019 that the property was ready for Ms B to return to. It advised any compensation due would be calculated by the complaints team the following week. At the time of Ms B's complaint to the Ombudsman, no substantial compensation had been offered.

Outcome

Works were first requested in 2014 and the matter took until May 2019 to be resolved. The reports in response to the complaints in 2014 and 2017 indicated there were extensive problems at the property and it would not have been reasonable for Ms B to live there.

Throughout the life of the complaint there was a succession of promises that financial redress would be forthcoming once the works were completed but only a very limited offer was made. Nor did we see any offer of alternative accommodation. We found severe maladministration and ordered the landlord to pay Ms B £4,000 in compensation and to refund the rent it had previously agreed.

Learning

Where landlords make recommendations in response to a complaint, they must be acted on in a timely manner. It is not acceptable for residents to have to raise multiple complaints in order to progress a repair. Landlords should ensure that where

a resident is given a single point of contact that that person is empowered to progress the matter when things stall.

Questions for landlord complaint handlers

- How do you ensure that recommendations made after a complaint investigation are acted on?
- What mechanisms do you have in place to ensure that where issues are ongoing for a significant period of time, they are identified and escalated appropriately?

Recommendation 14 for senior management

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.

Professional standards

We are aware that many landlords are encouraging their staff to identify other potential issues when visiting the homes of residents and this is particularly important in relation to damp and mould to avoid cases becoming more complex to resolve later on. We encourage landlords to consider the Chartered Institute of Housing's Professional Standards if they have not already done so.

In particular the 'Skilled' standard requires housing professionals to '*solve problems, be flexible, adaptable and respond to situations creatively, in the moment*' and considers practical application of this standard to include '*taking pre-emptive action and proactively problem solving*' and '*finding solutions, even if they lie outside "normal" activity.*'

Crucially, landlord staff and contractors should respond proactively rather than take a "not my department" approach to issues that fall outside of their area of expertise. At its most simple, this could consist of raising repairs on the resident's behalf or ensuring the relevant team is informed of the problem. This requires staff to be trained and knowledgeable about the signs of damp and mould and have clear policies in place to respond appropriately.

We would encourage landlords to ensure they are supporting residents whose homes are overcrowded and actively explore solutions such as management moves and mutual exchanges, as well as ensuring the resident is registered with the relevant housing authority and supporting them to check their application has been given the correct priority banding.

Making the most of every visit

For early prevention work, one landlord will use every visit to a property, whether it is a gas servicing visit, a repair visit, an electrical test, a visit from the housing officer or any other opportunity they create to identify early signs of damp or mould. Like their safeguarding response, they consider that everyone has a responsibility to highlight potential concerns.

Case study – Landlord issued with Improvement Notice following failure to act on survey recommendations

Following a report of mould growth at a home, the landlord visited and recommended a specialist contractor came to inspect. The specialist contractor recommended extensive works, but after two months, the landlord had not taken any further action so Ms J emailed for an update. The landlord did not respond resulting in her visiting the landlord's offices two months later. The landlord informed her there had been staffing changes, but despite it advising it would investigate and provide an update, it did not.

Although there had been a specialist inspection five months earlier, the landlord used its own staff to inspect the property again. This report noted the property had *"severe damp/mould"* and that it was caused by *"lifestyle and the amount of residents living in the property."* The scheduled works to complete a mould wash, apply anti-mould paint and treat the windows were not completed due to a lack of access, which Ms J disputed. The landlord did not supply the Ombudsman with any evidence regarding what happened over the next three months, but a specialist contractor visited the property again after this period and according to Ms J noted that overcrowding was a factor. Ms J had to chase the landlord again a month later as she had not had any update from the landlord. She contacted environmental health who inspected the property and wrote to the landlord about the condition of the property. The landlord did not respond, so environmental health issued an Improvement Notice. A month later the landlord completed a planned visit to Ms J and advised that due to the extensive works required, she would need to be decanted.

There was a delay in the works taking place as the paperwork completed in preparation for the decant was inaccessible due to staff sickness. This also resulted in a disagreement between Ms J and the landlord regarding whether a permanent decant had been agreed.

In response to Ms J's complaint, the landlord stated it had handled the decant to the best of its ability and in line with policy. It acknowledged it should have been clearer that a permanent decant was not guaranteed, but that as the mould was treatable it did not consider a permanent decant was necessary. The landlord apologised for the delays and the stress and inconvenience caused and offered £100 compensation. Ms J asked for her complaint to be escalated stating the landlord had not considered that overcrowding was a contributory factor and the environmental health report. In its response, the landlord reiterated its offer of £100 and explained Ms J's property had been allocated to her based on her original household size and that she was in the correct banding.

Following Ms J's contact with the Ombudsman, the landlord reviewed its response and offered £3,025. It also offered its sincere apologies and advised it had taken steps to prevent reoccurrence.

Outcome

We found maladministration in respect of the landlord's response to reports of mould at the property and its handling of the decant. We also found service failure for its handling of the banding assessment and its complaint handling. We ordered the landlord to re-evaluate Ms J's priority banding taking the overcrowding and health

concerns into account, thoroughly explain her housing options to her in writing, pay the previously offered compensation of £3,025, and to calculate and pay an additional sum of compensation of 30% of the rent over a period of approximately ten months.

Learning

Where inspections result in recommended works to tackle condensation, damp or mould landlords should ensure they act on the recommendations in a timely manner. Any deviations from the recommendations should be clearly documented and explained to the resident. Landlords should also consider sharing reports with residents to promote openness. Landlords should also ensure that information is available to all relevant staff, so cases are not delayed in the event of staff absence.

Questions for landlord complaint handlers

- What actions do you take to proactively support households that are overcrowded?
- How do you ensure that recommendations following property inspections are acted on in a timely manner?
- What procedures do you have in place to respond appropriately to contact from environmental health?
- What procedures do you have in place to ensure that records are accessible to all staff who may need them?

Recommendation 15 for senior management

Landlords should ensure that their staff, whether in-house or contractors, have the ability to identify and report early signs of damp and mould.

Appropriately skilled staff

We know from our casebook that landlords assigning jobs to operatives who do not have the correct skills can be extremely frustrating for residents and lead to jobs being closed prematurely. The National Federation of ALMOs, amongst others, reported that their members' evidence showed having well-qualified, experienced, customer-focused surveyors, technical staff and repairs managers willing and able to properly inspect and remedy issues was crucial to being able to identify root causes.

We are aware some landlords have developed specialist teams for the diagnosis of, and remedial work to, damp and mould and others have directly employed surveyors to ensure they can swiftly respond to reports. Others have set up networks to share best practice, procedures, technical expertise and staff between organisations to overcome this problem.

Whilst accessing the right skills can be challenging, landlords should have appropriate plans in place to address any skills gaps.

Case study – Appropriately qualified staff are crucial to early diagnosis of issues

Following a report of damp in the bedroom, the landlord inspected the home and identified a leak from a pipe beneath the bath, which was suspected to be the cause of the damp. The landlord repaired the pipe, replaced the ceiling in the bedroom, and installed heaters and dehumidifiers. Mr E continued to report damp and mould at his home, including that it had spread to the living room, and he subsequently raised a claim for damage to his belongings with the landlord's insurer. The landlord offered Mr E £50 in compensation for delays to repairs and arranged for a surveyor to visit.

This inspection also identified a leak to the pipe beneath the bath was the likely cause of the continuing damp and although the damp was contained to the bathroom, mould was evident throughout the home. The surveyor recommended further repairs to the bedroom, anti-mould wash to the internal walls, installing a new chemical damp proof course and upgrading the fans to the kitchen and bathroom. The landlord accepted the recommendations, and the work was completed the following month.

It is evident issues continued as environmental health inspected the home five months later and found high damp readings, which appeared to come from the floor and recommended further investigations to identify the cause. They also recommended that Mr E vacated his home until the damp issues had been resolved, which he did. The landlord arranged another inspection by its surveyor who found mould in the bedroom, living room and bathroom and suggested the damp was caused by the property being unoccupied with limited heating left on. The landlord's surveyor recommended the installation of a larger radiator to the living room and improved ventilation in the bathroom. Although not mentioned in the report, the landlord also repaired the guttering and exterior brick work.

Mr E complained to the landlord that the leak in the bathroom should not have been left for three years and that the landlord's contractors had misdiagnosed the damp, which had still not been resolved. The landlord completed a heat survey and introduced dehumidifiers to the property to reduce condensation. It also completed further damp investigations including a CCTV survey, which found no evidence of damp penetrating the property from outside. The landlord subsequently fitted a new kitchen (as part of major works), installed the larger radiator, and applied a mould wash as recommended by its surveyor, fitted a new boiler, and installed cavity wall insulation. The landlord then met with environmental health and following their recommendation completed a water test to confirm the property was no longer damp. Following this, the landlord completed a final inspection and confirmed to Mr E his home was ready for him to return to. Mr E said he could not return as he could not afford to replace his damaged belongings.

The landlord responded to Mr E's complaint six months after he submitted it. It advised it would refer his claim for damages to its insurer and apologised for the length of time it had taken to complete repairs. It offered compensation of £2,995.48 in recognition of the inconvenience caused by the delays, the cost of running the dehumidifiers and the cost of rent between February and July 2018. The landlord subsequently redecorated the property and in its final response, it increased the compensation to £4,242.22 in recognition of environmental health declaring the home uninhabitable in November 2017 and confirmed its insurer had also offered

£3,000 in respect of the damaged belongings. Mr E gave notice to terminate the tenancy shortly afterwards.

Outcome

We found that the landlord acknowledged the delays in resolving the damp and offered reasonable compensation. We also found that it was appropriate for the landlord to refer the claim for damage to Mr E's belongings to its insurer for consideration. However, we found that the landlord did not adequately investigate the cost of running the dehumidifiers and that it could have offered Mr E more assistance with acquiring the basic furniture he needed to return to his home. We ordered the landlord to pay an additional £250 in compensation in account of these service failures.

Learning

Landlords should ensure that their operatives are appropriately qualified to investigate the causes of damp and mould to avoid misdiagnosing the cause. It is also important that investigations are thorough and that appropriate tools are used. An aftercare programme can help landlords to quickly identify when matters have not been resolved without residents having to report the problem again. Where landlords make use of dehumidifiers or other electrical tools that are likely to have a marked impact on residents' electricity costs, landlords should ensure they can accurately calculate the costs to reimburse residents accordingly.

Questions for landlord complaint handlers

- What aftercare processes do you have in place to confirm that works have been successful or to quickly identify that further action is needed?
- What can you do to assist residents to successfully return to their property after a decant where their belongings have been damaged?
- How do you calculate the electrical costs of works incurred by the resident, particularly when the resident has been decanted?

Recommendation 16 for senior management

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.

Keeping residents informed

Our investigations have often found poor communication, particularly in regard to inspections, outcomes and timetabling of works. In a number of cases involving roof leaks and leaseholders, we found poor communication had exacerbated the situation.

Residents should be given a choice of appointments times and, wherever possible, reasonable notice. If appointments need to be changed, the landlord should inform the resident of this at the earliest opportunity and rearrange at the same time. Whilst

it is reasonable for landlords to confirm appointments in writing, it is not appropriate for residents to only be sent appointments by letter, unless this is specifically requested by the resident. This puts the onus on the resident to contact the landlord to rearrange appointments that are inconvenient, and the landlord has no control over if or when the resident receives the letter.

It is important the landlord clearly communicates its diagnosis with the resident, sharing any relevant information, to ensure the resident has confidence in it and understands the next steps. Where follow up work is required, the resident should be informed early on. Landlords should explain why follow up work is required, what work is needed, why the work could not be completed at the initial appointment and a clear timetable for future works. If there is any slippage to the timetable, again residents should be informed as soon as possible, and they should be advised why the timetable has changed.

Wherever possible, landlords should avoid leaving external contractors to arrange appointments with residents directly, so they are fully aware of all issues and the onus is, again, not on the resident to reports these.

It is also important for landlords to have appropriate processes in place to ensure that where follow up work is needed, jobs are not marked as complete in error leaving the resident to chase the outstanding activity. Appropriate after care services, such as a follow up call after the job is marked as complete, will quickly identify any outstanding issues which can be appropriately managed.

It would also be good practice for landlords to schedule follow up visits at set periods, for at least a year after works are completed, to satisfy themselves that the problem has not returned.

Where landlords decide follow up work is not required, residents should again be informed of this in a timely manner. Landlords should clearly explain to the resident why they have decided no further work is needed. If landlords have had the property inspected and have decided against further works based on the inspection report, consideration should be given to sharing the results of the report with the resident, if they do not routinely do so already. Clear communication and sharing information are particularly important where the resident has supplied their own inspection report that contradicts the landlord's inspection report. This can help to build trust between residents and landlords.

Recommendation 17 for senior management

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.

Case ownership

It is clear from our investigations that residents can often fall through the gaps between different departments, with no one taking overall ownership for resolving the

problem reported. Whilst different departments and expertise may be required at different times, landlords must ensure their approach is robust and does not prevent early and effective action to help the resident.

Landlords must ensure the effective operation of communication channels between different teams, such as the complaints and repairs teams. This will ensure that all parties have access to accurate and current information which can be passed to and from the resident and will avoid unnecessary delays.

Landlords should ensure that one department or individual has overall responsibility for ensuring that all reports or complaints are resolved, especially where the response covers a range of disciplines or departments.

Good practice – Case ownership

To tackle this issue, one landlord is considering introducing a specialist damp and mould team who will manage these types of cases from end-to-end. Their purpose would be to have control of the case from the point of identification including accurate diagnosis, triaging, agreeing the appropriate intervention, monitoring case performance until completion, quality assurance and aftercare.

Case study – Failure to appropriately manage contractors resulted in lengthy decant for family

Following a report of mould, the landlord visited the home and recommended a specialist contractor inspected the issue. There was a short delay in the contractor completing the inspection, which the contractor emailed Ms G and apologised for. It also explained that a mould wash and use of a dehumidifier would not resolve the situation. Following the inspection, Ms G emailed the contractor explaining she was concerned about the environment she and her children were living in, reporting that her soft furnishings and clothes were damp and that her youngest child was ill again. The contractor provided a copy of the report to Ms G which recommended the installation of passive vents in each bedroom, an air filter and a new extractor fan. The contractor also suggested there may be a problem with the plasterboard absorbing water and works to open the area would be needed to remedy the situation. It confirmed it was waiting for the landlord to approve the works, which it expected to take 4-5 days.

Ms G chased the contractor who advised it was still waiting for the landlord to approve the works. Ms G subsequently informed the contractor that she had sought legal advice and would be requesting compensation for the damage to her belongings. The contractor acknowledged Ms G's contact, advised it had informed its insurer and arranged an appointment to complete mould removal and treatment. The contractor was late attending this appointment due to a vehicle breakdown, which it failed to inform Ms G about and when it arrived, its operative was unable to complete the works required. The contractor was also late to the follow-up appointment which meant it was unable to access the property.

Presumably a mould treatment was applied by the contractor at some point, as Ms G contacted the contractor and the landlord to advise the mould wash had not worked and the walls were covered in mould and fur. She stated the issue of rising damp

had been raised previously but the contractor had failed to address it. Ms G subsequently raised a formal complaint in which she stated she had been informed by email that she needed to be decanted but there were no properties available, she had been forced to live in one room with her children due to the condition of her home, and that the landlord had not taken the situation seriously. The landlord sent the resident a £20 voucher for the missed appointment and the air filter was installed shortly afterwards.

Three months after the initial report, the landlord's operative attended to apply a mould wash but because of concerns about the effectiveness of the treatment, he sought advice from a supervisor who told the operative to stop work and leave the property. Two days later the landlord raised a work order for a subcontractor to carry out intrusive works and Ms G was decanted two weeks later. Approximately one month after she was decanted, the subcontractor confirmed it had located the source of the damp, which was due to a leak from the collar of a rainwater downpipe in the kitchen/diner.

Five months after Ms G had been decanted, she was invited to view the property. Following the viewing, she informed the landlord that she was "*disgusted with the state of it*" and asked for her complaint to be escalated despite not having received a response at stage one. The property had still not been deep cleaned when Ms G returned to it almost two months later. In its stage two response, the landlord acknowledged delays and that the works had not been completed to the standard expected before Ms G returned to her home. It apologised for the delays and attributed them to its subcontractor. It also apologised for the delay in responding to the complaint and offered Ms G £525 in compensation.

Outcome

We found that the landlord had delayed unreasonably in carrying out the repairs needed to Ms G's home. We found there were repeated failures to manage its repairs contractors and subcontractors effectively, leading to Ms G and her children being decanted for a significant period. While we acknowledged that the landlord had offered compensation, in our opinion it was not proportionate to the circumstances of the case, and we ordered the landlord to pay Ms G £1,500 in compensation.

Learning

Landlords should ensure they have processes in place to appropriately manage delays caused by their contractors and subcontractors. They should also ensure they maintain contact with the resident throughout the repair process instead of leaving the resident to liaise directly with the contractor. Where intrusive works are required, landlords should act quickly to decant the resident and start the works. Appropriate checks should be carried out at the property to ensure it is suitable for residents to return to.

Questions for landlord complaint handlers

- How do you manage delays caused by contractors and subcontractors?
- What steps do you take to ensure properties are in a suitable condition for residents to return to following a decant?

- Do you ensure that you speak to residents directly, rather than letting the contractor liaise with the resident?

Recommendation 18 for senior management

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.

Remedies

Where something has gone wrong, it is important that the landlord puts it right and they have the opportunity to do so before we investigate. Where we found service failure, this was often because landlords had not provided appropriate remedies to restore the resident to the position they would have been in had the failure not occurred.

This was generally caused by failing to fully account for the distress and inconvenience the resident had experienced, loss of amenities or additional costs to the resident because of damp and mould. Whilst a clear remedies policy can provide good guidance to complaints teams to help them determine adequate redress, it is crucial that landlords consider the individual circumstances of the household or resident when calculating compensation. Finally, landlords should apologise to the resident, and in more serious cases, consideration should be given to a senior member of staff apologising in person.

In some cases, personal items will have been damaged as a consequence of damp and mould. Where an insurance claim may be required, it is important for landlords to offer appropriate support to residents, which could include the landlord submitting the claim to their insurer rather than requiring the resident to submit the claim themselves.

Recommendation 19 for senior management

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.

Chapter 3: From disrepair claims to resolution

Identifying complex cases

There will always be some damp and mould cases that are more difficult to diagnose and/or repair and, therefore, longer to rectify. It is important that these types of cases are handled with particular care to ensure they are resolved effectively, maintain the relationship between the resident and the landlord and reduce the risk of the resident feeling the need to resort to a disrepair claim.

Landlords should ensure they have strategies in place to manage these types of cases with an emphasis on ensuring that the resident is kept informed, feels that the landlord is taking the issue seriously and that the matter is progressing. This is particularly the case where it is going to take longer than usual for works to commence at the resident's home.

Landlords should consider providing a single point of contact and a timeline of work and/or to providing updates to residents at set intervals. This includes when the matter has not progressed for a period of time to ensure residents are kept informed and can be assured that they have not been forgotten.

Recommendation 20 for senior management

Landlords need to ensure they can identify complex cases at an early stage and have a strategy for keeping residents informed and effective resolution.

Case study – Focus on subsidence meant landlord missed opportunities to respond to damp

Ms H reported problems with several doors which were repaired and noted as possible subsidence. Subsidence was later confirmed by the landlord's insurer who completed a plan of works to rectify the issue.

Ms H informed the landlord of further problems with the doors. In responding the landlord also asked the operative to check for signs of damp or condensation.

Seven months after first reporting the issue, Ms H chased a damp survey contractor regarding an inspection the landlord had raised three months previously. During this contact with the damp survey contractor, Ms H requested an out of hours appointment, which the contractor raised with the landlord. However, the landlord did not respond to the request. A year after the problem was reported, the landlord's insurer identified damp in the kitchen floor, which it said required further investigation.

Ms H subsequently complained about how it had handled her reports of damp and cracks to the property. Almost a year after the landlord had raised the inspection request, the damp contractor and a roofing contractor inspected the property. The

roofing contractor informed the landlord the same day that the loft should be insulated, and the roof replaced. The damp contractor provided a report to the landlord a week after the inspection in which it advised it had not been able to find a damp-proof course, several cracks were potentially allowing damp in, it had found condensation and it could not give any assurance that the property was not affected by rising damp.

The landlord issued its stage one response three months later and explained it had decided to rehouse her due to the subsidence. It apologised for its poor communication, the inconvenience caused and offered £400 in compensation. It also confirmed it would not complete any further repairs at the property unless they were urgent. Ms F accepted the landlord's offer to be rehoused but also asked for the complaint to be escalated. In its stage two response the landlord explained its actions further, apologised and did not offer any further compensation. Ms F was rehoused eight months later.

Outcome

We found the landlord had offered reasonable redress for its complaint handling failures, however we found maladministration for how it handled Ms H's reports about the door, cracked walls and damp. We considered that the landlord had not treated the issues with the door as an emergency, despite it being a fire safety hazard and a security risk. We also found that it had unreasonably delayed in arranging the damp report which meant Ms H had had to live in a home requiring extensive repairs for much longer than necessary. We ordered the landlord to pay an additional £450 in compensation.

Learning

Despite recognising at an early stage that the home may be affected by condensation and damp, it took over a year for a damp survey to be completed. When the survey was completed, it identified significant issues at the property, including cracks to the building that Ms H had reported several times. Landlords should ensure they respond quickly to reports of condensation, damp, or mould and should not let other significant repairs prevent the investigation of these issues. It is crucial that landlords maintain regular contact with residents whilst they are living with repairs issues that will take a significant period to rectify. Landlords should also consider whether it is reasonable to leave a resident living in a home that has structural issues, major faults and requires major remedial work whilst a permanent move is identified.

Questions for landlord complaint handlers

- How do you keep residents informed when another organisation is leading remedial works?
- How can you ensure that reports of damp or mould are not neglected when other significant works are identified?
- Are your staff trained to notice flags for possible safety and security issues that may not have been reported by the resident?

Where specialist surveys are required, landlords should ensure the need is identified early on and that work orders are progressed in a timely manner. Landlords should also highlight instances where using an independent, mutually agreed and suitably qualified surveyor may be useful to avoid any concerns the resident may have of bias, and obtain parity with the housing conditions pre-action protocol. The outcome of these surveys, and any other inspection at the resident's property, should be routinely shared with, and explained to, the resident. This includes being clear where on any recommendations or actions that are not going to be followed up and the rationale for this to aid the resident's understanding.

Recommendation 21 for senior management

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.

Decanting

Diagnosing damp and mould issues can take time, with repeated visits to, and inspections of, the resident's home, but residents are not always properly updated following these inspections. Residents will see more people coming to their home but will not know what, if anything, is happening following the inspection which can cause frustration and a loss of trust in the landlord.

Where appropriate, landlords should consider at an early stage whether moving the resident out of the property (otherwise known as 'decanting') to suitable accommodation is necessary, either on a temporary or permanent basis. This will ensure that residents are not left living in unsatisfactory conditions for months before a decant is considered. This is particularly important with respect to vulnerable residents where major works are required.

Landlords should also ensure that where significant works are required, smaller remedial works such as mould washes/anti-mould paint that will improve the resident's living environment are still completed. Landlords need to be clear that where such treatments are required, they should be treated as a repair obligation and not classed as 'decoration' which would be considered a resident responsibility.

Recommendation 22 for senior management

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.

Case study – Landlord should have considered the resident's medical conditions following a leak

Mr L reported a 'flood' in his kitchen and living room, apparently caused by a blockage in the pipework. The landlord initially treated this as a routine repair as there was no leak but upgraded this to an 'emergency repair' when Mr L reported the same problem three days later.

A drainage company visited and believed it had cleared the blockage, but the problem soon recurred. Due to his medical conditions and limited mobility, Mr L decided to vacate his home until the problem had been resolved.

The landlord made several inspections of the pipework in the flat and in the property above, but after five weeks it had still not found the cause of the problem. Mr L made a formal complaint about the time taken; he explained that he was still paying rent but felt unable to live in his home due to his medical conditions and disability. The landlord provided a verbal response to the complaint, agreeing to investigate the delay and resolve the problem as soon as possible.

The landlord needed access to other neighbouring properties to identify the cause of the blockage, which meant it took a further 13 weeks before the landlord was able to fully resolve the issue and carry out the subsequent repairs to Mr L's flat.

In its final response the landlord offered Mr L £250 as a 'goodwill gesture'. It noted the property had been habitable and it was Mr L's decision to vacate it. It considered that the complexity of diagnosing the problem had contributed to the time taken.

Outcome

We found that whilst the landlord had responded in line with its repairs policy, it had not considered the impact of Mr L's medical conditions when deciding whether it was reasonable for him to remain in the property. We also found maladministration for its complaint handling as the landlord did not provide a written response to the formal complaint; took too long to issue its final review; and its offer of compensation did not have regard to all the relevant factors.

We ordered the landlord to refund Mr L the £1,280 he had paid for alternative accommodation or to refund him the rent paid for his home while he was absent. We also ordered the landlord to pay Mr L £700 compensation and to explain what evidence it required should he wish to reclaim other expenses and how to make an insurance claim.

We recommended that the landlord should ensure its staff are aware of the Ombudsman's Complaint Handling Code and the need to provide a complainant with the written outcome of their complaint at each stage of the process.

Learning

Despite the report being dealt with in line with the landlord's repairs policy, this case was unusually complex and required several inspections of multiple properties, leading to the issue remaining unresolved for an extended period. After five weeks Mr L indicated to the landlord that he felt unable to live in his home as he was disabled. In situations where residents do not feel their home is habitable, or where major works are required, landlords should consider whether the resident ought to

move out or what could be done to help them stay in the property to avoid additional expense and inconvenience.

Questions for landlord complaint handlers

- Does your organisation have processes in place to review and increase the urgency of repairs if subsequent information comes to light following the initial report?
- Where major works are required, or residents report that they feel their home is not habitable, does your organisation have a mechanism in place to consider whether decanting the household is required?

Making effective use of the complaints procedure

Long-term or complex cases are at higher risk of becoming legal issues. Landlords are clearly concerned about the increase in disrepair claims from their residents, with one reporting a 70% increase in associated costs over two years. Whilst this issue is broader than damp and mould, it is critical that residents in these cases do not feel the need to resort to disrepair claims, especially when the complaints procedure could provide a better outcome for the resident and landlord. There are real benefits to both residents and landlords if disputes can be resolved through the complaints process, and the Pre-Action Protocol for Housing Condition Claims makes clear that alternative dispute resolution should be sought.

Landlords should ensure they clearly promote the benefits of their complaint process and the resident's rights to approach the Ombudsman at an early stage, which include:

- More timely resolution of the issues
- More straight-forward and flexible approach to redress
- Free to the resident and
- Not limited in scope, unlike a disrepair claim.

Should the complaint process be exhausted then residents are able to use our alternative dispute resolution service which is:

- Free and simple to use
- Impartial
- Independent of the landlord
- Non-adversarial
- Faster and
- Broader in scope than a legal disrepair claim.

Recommendation 23 for senior management

Landlords should promote the benefits of their complaints process and the Ombudsman to their residents as an appropriate and effective route to resolving disputes.

Pre-Action Protocol for Housing Conditions Claims

When a landlord receives correspondence initiating the protocol, it is important that they do not disengage from any open complaint or the repair issue itself. Commencing the protocol does not constitute legal proceedings and a complaint can be considered at any stage of the protocol.

The Ombudsman's view is that a matter does not become 'legal' until proceedings have been issued. The landlord should be clear with the resident on how it is handling correspondence – whether under the complaints process, the protocol or both – and clearly communicate to the resident when a complaint has exhausted its process. Landlords should direct residents to the Ombudsman for a free, independent and impartial assessment of the case.

The Ombudsman's view is that a matter does not become 'legal' until proceedings have been issued and following the pre-action protocol does not constitute proceedings, and that there is no reason landlords cannot continue to try and resolve matters through the complaints process until that time.

Whilst landlords may manage residents' expectations around our jurisdiction, it is ultimately for us to decide whether we will investigate a complaint. We have updated our jurisdiction guidance to address this issue in more detail and landlords will need to ensure their approach is consistent with the guidance.

The Ombudsman will accept that a landlord letter (from either their in-house legal team or legal representatives) in response to a solicitor's letter on behalf of the resident, such as a letter of claim, is their final response and evidence of having exhausted the complaints process for the purpose of the Ombudsman's jurisdiction.

Even when proceedings have been issued, the landlord should determine whether matters raised in subsequent correspondence form part of those proceedings or ought be addressed through another route such as the complaints process.

This approach should ensure landlords make full use of their complaints process wherever possible and do not prematurely close complaints because of existing unrelated proceedings. Landlords should also use intelligence from these cases to inform and feed into their proactive actions to address damp and mould.

Recommendation 24 for senior management

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.

Case study – Landlord failed to progress resident’s complaint

Ms R had been reporting issues with mould at her home for over a year before it was inspected, and significant works were recommended. The inspection report recommended Ms R was decanted while the works were completed. Ms R reported that the landlord attended and removed the bath panel six months after the inspection, but nothing further happened.

Ms R referred her complaint to the Ombudsman two years after she first started reporting the issues at the property.

The landlord was prompted to update Ms R about the outstanding repairs after one of their staff attended her home to speak to her about another matter, three months after the complaint was referred to the Ombudsman. The landlord apologised for the delay in responding. The following day it advised Ms R that arrangements had been made for the drains to be repaired and once this was completed and the property had dried, further works would commence.

Despite several requests for information, the landlord did not engage with the Ombudsman and the complaint was accepted for investigation. The landlord subsequently advised that the matter was a disrepair case being handled by its solicitors and there was no evidence of an investigation into Ms R’s complaint. Two months later, the landlord confirmed the case had not gone down the legal route and was not subject to legal proceedings.

Outcome

We found severe maladministration in the landlord’s handling of Ms R’s repair requests and the formal complaint. We ordered the landlord to pay Ms R £3,663 in compensation, provide us and Ms R with a detailed schedule of works with timescales to deal with all outstanding issues at the property, discuss the damage to Ms R’s belongings and offer reasonable redress to reflect this. We also ordered the landlord to complete a senior management review of the case and to look at why it had failed to carry out the repairs, failed to raise and respond to the complaint and failed to send us a copy of the report.

Learning

Wherever possible, landlords should continue to engage with residents when a complaint or damp or mould issue has the potential to become a disrepair case. Where residents have made a complaint, landlords should continue to progress the complaint until the court papers are issued, at which point the court case takes precedence. Importantly, landlords should ensure that repairs are progressed.

Questions for landlord complaint handlers

- How do you respond to contact from solicitors when the resident has not previously made a complaint?
- Are your complaints teams empowered to continue to investigate complaints when a case has the potential to become legal, but proceedings have not been issued?
- What processes do you have in place to ensure repairs are progressed in these circumstances?

Chapter 4: From complaints to a learning culture

Establishing a learning culture around complaints

Whilst we have high compliance with individual orders, organisational learning from our decisions needs to be better. We made maladministration findings in relation to complaint handling in 64% of cases involving damp and mould. This indicates that landlords are not doing the basics as well as they could and may be a reflection of the organisational culture in relation to complaints.

Some organisations can view complaints as a direct criticism that requires a defensive response. On the contrary, it is essential that landlords recognise that complaints are a valuable learning opportunity that provide real insight into performance on the ground and what is not working quite as well as it could be. Complaints can also help to identify trends and root causes to prevent future issues. With the right response, they can be a strategic resource providing a variety of perspectives on how well a landlord's aims are being achieved from the point of view of their residents.

Landlords can and should encourage complaints from their residents by ensuring their systems provide multiple ways of submitting complaints to support different accessibility needs across their resident population.

A review of our casebook indicates that complaints in relation to damp and mould problems share many of the following characteristics:

- They are often complex
- Issues may be long running
- Poor communications
- Lack of clarity about repairs and timescales
- Lack of confidence by residents in the initial diagnosis
- High level of distress and disruption for the resident
- Health and wellbeing are frequently cited and
- Problems are not fixed and reoccur.

These characteristics mean that complaints concerning damp and mould provide necessary learning for landlords and their staff, which may also be relevant to other areas of landlord operations. The key question for landlords is how well they are set up to capture this learning and feed it into service improvements that will also improve the lives of their residents.

Complaint systems should allow the landlord to analyse their complaints data effectively and to identify themes, trends and learning opportunities. This will enable landlords to be proactive rather than reactive as outlined at the start of this report. Consideration also should be given to sharing learning from complaints with the wider organisation and with their residents, celebrating when things have gone well,

or when positive changes have been made because of complaints or other comments.

We recognise that organisational learning is a challenge for any organisation and are exploring establishing a Centre for Learning as part of our next three-year corporate plan to assist landlords with learning from the wider sector. However, landlords will still need to consider how best to implement organisational learning from their own complaints.

Recommendation 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.

Empathy

It is clear from our investigations that complaints involving damp and mould cause considerable distress and inconvenience to the resident. Unlike some other areas of our casework, health and well-being are frequently cited by the resident.

It is important that landlords demonstrate empathy with these circumstances when responding to complaints. Landlords should consider how they train their teams and how to prevent fatigue setting in with call handlers. Landlords should also recognise the impact handling complaints can have on their staff and ensure that appropriate mechanisms are in place to support staff when necessary.

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.

Conclusions: Demonstrating change

Damp and mould can be a complex and often frustrating issue for both landlords and residents. We recognise that some landlords are being proactive and that governing bodies are scrutinising approaches. This report aims to support these actions.

We have noted two key systemic issues that persist in cases across our casebook.

- Over reliance on residents
- Lack of overall responsibility for ensuring complaints are resolved.

Our evidence reveals many landlords relying on residents to report problems, to follow up work and to chase missed appointments. Whilst it is accepted that residents have a responsibility to report repairs at an early stage, landlords should ensure proactive actions are incorporated into business-as-usual activities to anticipate likely issues without waiting for those issues to manifest and be reported. For example, if an issue reported by one resident is likely to affect multiple residents, landlords should not wait for the other residents to be affected before taking action. Residents should not be expected to follow up on poor workmanship, outstanding works and missed appointments. These areas are the landlord's responsibility and speak to the importance of good communication and robust follow up procedures.

We also repeatedly see cases where the resident has fallen through the gaps in service provision, and issues that could have been resolved at an early stage have deteriorated, often leading to unacceptable living conditions for those residents. It is crucial that where issues are reported someone is accountable for the resolution of the matter to prevent residents being passed between teams and/or between the landlord and its contractors. It is important to note that both issues are not unique to damp and mould cases and accountability starts at the point the matter is reported not at the point a complaint is made.

It is important for landlords to demonstrate to residents learning from damp and mould complaints. We would encourage landlord staff and managers to review the case studies and learning provided in this report, actively consider how they would have responded to the case and whether as an organisation they would have made the same mistakes.

While some landlords are considering afresh their approach to damp and mould, we would encourage all landlords to do so. In particular, we would encourage senior leaders and governing bodies to ask the following points:

- 1) Do we have a proactive, zero-tolerance approach to damp and mould and a comprehensive, consolidated policy or framework for responding to these cases? Are we considering damp and mould as part of our net zero strategy?**

- 2) **How effective and timely are we at responding to and resolving reports and complaints concerning damp and mould? How do we know we are providing meaningful information and support to our residents?**
- 3) **How do we identify and manage complex cases, complex situations and/or those involving legal disrepair claims? Are we promoting our complaints processes enough and does our approach allow the complaints process to continue alongside pre-action claims?**
- 4) **What is our organisational culture with respect to learning? Are we making the most of our complaint data and case studies to learn and improve?**

Governing bodies should seek assurance in relation to compliance with the Complaint Handling Code, as this provides a strong platform for good complaint handling. They should also seek assurance that their organisations and their policies address the key questions outlined by this report and are producing the right outcomes.

We would strongly encourage landlords to share their learning and an action plan with residents during 2022 to improve understanding of their response, transparency and accountability.

Landlords should consider their approach to accountability and transparency and how they can demonstrate these values to their residents. Landlords should make use of opportunities for sharing information such as resident panels, community workshops and newsletters. Crucially, resident panels and community workshops provide landlords with the opportunity to hear the resident voice and be accountable to their residents.

Alongside this, the Ombudsman is also committed to taking action in several areas following this report. In addition to the new guidance on our jurisdiction, we are:

1. **Responding to the Ministry of Justice's call for evidence on the role of alternative dispute resolution.** We hope this will reduce the current trend of 'no win, no fee' legal firms soliciting disrepair claims from residents who have not been through the complaints process.
2. **Raising awareness of our service and the benefits of the complaints process to address issues.** While we have seen a significant increase in complaints relating to damp and mould, our corporate plan sets out plans for more awareness raising including removing barriers for any groups who may find accessing the complaints process more challenging.
3. **Reviewing the cases in this report to inform the proposed review of our remedies guidance in comparison with disrepair case studies.** Whilst we do not necessarily propose to increase the level of redress we offer to compare

favourably with disrepair claims, we recognise that we need to do more to encourage residents to use our services over the courts.

4. **We will follow up on this report.** The report covers a lot of issues and landlords will need time to consider their response. We will be monitoring landlord performance in this area and will actively consider where further systemic investigations may be required in the future to address service improvements with individual landlords. We will also consider whether we need to do further work in relation to possible contributory factors to damp and mould such as roof leaks, retrofitting or the managed decline of stock.

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Inquest Touching the Death of Awaab Ishak

Ms Joanne Kearsley HM Senior Coroner North Manchester

Findings and Conclusion

Introduction

1. This has been the inquest into the death of Awaab Ishak ("Awaab"). The Interested Persons ("IPs") are (i) Mr Faisal Abdullah and Ms Aisha Amin, Awaab's parents, represented by Christian Weaver counsel, (ii) Rochdalewide Borough Housing ("RBH"), represented by Malcolm Galloway of counsel, (iii) Northern Care Alliance, ("NCA") represented by Sion Davies, and iv) Rochdale Council represented by Mrs Scott-Bell of counsel.
2. The purpose of this inquest is laid out in section 5 (1) of the Coroners and Justice Act 2009 which provides that a coroner must ascertain who the Deceased person was and when, where and how he came by his death.
3. In order to answer those questions I have received and admitted oral and written evidence from Awaab's family, from his GP, Health Visitors, Early Years, his medical records, from doctors at Rochdale Urgent care and Royal Oldham hospital, post mortem investigations, from investigations of his death conducted by Greater Manchester police and from a variety of professionals who work for RBH.
4. Set out below are my findings and conclusion as to Awaab's death. My findings have been reached on the balance of probabilities. In the course of this document I make reference to some of the evidence I have heard but it is not intended to be, and is not, a comprehensive review of all the evidence before me. Rather, my intention is to explain, by reference to parts only of the evidence, why I have reached my findings of fact and conclusion. However, in reaching my findings and conclusion I have taken account of all the evidence I received, both oral and written. If a piece of evidence is not expressly mentioned, it does not mean that I have not considered and taken full account of it.
5. I should say at the outset both the NCA and RBH provided the court with position statements. I am grateful to both organisations for these.

Background Facts

6. I am satisfied that the person who died was Awaab Ishak who was born on the 13th December 2018 in Oldham.
7. Awaab was the first child of Faisal Abdullah and Aisha Amin. Mr Abdullah had come to live in the UK in 2016 from the Sudan. He was joined in 2017 by his wife. Whilst Mr Abdullah has some understanding and ability to converse in English, his wife has very little. This is important when considering the ability of professionals to engage in discussions with the family and when considering the ability of the family to explain any worries or concerns they had and to understand advice.
8. Awaab had been born prematurely at 31 weeks however there was no concerns from his Consultant Neonatologist or any other health professionals that he was not developing well. All the evidence suggests he was an engaging, lively, endearing two year old who was much loved and cared for by both of his parents.

196 Ilminster

9. 196 Ilminster is a one bedroom flat. This property is owned by RBH who are the landlords. Mr Abdullah moved into the property shortly after his arrival in the UK.
10. In 2017 he was joined by his wife and they continued to live there when Awaab was born.
11. Mr Abdullah told the court that in 2017 he had noticed mould developing in the property and had advised RBH of the same. He explained he was told to paint over the mould. I heard that Mr Abdullah painted over the mould and that he did this on more than one occasion. On balance I find as a matter of fact this was the advice given to Mr Abdullaah when he reported his concern. On balance I also consider it is more likely than not that Mr Abdullah would not have fully understood to treat the mould with anti mould treatment / paint.
12. Having received this advice I consider it more likely than not, there were other occasions over the next 2 years when Mr Abdullah continued to follow this advice and repainted the property particularly when he was joined by his wife and when their baby was due.

13. I also find from the evidence of Mr Abdullallah and Ms Amin that the mould in the property was a recurring, consistent issue and in June 2020 Mr Abdullah instructed solicitors. In all likelihood it appears this claim was initiated via a claims company. Due to policy the impact of the commencement of a claim meant that any disrepairs found would not be undertaken until there had been an agreement from the claimant's solicitors.
14. I heard evidence that this policy was not unique to RBH and was adopted by them following other similar organisations who have this policy.
15. There is no evidence that between the advice being given to Mr Abdullallah in 2017 and June 2020 that there was any indication given to RBH of the recurring mould.
16. I heard evidence that in July 2020 Ms Amin, who was now pregnant with her second child, and Mr Abdullah began to seek help from health professionals who were involved with the family.
17. Caroline Ridley Health Visitor attended the home address on the 1st July 2020. She told the court Mr Abdullah showed her the mould in the kitchen and the bathroom. He asked for support with the application which was pending to move house. Ms Ridley wrote to RBH on the 9th July 2020 expressing her concerns about the mould in the house and the potential impact to the health of Awaab.
18. I heard evidence that in 2020 there were numerous different IT systems in use within RBH and not everyone who had contact with the family would have had access to the same information, hence some RBH employees would not have been aware of the concerns raised by Ms Ridley, others may not have been aware a child resided in the property.
19. Mr Wrigley is a disrepair manager at RBH. He attended at 196 Ilminster on the 14th July 2020 to complete a disrepairs inspection. Mr Wrigley explained that this inspection was essentially to consider if the claim of mould in the kitchen and bathroom as raised in the letter from the solicitors representing the family, was accurate. Mr Wrigley told the court he inspected the property and confirmed some actions were needed namely:
 - a. Mould in the kitchen on the walls and ceiling required treatment
 - b. Mould in the bathroom on the walls and ceiling required treatment
 - c. The mould seen in the cupboard in the bedroom required treating using a 3 part treatment

20. At the time of the inspection there was no indication of any damp, the walls were dry and there was no obvious evidence of any leaks. A plumber was asked to attend in order to confirm the same. This further check was completed by Mr Tilbey.
21. In November 2020 Caroline Ridley re-sent her letter to RBH at the request of Mr Abdullah. On the 20th November 2020 Mr Foster a technical inspector at RBH told the court he attended 196 Ilminster due to concerns there may be a leak from 196 into a property below. He told the court that Ms Amin was present in the property but he acknowledged he did not have access to an interpreter. He recalled she was quite upset as she showed him around the property.
22. Mr Foster said he could find no evidence of any leaks in the bathroom or anywhere in the property. He did note the mould and also confirmed there was no effective ventilation in the bathroom as the fan worked but very poorly. The kitchen had no mechanical ventilation at all. Mr Foster recommended a survey to look at the ventilation issues and treatment of the mould.

Expert Evidence

23. During the course of the Inquest I heard evidence from Mr Richard Blakeaway the Housing Ombudsman and also Professor Richardson Consultant Mycologist.
24. Professor Richardson assisted Greater Manchester police during their investigation into Awaabs death. He had attended at 196 Ilminster to assess and test the mould present. He explained how he found extensive and significant mould in all the rooms. In his view it had been present for some considerable time, although he could not date it. He explained to the court the importance of locating and understanding the source of the damp or water. For example in the bedroom cupboard he was of the view that the pattern was likely due to water ingress from somewhere but told the court it was not his role to locate the source.
25. Professor Richardson described the various types of fungi and the diversity of the mould within the property. He also explained the health issues which can arise from exposure to mould.
26. In October 2021 the Housing Ombudsman published a report highlighting issues relating to damp and mould. Mr Blakeway told the court this report was produced due to the ombudsman noting an increasing number of complaints being received relating to this issue together with emerging common themes.

27. One of these themes Mr Blakeway explained was, the over-reliance being placed on the contribution of a tenant's lifestyle as the cause of the problem.
28. Ms Khan for RBH recognised this in the evidence she gave to the court and accepted that rather than focus on the cause, the focus needs to be on preventative measures.
29. Having considered all the evidence in this case I find that the most likely cause of any damp or moisture in 2020 was, more likely than not, due to normal daily living activities albeit there may have previously been other issues such as leaks from other properties. To be clear there is no evidence that the ways of living by the family were in anyway excessive.
30. Furthermore I find as a matter of fact that the ventilation in the bathroom was not effective, there was a lack of ventilation in the kitchen and an overall lack of an effective ventilation system in the property. This was a direct contributing factor in the development of the mould.
31. It is acknowledged by RBH and I find as a matter of fact, that following the report from Mark Wrigley in July 2020 a more proactive response should have been taken to treat the mould which was present and to take steps to prevent its re-occurrence.
32. Finally I find as a matter of fact that no action was taken and from July 2020 until December 2020 Awaab continued to have chronic exposure to harmful mould.

Medical Conditions

33. I heard evidence that Awaab presented more than most children to his GP and to hospital with cold-type illnesses. Runny noses/coughs /upper respiratory tract infections. These presentations of themselves were not enough to flag up any concerns, they are not uncommon presentations in young children.
34. A number of health professionals were involved with the family these included health visitors, midwives and the GP. All health professionals were asked about the information sharing process between their services.
35. As already stated in July 2020 Health Visitors raised concerns to RBH about the mould and potential impact on Awaab's health. The GP advised he was not made aware of this or copied into the correspondence.

36. The GP was aware of the number of times Awaab had presented to surgery but this information was not shared with the health visitors.
37. In September 2020 the community midwife completed a special circumstances form to Children's services highlighting concerns about the mould and potential impact on Awaab's health. This was not shared with the GP or Health visitor. There is no evidence to show this was received by Children's Service and there is no evidence to indicate any action was taken.
38. A referral was made to Early Help / Early years and attempts were made by Lauren Hughes to assist the family by making contact with housing.
39. I am satisfied from the evidence heard that there was an evident gap in the information sharing between Health Visitors / Midwives / Early Help services and the GP. Most importantly it was not until the 16th December 2020 that there is any indication that the GP is aware of any social conditions which may be having an impact on a child patient's health.

19th – 21st December 2020

40. I heard evidence that on the 19th December 2020 Awaab was taken to Rochdale Urgent Care Centre by his parents. This was due to a two week history of shortness of breath. His breathing was noted to be noisy and it was noted that his breathing had suddenly deteriorated. He was treated and observed and shortly after midnight was transferred over to Royal Oldham hospital for further observation.
41. Dr Marshall told the court she saw Awaab with his mother and also took information from his Father over the telephone. Throughout his period of observation Awaab remained medically stable and Dr Marshall felt his presentation was one of croup. Awaab was discharged home. I am satisfied that given Awaab's improvement and presentation this was a reasonable diagnosis.
42. The following day he deteriorated and the court heard he was taken to Rochdale Urgent Care centre by his parents following a conversation with the Community Children's Nursing Team. It was accepted by the NCA that the advice should have been given to either call 999 or to take directly to ROH.
43. As a matter of fact I find there should have been explicit instructions provided to the family on the morning of the 21st December to call an ambulance or to take Awaab directly to Royal Oldham Hospital.

Medical Cause of Death

44. I heard evidence that following Awaabs death extensive investigations were conducted by Dr Lumb Forensic Home Office Pathologist and Dr Petts Consultant Paediatric Pathologist in order to determine the cause of Awaabs death.
45. Dr Lumb also had the benefit of listening in court to the evidence from Professor Richardson. Dr Lumb told the court that on examination of Awaab his trachea and bronchi were swollen and this swelling to the lining of his airways and throat was the most significant internal finding.
46. Histology indicated an unusual pattern of change there was evidence of severe granulomatous tracheobronchitis. Dr Lumb explained this was usually a longstanding process which would take time to develop, usually weeks or months.
47. Dr Lumb was asked whether the process could be reversed and he told the court that the presence of granulomas is evidence of a long term inflammatory process, which are difficult to reverse and that would take sometime. In this case he explained that they are continuing to get worse with continued exposure.
48. Dr Lumb went onto advise that granulomas are normally seen in specific conditions and are very rare in young people. He went onto explain that there was no evidence of TB and the pattern of change was not of the same distribution as you may expect to see in people who have autoimmune conditions.
49. The distribution here fitted a pattern of something entering the airways and causing the granulomas. Dr Lumb told the court this fitted with fungal infections and together with the history and circumstances and with the post mortem findings the only explanation, in his opinion, was that the death was due to chronic exposure to fungus.
50. I find as a matter of fact that the medical cause of Awaabs death was :
 - a. 1a) Acute airway oedema with severe granulomatous tracheobronchitis due to
 - b. 1b) Environmental mould exposure

Conclusion as to the Death

51. At the end of the evidence I received legal submissions from counsel for the IPs which address the possible conclusions available to me. I have considered and taken full account of all the submissions.
52. It was agreed by all IPs that a narrative conclusion would be the most appropriate conclusion in this case and I accept that submission.
53. I was then asked by the legal representatives for the family to consider a rider of neglect. In order to consider neglect I have to be satisfied on the balance of probabilities that there is a 'clear and direct causative link' between the action or omission to which the neglect relates and the death.
54. I accept it does not have to be the only action but it must have caused or contributed more than 'minimally, trivially or negligibly' to the death.
55. I find as a matter of fact that the development of Awaab's severe respiratory condition which led to him going into respiratory arrest was entirely due to the prolonged exposure he had to mould in his home environment.
56. However the very difficult question in light of the position of the NCA and the evidence of Dr Panesa is, would Awaab have died at the exact time he did if appropriate advice and treatment had been given. Dr Panesa was pressed on this point in questions from myself and his evidence to the court was that Awaab would not have died if an ambulance had been called or if he had been taken directly to Oldham hospital.
57. He explained that they would have been able to place the ventilation tube further down past the blockage which would have prevented the cardiac arrest.
58. This evidence was not challenged by any of the legal representatives.
59. For a rider of neglect any such failure would have to be considered by myself to be a "*gross failure to provide adequate nourishment or liquid, or provide or procure basic medical attention or shelter or warmth for someone in a dependant position – because of youth, age, illness or incarceration – who cannot provide it for himself.*" R v North Humberside Coroner ex p Jamieson [1995] QB1
60. I do not find that the omissions, which are accepted omissions by the NCA, are such that they reach the threshold of gross. As such I am not adding a rider of neglect to my conclusion in Box 4.

Record of Inquest

I shall, therefore, record the following on the Record of Inquest :

Box 1 :

Awaab Ishak

Box 2 :

Ia Acute airway Oedema with severe granulomatous tracheobronchitis
Ib Environmental Mould Exposure

Box 3 :

Awaab died on the 21st December 2020 at the Royal Oldham Hospital. Since his birth he had lived at 196 Ilminster, Tweeddale Street, Rochdale. During his life he had been exposed to environmental mould which had formed in the home address due to damp and condensation arising from normal activities of daily living. The mould had been reported to Rochdale Boroughwide ("RBH") housing association, the landlords of the property in 2017. In 2017 the advice given, to paint over the mould, was not clear or effective and did not address the underlying cause of the mould.

The property had inadequate ventilation and was not equipped for normal day to day living activities, which led to excess damp and condensation.

Awaab had consistently suffered from cold/respiratory issues throughout his life. In July 2020 Health Visitors raised their concerns about the mould in a letter to RBH dated 9th July 2020. This information was not shared with the GP.

RBH conducted an inspection of the property on the 14th July 2020. Too much emphasis was placed on the cause of the mould being due to parent's lifestyle and did not identify the lack of an adequate ventilation system as a factor in the presence of the mould.

Due to an ongoing disrepair claim no remedial action was taken. Remedial works to treat and remove the existing mould should have been undertaken. The lack of action meant Awaab continued to be exposed to harmful mould between July 2020 and December 2020. The harmful effects of mould were not fully appreciated or understood.

On the 19th December 2020 Awaab was taken by his parents to Rochdale Urgent Care Centre due to stridor and increased respiratory effort. He was transferred to Royal

Oldham hospital for observations. This attendance was during the pandemic when only one parent could be present. English was not the first language for Awaab's mother who was present. Awaab was medically stable following his observations and a working diagnosis of croup was made. This was reasonable given his presentation. The Doctor had been made aware of the presence of mould in the house and an appropriate referral was made to social services.

Awaab was discharged on the 20th December 2020. Clear instructions using an appropriate translator should have been provided to the family. It should have been communicated to them that should Awaab have any further breathing difficulties then they must call an ambulance or present directly to the Royal Oldham hospital.

On the 21st December 2020 Awaab's father contacted the Children's Community Nursing Team, he was advised he could take Awaab to hospital himself. Parents should have been advised to call 999 for an ambulance. The time of this call was not documented. Awaab was taken to Rochdale Urgent Care Centre. He was in a critical condition and proceeded to go into respiratory arrest. The ventilation of his airway was sub-optimal and enroute to Oldham hospital he went into cardiac arrest. Despite attempts to resuscitate Awaab he died at Royal Oldham hospital.

Box 4 :

Awaab Ishak died as a result of a severe respiratory condition caused due to prolonged exposure to mould in his home environment. Action to treat and prevent the, was not taken. His respiratory condition led to a respiratory arrest. The medical advice given to his parents led to Awaab receiving sub-optimal ventilation of his airway which was unable to prevent his cardiac arrest.

Box 5 :

- (a) 13th December 2018, Royal Oldham Hospital
- (b) Awaab Ishak
- (c) Male
- (d) -
- (e) 21 December 2020 Royal Oldham Hospital
- (f) – Son of Aisha Amin Housewife and Faisal Abdullah, 196 Ilminster, Rochdale.

Joanne Kearsley

HM Senior Coroner

15th November 2022

The Better Social Housing Review



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INTRODUCTION

We believe that good quality housing is a basic human right. The places that we call home have a significant impact on our health and happiness and on what we can achieve in our lives.

Housing associations collectively provide homes to around six million people. When social housing works best, it creates good quality, safe and secure homes for individuals and families to thrive in, in strong communities.

Throughout our review, we've seen inspiring examples of social housing that is achieving exactly that.

However, it is not always the case and too many people are now living in housing which doesn't live up to these ambitions.

The adverse effects this can have on tenants' physical and mental health and wellbeing are profound and sometimes tragic. The Grenfell Tower disaster and the subsequent inquiry clearly evidenced how an entire community can be catastrophically let down, exposing fundamental racial inequalities and discrimination.

Yet the disturbing news stories continue. Just last month, we read the shocking finding that the death of two-year-old Awaab Ishak was due to a severe respiratory condition caused by exposure to untreated mould whilst living in a social housing property.

The coroner told the BBC that this "should be a defining moment for the housing sector."¹ The National Housing

Federation have consulted their members on proposals to take action on this. They have also consulted on the proposal for 'Awaab's law' and committed to working with other stakeholders to develop and set specific targets around it.

Recent media reports have highlighted many other cases of poor quality housing up and down the country. Daniel Hewitt's investigations for ITN and Kwajo Tweneboa's social media campaigns have exposed footage and photos of properties with a wide range of issues relating to damp, mould, leaks, inadequate ventilation, pests, overcrowding and more. When such problems go unresolved and are compounded by a lack of response or disrespectful communication from landlords, the impacts can be devastating and destroy lives. The desperate and growing shortage of social housing nationally makes it even more critical that the stock which is available is of a decent standard as tenants inevitably have so little choice.

The Better Social Housing Review was set up by the National Housing Federation and Chartered Institute of Housing to examine these and other issues relating to the quality of social housing. This report is the culmination of six months of work by a panel of independent experts in social housing and includes our key findings, and recommendations.

¹ BBC News (November 2022), Awaab Ishak: Mould in Rochdale flat caused boy's death, coroner rules <https://www.bbc.co.uk/news/uk-england-manchester-63635721>

We have looked at the quality of social housing in England through a number of different lenses including:

- the challenges of managing and developing housing stock
- culture, complaints and communication
- stigma and discrimination
- tenant voice and power
- sustainability and climate change
- workforce
- health
- access to data and information

We structured our investigations around two key pillars which quickly emerged as the top priorities for those living in social housing:

- i) the suitability and quality of housing stock, and
- ii) the housing association's culture and responsiveness to tenants' concerns and complaints.

There is nothing revelatory in our findings or recommendations, but they are informed by the evidence and insights we have gathered from a huge range of different people and organisations involved in social housing. It may seem to housing associations that our recommendations are already central to their existing thinking and approach. All our recommendations have been inspired or informed by examples of good practice we have seen from housing associations, staff and tenants. They provide evidence that the provision of consistently good quality social housing and greater equity of voice and power across the sector are both possible. However, we urge every housing association to have the courage to ask themselves difficult, but necessary, questions about the reality of all the homes they provide and the service given to all their tenants, so that real progress can continue to be made.

We recognise that the context in which housing associations are operating is challenging. Imposed requirements on housing associations' expenditure have increased considerably and operating margins have decreased. The need to meet important additional standards around building safety and climate action, for example are expanding alongside the ever more urgent demand to build more homes.

England has moved from having 31% of households in social rented accommodation in 1979 to 17% in 2018/19.² This has led to the so-called 'residualisation' of social rent, meaning that this form of tenure houses those with the highest need rather than providing an affordable option to a cross-section of society. This shift is having a profound effect on tenants, those working in the sector and society as a whole. Already, a greater proportion of people who may need additional support live in this sector compared to other tenures.³ The number of tenants with more complex needs is also increasing whilst, at the same time, other sources of support in the community are falling away.

Many tenants face structural inequalities, especially people from black and minority ethnic communities, those with disabilities and single parent households. Serious concerns were raised with the panel about the systemic disadvantage still being faced by black and minority ethnic communities in particular. Structural inequalities and racism are threads that run throughout the report and tackling them has underpinned all the recommendations the panel is making.

² Economic and Social Research Council (ESRC) (February 2007), Ends and means: The future roles of social housing in England by John Hills <https://sticerd.lse.ac.uk/dps/case/cr/CASEREport34.pdf>

Ministry of Housing, Communities & Local Government (2018-19), English Housing Survey Headline Report, 2018-2019 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860076/2018-19_EHS_Headline_Report.pdf

³ Department for Levelling Up, Housing & Communities, English Housing Survey, Social Rented Sector 2020-21 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1088500/EHS20-21_Social_Rented_Sector_Report.pdf

The sector faces many external pressures. There is a cost of living crisis, and the cost of heating homes is a very real and rapidly increasing problem for many social housing tenants. The proposed rent cap is also likely to have an impact on housing associations with some parts of the social housing sector, such as supported housing or smaller specialist providers, much less able to withstand additional financial pressures. On top of this we are just emerging from a pandemic that has left the sector with supply and staffing shortages that are very challenging for housing providers to navigate and manage.

Resources and external funding are tight and increasingly uncertain. Housing associations have rightly been required to 'sweat their own assets' to support delivery of their purpose, but we have heard growing arguments that this model is fast reaching its limits. The revolving door of housing ministers has meant that there has been a lack of consistent and strategic thinking and action at a government level around housing. Funding taps have been turned on and off with minimal notice and successive governments have not invested enough in providing funding for critical areas such as regeneration. Central government may have outsourced its responsibilities for the provision of social housing, but it must recognise that it remains fully accountable for the provision of decent housing nationally and act on that responsibility as clearly as it already does in relation to health and education.

In short, housing associations have a really difficult job on their hands, and we have sought to reflect that reality in our findings and recommendations.

In developing our thinking we have built on the findings of many other reports and recommendations as well as important legislative and regulatory provisions and changes. The Social Housing Regulation Bill, with the newly proactive consumer regulation regime built on

tenant satisfaction measures; the significant work and reports of the Housing Ombudsman, in particular the report on damp and mould and the revised complaint handling code; and the recent Levelling Up, Housing and Communities Select Committee report on regulating social housing are all good examples of this. These are all very much welcomed.

With all this in mind, the panel's overriding concern is that the sector is at risk of diluting its focus on its core purpose which we take to be providing decent, safe homes for all those who can't afford the market. There are three essential elements to this core purpose: tenants, stock and staff. Thinking of this as a three legged stool, we see how crucial each of the three interdependent elements is to keeping the sector steady, balanced and effective. Under continuing pressure, however this balance can be lost.

Many tenants and other stakeholders we spoke to told us that the tenant voice and influence in particular, are no longer strong enough. It is for that reason that we have put tenants at the very centre of our thinking.

The recommendations within this report relate to those areas which our review suggests need to be held in the clearest line of sight and which are most directly relevant to protecting and progressing against this core purpose. Whilst the panel has focused its review on housing association provision across England, we hope that our recommendations may also be of value to social housing providers more generally.

THE KEY RECOMMENDATIONS IN SUMMARY



1. Every housing association, and the sector as a whole, should refocus on their core purpose and deliver against it.



In a system under pressure, housing associations need to go back to test their performance against their core purpose – to provide decent, safe homes for those who can't afford the market.

When housing associations can demonstrate that they are delivering against that purpose they should then review again what further capacity they have available to continue to deliver against wider responsibilities and ambitions.

2. Housing associations should work together to conduct and publish a thorough audit of all social housing in England.



There is currently no comprehensive, consistently measured picture of the state of social housing across the country. Different housing associations have varying approaches to auditing their stock and expressing data.

Housing associations should work together to undertake a comprehensive national audit of social housing. The panel recommends that they should do this by adopting and applying the new HACT UK Housing Data Standards right across the sector.

3. Housing associations should partner with tenants, contractors and frontline staff to develop and apply new standards defining what an excellent maintenance and repairs process looks like.



There are widespread and growing concerns about how too many housing associations manage the maintenance and repair of their housing stock and respond to concerns and complaints about this raised by tenants.

Each housing association should ask tenants, frontline staff and contractors to work together to review how the organisation deals with maintenance and repairs. They should develop new standards together to be applied to review the organisation's performance and then develop an annual plan for continuous improvement.

4. The Chartered Institute of Housing should promote the traditional housing officer⁴ role as a supported and valued employment opportunity with a Chartered Institute of Housing recognised programme of training and continuing development.



Exceptional pressures and demands on frontline staff working directly with tenants are contributing to very high turnover rates at this level and making it harder for many tenants to communicate with their landlord.

Housing associations should increase investment in recruiting, developing and supporting the retention of more housing officers to enable them to re-establish more manageable patch sizes.

⁴ The role that has traditionally been referred to as 'housing officer' is defined here as those staff who interact with tenants on a daily basis and liaise with them in regards to their properties.

5. Housing associations should work with all tenants to ensure that they have a voice and influence at every level of decision making across the organisation, through both voluntary and paid roles.



There are widespread concerns that tenant voice, and the diversity of that voice, can get lost in a sector under pressure where leaders can be distanced from the realities of tenant experience.

Tenants should be recognised as key partners in delivering sector purpose. All housing associations should assess their performance against tenants' experiences by empowering them to lead investigations and reviews and should expand the roles they can play across organisations.

6. Housing associations should develop a proactive local community presence through community hubs which foster greater multi-agency working.



Too many tenants are concerned about reduced face to face contact with landlords. Internal silo working and lack of commitment to external multi-agency working can reduce the efficiency and impact of associations.

Housing associations should actively seek to create more community-based hubs, either by engaging with existing ones or actively setting up new ones. These hubs should reflect the needs and aspirations of the community and be based on the principle of 'go where the tenants are.'

7. Housing associations should support tenants and frontline staff to undertake an annual review of the progress each organisation is making in implementing this review's recommendations.



For these recommendations to have real impact, housing associations should work with their tenants and frontline staff to examine how well they are doing in terms of implementing them and to find ways to overcome the challenges and barriers they face in doing so.

RECOMMENDATIONS IN DETAIL



1. Every housing association, and the sector as a whole, should refocus on their core purpose and deliver against it.



In a system under pressure, housing associations need to go back to test their performance against their core purpose – to provide decent, safe homes for those who can't afford the market.

When housing associations can demonstrate that they are delivering against that purpose they should then review again what further capacity they have available to continue to deliver against wider responsibilities and ambitions.

The problem and related findings

Social housing is a system under pressure.

Housing associations are increasingly struggling to manage growing external demands and expectations with the resources they have. Many at the same time risk overstretch and reduction of focus through the scale of their internal ambition to deliver social justice and equity for all tenants. One result of that ironically is that tenants' voices can too easily be drowned out by multiple immediate pressures.

The sector is required to deliver against many and, at times, competing targets. As part of managing the quality of their housing stock, many housing associations face the costs and challenges of

regenerating old and failing estates whilst at the same time meeting the increasingly urgent need to build new social housing at pace and at scale. Providers must comply with new regulations around, for example, building safety and achieving net zero. With fewer social homes available and the 'residualisation' of social housing provision, many associations are working with tenants with increasing complexity of need, in communities where other support organisations are falling away.

The government's outsourcing of responsibility for social housing has compounded these pressures. We've seen rotating government ministers, rapidly changing policy environments and unpredictable rent settlements making it harder to borrow and plan.

The focus on proactive economic regulation in pursuit of financial viability has led some housing associations to become far more commercial in their focus with increasing numbers of mergers and the temptation to count the number of new housing units built rather than tackling how to measure and perform against more complex indicators such as tenant experience and satisfaction. Larger organisations in particular face the risk of being further removed from tenants, who should, ultimately be at the heart of any housing association's social purpose.

The recommendation

The pressures of being pulled in multiple directions, and the failure to make clear choices about what to prioritise and how within limited resources, have been highlighted by stakeholders time and time again as part of our review. They have repeatedly told us that the role of housing associations is fundamentally to provide decent, safe homes for those who cannot afford the market and that this should be their immediate priority.

It is therefore time to go back to basics. Each organisation will make its own judgements on priorities in the context of its geography and communities but, as with any business, it is essential when under pressure to revisit core purpose and re-establish clarity and focus on that in order to stay on track. Housing associations need to assess how well they are delivering against those basics. It is only when there is confidence that these are being properly resourced and delivered that housing associations will then be able to make well-informed judgements about how far to extend and diversify other commitments and ambitions.

As part of this renewed purpose, the sector must do more to challenge and break down the stigma and discrimination still faced by people who live in social housing, both in society as a whole and within the social housing sector itself. The situation is worse for those individuals and groups who already face discrimination and structural inequalities in wider society such as people with disabilities and those from black and minority ethnic communities. The sector needs to serve and represent all its tenants, whatever their circumstances or backgrounds.

Some stakeholders also believe that the sector has lost its campaigning voice and is not advocating with tenants strongly enough to government, whether for additional capacity or changes to policy and legislation. Housing is an investment in society, as important as health and education yet it is not currently prioritised as such at government policy level. Stakeholders told us that for too long tenants have not had enough of a voice to seize the government's attention and demand change.

There therefore needs to be sharper and clearer agreement on core purpose at a sector level too. This should ultimately empower the sector to make stronger, more cohesive arguments to government alongside its tenants as a voice which government will need, and want to listen to.

2. Housing associations should work together to conduct and publish a thorough audit of all social housing in England.



There is currently no comprehensive, consistently measured picture of the state of social housing across the country. Different housing associations have varying approaches to auditing their stock and expressing data.

Housing associations should work together to undertake a comprehensive national audit of social housing. The panel recommends that they do this by adopting and applying the new HACT UK Housing Data Standards right across the sector.

The panel recommends that housing associations agree to adopt these standards within six months of this review and produce a comprehensive strategy across the sector that implements the standards in full, within three years.

We would like to see this audit being undertaken on a regular basis with the information gathered forming a national and updatable, publicly available database of the social housing stock and wider performance of housing associations in England.

The problem and related findings

As it currently stands, the sector has no clear picture of the state of its stock and its wider performance. Data quality and integrity are, in fact a resource drain across the sector, with an estimated 25-30% of all resources currently engaged in recording, collating, cleaning and re-keying poor quality data.⁵ This makes for inadequate insight, compromises decision making and hampers scrutiny and accountability.

Many stakeholders we spoke with suggested that housing associations both need to be more proactive about getting on top of data on quality and to make more effective use of what is already known.

The focus of regulation over recent years has been significantly skewed towards measuring and valuing success against economic rather than consumer standards. Organisations can therefore be working to KPIs more related to business efficiency, such as

the number of new housing units being built, than to measuring tenant satisfaction with them. This has led to some housing associations shifting their focus from basic housing management to a continuous push for development and growth in the desire to reach and exceed these targets.

The number of external requirements and standards housing associations are required to deliver against can similarly result in organisations measuring functional components and formal data at the cost of other things which are harder to measure, but arguably more important, such as tenant experience.

Housing associations use a variety of approaches to collate information about compliance, even with something as fundamental as the Decent Homes Standard. Some, for example, exclude homes where plans are in place to repair from reporting which leads to discrepancies in data about the rates of compliance.

⁵ HACT, November 2022

The end result can be a reality gap - self-reported compliance is over 99%, while the English Housing Survey found compliance at 88.7%.⁶

Especially in larger housing associations, the leaders and, in particular the board, may not have sufficient line of sight on the realities of that tenant experience - the distance between those with the power to get things done and tenants can become too long. Staff may also be concerned about the possible consequences of being open in reporting on poor performance so reporting can become more about providing potentially misplaced reassurance rather than proper assurance.

Responses to this review however, raised a range of concerns about quality across the social housing sector which need to be more confidently understood and addressed.

In 2020, 11% of dwellings in the social rented sector failed to meet the Decent Homes Standard. This equates to around 448,000 homes.⁷ It is clear that poor quality social housing is an issue for too many tenants. According to the English Housing Survey, almost one third (32%) of social renters had considered making a complaint to their landlord or tenant management organisation and among those who did complain, almost two thirds (63%) were not happy with the response they received to their complaint. Furthermore, 43% of those choosing not to complain chose not to because of the hassle and time required to do so.⁸

The social injustice of this is further exacerbated by the fact that the social rented sector is home to a higher proportion of people from excluded or disadvantaged groups than other sectors. In social rented households 55% have at least one household member with a long-term illness or disability (this contrasts with 29% of private rented households), 50% are in the lowest income quintile and 18% are lone parent households.⁹ Social housing tenants are also disproportionately likely to be from black and minority ethnic backgrounds.¹⁰ Relative to total population size, 44% of Black African households and 40% of Black Caribbean households are social renters, compared to 16% of White British households. Black and minority ethnic tenants are also more often located in inner city properties where stock may be poorer quality and harder to repair and retrofit, and where there are fewer green areas.¹¹

Stakeholders told us that too many one or two bed units are being built to hit development targets and that there is consequently even more pressure on the availability of larger properties for intergenerational family groups. This can lead to overcrowding which can, in turn, have negative health impacts for tenants. Again, this inadequacy of stock unfairly and disproportionately impacts people from black and minority ethnic communities. A study by the Black South West Network, for example found that 63% of Somali households, who are more likely to live in inner-city social housing estates, experienced overcrowding.¹²

⁶ Department for Levelling Up, Housing & Communities (July 2022), English Housing Survey: Social rented sector, 2020-21 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1088500/EHS20-21_Social_Rented_Sector_Report.pdf

⁷ As above

⁸ As above

⁹ As above

¹⁰ Renting social housing - GOV.UK Ethnicity facts and figures (www.ethnicity-facts-figures.service.gov.uk)

¹¹ Inside Housing (24th May 2021), How race impacts on people's chances of living in a damp home or experiencing fuel poverty <https://www.insidehousing.co.uk/insight/insight/how-race-impacts-on-peoples-chances-of-living-in-a-damp-home-or-experiencing-fuel-poverty-70645>

¹² Black South West Network for Power to Change & Bristol City Council (2020), Housing BAME communities in Bristol <https://www.blacksouthwestnetwork.org/>

We heard many concerns about the number of empty properties across the sector and the need to know with more confidence about how many there are and their current condition. This would help to optimise their use to relieve the critically serious shortages of social housing across the country. Some stakeholders questioned why so few housing associations have opted to raise voids standards generally, even though investment in this might also establish better relationships and more trust with tenants from the start of their tenancies.

Damp, mould and condensation were the most prevalent and long-standing concerns for the majority of stakeholders we spoke to as part of the review. The Housing Ombudsman found, however that the majority of social landlords still take a reactive, rather than a proactive approach to dealing with this issue.¹³ Numbers of complaints are going up and more are being upheld.

Equity issues are at play here too as people from black and minority ethnic backgrounds are much more likely to live in houses with damp and mould and to experience fuel poverty.¹⁴ The risk of tenants turning heating down or off because of the current cost of living pressures can trigger increased problems with damp and mould which have direct, adverse health consequences. Studies have linked damp to a number of health problems including respiratory issues, asthma, physical pain, immune system issues and headaches, particularly affecting children.¹⁵ A recent

study found that retrofitting home insulation can reduce the onset of chronic respiratory diseases, such as asthma, by up to 10% and can also help to manage symptoms.

Homes with heat pumps fitted had even better results on health.¹⁶ In fact, as part of The Warm Home Prescription trial doctors are now prescribing heating to those patients that have health conditions that get worse in the cold, to avoid the cost of hospital care if they become more ill.¹⁷

The recommendation

The Regulator for Social Housing clearly plays an extremely important role in relation to quality and performance across the sector. In this context the panel welcomes the increased powers of the regulator, the work of the new Director of Consumer Regulation and the development of new Tenant Satisfaction Measures, all of which are expected to be enacted through legislation stemming from the current Social Housing Regulation Bill. The panel urges the government now to complete this legislative process at pace.

The particular recommendation of the panel in this area is that housing associations should work together to conduct and publish a thorough audit of all social housing in England. It is recommended that this is made possible by sector-wide adoption of the HACT UK Housing Data Standards (UKHDS).

¹³ Housing Ombudsman Service (October 2021), Spotlight on: Damp and mould

<https://www.housing-ombudsman.org.uk/wp-content/uploads/2021/10/Spotlight-report-Damp-and-mould-final.pdf>

¹⁴ Inside Housing, How race impacts on people's chances of living in a damp home or experiencing fuel poverty <https://www.insidehousing.co.uk/insight/insight/how-race-impacts-on-peoples-chances-of-living-in-a-damp-home-or-experiencing-fuel-poverty-70645> citing English Housing Survey Data, <https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/housing-with-damp-problems/latest#by-ethnicity> and Fuel Poverty Data, <https://www.ethnicity-facts-figures.service.gov.uk>

¹⁵ Housing Ombudsman Service (October 2021), Spotlight on: Damp and mould

<https://www.housing-ombudsman.org.uk/wp-content/uploads/2021/10/Spotlight-report-Damp-and-mould-final.pdf> ; NHS, Can damp and mould affect my health? <https://www.nhs.uk/common-health-questions/lifestyle/can-damp-and-mould-affect-my-health/>

¹⁶ Indoor Air (August 2022), Retrofitting home insulation reduces incidence and severity of chronic respiratory disease <https://onlinelibrary.wiley.com/doi/10.1111/ina.13101>

¹⁷ BBC News (22 November 2022), Energy bills: patients prescribed heating as part of health trial <https://www.bbc.co.uk/news/business-63707689>

The sector needs good quality data that is consistently recorded and expressed to drive insight about both housing quality and service experience. Adoption of the UKHDS would also, as one specific example, provide the means to drive insight around whether and how certain groups of tenants experience discrimination – an issue which has most recently been highlighted again as a central factor in Awaab Ishak’s death.

Good quality data enables boards to accurately assess the quality, safety and experience of what it provides. Comprehensive data standards would strengthen scrutiny and accountability, allow for informed comparisons across housing associations, give all tenants a quality benchmark and promote much easier sharing of good practice. With good data, landlords can make much better decisions.

Conducting a national audit based on these standards would establish the true state of social housing in England and could be used to inform policy and practice and create a powerful case for targeted support from, and engagement with, government on increasing the quality of social housing.

3. Housing associations should partner with tenants, contractors and frontline staff to develop and apply new standards defining what an outstanding maintenance and repairs process looks like.



There are widespread and growing concerns about how too many housing associations manage the maintenance and repair of their housing stock and respond to concerns and complaints about this raised by tenants.

Each housing association should ask tenants, frontline staff and contractors to work together to review how the organisation deals with maintenance and repairs. They should develop new standards together to be applied to review the organisation's performance and then develop an annual plan for continuous improvement.

The problem and related findings

It was very evident from our discussions with tenants in particular that dissatisfaction with repairs and maintenance work is a major issue in the sector. Investment in repairs of social housing stock is 33% below target and this is clearly having a knock on effect on the overall quality of stock as well as tenant satisfaction levels.¹⁸

Satisfaction with repairs is lower among social renters (66%) than private renters (75%) and the main reasons for dissatisfaction are: 'the landlord is slow to get things done' (29%), 'the landlord does not bother' (26%), 'the work done was of poor quality' (17%) and 'the landlord does the bare minimum' (13%).¹⁹

The Right to Buy policy contributed to a reduction in the number of homes available for social rent overall²⁰ and simultaneously led to an increase in the proportion of social housing stock that is difficult to maintain, particularly in inner-city areas.²¹

The cost of repairs and maintenance works has increased well beyond inflation levels. Future developments must consider the scarcity of materials and energy as this approach will enable future cost savings. Retrofitting existing housing stock and improving insulation may seem expensive but investment now would enable savings in the future. The current very high cost implications of retrofitting are compounded by the fact that VAT on retrofitting to meet zero carbon responsibilities is currently 20% whilst there is no VAT on new builds. Yet it is often the older properties that are most popular with social housing tenants. The panel asks government to review this VAT anomaly as a priority.

¹⁸ Inside Housing (6th September 2022), RSH quarterly survey: inflation and labour shortages bring repairs investment 33% below target

¹⁹ Department for Levelling Up, Housing & Communities, English Housing Survey, Social Rented Sector 2020-21 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1088500/EHS20-21_Social_Rented_Sector_Report.pdf

²⁰ DLUHC Regulation of Social Housing report of first session 2022/23, <https://publications.parliament.uk/pa/cm5803/cmselect/cmcomloc/18/report.html>

²¹ As above

There are additional issues with supply chains with smaller housing associations often disadvantaged in such a competitive market²² and labour shortages have also been a problem, particularly as a result of the pandemic. It was clear from discussions with stakeholders that in-house repairs and maintenance services appear, on balance, to deliver better end to end service and more reliable quality, but that is not a practical possibility for all associations.

Issues with standards can be harder to navigate for tenants with disabilities. The Social Landlord Disability Charter has been drafted by the Social Housing Action Campaign to encourage and help housing associations achieve greater awareness of, and compliance with the requirements of the Equality Act 2010. Social landlords may be familiar with making reasonable adjustments to properties, such as ramps or alternative communication methods, but adjustments required by tenants with mental health issues or invisible impairments can be more challenging for housing associations to address.²³

Many stakeholders we spoke with raised the issue of ‘ambulance chaser’ lawyers diverting finance which might otherwise be allocated to investment in repairs and maintenance and working more proactively on concerns. Most of the lawyers we spoke with, however pointed out that very few lawyers working on a ‘no win no fee’ basis would take on a case unless they thought the grounds were strong enough to make a win the more likely outcome. Government must in this context carry responsibility for the very steep cuts in the availability of legal aid funding in recent years. This has meant that, even when the (Homes) Fitness for Human Habitation Act was brought in 2018, so few legal aid lawyers were by then available to take up the opportunities this created to pursue wider disrepair

claims that this legislation has yet to be taken through the courts and used.

Dissatisfaction with the process of managing maintenance and repairs is significantly compounded by equivalent concerns with the handling of complaints and the defensive culture of too many housing associations.

Studies have shown that barriers relating to disability, sexuality, ethnicity, not having English as a first language, communication impairments, poor mental health, homelessness and geographical isolation can all contribute to people not being properly heard when they raise concerns. The panel noted from interviews with stakeholders that class is often an issue too.

The primary responsibility for resolving complaints lies with providers, but complainants can be expected to assimilate into systems that do not meet their needs and processes can be obstructive and inefficient. There are bureaucratic barriers to complaining including confusing terminology, (such as the difference between appeals and complaints,) and the complexity of the complaints processes themselves.²⁴

Levels of distress among tenants raising complaints can understandably be high, but staff handling the complaints can develop fatigue from dealing with them.²⁵ Staff in central call centres can too easily make unfounded assumptions about where problems and fault lie, tending to push back on what tenants tell them rather than accepting and acting on that. Too many providers have a culture of viewing complaints as unwelcome criticism in need of a defensive response rather than as valuable learning opportunities that provide critical insight.²⁶

²² Inside Housing (26th June 2022), New homes, repair and maintenance costs all rising above inflation, warns NHF

<https://www.insidehousing.co.uk/news/news/new-homes-repair-and-maintenance-costs-all-rising-above-inflation-warns-nhf-77899>

²³ Inside Housing (17th October 2022), Disabled tenants speak out through new charter

<https://www.insidehousing.co.uk/insight/insight/disabled-tenants-speak-out-through-new-charter-77901>

²⁴ University of Glasgow (August 2022), Briefing paper: Barriers to accessing adult social care and social housing complaint systems

<https://eprints.gla.ac.uk/277463/1/277463.pdf>

²⁵ Housing Ombudsman Service (October 2021), Spotlight on: Damp and mould

<https://www.housing-ombudsman.org.uk/wp-content/uploads/2021/10/Spotlight-report-Damp-and-mould-final.pdf>

²⁶ As above

Complaints to The Housing Ombudsman have increased by 139%²⁷ but there are still many tenants who choose not to complain for fear of retribution.²⁸ Social tenants from black and minority ethnic backgrounds are reported to feel afraid to discuss housing conditions for fear of losing their homes or other repercussions.²⁹ The Housing Ombudsman has repeatedly raised serious concerns about poor record keeping which further undermines the process of managing complaints.

The recommendation

The panel strongly supports the Housing Ombudsman's 2020 Complaint Handling Code which sets out good practice that will allow landlords to respond to complaints effectively and fairly. Strengthened provisions were recently added to this which took effect from April this year.

This area also speaks to the importance of data. One of the early domains that was developed for the UKHDS was on reactive repairs and planned maintenance, closely followed by development handover data. Good data and data flows are critical if the sector is to develop repairs and maintenance services that build excellence. If housing associations know about their buildings, can share data effectively across the supply chain and then have one accurate, data driven record of a building and its performance, both preventative and reactive maintenance should improve.

Retrofitting implementation and net zero improvements should also be factored into these data records. The panel believes that for the sector to truly accelerate towards a lower carbon future the current 20% VAT on retrofitting (vs. 0% on new builds) needs urgently addressing to ensure that it becomes as economically viable for a housing provider to bring an existing home up to standard, as it is to build from scratch.

Getting new building right from the start will also be important. There needs to be a long-term vision for the development of new housing stock which is sustainable and responds to net zero targets. Passivhaus schemes such as Goldsmith Street social housing in Norwich show what is possible to achieve if there is a will. The better the build quality, the less the effort which will be required to maintain it and the more sustainable the homes can be. The planned update to the Decent Homes Standard is timely in the context of new pressures on energy costs and the seriousness of the cost of living crisis. Careful choice of building materials along with ventilation, (extractor fans in kitchens and bathrooms or, even better, whole house ventilation systems,) with better heating and insulation will, as examples, help to eradicate damp and mould – the biggest source of complaint from tenants.

The specific recommendation of the panel in this area, however is that housing associations should use the experience and knowledge of those closest to the reality of the landlord's handling of maintenance and repairs – the tenants, contractors and frontline staff – and partner with them to develop and apply new standards defining what an excellent maintenance and repairs process looks like.

These should then be used to benchmark current performance – taking Decent Homes as the minimum acceptable standard – and inform the development of an annual plan for continuous improvement. Results should be shared across the sector to support wider learning.

²⁷ Housing Executive (January 2022), Social Housing Professionalisation review underway www.housingexecutive.co.uk

²⁸ University of Glasgow (August 2022), Briefing paper: Barriers to accessing adult social care and social housing complaint systems <https://eprints.gla.ac.uk/277463/1/277463.pdf>

²⁹ Inside Housing (24th May 2021), How race impacts on people's chances of living in a damp home or experiencing fuel poverty, citing research by Black South West Network, <https://www.insidehousing.co.uk/insight/how-race-impacts-on-peoples-chances-of-living-in-a-damp-home-or-experiencing-fuel-poverty-70645>

4. The Chartered Institute of Housing should promote the traditional housing officer ³⁰ role as a supported and valued employment opportunity with a Chartered Institute of Housing recognised programme of training and continuing development.



Exceptional pressures and demands on frontline staff working directly with tenants are contributing to very high turnover rates at this level and making it much harder for many tenants to communicate with their landlord.

Housing associations should increase investment in recruiting, developing and supporting the retention of more housing officers to enable them to re-establish more manageable patch sizes.

The problem and related findings

Frontline employees such as housing officers can be a housing provider's biggest asset when it comes to realising the sector's core purpose, regularly walking around local communities, building trust and knowledge of household circumstances through face to face connections and relationships with tenants and building on the ground knowledge of the housing stock.

Over recent years, however the number of housing officers employed has decreased as investment in digital communications has increased and we heard about patch sizes which have expanded to up to 1000 households with an increased range of complexities thrown into the mix, including anti-social as well as criminal behaviour.

The panel noted a significant level of stress being experienced by these customer-facing employees. They are often all too acutely aware of the shortfalls in the quality of services, but are unable to access the

resources they would need to deliver to the standard they would want to. They do not feel empowered to make the decisions and take the actions that would be necessary to solve tenants' problems.

Stakeholders report that frontline employees like housing officers are currently feeling under siege from above and below as well as from social and traditional media. There is a lack of general public recognition of and status for this important role and morale can be low. This can in turn lead to a deficit of aspiration, ambition and pride for officers in their role. Research shows that being complained about can have a negative impact on those delivering public services which then feeds into feelings of less trust for the service users themselves.³¹

³⁰ The role that has traditionally been referred to as 'housing officer' is defined here as those staff who interact with tenants on a daily basis and liaise with them in regards to their properties.

³¹ University of Glasgow (August 2022), Briefing paper: Barriers to accessing adult social care and social housing complaint systems <https://eprints.gla.ac.uk/277463/1/277463.pdf>

It is clear that, within the sector, there are purpose-driven, approachable and empathetic individuals working in housing officer type roles. However, unless they are properly valued and rewarded, turnover will continue to be high and this can have a direct, adverse effect on the quality of service that tenants experience. Time and again, stakeholders taking part in the review, reported significant problems with the recruitment and retention of staff overall due to a competitive and volatile market, but this is particularly true of the frontline. High staff turnover is contributing to what one stakeholder described as ‘the snakes and ladders effect’ whereby, as soon as a tenant makes progress on an enquiry or complaint, a new member of staff comes in to replace that departing staff member and tenants repeatedly have to start the process all over again.

In this context it was also noted that there is a recurring risk of housing providers having to employ people at pace out of necessity to cover urgent staffing gaps rather than taking the time needed to make the best appointment and insisting on the quality, skills, experience and more representative diversity really needed to fill critical roles.

The recommendation

The panel believes that improving the recruitment and retention of housing officers and increasing the numbers employed in this role across the sector again would make a very positive difference to the sector’s ability to deliver high quality social housing services, not least through allowing reductions in patch sizes again.

One way to raise morale would be to encourage links between different customer facing teams so that they begin to have the agency, capability and capacity to proactively identify issues together and take effective action.

All housing associations should also take a ‘values-based’ approach to the recruitment and development of staff generally with clearly defined expectations around attitudes and behaviours and linked rewards and incentives that encourage outstanding customer service. When recruiting new housing officers in particular, organisations should seek to attract candidates from the communities they are based in, both to widen representation and to build stronger connections between the staff and the tenants they support.

The specific recommendation of the panel in this area, however is that the Chartered Institute of Housing should promote the traditional housing officer role³² as a valued and supported employment opportunity with a recognised programme of training and continuing development which would then open up opportunities for career progression across the sector. This programme should cover a range of formal professional skills, but also support the development of strengths such as empathy, decision making and communication, as well as building knowledge and understanding of relevant issues such as mental health, anti-social behaviour and domestic violence.

The panel strongly believes that this approach would help to raise the profile of this work and increase the status and national recognition that these crucial roles deserve.

³² The role that has traditionally been referred to as ‘housing officer’ is defined here as those staff who interact with tenants on a daily basis and liaise with them in regards to their properties.

5. Housing associations should work with all tenants to ensure that they have a voice and influence at every level of decision making across the organisation, through both voluntary and paid roles.



There are widespread concerns that tenant voice, and the diversity of that voice, can get lost in a sector under pressure where leaders can be distanced from the realities of tenant experience.

Tenants should be recognised as key partners in delivering sector purpose. All housing associations should assess their performance against tenants' experiences by empowering them to lead investigations and reviews and expand the roles they can play across organisations.

The problem and related findings

Many housing associations have made focused efforts over recent years to try to engage tenants and listen to their experience and ideas. The National Housing Federation is investing in the Together with Tenants initiative and the panel recognises the value and intention of this.

Tenants now often sit on housing association boards and fulfil important scrutiny and governance roles. The importance of boards and senior leaders in setting and modelling an organisation's culture and values cannot be underestimated. Leaders should, as one review respondent said, 'have enough insight to develop empathy' with tenant experience.

Having tenants on the board is one positive way to shorten that line of sight. This has even greater significance in the context of the challenges that the sector faces in relation to representation at senior staffing levels. An Inside Housing survey on diversity found 62 housing associations had all-white executive teams and more than a quarter of associations had all-white boards. Furthermore, men made up 58%

of all executive-level jobs in the UK and 66% of G15 executives. While 18% of social housing tenants in England are disabled, only 4.9% of board members and 5% of executives identified as disabled. Research carried out in both the Midlands and Kent by The Housing Diversity Network found that housing providers reflect their community at front line level, but the further up the organisation you go the less diverse it gets.³⁴

Black and minority ethnic tenants are currently often excluded from decision-making. Consequently, issues that impact such groups disproportionately, such as overcrowding, unsafe and poor quality housing, overconcentration of housing in the most deprived areas and language barriers may not be given proper emphasis. These communities can too often be disregarded with decisions which affect them being repeatedly made without seeking their input, with the excuse that they are 'hard to reach'.

³³ Inside Housing (Dec 2021), How diverse is the housing association workforce in England?

<https://www.housing.org.uk/globalassets/files/edi/new-edi-national-data-report-final.pdf>

³⁴ Housing Diversity Network (November 2022), Kent Housing Group – EDI Baseline Report 2022 <https://www.housingdiversitynetwork.co.uk>
<https://www.housingdiversitynetwork.co.uk>

Tenant engagement, both at board level and more widely, has also tended to favour people with the available time to commit – another reason why those who are most engaged are not always representative of the demographic of the local tenant group.

At present there is no standard definition of ‘engagement’ when it comes to social housing tenants and the objective behind the engagement itself may not be clearly expressed or understood. Tenants’ contributions and ideas may not always be carried forward and, as a result, the experience of engagement can too easily feel like a ‘tick-box exercise’.

The recommendation

The panel recommends that all housing associations should see their tenants as one of their most important assets alongside their staff and the physical housing stock. The representation and contribution of tenants should sit automatically at the very heart of an organisation and be established as the ‘golden thread’ running through all operations.

Housing associations are encouraged to think more widely and creatively about a range of forms of engagement in order to ensure diverse and representative tenant voices are far more prominent throughout organisations. They should, for example, actively ensure that, when seeking to give tenants a voice and influence, there is proportionate representation from black and ethnic tenants.

The panel particularly recommends that housing associations work in partnership with tenants at all levels of the organisation, assessing their performance against tenants’ experiences and empowering tenants to lead investigations and reviews as standard.

In addition, the panel recommends that housing providers go further and actively recruit and employ tenants through:

1. Creating or providing more tenant apprenticeships schemes as well as a wider range of tenant volunteering roles to provide more pathways to employment for tenants, and opening up opportunities for valued contribution and inclusion to a much wider diversity of tenants.
2. Recruiting and supporting tenant peer mentors in paid roles to represent and support other tenants through complaints processes.
3. Recruiting and supporting tenants in paid roles to sit on newly created peer complaint resolution / adjudication boards.

All this should have a direct effect on how tenants feel treated and valued and potentially release significant additional strengths and capacity to support effective delivery of the organisation’s purpose.

6. Housing associations should develop a proactive local community presence through community hubs which foster greater multi-agency working



Too many tenants are concerned about reduced face to face contact with landlords. Internal silo working and lack of commitment to external multi-agency working can reduce the efficiency and impact of associations.

Housing associations should actively seek to create more community-based hubs, either by engaging with existing ones or actively setting up new ones. These hubs should reflect the needs and aspirations of the community and be based on the principle of 'go where the tenants are'.

The problem and related findings

The panel were told several times about the number of community buildings housing associations own across the country, but one of the most strongly and frequently shared complaints we heard from tenants was about the loss of local, face to face contacts with housing association staff. Part of this related to reductions in the numbers of housing officers employed, but tenants of larger associations in particular also raised real concern about the lack of organisational community presence and how much harder it therefore felt to connect with their landlord. Instead of being able to call in to a local office for support or advice, tenants generally have to contact staff by phone or digitally. The staff at the end of the phone are much less likely to know about and understand local issues and many tenants find it harder to raise concerns through these routes for reasons ranging from lack of self-esteem to mental health problems or cultural and language barriers.

Many tenants shared their experience of a number of housing associations working across one estate without apparently making any attempt to cooperate and coordinate knowledge and resources. We also

heard about how isolated smaller and specialist housing associations can be from other sector providers. Black and minority ethnic housing associations, for example, told us how their numbers have been reducing as they are too quickly absorbed into large generic associations if they run into difficulty rather than being offered more creative support by those associations.

Tenants may be engaged with a number of public and voluntary sector bodies as well as their landlord and juggling all those relationships can be challenging and frustrating in terms of both time and travel costs.

Compared with other tenures, social renters are generally less satisfied with their local area and the supporting infrastructure (79% compared with 91% of owners and 86% of private renters).³⁵ A 'social infrastructure deficit' is defined as a place suffering from poor connectivity (physical and digital), low community engagement levels and lacking in meeting spaces.³⁶

³⁵ Department for Levelling Up, Housing & Communities, English Housing Survey: Social rented sector, 2020-21 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1088500/EHS20-21_Social_Rented_Sector_Report.pdf

³⁶ APPG Left Behind Neighbourhoods, Social capital and social infrastructure: why it matters

<https://www.appg-leftbehindneighbourhoods.org.uk/evidence/session-2-social-capital-and-social-infrastructure-why-it-matters/>

The stakeholders we spoke with however – both tenants and staff – showed a keen interest in reviving communal spaces to meet. This was partly a response to how many people are struggling with loneliness and isolation, but was also recognition of all the potential benefits of being part of a joined up community where interests and skills can be shared and positive relationships can be built.

The recommendation

Housing providers of the future need to be designing social housing with strong social infrastructure that in turn, helps to build cohesive communities. The panel has been inspired by providers such as the members of the PlaceShapers network who work together to help communities to thrive. We also discussed the work of Big Local supported by Local Trust and reviewed the work of a number of other innovative community-based initiatives.

Our recommendation is that housing associations should actively seek to create more community-based hubs, either by engaging with existing ones or actively setting up new ones. Housing providers have a real opportunity to think creatively here. The hubs might provide an opportunity to repurpose an existing building or facility owned by an association or be included in a new, multi-purpose development. Equally, associations could contribute to the income and sustainability of a provision in another organisation's premises.

Association staff should be available in the hub at known times across a week, ideally alongside a cross-section of other agencies. This would build connectivity between housing workers and tenants and between staff across the different agencies. It would also improve access for tenants to the services of all the agencies involved. In the same way, smaller, specialist

housing associations might become more visible and secure as part of bigger, collaborative networks, enabling them to share their knowledge more widely and extend their influence on practice.

Hubs could tap into and make connections with other local services such as after school clubs, libraries, crèches, shared working spaces, training and skills programmes, furniture exchanges, repairs workshops, community gardens, and many other ideas that benefit their community.

What is important is that they should be community-led, reflect the needs and aspirations of their community and be firmly based on the principle of 'go where the tenants are'.

This approach does not necessarily require substantial financial investment, but the positive impacts on health, well being, opportunity, life satisfaction and increased social cohesion represent substantial social value – a value which must be captured by housing associations in any assessment of return on investments.

The panel recognises that the concept of a specific community hub may not be appropriate for all housing associations. Rural associations will, for example, tend to have smaller pockets of housing scattered across a number of communities. The principles of proactively working to increase the range of connections between tenants and their landlord and investing in multi-agency working, however should apply across the sector.

7. Housing associations should support tenants and frontline staff to undertake an annual review of the progress each organisation is making in implementing this review's recommendations.



For these recommendations to have real impact, housing associations should work with their tenants and frontline staff to examine how well they are doing in terms of implementing them and together find ways to overcome the challenges and barriers they face in doing so. Every housing association is different, but it is the frontline staff and tenants who have the most direct experience and insights to help ensure that the ambitions in these recommendations become a reality on the ground.



CONCLUSION

The English Housing Survey indicates that most social housing in England is of a decent standard and we have seen inspiring examples of positive and effective practice across the sector in the course of the panel's review.

The deaths of 72 individuals in the devastating fire at Grenfell and now the death of Awaab Ishak whilst living in a social housing property, however have thrown into sharp relief serious, continuing questions about the quality of social housing which both the sector and government must urgently acknowledge and address.

We urge the social housing sector to take immediate action on the issues raised in this review and would like to see our recommendations built into sector-wide as well as organisation-specific plans within six months.

The power imbalance between tenants and housing providers remains one of the biggest problems facing the sector, perpetuating rather than dismantling the societal stigma and discrimination experienced by people living in social housing. This is particularly true for those from black and minority ethnic communities.

To tackle this, social housing tenants must be front and centre of the sector's thinking. All tenants should be recognised and included as valued partners in the delivery of the sector's purpose as the key to unlocking an equitable and socially just way forward.

Associations need to go back to basics alongside tenants and staff at all levels, reviewing what to prioritise to deliver core purpose, reassessing wider ambitions against capacity and reviewing the systems and beliefs at the very heart of their operations. A framework of national standards with reliable

evidence of performance against them should underpin all this work and will be crucial to ensuring the quality of both homes and services.

The government, for its part, must fully accept its responsibilities and its accountability for the provision of decent safe and secure housing for all its citizens, as it has always done for health and education. It must also recognise where it has failed to provide the environment and investments needed to support the vital work of the sector.

With its 'house in order' the sector will be in a far stronger position to create a powerful collective case for targeted support from, and active engagement with government. The government and the sector should seize the opportunity to work together on delivering a shared vision for high quality social housing and its power to transform lives.

This country must be more ambitious for social housing, for the tenants who live in it, the employees who work in it, and the communities it forms such an important part of. After all, this doesn't just have the potential to ensure that every housing association provides homes where its tenants can thrive. It also has the potential to positively and profoundly benefit the health and wellbeing of communities up and down the country. That is a sector with real purpose. True ambition. That is a world class vision of 'levelling up'.

Methodology note

In June 2022, the Better Social Housing Review (BSHR) was set up by the National Housing Federation (NHF) and Chartered Institute of Housing (CIH), to independently examine ways to improve the quality of social housing provision in England.

As sector representatives, the two organisations asked an independent panel of experts to conduct a full review into the social housing provision provided by housing associations in England. The review was to culminate in a series of practical recommendations by the end of the year.

The aim of the review was to examine existing issues – physical, cultural and environmental – and make recommendations to help ensure that, going forwards, all social housing is fit for tenants to live and thrive in.

The panel was asked to consider the funding and policy environment in which the sector operates; common factors that may exist in cases of poor quality; issues around accessing repairs services; effectiveness of complaints procedures; as well as improved approaches for housing associations, tenants and Government to work individually and collectively to resolve issues.

In August, after compiling a target list of key stakeholders to approach for interviews, the panel began a period of consultation which consisted of both face-to-face and virtual meetings with a range of organisations and individuals who have a stake in improving the quality of social housing, including:

- Tenants' groups and campaigners
- The housing association sector
- Frontline workers – including repairs and maintenance staff as well as customer-facing staff
- The Regulator of Social Housing and the Housing Ombudsman Service
- Professionals working in housing including lawyers and architects

- The charity sector
- The Department for Levelling up, Housing and Communities
- MPs with an interest in social housing.

With the aim of conducting an open, inclusive and representative review the panel launched a website (www.bettersocialhousingreview.org.uk) in September which hosted two online surveys – one specifically for tenants, and the second for other social housing stakeholders. These surveys remained open for submissions until 31st October 2022.

During October, the panel held meetings around the country, visiting housing associations in London, Loughborough, Bath, Manchester and Sunderland in order to meet face-to-face with tenants and frontline workers.

Members of the panel met fortnightly either virtually or face-to-face throughout the review period and, following four months of insights and evidence gathering, drafted their recommendations in November when they also finalised this report.

The panel reported their findings to The Better Social Housing Review's Steering Group. This group is made up of housing association leaders who helped to shape the original terms of reference for the review and will now take the recommendations forward within the sector.

Neither the two funding organisations nor the Steering Group had any direct role in running the review, nor in the panel's final recommendations.

The Steering Group will now work to develop an action plan in response to the panel's recommendations for the sector to implement as soon as possible. The NHF and CIH will consult their members as part of this.

Throughout the process, the panel was supported by a secretariat to manage logistics for the panel including organising meetings and interviews, attending meetings of the panel as required in order to take minutes and drafting initial report content and recommendations at the instruction of the panel. The secretariat was provided by Forster Communications.

The Better Social Housing Review has been funded by The National Housing Federation and Chartered Institute of Housing.

About the Panel

The National Housing Federation and Chartered Institute of Housing appointed Helen Baker as Chair of the Better Social Housing Review panel after research by an external consultancy. The additional members of the panel were convened by invitation from the Chair, with support from Forster Communications.

A long list of potential panel members was drawn up and supplied to the Chair for her consideration and invitation. The Chair was asked to consider:

- People who live, or have lived, in social housing
- Background and experience in social housing, business, academia and the charity sector
- Geographic spread
- Diversity and inclusion
- Ensuring a lack of political bias.

As a result, the independent panel is made up of five volunteer experts with diverse experience of social housing in England and a passion for improving its quality.

They are:

Helen Baker, Chair

Helen has held many board level leadership roles in the civil society and public sectors across a career spanning social care, housing, health and education. She has chaired organisations ranging from national housing associations to NHS trusts and social care providers, a multi-academy trust and both local and national charities.

Helen has set up and managed a number of charities and began her career as a social worker. She has always had a strong focus on working with those who have been marginalised and disadvantaged – in particular those with disabilities, mental health issues or other long-term health conditions. Board appointments with Government arms-length bodies have included roles with the General Social Care Council, the Commission for the Compact and the National College for School Leadership.

Helen is currently the chair of Shelter and vice chair of The What Works Centre for Wellbeing and is also a deputy lieutenant for Oxfordshire.

Jennifer Brathwaite

Jennifer has been a councillor for Lambeth Council for 12 years and is a landlord and tenant lawyer by profession, specialising in leasehold enfranchisement. She was deputy leader of Lambeth Council, having held cabinet portfolios in Housing, Environment and Children Services. She has direct experience of the issues faced by those who live in social housing and those who are struggling to be housed.

Jennifer led on Lambeth's Equalities Commission and has a strong commitment to equality and diversity. As well as having run her own law firm she has been a partner for a medium sized London firm of solicitors. She has a particular interest in helping tenants and landlords to understand their rights and obligations. Leading Lambeth's housing services, she has direct knowledge of the inner workings of a large housing provider and has seen, first-hand, how good and poor quality housing services impact people's lives.

She is keen to raise awareness of the plethora of (often complex) housing/ leasehold legislation, as good legislation does not automatically enforce itself.

Sumita Singha OBE

Sumita is a chartered architect, author and teacher with a passion for the environment, equity and ethics. She came to the UK 30 years ago from India, on a scholarship to the University of Cambridge to study sustainable design, having studied architecture in India. She runs her own sustainability-focused practice, Ecologic Architects, and is on the board of the Royal Institute of British Architects (RIBA). Sumita has been teaching architecture for 30 years; and is a published author and popular speaker.

Sumita was on an NHS board for nine years and is passionate about health equity through design. She campaigns on social equity and diversity, setting up Architects for Change, the Equality Forum for architects in 2000, and is a trustee of the Architects Benevolent Society amongst others. Sumita comes from a humble background and has direct experience of the issues faced by people living in social housing and helping many. She is interested in the provision of safe, durable and sustainable housing for all. Sumita received an OBE for services to architecture in 2021.

Declaration of interests: Director, Ecologic Architects; Part time visiting lecturer, University of Westminster; Visiting professor, Technical University of Milano; Trustee, Charushila; Trustee, Commonwealth Association of Architects; Trustee, Waltham Abbey Royal Gunpowder Mills; Professional Conduct Panel, RIBA; Member, Hackney Design Review Panel; Trustee, Royal Institute of British Architects.

Neal Wylde

Neal has lived in rented accommodation for over 30 years, in both private and social housing. He has sat on a number of social housing panels and volunteered as an engaged tenant for 11 years. Neal has been involved in all aspects of engagement, from analysing and improving the operational workings of organisations and contract procurement, to communications systems, policy oversight and staff employment.

Neal has been volunteering with the National Housing Federation (NHF) Tenant Advisory Panel since 2019 on the Together with Tenants Charter, was involved in

the Together with Tenants roll out, and continues to volunteer with the NHF to challenge and support what they are doing to strengthen relationships between tenants and landlords. He has worked in managerial positions in a range of industries including retail, wholesale, the motor industry and transport logistics. As a wheelchair user, Neal is passionate about ensuring the voices and experiences of tenants with disabilities and the more vulnerable within society are heard and respected.

Declaration of interests: NHF tenant advisory panel member; Housing Ombudsman resident panel member; Social Housing Quality resident panel member.

Tom Markham

Tom is a Commissioning Officer working in Children's Services for Manchester City Council. He has spent the last three years commissioning and leading on the procurement of accommodation and support services for care experienced children and young people, including Unaccompanied Asylum-Seeking Children. This year, he was awarded the Council's 'Rising Star' award in recognition of his commissioning work, which focused on expanding partnerships with charitable/non-profit organisations.

Tom also works closely with the Leaving Care Service in Manchester, which supports over 100 care experienced young people leave care each year. Moreover, he has helped to roll out Manchester's House Project, which has developed into the Greater Manchester House Project Collaborative across seven Greater Manchester authorities, and which aims to better support care experienced young people moving into their first tenancy. Tom works closely with young people, their key workers, and providers to ensure Manchester develops the right accommodation at the right time to meet the presenting needs. In Tom's current role for Manchester City Council, he commissions and procures a variety of accommodation models delivered through a range of providers, including Housing Associations.

Tom is also a Youth Justice volunteer with Trafford Borough Council.

Stakeholders

Thank you to the following organisations and individuals who met with the panel and contributed to this review.

Architects specialising in social housing and building safety

Association of Retained Council Housing (ARCH)

Chartered Institute of Housing (CIH) networks

- Assets and Repairs Group
- Frontline staff

CEL Solicitors

Crisis

Dan Hewitt, ITV

David Bogle, Hightown Housing Association

Department for Levelling Up, Housing and Communities

Duncan Baker Brown, BakerBrown

Echelon Consultancy

English Rural Housing Association

Greater London Authority

Housing Associations' Charitable Trust (HACT)

HACT NED Network

Health Foundation

House Project

Housing Diversity Network

Housing Law Practitioners Association

Housing Ombudsman Service

Jim Strang, board member of Shelter

Kwajo Tweneboa

Local Government Association

Local Trust

Lord Roy Kennedy

National Federation of ALMOs

Placeshapers

Samantha Burrell

Shelter

Social Housing Action Campaign

Specialist lawyers

The Regulator of Social Housing

Tony Stacey, South Yorkshire Housing Association

Tpas

Trussell Trust

The National Housing Federation's networks:

- BME National
- BME London
- G15
- G320
- Supported housing

Site visits

Carrowbreck Meadow

Curo

EMH Homes

Gentoo Group

Goldsmith Street

MSV Housing Group

Peabody and Thamesmead Peabody

Conferences

National Housing Federation Summit

Labour Party Conference

Conservative Party Conference

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