

## SDC Damp and Mould self-assessment

Ombudman Recommendation	Recommendation detail	SDC Current Status	SDC Actions (Due Dates)
1. Adopting a Zero Tolerance Approach	Landlords should adopt a zero-tolerance approach to damp and mould interventions. Landlords should review their current strategy and consider whether their approach will achieve this.	<p>The Council take a proactive zero tolerance approach to damp and mould. We have formulated a working group to develop a damp and mould policy that will be presented to Housing Committee, our Governing Body, later in 2023 for approval.</p> <p>The development of the new policy will include a detailed action plan, some of which has already been started and/or been completed. This action plan will outline how we will respond to reports of damp and mould, but importantly, how we will be proactive in our approach to identifying homes at risk of damp and mould.</p> <p>We are investing in equipment and training for our staff. Our staff will be equipped to spot early signs of damp and mould and we are using data and technology to profile our housing stock that will enable us to identify which properties may be at risk of damp and mould. This will mean we can take a proactive approach to supporting tenants and improving lives.</p> <p>We are committed to improve the homes of our tenants and have an investment plan to improve the condition of our homes, including a strong retrofit programme.</p> <p>We have completed gap analysis of training within the team and will be working to improve the culture of the organisation. The whole of the housing team is invested and committed to delivering the best services to our residents.</p>	<p>Organisation awareness training, including for members by end of July 2023</p> <p>Housing staff training and awareness training to enhance the zero tolerance culture. To be completed by the end of July 2023</p>
2. Policy and Framework review	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.	We are reviewing the current Damp and Mould Policy and will develop a new Policy to be taken to our governing body for approval later in 2023. We are developing an action plan which will include proactive interventions, technology, communications and aftercare. A working group including tenant representatives and members has been formed and actions are ongoing from this group. We have undertaken the assessment against the 26 recommendations which will be taken to our governing group in June 23	<p>Self assessment to be taken to Housing Committee (27 June 2023)</p> <p>Updated policy is being taken to Housing Committee (September 2023)</p>
3. System Review - Complaints and Repairs Reporting	Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to 'find their silence'	SDC considers and champions accessibility in system design and specification. Currently repairs can be reported by email, text message and telephone. Contact methods and accessibility to services form part of the new IT system project which aims to implement an integrated housing management system. Housing Officers hold community events and are out in the district to assist tenants reporting repairs. Our complaints process is continually reviewed and complaints can be reported through a number of contact channels. These include through our website, by phone call, email, letter, in person and via social media. Additionally as part of the data-led project (mentioned below in 5) the Council will cross-reference tenant contact logs with repairs and complaints data. The aim of this part of the data-led project is to identify tenants and groups of tenants who have had little or no recent contact with the Council. The resulting insight will be used alongside property damp and mould risk profile rankings to inform proactive tenant engagement work. The Project is currently in the planning phase, with data analysis due for completion by the end of July 2023.	<p>Data analysis completed July 2023.</p> <p>Housing Management System to include accessibility in its design</p>

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4. Reviewing scope of inspections	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.	The Council recognises that the scope of diagnosis should be extended and has used current knowledge to identify areas, including neighbouring properties, where the issue is prevalent. A damp & mould working group has been convened and is in the process of reviewing how best to approach on an estate/neighbourhood basis. The council has invested in technology including damp meters and environmental monitoring including thermal imaging.	Phase 1 (property damp and mould risk profile based on data) to be completed July 2023.  Review current technology and equipment and invest as appropriate. Additional equipment ordered before end of July 2023.
5. Moving towards a data driven and risk based approach	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.	A data-led project has been initiated to identify properties that are potentially at a higher risk of damp and mould, with the aim of prevention and early intervention in higher risk cases. This project is currently in the planning phase. The first phase of the project will analyse data on stock profile & stock condition information; asset & compliance data; repairs; tenant contact & tenancy audit information; energy data; complaint and disrepair data; known damp and mould issues in similar properties and tenancies, and tenant satisfaction data. Each property will be assigned an initial damp and mould risk profile based on these data. Phase 1 is due to be delivered July 2023. The second phase of the project will focus on proactive tenant engagement based on the identified risk profile of the property. This will include 1-to-1 energy advice, conducting tenancy audits and prioritising stock condition surveys.	Phase 1 (property damp and mould risk profile based on data) to be completed July 2023.
6. Regeneration and development equality	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.	The process for properties that are identified for future disposals or regeneration has recently been reviewed. The process in place is to carry out a full options appraisal of those properties which allows us to look at the costs associated to carrying out the all of the work required and to look at other options that could be viable. Whilst this is being done we will put a temporary hold on any major planned works required (new kitchens, bathrooms etc) and only undertake urgent repairs and HHSRS failings to ensure that our residents and their homes are kept safe and do not receive a poor standard of service or allow them to go in to disrepair. We ensure that we are communicating with tenants to keep them updated.	

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7. Avoiding placing onus on resident and evaluation of mitigations	Landlords should avoid taking actions that solely place the onus on the resident. They should evaluate what mitigations they can put in place to support residents in cases where structural interventions are not appropriate and satisfy themselves they are taking all reasonable steps.	<p>At the start of our tenancies we have a programme of support which includes regular visits from the housing officer during the first year. The aim of these visits are to support tenants in maintaining a successful tenancy, this includes information and support with ventilation and what to do if damp or mould occurs in terms of reporting and engaging with the council to resolve.</p> <p>Due to the age profile of some of our stock, we are aware that some homes were not designed with modern living in mind. We are aware that some residents may have limited alternative options for drying their laundry.</p> <p>Where appropriate, we facilitate items such as washing lines for communal areas. We have taken steps to increase ventilation in homes and we have used thermal equipment to identify peaks humidity levels so that we can support residents with when it is best to ensure adequate ventilation.</p>	<p>Review tenancy visit checklist to ensure we continue to focus on relevant and current support issues and mitigations that can be put in place to support residents. Checklists complete by end of August 2023.</p> <p>This is to include visible checks for early signs of damp and mould and ensure tenants have the opportunity to raise any repair concerns, including instances of damp and mould</p>
8. Review of advice guidance and support to residents	Together with residents landlords should review the information materials and support provided to residents to ensure that these strike the right tone and are effective in helping residents to avoid damp and mould in their properties.	The Council will review the information, materials and support provided to residents. The website page has been partially updated to include useful guidance and a tutorial to illustrate how damp and mould can be managed. Work is being undertaken in the working group with tenants to ensure that residents feedback is valued and integrated into the final design.	<p>Housing staff to introduce a checklist to include checking tenants homes , providing tenant opportunity to raise concerns and staff to provide guidance and information as appropriate.</p> <p>Review all guidance and website with tenants involved.</p> <p>Complete by end of August 2023.</p>
9. Incorporate Damp and Mould into Mutual exchanges including visits and void periods	Landlords should be more transparent with residents involved in mutual exchanges and make the most of every opportunity to identify and address damp and mould including visits and void periods.	When a property is due for a mutual exchange an inspection takes place with a housing officer and a technical officer. The outgoing tenant is informed of their responsibilities including removal of personal possessions from the property and reviewing any outstanding repairs or maintenance issues with us prior to their move. A checklist is used to identify potential defects to the property for rectification before the mutual exchange or once it is void.	<p>Damp &amp; Mould Checklist February 2023 to be reviewed annually</p> <p>To review mutual exchange policy / procedure, by end of December 2023.</p>
10. Planning for unintentional damp and mould consequences when delivering net zero carbon homes	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.	All retrofit works carried out on our retrofit programme all properties are subject to a pre and post retrofit assessment, at pre inspection stage a ventilation strategy is put together to identify if any new or upgraded ventilation systems are required to ensure that the home is more energy efficient and to ensure that there is adequate ventilation to prevent damp and mould in the home.	Add to the retrofit process for Officer to make contact with resident to ensure that unintended consequences are mitigated and tenants are aware of how to operate equipment (i.e. heat pump), by end of June 2023.

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11. Involve residents in the initial responses to damp and mould	Landlords should review alongside residents their initial response to reports of damp and mould to ensure they avoid automatically apportioning blame or using language that leaves residents feeling blamed.	<p>When a instance of damp and mould is reported it is triaged by the repairs service who will ask a questionset to establish the tenants views on the damp and mould including requesting picture(s) to enable identification. This allows positive communication to investigate the root cause of instances of damp and mould without jumping to solutions or conclusions.</p> <p>A damp and mould working group has been convened including residents. All have been briefed on the white paper and the importance of using the correct language to ensure blame is not automatically apportioned to residents.</p>	Review questionset with tenant working group to gain insight as to how this comes across from the tenants perspective. By end of September 2023.
12. Review record keeping for Damp and Mould	Landlords should consider their current approach to record keeping and satisfy themselves it is sufficiently accurate and robust. We would encourage landlords to go further and consider whether their record keeping systems and processes support a risk-based approach to damp and mould.	<p>The Council uses a damp and mould tracking system to monitor all reported instances of damp and mould. The system is used to track the status of actions being taken, assign priority levels, and capture detailed information relating to possible causes. A similar tracking system will be set up to manage a damp and mould risk rating for each property and all resulting actions taken (an output of 5 above).</p> <p>The Council has invested in a new Housing Management System which is currently in the process of being implemented. The new system will improve the interoperability of data between service areas, leading to improved visibility of records and information across landlord services. Longer-term and more robust system requirements for Damp and Mould record-keeping have been incorporated into this Project.</p>	Property damp and mould risk rating system in place by end of August 2023
13. Review timeliness and urgency of cases	Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.	Emergency works are completed within 24 hours, non-emergency works are surveyed within 28 days. Works response times are routinely monitored and tracked against targets as part of key performance indicator reporting. Damp and mould actions are monitored on a case-by-case basis and are flagged if overdue.	<p>Conduct a review of damp and mould specific timescales as part of the strategic review</p> <p>Training staff to HHSRS standards to assist with robust categorisation, by end of September 2023.</p>
14. Conduct review into missed appointments	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.	The Council runs a weekly "no access" report and residents are contacted to re-book appointments at their convenience. Records will be kept to illustrate that all reasonable measures have been put place to gain access.	<p>Weekly "no access" report - SDC Property Care Team</p> <p>Review no access process and amend as appropriate to ensure a proactive and engaging approach, with a commitment to contact tenants to remind them of damp and mould appointments/inspections. Complete by end of July 2023.</p>

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15. Ensuring staff , and contractors , have the ability to identify and report early signs of damp and mould	Landlords should ensure that their staff whether in-house or contractors have the ability to identify and report early signs of damp and mould.	Training courses for reporting of damp and mould have been identified. The first phase of training has been provided to frontline repairs operatives and currently officers are reporting damp and mould cases when visiting properties in line with our current processes. It is recognised that additional training for the wider team will help to make this process more robust.	Ensure that training is booked on identifying damp and mould for all teams (31/06/2023)  HHSRS training for officers by end of September 2023.
16. Skills gap analysis	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.	Through toolbox talks and team meetings we have identified the gaps in knowledge and training needs for our teams in our Maintenance, Investment, Tenancy and Income teams and are sourcing suitable training to resolve identified skills gaps as discussed in 15	
17. Review of policies and processes regarding communication in relation to actions	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.	The process for damp and mould resolution is being reviewed by the Council's Damp and Mould Working Group. The review will ensure that tenants receive communication at each stage of the process. Tenants are informed of the plan of action to tackle the damp and mould in their property, and are kept updated. After-care will include follow-up surveys and telephone contact to ensure that the problem has not returned. Process maps are to be updated by August 2023.	Update process in line with reviews  Update process maps to include tenant communication by August 2023.
18. Review internal communications and ensure one team has overall responsibility for resolution followup and aftercare	Landlords must ensure there is effective internal communication between their teams and departments and ensure that one individual or team has overall responsibility for ensuring complaints or reports are resolved including follow up or aftercare.	The Council's Damp & Mould Working group is reviewing internal communications at all stages in the process as it recognises that the responsibility for ensuring complaints and reports are resolved including following up care, involves cross-team participation.  We have a joint Managers meeting for raising housing concerns and discussing cases at high level.  Complaints are managed using a centralised system which includes oversight and followup.	Update on process maps to include internal communications by August 2023
19. Review complaints policy	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.	A copy of Stroud District Council's corporate complaints policy is published on its website, and Tenant Services reference complaints on their own website page, which clearly outlines this definition. See: <a href="https://www.stroud.gov.uk/housing/council-tenants-and-leaseholders/our-customers-matter/complaints-and-complaints/complaints">https://www.stroud.gov.uk/housing/council-tenants-and-leaseholders/our-customers-matter/complaints-and-complaints/complaints</a> .  When dealing with any communication/enquiry/ complaint, residents expectations are managed as per our usual service delivery practice in conjunction with the Council's Compensation Policy.	Self-Assessment Review due October 2023

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20. Review strategy to ensure complex cases can be identified	Landlords need to ensure they can identify complex cases at an early stage and have a strategy for keeping residents informed and effective resolution.	The Council takes steps to identify complex cases at an early stage using a triage system as soon as a report is received. This will decide whether the report requires a visit for complex specification. Residents are kept informed of resolutions to be taken and timescales involved. The Council has a variety of tools at its disposal to identify the causes of damp and mould to ensure that we are dealing with the root cause and not merely the symptoms. Should the initial screening or survey identify a serious issue, this is escalated and all options are thoroughly discussed, including emergency home moves.	Review Damp & Mould Triage Call checklist.  Implement "Every Contact Counts" approach to ensure every opportunity to identify complex cases is realised by end of July 2023.
21. Identifying when independent surveyors / experts should be used	Landlords should identify where an independent mutually agreed and suitably qualified surveyor should be used share the outcomes of all surveys and inspections with residents to help them understand the findings and be clear on next steps. Landlords should then act on accepted survey recommendations in a timely manner.	We have a team of trained surveyors who investigate instances of damp and mould. It is recognised that where there are complex cases or where causes are difficult to identify an external and independent surveyor would be necessary. Where identified the Council will appoint an independent, suitably qualified surveyor to inspect and report on the findings including recommendations for remedy. These reports are shared with residents and the recommendations explained. An officer then takes responsibility for implementing the recommendations in a timely manner.	Update process maps to include appointment of independent surveyor where identified by August 2023  Ensure surveyors are suitably trained in Damp and Mould by end of September 2023.
22. Conduct review of decant policy	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.	Review of decant policy is currently being undertaken. Latest policy was revised in April 2022 this recommendation is being taken into consideration in the review.	Complete review of decant policy (December 2023)
23. Promotion of complaints process	Landlords should promote the benefits of their complaints process and the Ombudsman to their residents as an appropriate and effective route to resolving disputes.	The Council's complaints policy advises that any resident of Stroud District, or their representative, who has been given appropriate consent by the resident, may make a complaint, and these will be handled in line with our complaints policy. A number of contact channels are provided to residents so they can make a complaint. These include through our website, phone call, email, letter, in person, and via social media. The tenants rights to contact and escalate to the Ombudsman is outlined in both the Stage 1 and Stage 2 response letter templates. Reference to the Housing Ombudsman is also on our website under our complaints & feedback page.	Self-Assessment Review due October 2023
24. Review complaints process and disrepairs process together to ensure complaints procedure is used effectively	Landlords should continue to use the complaints procedure when the pre- action protocol has commenced and until legal proceedings have been issued to maximise the opportunities to resolve disputes outside of court. Landlords should ensure their approach is consistent with our jurisdiction guidance and their legal and complaint teams work together effectively where an issue is being pursued through the complaints process and protocol.	The Council recognises where a resident might have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the Council, where this is reasonable. Where a key issue of a complaint relates to either parties' legal obligations, the Council will clearly set out our understanding of the obligations of both parties, ensuring that any additional requirements are addressed.  The Council are committed to resolving residents complaints timely and effectively, using the complaints procedure, including when pre-action has been commenced.	Self-Assessment Review due October 2023

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25. Review the learning from complaints and the positive impacts of learnings	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.	<p>Learning outcomes / lessons learned are captured and reported back to managers for action to be taken, as well as at monthly team meetings for further discussion. Refresher training is also delivered where required. We are providing more opportunities for resident involvement through the delivery of the Charter for Social Housing, improving on our continued commitment to build on resident involvement opportunities. We have held several tenant participation events and these are used to give and receive feedback on complaints. Quarterly and Annual Reports are submitted to Housing Committee for their approval.</p> <p>The Strategic Director of Communities and Strategic Head of Housing receive quarterly and annual reports detailing complaints data.</p> <p>Managers meet regularly to discuss complaints handling and learning outcomes. All staff are informed of learning outcomes at monthly operational meetings with training given when identified.</p> <p>We will be liaising with the Youth Council to encourage feedback from younger residents.</p> <p>Keynotes, the Council's tenants' newsletter, also includes complaints feedback, e.g. "you said, we did", plus statistical data.</p>	<p>Self-Assessment Review due October 2023</p> <p>Complaints data to be uploaded to the Council's performance monitoring system on a monthly basis.</p> <p>The Performance Monitors (elected Councillors) for Housing Committee are responsible for this area and will scrutinise and report on the data at Housing Committee meetings.</p> <p>An Annual Report has not been produced since 2019 (due to CV-19); however, it has been reintroduced for 2022/23 and will be distributed at year end.</p>
26. Review complaint handling to ensure that residents are treated with respect and empathy	Landlords should ensure they treat residents reporting damp and mould with respect and empathy. The distress and inconvenience experienced by residents in this area is some of the most profound we have seen and this needs to be reflected in the tone and approach of the complaint handling.	<p>Annual self-assessment completed against the Complaint Handling Code to ensure complaints handling remains in line with Housing Ombudsman requirements. Self-assessment also reviewed following a significant restructure and/or change in procedures/policies</p> <p>Regular staff toolbox talks are held and managers meeting to discuss instances and complaint feedback to ensure that residents are treated with empathy and respect.</p>	<p>Self-Assessment Review due October 2023</p> <p>Culture and the way in which we communicate with our tenants is being built into our training plans</p>