

# Damp & Mould Management Plan

Date: March 2023

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# 1 Repairs Policy

- 1.1 We recognise that Damp and Mould could pose a risk to the lives and wellbeing of customers, Support Staff, colleagues, people who work on our behalf, and members of the public who live in our homes or visit our properties we own or manage.
- 1.2 Our Repairs Policy outlines our approach to managing Damp and Mould within our Properties
- 1.3 The policy expresses the priority afforded to Damp and Mould, our aim to meet legislation and regulation, assessing and managing risks, being clear on roles and responsibilities, having trained and competent colleagues and contractors, and communicating with Tenants.
- 1.4 This plan supports the policy and includes measures to minimise the risk to Tenants, their visitors, Support Team, colleagues and people who work on our behalf by effectively managing Damp and Mould within properties and communal areas. These measures include-
  - Effective Inspection and diagnosis
  - Provision and use of appropriate equipment to both investigate and remedy
  - Logging of and management of cases
  - Training of staff and use of qualified contractors
  - Planned programmes of work Page 4 of 5 Repairs Policy
  - Educational and informative information provided to customers and other stakeholders

• Liaising with other Registered Providers, Environmental Health and Energy Advice Agencies to seek, share and adopt best practice.

- Appropriate budgets in place to prevent and tackle damp and mould issues.
- 1.5 Both documents are available to all colleagues and should be read in conjunction with each other.

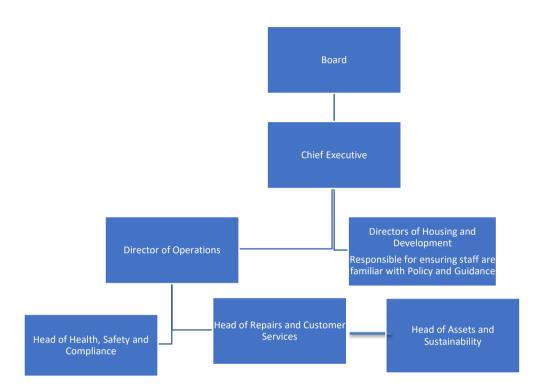
# 2 Legislation, regulation, codes of practice and guidance

- 2.1 The legislation, regulations and codes of practice in the UK relating to Damp and Mould are highlighted below-
- 2.2 Legislation, regulations and guidance includes:
  - Health and Safety at Work Act 1974
  - Management of Health and Safety in the Workplace 1999
  - Defective Premises Act 1972 (s4)
  - Landlord and Tenant Act 1985, Section 11 Repairs and Maintenance
  - Environmental; Protection Act 1990 (s79 Statutory Notice)
  - Housing Act 2004 which introduced the Housing Health and Safety Rating System (HHSRS)
  - Equality Act 2010

- Building Regulations 2013 : Approved Document C (Site preparation and resistance to contaminants and moisture)
- Homes (Fit for Human Habitation) Act 2018

## 3 Roles and responsibilities

3.1 Specific responsibilities in relation to Damp and Mould are summarised in the following section. Where some tasks are delegated to other colleagues these will be specified in job profiles or other documents as appropriate.



# **Chief Executive**

3.2 The GLH board has delegated authority to the chief executive for implementing arrangements to achieve compliance with our health and safety policy and framework and associated policies, including the Repairs Policy.

The chief executive is responsible for ensuring that Damp and Mould is adequately resourced and implemented. This is achieved by the nomination of competent colleagues to assist in ensuring compliance on a day to day basis including assigning executive responsibility for Damp and Mould to the Director of Operations.

# **Director of Operations**

3.3. Executive responsibility for Damp and Mould lies with the Director of Operations who is the appointed 'duty holder' for GLH.

3.4. Their role is to be accountable for ensuring that we fulfil our legal and regulatory responsibilities as well as ensuring appropriate financial and human resources are available to support delivery in respect of Damp and Mould. In doing so, they are expected to take appropriate measures to fulfil these responsibilities and keep the chief executive and the GLH board informed of any such issues as and when they arise.

In addition, the Director of Operations is responsible for:

- Monitoring the implementation of the policy in line with Business Plan targets set by the Leadership Team and agreed by Trustees/Board
- Ensuring staff are appropriately instructed on the procedures to support effective delivery of this policy
- Promotion of good practice and continuous improvement across GLH
- Annual review of performance (KPI's)

#### **Director of Legal & Governance**

3.5. Is responsible for reporting Damp and Mould incidents to the Social Housing regulator.

#### **Director of Housing/Director of Development**

3.6 Both Directors will ensure that their teams are familiar with the Repairs Policy and associated Damp and Mould management plan and that they are appropriately instructed on the required processes and procedures to support their effective delivery.

#### Head of Assets & Sustainability

3.7 Overall accountability for the operational management of Damp and Mould, including for the day to day management and delivery of the compliance and servicing programmes ensuring effective liaison with contractors in the completion of regular inspection programmes and the completion of remedial works, sits with the Head of Assets, supported by the Assets Team.

As the designated 'competent person' this means that they are responsible for all of the following:

- Managing the programme of Damp and Mould checks for new and existing properties, ensuring they are completed on time and to the required standard.
- Ensuring effective arrangements are in place so that access is obtained to customers' homes including, where required, that any legal action is taken to gain access.
- Ensuring that the results of Damp and Mould checks are recorded in the Housing management system (Active H).

- Ensuring that all actions arising from Damp and Mould checks, including remedial actions, are managed and recorded accordingly.
- Ensuring that all remedial actions, including those undertaken by other colleagues, are completed in accordance with agreed priority timescales.

# Head of Health, Safety & Compliance

- 3.8 The Head of Health, Safety and Compliance has the overall responsibility for ensuring the effectiveness of our management of Repairs Policy and Damp and Mould management Plan. This means that they are responsible for the following:
  - Ensuring that the operational requirements of the Repairs Policy and Damp and Mould management plan are fully implemented and being adhered to.
  - Ensuring through monitoring that we fully comply with legal and regulatory requirements and codes of practice in respect of Damp and Mould in any of our operations.
  - Being aware of any impending changes in Damp and Mould legislation, regulations and codes of practice which may affect policies, management plans and procedures and through reporting enable the executive board and the GLH board to be aware of any impact this may have on policy or compliance.
  - Maintaining and ensuring that the Repairs Policy and damp and Mould management plan (plus any supporting procedures, guidance and notices) are kept up to date in terms of legislation, regulations, codes of practice and organisational practice.
  - Ensuring that these are readily available and communicated, as appropriate, to colleagues, tenants, people who work on our behalf, and members of the public who live in our homes or visit our properties. Providing advice to all colleagues
  - Acting as a point of reference for GLH in respect to Repairs Policy issues.
  - Dealing with the questions and concerns of colleagues, customers, people who work on our behalf and visitors in relation to Damp and Mould.

# Head of Repairs & Customer Service

- 3.9 Overall accountability for the management of Damp and Mould with regards to all emergency and responsive repairs, in line with the Repairs Policy and management plan, along with records kept of repairs and product information sits with Head of Repairs and Customer Services.
- 3.10 Overall accountability for managing relationships with Tenants including, leaseholders and shared owners, in respect of damp and mould including the provision of information and assistance during emergency situations sits with the Head of Repairs & Customer Service.

3.11 They will ensure that satisfactory measures are in place and keep the Director of Operations informed of any such issues as and when they arise.

# People and Culture/Learning & Development Role

- 3.10 Overall accountability for ensuring that all relevant colleagues receive training in damp and mould sits with the People and Culture team. This includes awareness training for the majority of colleagues and specialist training for colleagues who are responsible for managing Damp and Mould on a day to day basis.
- 3.11 The People and Culture Team is accountable for ensuring that training records are maintained and ensuring that training needs will be assessed annually, as a minimum.
- 3.12 They will ensure that satisfactory measures are in place and keep the Director of Operations (3.4) informed of any such issues as and when they arise.

# Other colleagues

- 3.13 All colleagues have a duty to observe and comply with our Repairs Policy, management plan and any supporting procedures, guidance or notices issued on Damp and Mould.
- 3.14 Colleagues are responsible for undertaking Damp and Mould awareness training and specialist training, depending on their role. They are also responsible for raising any training needs they consider themselves to have with their line manager.
- 3.15 Any colleague that is present in one of our properties/communal areas and becomes aware of any issue related to the property (including communal areas, garages and surround estate) that could impact upon any aspect of Damp and Mould should promptly raise this with Property Services Customer Services team
- 3.16 Any colleague that is visiting, meeting, corresponding or speaking with a customer and becomes aware of any issue related to the capacity or capability of the customer that could impact on any aspect of Damp and Mould should promptly raise this with manager their Line Manager.
- 3.17 Any colleague that has a Damp and Mould action which has been assigned to them, must ensure that they are completed on time and to the required standard, for example, remedial actions following a Damp and Mould inspection.

#### 4 Governance and assurance

4.1 Our health and safety governance arrangements are set out in the Health and Safety Policy. Explanation of these arrangements as they relate to Damp and Mould is set out below:

# Health and Safety Steering Group (committee)

- 4.2 The Health and Safety Steering Group/committee membership includes Directors/Heads of Service/Representatives of Employee Safety and other specialist roles who have a key focus on the management, monitoring and reporting of health and safety compliance issues, including Damp and Mould.
- 4.3 The Health and Safety Steering group (committee) focuses on health and safety performance and monitoring compliance across the business and is accountable to the executive team/board.
- 4.4 In relation to Damp and Mould, the Health and Safety Steering group/committee is responsible for all of the following:
  - Monitoring adherence to and the effectiveness of the Repairs Policy and Damp and Mould management plan.
  - Monitoring Damp and Mould key performance indicators (KPIs)
  - Establishing Damp and Mould KPIs and targets each year.
  - Scrutinising any in-depth review of Damp and Mould (and any follow up review) and any action plans to deliver the recommendations.
  - Monitoring the delivery of action plans to strengthen legal and regulatory compliance and with our Repairs Policy and management plan.
  - Providing assurance on Damp and Mould as part of a the bi-monthly Board report
  - Ensuring that colleagues who are responsible for Damp and Mould are competent.
  - Ensuring that Damp and Mould training is being delivered to colleagues who require it, is appropriate to their roles and is effective.
  - Ensuring that people who work on our behalf in relation to Damp and Mould are competent to do so.
  - Ensuring that communication on Damp and Mould with colleagues, Tenants and people who work on our behalf is effective.

# 5 Damp and Mould

5.1 Damp and Mould is caused by excess moisture in buildings. Moisture in buildings can be caused by leaking pipes, damp in basements or ground floors from water rising through property due to lack of a "damp proof barrier", , or water ingress from rain seeping in buildings because of damage to the fabric of the building, roof or around window frames.

- 5.2 Damp and Mould related health outcomes may affect people regardless of age or current health; the elderly and children are most at risk
- 5.3 The main types of Damp are:

• Rising Damp – movement of moisture from the ground rising up through the structure of the building though capillary action

• Penetrating Damp – water penetrating the external of a structure or internal leaks causing damage to the internal surfaces or structure

• Condensing Damp – moisture held in warm aim coming into contact with cold surfaces, subsequently condensing and causing water droplets

- 5.4 Mould is a natural organic compound that develops in damp conditions and will only grow on damp surfaces. It is often noticeable and present in situations where condensation damp is present
- 5.5 In October 2021 the Housing Ombudsman issued a report to social landlords, recommending that they adopt a zero-tolerance approach to damp and mould. The report recognised the challenges for landlords tacking these issues, and identified best practice and 26 items for landlords to implement including:
  - Greater use of intelligence and data to prevent issues
  - Adopting a consolidated policy for actions it may be take based on diagnosis
  - Reviewing communication with residents to improve tone

• Improve access to complaints to resolve issues, including alongside disrepair claims, and learn from them

# 6.0 Damp and Mould checks

- 6.1 The Assets team will manage Damp and Mould issues identified within properties and Communal areas. The process can be viewed at appendix 1
- 6.2 All Colleagues that visit properties or receive information on Damp and Mould issues will report these issues via GLH Property Services who in turn will log a task on Active H for the respective Surveyor to investigate further.
- 6.3 Remedial actions will be risk rated and prioritised and works programmes delivered
- 6.4 Post inspection of works will be implemented

#### 7. Void properties

7.1 When a property becomes void and it will be inspected for Damp and Mould

- 7.2 Where Damp and Mould is identified remedial works will take place
- 7.3 Damp and Mould prevention advice will be given to new Tenants

#### 8. Acquisition of a property

8.1 Where we are acquiring a property from a third-party which has damp and mould; we will become responsible for Damp and Mould within the property and will obtain historic Damp and Mould records (if available).

A new inspection must be carried out to identify, evaluate, remediate and manage all the damp and mould hazards in the property. This will determine whether any existing Damp and Mould measures i.e. (Damp proof course) including its design are effective, suitable and sufficient. It will also help us to determine whether we will require and/or obtain any warranties, guarantees or similar from the third party following completion of the transaction.

- 8.2 The results of the new inspection, including remedial action, and reviews relating to Damp and Mould, are recorded in and managed through our asset management system.
- 8.3 All remedial action must have been completed before the property can be used for its new purpose.
- 8.4 The new occupants of the property must be provided with Damp and Mould information relevant to the property, including precautions and what to do if this becomes a problem.

#### Development or acquisition of a newly built property

- 8.5 Where we are developing or acquiring a newly built freehold property we will become responsible for Damp and Mould within the property and arranging remedial actions.
- 8.6 Prior to acquisition and before occupation, an inspection will be carried out to identify, evaluate, remediate and manage all the damp and mould hazards in the property based on its intended use.
- 8.7 The results of the inspection, including any remedial actions, will be recorded in, and managed through, our asset management system.
- 8.9 The new occupants of the property must be provided with Damp and Mould information relevant to the property, including precautions and what to do if this becomes a problem.

#### 9.0 Remedial actions arising from Damp and Mould checks

- 9.1 GLH Surveyors will risk rate remedial actions based on high/medium/low
- 9.2 Actions may include-

- Low risk- Spray the affected area with an anti-fungal wash and allow that to dry and treat the affected area with a mould-resistant paint and advise Tenant of Damp and Mould prevention
- Medium risk-Fitting ventilation fans or replacing faulty fans or upgrading existing fans and also ensure doors and windows are serviceable and can effectively ventilate along with Low-risk measures
- High risk- Mechanical Ventilation systems along with Medium and Low risk
  measures where appropriate

# 10 Competency of people and organisations undertaking Damp and Mouldrelated work

10.1 All Damp and Mould related work, will be carried out by Competent Contractors

# 11 Damp and Mould incidents

11.1 All Damp and Mould incidents, including, will be logged on the GLH Incident form, including details of any follow-up actions.

# 12 Audits, inspections, enforcement or improvement action taken by statutory bodies

- 12.1 We will work closely with local authorities and other statutory bodies to obtain their advice and assistance in relation to Damp and Mould in our properties. This can include audits and inspections of our properties and promoting Damp and Mould awareness amongst our tenants.
- 12.2 We will respond promptly and positively to any enforcement or improvement action that is taken by a statutory body. Our response will include the following:
  - We will review the conclusions of the statutory body and engage with them if we have reason to challenge or seek clarification of their conclusions and/or requirements.
  - We will ensure that requirements are addressed within the specified or agreed timescale.
  - We will identify if there are similar issues within our other properties. If so, we will take appropriate remedial action.

# 13 Training and awareness

13.1 We will ensure that all relevant colleagues receive training in relation to Damp and Mould. We will provide awareness training for all colleagues and specialist training for colleagues who are responsible for managing Damp and Mould on a day to day basis.

- 13.2 Training records will be maintained in order to provide assurance about the competence of colleagues and to identify any gaps.
- 13.3 All Damp and Mould training needs will be assessed annually, as a minimum.

# Specialist training

- 13.4 We will provide specialist training for colleagues who are responsible for managing Damp and Mould on a day to day basis or whose work could impact upon Damp and Mould measures within our properties. This will be tailored to the role and will include the following colleagues:
  - Colleagues who have specific roles set out in this management plan.
  - Colleagues who organise, specify, monitor or supervise repairs and maintenance in our properties, including customers' homes.
  - Colleagues who undertake repairs, maintenance, testing and inspection in our properties and customers' homes.

#### **Board members**

13.5 Board members will receive information in relation to Damp and Mould. This will be tailored to enable them to understand our responsibilities as a landlord and their legal and regulatory responsibilities as non-executive directors. It will also enable them to hold the executive board, and other senior managers, to account for legal and regulatory compliance in respect of Damp and Mould.

#### 14 Performance management

14.1 GLH utilise Key Performance Indicators (KPIs), to monitor performance

Respo	Response Repairs: Damp, Condensation and Mould Related Repairs				
		Frequency	Unit	Target	Comment/ Observation
				Timescale	
PI:1	Total number of new damp, condensation and /or mould related repairs reported, inspected, and analysed and works orders <u>'raised'</u> within target timescale of <u>'10</u> <u>working days'</u> within the prescribed calendar month.	Calendar Month	Number	10 working days	
PI:2	Total number of damp, condensation and /or mould related repairs inspected and analysed and works orders 'completed' within target	Calendar Month	Number	20 working days after inspection	

			1	1	1
	timescale of <u><b>'20 working</b></u>				
	days'. after the date of the				
	inspection and diagnosis.				
P1:3	Total number of damp,	Calendar	Number	30 working	Definition of completion: damp,
	condensation and /or	Month		days from	mould and /or condensation fully
	mould related repairs			report	resolved and rectified. Not
	inspected and analysed				partially completed. No further
	and works orders				action required.
	<u>'completed' .</u>				
PI: 4	Total number of damp,	Calendar	Number		
	condensation and /or	Month			
	mould related repairs				
	inspected and analysed				
	and works orders 'work in				
	progress' at the end of				
	the month.				
PI:5	Total number of damp,	Calendar	Number		This will need to be closely
	condensation and /or	Month			monitored and further
	mould related repairs				measurements at key stages put
	where <u>'no access'</u> is an				into place.
	issue.				
PI: 6	Total number of damp,		Number		May need to be monitored if this
	condensation and /or				figure increase over time.
	mould related <u>'stage 1</u>				This is an indicator of the
	formal complaints'				success and effectiveness of the
	received during the				adopted procedures and
	calendar month.				protocols for the management of
					damp, condensation and mould
					related repairs.

14.2 The Director of Operations is responsible for the annual review of performance (KPI's).

# 15 Record keeping and documentation

- 15.1 This section identifies all of the data and information that we hold in relation to Damp and Mould, where it is stored and responsibility for ensuring that complete and accurate records are kept on a timely basis.
- 15.2 Colleagues who are responsible for data and information must ensure that the requirements of our data protection policy are met (where appropriate).
- 15.3 Data regarding Damp and Mould is logged on our Housing Management system (Active H).

# 16 Monitoring and review

- 16.1 The application of this management plan will be monitored through reporting to:
  - all operational leaders
  - the executive board

- the audit committee
- the GLH board.
- 16.2 This management plan will be reviewed every year or sooner if legislation or regulations change

# 17 Other related reading

- 17.1 The following documents support the context and the application of this management plan;
  - Repairs Policy

#### **18** Further information

18.1 Please contact Matt Hardy, Head of Organisational Health and Safety <u>matt.hardy@glh.org.uk</u> for information or support in relation to this plan.

Versio	Version control					
Avoid r	Avoid referring to printed versions of this document. Printed versions may be out of					
Owner/responsibility for compliance			Matt Hardy, Head of Organisational Health and Safety			
Status (draft / approved & live)		ved & live)	Live			
Versi	Date	Approved	Summary of changes made to each version:			
on	approved	by:				
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# <u>Appendix 1- Damp and Mould Process for Recording, Diagnosing / Remedying</u> and Reporting Cases where Damp and Mould is present

#### Stage 1 – Recording Damp and Mould Occurrence

- 1. Upon notification of Damp and Mould being present on any GLH property all teams are responsible for raising a CRM call specifically for the damp and mould report. A call template has been created in Active H to ensure consistency. The call template is called 'Mould Report'. The call template asks a series of questions regarding the location of the mould, reporting history etc. It also requests photographs of the mould to be provided. Once the CRM call data is completed, you must then generate the attached task and send it to the relevant Property Surveyor. Property Services should also be copied into this task. Any photographs received should be emailed into property services with the CRM call reference noted in the email.
- 2. Once tasked, PSC will then complete the mandatory questions on the Damp and Mould Attribute on Active H and save the photographs to the property folder – example pathway below:

S:\GLH\GLH document library\PROPERTY FOLDERS\4. Region 4\0049 - 4 Church Road Place\Maintenance\Damp and Mould

PSC to then copy the file location onto the original CRM call.

PSC to add notes and completion dates to actions 1 and 2 on the task to confirm above stages have been followed. PSC involvement now complete at this stage.

3. Upon receipt of the task, the Property Surveyor / Development Surveyor will add notes to Action 7 on the task regarding when to raise a Mould Treatment works order for the affected area to Resolve or Responsive Contractor. Property Surveyor / Development Surveyor to then refer the task back to PSC so they are aware to action. PSC to raise order, update Damp and Mould attribute with the order number for the works and complete Action 8 on the task to confirm completion of these items.

# Stage 2 – Diagnosing and Remedying Damp and Mould Occurrence

- 1. Property or Development Surveyor updates notes and completion dates for the following actions on the task:
  - a. Contact made with the tenant (Action 3)
  - b. Visit by surveyor (if required) Inspection Date (Action 4)
  - c. Contractor attending to scope works etc (Action 5)
  - d. Date for reassessment
- 2. Property or Development Surveyor logs actions on Active H in Damp and Mould Attribute and confirms on Action 6 of the task when this has been done.

- 3. Property or Development Surveyor calls property back after agreed timeframe to either
  - a. Close down request
  - b. Escalate request with further works as required
- Property or Development surveyor repeats step 3 until satisfied Damp and Mould have been resolved – Recording all findings on the Damp and Mould Attribute in Active H

#### Stage 3 – Reporting Damp and Mould for Compliance Assurance

- 1. Data and Performance Officer provides weekly report by Friday 12.00pm to Assets and Compliance informing on the number of live Damp and Mould Cases and provides assurance.
- 2. Property or Development Surveyor to check all case they are responsible for prior to the weekly report being sent out.