

DAMP AND MOULD POLICY

Lead Manager:	Senior Building Safety Manager
Responsible Senior Manager:	Interim Assistant Director of Assets
Approved By:	EMT, DSSI and Board
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Linked Procedures:	Responsive Repairs Procedure

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1. PURPOSE

This policy defines the approach of Shropshire Towns & Rural Housing (STAR) to managing damp and mould in properties under its control. It establishes a clear framework for oversight, roles, and responsibilities to ensure effective management at both strategic and operational levels.

2. POLICY STATEMENT

STAR is committed to ensuring the health, safety, and welfare of all individuals within its premises. Recognising the foreseeable risk of damp and mould in STAR-owned and managed properties, the organisation accepts its responsibility to protect customers, employees, and others from associated hazards. STAR will adopt a proactive and responsive approach, addressing reported cases promptly while implementing asset management strategies to prevent future occurrences.

3. SCOPE OF POLICY

This policy applies to all properties where STAR is responsible for repairs and maintenance under the terms of tenancy agreements, conditions, leases, or transfer documents.

Leaseholders are accountable for preventing and managing damp and mould within their homes, as specified in their lease agreements.

4. POLICY PRINCIPLES

- Provide homes that are safe, warm, dry, and free from health hazards.
- Comply with all relevant legislation and regulatory standards.
- Ensure customers can easily report damp and mould concerns and resolve issues promptly and effectively.
- Offer clear, practical, and accessible advice and support to customers.
- Maintain transparent, robust processes and reporting measures.
- Use data and performance insights to continuously improve our approach to damp and mould management.

5. DEFINITIONS

Damp is an excess of moisture in a premises, that cannot escape. It can go on to cause significant damage to a property. There are three main causes of damp, with each requiring different solution:

- **Condensation** occurs when something raises the moisture level within the premises. At a given temperature, air can only hold a certain amount of water vapour before becoming saturated. If the saturated air is cooled it cannot hold all the moisture as vapour, so the excess moisture is given up as condensation on a cooler surface. It can come from cooking, cleaning, bathing, drying damp clothes on a radiator, under- heating, an overcrowded dwelling, or even breathing. It forms on the coldest surfaces in a room first, typically around windows, in corners and on external walls. Four factors affecting the control of condensation are heating,

ventilation, thermal insulation; and moisture vapour generated within the premises. If left for a long period of time it can cause damp and/or mould.

- **Rising damp** is where water rises through the fabric of the building, after being absorbed from the surrounding ground.
- **Penetrating damp** arises when water penetrates through the fabric of the building, for example through a leak.

Mould is one of the many forms of fungi. It spreads through spores, which are invisible to the naked eye but are in the air around us all the time and can quickly grow on surfaces where dampness persists, or water has formed into a visible covering. Breathing mould spores and leaving damp untreated can lead to significant property damage and allow spores to spread quickly on persistently damp surfaces, increasing risks to both the building and tenants' health.

6. RESPONDING TO REPORTS OF DAMP AND MOULD

A report might be received from a tenant, STAR employee, contractor, or third party. All reports of damp and mould will be recorded, managed and monitored centrally by the Building Safety Team.

STAR will contact a customer to arrange a site visit within two working days of a report being received. (Subject to customer availability). A site survey will be undertaken for every report, with a summary of findings provided to the tenant within 3 days after the survey. All reports will be initially assessed to determine if any vulnerabilities might be present that need to be considered in respect of damp and mould and prioritised accordingly. The survey will seek to determine the cause(s) of any damp and mould, and identify what measures are required to address them. If appropriate a Housing Health and Safety Rating System (HHSRS) assessment will also be undertaken to determine if any identified issues constitute a category 1 or 2 hazard as defined by the Housing Act. Timescales for actions identified by through the survey will be based on the assessed risk/severity as determined by the surveyor. The risk level and associated timescale is determined with reference, but not limited to, factors set out in the table below:

Risk Level	Risk Factors	Action Timescale
High (Emergency)	• Severe damp and mould • Immediate risk to customer wellbeing (informed by vulnerability assessment) • HHSRS Category 1 hazard	• Interim Assistant Director of Assets will be notified on day of survey if any potential vulnerability issues are identified. • Investigation property and make safe within 24 hrs • Works will commence and/or customer decanted within 24 hours of results • Provide a written summary within 3 working days of completing the investigation

Medium (Significant damp and mould)	• Multiple rooms affected Repeat case • Penetrative damp identified • HHSRS Category 2 hazard • Vulnerabilities present that may be impacted by effects of damp and mould	• Investigate within 10 working days • Provide a written summary within 3 working days of completing the investigation • Property made safe within 5 days of confirmation. • Remedial works to start within 5 days or if delayed scaffolding major works etc physically begin within 12 weeks • Decant if property is unsafe
Low (Outside of Awaab's Law)	• Single room affected • Condensative damp identified	• Mould wash undertaken within 1 month by general repairs and maintenance team.

Case Review and Remedial Actions

Where appropriate, cases will be reviewed by the Senior Building Safety Manager and Head of Housing in line with STAR's vulnerability policy to ensure prioritisation from both asset and housing management perspectives.

Identified works will be delivered by STAR operatives or approved contractors under the direction of the Head of Repairs and Maintenance, Property Surveyor, or Asset Management team. Follow-up inspections will be carried out at six and twelve months to confirm issues have been resolved. Repeat or recurring cases will trigger further investigation to identify underlying causes and implement corrective measures.

Mould removal on asbestos-containing materials will be undertaken exclusively by licensed specialist contractors.

7. CUSTOMER ENGAGEMENT

STAR will ensure customers reporting damp and mould are treated with respect and kept informed throughout the process. Clear guidance on ventilation, heating, and other preventative measures will be provided to support resolution.

Where fuel poverty is a contributing factor, STAR's Financial Inclusion Team will offer appropriate assistance. If major works are required or there is a health risk, households will be supported with temporary decant arrangements in line with STAR's Decant Policy

8. CUSTOMER RESPONSIBILITIES AND EXPECTATIONS

Customers play an active role in implementing this policy by:

- Minimising moisture build-up by ventilating rooms, covering pans when cooking, and using provided extraction fans.
- Removing condensation or excess moisture from surfaces promptly.
- Maintaining adequate air circulation throughout the property.
- Following STAR's guidance on managing humidity and moisture.

- Reporting damp, mould, or other repair issues to STAR without delay.
- Keeping agreed appointments and allowing access for inspections and works.
- Ensuring any installed monitoring equipment remains unobstructed and functional.

9. NO ACCESS

Where tenants refuse access, STAR will make multiple attempts to gain entry to protect both the asset and the customer:

- Three phone calls
- One text message
- One email
- One posted letter
- Second posted letter, recorded in line with STAR procedures

If access cannot be obtained, the Senior Building Safety Manager and the Head of Housing will review the case, consider tenant safety and asset condition, and determine next steps. Where necessary, a notice of intent will be issued to address any HHSRS Category 1 hazards. If access attempts are discontinued, a flag will be added to the housing management system to ensure future contact includes checks for unresolved damp and mould issues.

Awaab's Law sets strict rules to make sure damp and mould problems are dealt with quickly. Once a tenant reports an issue, we must investigate it within 10 working days, then send the tenant a written summary of what we found within 3 working days after the investigation. If the issue is serious, the landlord must make the home safe within 5 working days and start repair work within the same timeframe (or as soon as possible if major works like scaffolding are needed).

To meet these deadlines, we must be able to get into the tenant's home. If we cannot gain access after arranging appointments, it may delay the investigation or repairs, and we may not be able to meet the legal timescales. That is why it is vital that tenants let us in when we need to inspect or carry out work so we can fix any problems quickly, keep tenants' homes safe, and make sure tenants' rights under Awaab's Law are fully protected.

10. COMPLAINTS

Customer dissatisfaction regarding this policy will be managed in accordance with STAR's Complaint Handling Policy. In the event of a disrepair claim, STAR will ensure that the legal process does not delay completion of necessary repair works.

11. PROACTIVE AND PREVENTATIVE MEASURES

STAR will analyse data from all reported cases to identify trends and adopt a proactive approach to damp and mould management. Information collected will include property type, root cause, remedial actions, and repeat cases. This data will be cross-referenced with wider organisational insights such as stock condition, EPC surveys, and repair history.

Findings will inform STAR's planned maintenance programme, 30-year investment strategy, and development/disposal plans to reduce future risk. Where appropriate,

technology such as environmental sensors will be utilised to enhance understanding of causes, solutions, and preventative measures, supporting both building and housing management strategies.

12. GOVERNANCE AND PERFORMANCE MANAGEMENT

Damp and mould management will be overseen by a working group chaired by the Operations Director, reporting KPIs to EMT and the Board.

Awaabs Law KPIs	
A3i	New emergency hazards reported per 1,000 properties
A3ii	New significant damp and mould hazards reported per 1,000 properties
A3iii	% of emergency hazards resolved within 24 hours
A3iv	% of significant damp/mould hazards investigated within 10 working days
Av	% of significant damp and mould repairs initiated within 5 working days

13. ROLES AND RESPONSIBILITIES

Responsible Body – Board Members

The Board has the overall governance responsibility for ensuring that STAR is compliant with regulatory standards, legislation, and codes of practice. The role of the Board includes:

- Formulating key H&S policies.
- Being cognisant of risks and risk controls in place.
- Agreeing on performance targets and a performance monitoring framework.
- Ensuring the availability of adequate resources and competencies for fulfilling policy commitments.
- Ensuring suitable reporting and auditing activity.
- Listening to the voice of customers.

Performance in relation to damp and mould issues will be reported regularly to Board as part of the organisation's "Compliance Plus" approach, enabling appropriate measures and actions to be incorporated effectively at a strategic level.

STAR has identified the following appropriate persons within the organisation to manage this area of risk and implement the policy:

Responsible Officer	Responsibilities
Operations Director	• Ensure adequate resources are available to deliver the organisation's policy • Ensure that the organisation fulfils its legal obligations in respect of damp and mould
Interim Assistant Director of Assets and Building Safety	• Strategic management and accountability • Implement the policy and related procedure • Monitor standards of delivery and compliance • Ensure the assets team takes a proactive approach and addresses the risks of damp and mould through all planned activity • Ensure the assets team has appropriate resources to deliver major remedial works • Report regularly to SMT and Board regarding performance
Senior Building Safety Manager	• To monitor the organisation's performance and ensure that a compliance-based approach is taken to address incidences of damp and mould
Head of Housing	• Represent and protect the interests/wellbeing of tenants • Ensure the repairs team has appropriate resources to deliver cleaning and (minor) remedial works • Ensure the voids team addresses any damp and mould issues when properties are vacant
DMC Surveyor	• Oversee process from initial report to completion of any works • Inspect, diagnose and formulate specification of remedial works • Ensure follow up checks are undertaken and acted on as required • Strategic monitoring of cases to determine any trends/underlying issues to enable a proactive approach to be developed and progressed
Head of Repairs and Maintenance	• Plan, organise and supervise remedial works as requested by the Lead Surveyor
All staff	• All staff and contractors have a responsibility to report the early signs of damp and mould in a timely manner

14. COMMUNICATION

STAR will ensure that all staff and contractors take a proactive approach to identifying and reporting damp and mould risks. Relevant information will be made available on STAR's website and upon request. Clear procedures will be in place to ensure responsibilities are understood and consistently applied.

15. TRAINING

STAR will ensure staff have the necessary skills and knowledge to implement this policy. Training will be tailored to roles and delivered through:

- Induction briefings.
- Toolbox talks for frontline staff.
- On-the-job training.
- Team briefings.
- Formal training courses.

16. REGULATORY CODE, LEGAL FRAMEWORK AND RELATED DOCUMENTS

The Regulator of Social Housing (RSH) requires Registered Providers to fulfil all applicable legal requirements for the health and safety of customers in their homes, which includes damp and mould through the RSH Homes Standard. The Decent Homes Standard requires that properties must not have serious (Category 1) hazards under the HHSRS – damp and mould is one of the 29 hazards identified in the HHSRS system.

Other relevant legislation and regulations currently governing registered provider policy and practice include:

- Landlord & Tenant Act 1985, Section 11 – Repairs and Maintenance
- Environmental Protection Act 1990, Section 79(a) - Statutory Nuisance
- Defective Premises Act 1972, Section 4 – Repairs and Maintenance
- Housing Act 2004 – HHSRS
- Homes (Fitness for Human Habitation) Act 2018
- Decent Homes Standard 2016
- The Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994
- Awaab's Law

17. POLICY EQUALITY AND DIVERSITY STATEMENT

STAR is committed to valuing and promoting equality, diversity, and inclusion across our services. We recognise our duty to eliminate unfair treatment and discrimination in the services we provide, and to promote and value respect in everything we do. We expect our staff to share these values and treat all customers with fairness and respect. We also require our contractors and suppliers to mirror our values and comply with our policies in this respect and their own respective duties.

STAR will uphold a zero-tolerance response to acts of discrimination.

STAR recognises that customers have different needs and may require a tailored and reasonable adjustment to our service to access our services or a property feature, either on a permanent or temporary basis.

STAR will ensure it meets its duties under the Equality Act 2010 to consider the need to:

- Eliminate discrimination, harassment, and victimisation.
- Advance equality of opportunity.
- Foster good relations between different parts of the community.

All contractors employed by STAR or carrying out works on STAR owned or managed

premises are required to adhere to the commitments we have made to valuing and promoting equality, diversity, and inclusion across our services.

18. REVIEW

This Policy will be approved by EMT, the DSSI subcommittee and STAR Board. It will be reviewed every two years unless amendment is prompted by a change in legislation, or monitoring and reporting reveals that a change in Policy is required sooner.

19. VERSION CONTROL

Renewal Date	Version	Approved By	Comments
XX 2026	2	Board	More detailed timescales, expanded governance and KPI requirements, updated no access protocol, stronger alignment to Awaab's Law
01 2025	1	Board	-

Equality Analysis and Equality Impact Assessment

Equality Analysis is a way of considering the potential impact on different groups protected from discrimination by the Equality Act 2010. It is a legal requirement that places a duty on public sector organisations (The Public Sector Equality Duty) to integrate consideration of Equality, Diversity and Inclusion into their day-to-day business. The Equality Duty has 3 aims, it requires public bodies to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation, and other conduct prohibited by the Equality Act of 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not.
- Foster good relations between people who share a protected characteristic and people who do not.

Equality Impact Assessment (EIA) is a tool for examining the main functions and policies of an organisation to see whether they have the potential to affect people differently. Their purpose is to identify and address existing or potential inequalities, resulting from policy and practice development. Ideally, EIAs should cover all the strands of diversity and Inclusion. It will help us better understand its functions and the way decisions are made by:

- Considering the current situation.
- Deciding the aims and intended outcomes of a function or policy.
- Considering what evidence there is to support the decision and identifying any gaps.
- Ensuring it is an informed decision.

Equality Impact Assessment (EIA)

Step 1: Scoping and Identifying the Aims		
Department	Asset	
Title of Change	Updated Policy	
What are you completing this EIA for?	Policy	(If other, specify here)
What are the main aims / objectives of the changes	To provide clear guidance on damp and mould management and keep up to date with latest laws and regulation	

Step 2: Assessing the Impact				
<i>Protected Characteristic</i>	<i>Positive Impact(s)</i>	<i>Negative Impact(s)</i>	<i>Not Applicable</i>	<i>Action to address negative impact</i>
Sex			√	
Gender reassignment			√	
Disability			√	
Age				
Sexual Orientation			√	

Pregnancy & Civil Partnership			√	
Marriage & Civil Partnership			√	
Religion or belief			√	
Race			√	

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, service users, ALMOs?)		
Have you taken into consideration any regulations, professional standards?	Yes	Policy must be in line with current regulations.

Step 3: Review, Risk and Action Plans			
How would you rate the overall level of impact / risk to the organisation if no action taken?	Low	Medium	High
		√	
What action needs to be taken to reduce or eliminate the negative impact?	Implementation of the damp and mould policy and procedure will ensure that risks are effectively managed.		
Who will be responsible for monitoring and regular review of the document / policy?	Operations Director, Assistant Director of Assets.		

Authorisation and Sign-Off

I am satisfied that all available evidence has been accurately assessed for any potential impact on employees and groups with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate, has been identified and dealt with accordingly.

Governance Manager		Date	
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