



DAMP AND MOULD POLICY

Lead Manager:	Leela Cottey
Responsible Senior Manager:	Mark Kavanagh
Approved By:	SMT
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Linked Policies:	Responsive Repairs Policy, Responsive Repairs Procedure, Vulnerable Customer Policy, Vulnerable Customer Procedure, Health and Safety Policy, Tenancy Management Policies and Procedures

1. Purpose

The purpose of this policy is to set out Shropshire Towns & Rural Housing's (STAR's) approach to managing damp and mould in properties under the organisation's supervision and control. This policy offers a framework within which the management of damp and mould will be directed, and outlines essential roles and responsibilities for the implementation of this policy. A key objective of the policy is to ensure that the senior management team and Board have oversight of STAR's actions to ensure that damp and mould is addressed at a strategic and operational level.

The associated damp and mould procedure documents STAR's operational strategy for ensuring damp and mould is managed effectively; detailing aspects such as receiving and recording reports of damp and mould, identifying the appropriate action, delivering that action, following up on completed activities and developing a proactive approach to damp and mould management.

2. Policy Statement

STAR is committed, as far as is reasonably practicable, to guaranteeing the health, safety, and welfare of persons at its premises. A reasonably foreseeable risk from damp and mould exists in STAR owned and managed properties; STAR therefore recognises that it has an obligation to safeguard its customers, employees, those who operate in STAR premises and others from risks associated with damp and mould. STAR will take a responsive and proactive approach, ensuring that reported cases are dealt with effectively, whilst wider asset management strategy and activities prevent/limit future occurrences.

3. Scope of Policy

This policy applies to properties where STAR has repairs and maintenance responsibilities in accordance with the terms of the tenancy, terms and conditions and lease or transfer document.

Leaseholders are responsible for managing and preventing damp and mould within their properties as outlined in the terms of the lease agreements.

4. Policy Principles

- We will provide homes that are safe, warm, dry and free from health hazards
- We will comply with relevant legislation and regulatory standards
- We will ensure customers can easily report concerns of damp and mould, and ensure that issues are resolved effectively and efficiently
- We will work with our customers to provide clear, practicable and accessible support and advice
- We will have transparent and robust processes and reporting measures
- We will learn from our data and performance to improve our processes and approach to resolving damp and mould

5. 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 and managed centrally and will be managed and monitored through this policy and associated procedures.

STAR will contact a customer to arrange a site visit within two working days of a report being received. (Subject to customer availability). The appointment will take place within seven days of receipt of the initial report. A site survey will be undertaken for every report, with a summary of findings provided to the tenant no more than two 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	Immediate risk to asset Immediate risk to customer wellbeing (informed by vulnerability assessment) HHSRS Category 1 hazard	Assistant Director of Housing will be notified on day of survey if any potential vulnerability issues are identified Works will commence and/or customer decanted within 24 hours of results
Medium	Multiple rooms affected Repeat case Penetrative damp identified HHSRS Category 2 hazard Vulnerabilities present that may be impacted by effects of damp and mould	Mould wash undertaken within 7 days of survey Repair works will commence within 7 days of survey results
Low	Single room affected Condensative damp identified	Mould wash undertaken within 1 month

Where appropriate, reported cases will be reviewed by the Assistant Director of Housing and with reference to STAR's vulnerability policy, to ensure that they are prioritised as appropriate from both an asset and housing management/customer perspective.

Identified works will be carried out by STAR's operatives and/or contractors, under the direction of the Repairs Manager or, where appropriate, the Property Surveyor and/or Asset Management team. STAR will undertake follow on checks at six and twelve months, to ensure that incidences of damp and mould are satisfactorily resolved. Where there are repeat/reoccurring incidences, STAR will undertake further investigation to identify any underlying issues and take further steps as required.

6. Customer Engagement

STAR will ensure that customers who report damp and mould in their property are treated with respect and empathy. Customers will be kept informed of planned activities and supported to facilitate the resolution of any incidences through the provision of information and advice regarding matters such as ventilation and heating.

Recognising the impact of fuel poverty on the issue, where appropriate customers will be supported by STAR's financial inclusion team. Where major works are required and/or there is a risk to the health of the residents, households will be considered for and supported with a temporary decant. Further information about how we manage cases where a resident is required to move from their home for works to be carried out can be found in our Decant Policy.

7. Customer Responsibilities and Expectations

Our customers have an active role in the implementation of this policy:

- Reduce the risk of excess moisture build up through opening windows as required, covering pans when cooking, and using ventilation fans where provided
- Wipe away condensation / excess moisture from surfaces
- Ensure there is adequate air circulation to walls and ceilings
- Follow advice and guidance provided by STAR in terms of managing humidity and moisture in the home
- Report any damp and mould (and other repair) issues to STAR promptly
- Keep to agreed appointment times and allow access for surveys, inspections and works
- Ensure that any installed monitoring equipment is not interfered with / compromised

8. No Access

Where tenants refuse access, several attempts will be made to seek gain entry so as to protect the asset and the customer:

- Three phone calls
- One text / SMS message
- One email
- One posted letter
- One hand-delivered letter, delivered and recorded using STAR process

The Assistant Director of Housing will be notified where access cannot be obtained through any of the above means, to consider the safety and wellbeing of the tenant in context of the known or likely condition of the asset, and determine what further action is required. If appropriate, a notice of intent will be issued to ensure that any HHSRS category 1 hazards can be addressed.

Should the decision be made to cease access attempts, a flag will be added to the organisation's housing management system to ensure enquiries are made in any further contact with the tenant, to determine if damp and mould issues are (still) present and require addressing.

9. Complaints

Any customer dissatisfaction in relation to our delivery of this policy will be managed in line with STAR's complaints policy. should we receive a disrepair claim, we will act to ensure that the legal process does not delay the completion of any repair works.

10. Proactive and preventative measures

Data from all cases will be collated and analysed, to identify trends and facilitate a proactive approach to damp and mould. Information gathered will include property type, primary cause of damp and mould, action required to resolve and repeat and similar cases. This will be analysed with reference to wider organisational data such as stock condition and EPC surveys, and property/archetype repair history. The outcomes of this analysis will inform STAR's rolling planned maintenance and 30-year planned investment programmes, as well as the development and disposals programme, enabling the organisation to design and build out the risk of future damp and mould incidences.

Where appropriate, the use of technology such as environmental sensors will be used to inform our understanding of the causes, remedies, and preventative measures of damp and mould. This information will inform both building and housing management strategy/interventions.

11. Governance and Performance Management

Damp and mould activities will be overseen by a working group chaired by the Assistant Director of Assets, reporting to SMT and Board. STAR will report on:

- Number of cases reported each month
- Number of cases not resolved within 6 months
- Number of repeat cases

- Number of damp and mould related HHSRS Category 1 hazards
- Primary causes of damp and mould
- Primary action taken to resolve
- Any emerging trends i.e. in locality, property type

12. 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	<ul style="list-style-type: none"> • 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
Assistant Director of Assets	<ul style="list-style-type: none"> • 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

Assistant Director of Housing	<ul style="list-style-type: none"> 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
Lead Surveyor	<ul style="list-style-type: none"> 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
Strategic Repairs Manager	<ul style="list-style-type: none"> Plan, organise and supervise remedial works as requested by the Lead Surveyor
Compliance Manager	<ul style="list-style-type: none"> To monitor the organisation's performance and ensure that a compliance-based approach is taken to address incidences of damp and mould
All staff	<ul style="list-style-type: none"> All staff and contractors have a responsibility to report the early signs of damp and mould in a timely manner

13. Communication

STAR will ensure that everyone working for the organisation or acting on its behalf takes proactive approach to raising any risks identified in relation to damp and mould.

STAR will ensure that appropriate damp and mould information is provided to relevant persons on our website and upon request.

STAR will ensure that procedures are in place and that staff and contractors are clear on their responsibilities.

14. Training

STAR will ensure that staff have the skills and knowledge to implement this policy. Training will be designed to fit the needs and roles of the employees and will include:

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

15. 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 Housing Health and Safety Rating System (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 – Housing Health and Safety Rating System (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

16. 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 of the time and can quickly grow on

surfaces where dampness persists, or water has formed into a visible covering. [Impact of breathing spores/leaving untreated].

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.

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

Protected Characteristic	Positive Impact(s)	Negative Impact(s)	Not Applicable	Action to address negative impact
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, ALMO's?)		
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.		

Step 4: 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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