

Damp and Mould – Self-Assessment Form



This form details our response as a landlord to the Housing Ombudsman's damp and mould self-assessment requirement. This provides Royal Borough of Greenwich's (RBG) required response for how as an organisation we comply with the Housing Ombudsman's recommendations, for our housing stock, as noted in the [Spotlight Report on Damp and Mould October 2021](#). This also includes Greenwich temporary accommodation stock which are serviced through the same processes as Greenwich general needs stock.

For completeness this report also includes commentary of how temporary accommodation (TA) not owned by the Council respond to these recommendations. Please note this doesn't include whether this is compliant with the recommendations in the Spotlight Report, as this isn't Greenwich stock, and is therefore for information only.

Chapter 1 – From reactive to proactive

No	Recommendation	Comply:	Evidence, commentary and any explanations
I	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.	Partial	We have a zero-tolerance approach to damp and mould. We have reviewed our current strategy and recognise there is more we want to do improve our offer to have a more resident centred approach.
	Non-RBG stock TA commentary		
	Environmental Health teams inspect temporary accommodation properties under the Housing Health and Safety Rating System. Appropriate and robust action is taken where hazards are identified. We have improved our focus and offer on damp and mould in temporary accommodation and we seek to remedy all damp and mould problems proactively. All damp and mould needs to be addressed, there is no "acceptable level of damp".		

2	Landlords should consider whether they require an overall framework, or policy, to address damp and mould which would cover each area where the landlord may be required to act. This would include any proactive interventions, its approach to diagnosis, actions it considers appropriate in different circumstances, effective communication and aftercare.	Yes	We have considered this through a recent discovery process to determine our current damp and mould offer. We have decided it is not enough at present so we will do more including the development of a specific Damp and Mould policy which will be made public upon completion.
Non-RBG TA stock commentary <p>There is no overarching policy on managing damp and mould at present however we do give residents information about condensation.</p> <p>All new properties are visited by the Disability & Home Improvement Team to inspect the property for repairs, gas and electric issues. These inspections are conducted with the occupant in situ.</p>			
3	Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to ‘find their silence’.	Yes	<p>We have reviewed the accessibility and use of our systems and updated our website with improved information and reporting functions which aims to enable residents to ‘find their silence’. These changes meet web WCAG accessibility standards and provide residents with up to date, accurate information which is easy to read and navigate.</p> <p>We will be adding further digital self-serve functionality in the future.</p>
Non-RBG TA stock commentary <p>Issues are reported directly to landlord by the resident. Where our Temporary Accommodation team receive a contact, either by email or phone call, we email the landlord. In serious cases, our Temporary Accommodation team follow up and visit if necessary, otherwise we react to client contact and check repairs are completed.</p>			

4	Landlords should identify opportunities for extending the scope of their diagnosis within buildings, for example by examining neighbouring properties, to ensure the response early on is as effective as possible.	Yes	We identify opportunities to undertake further diagnosis such as mirror imaging of properties so we can identify buildings and blocks that have the same make up and are likely to suffer from the same problems. From there we conduct detailed pilot surveys of problem areas across the borough to help us take a holistic and preventative approach.
	Non-RBG TA stock commentary		
	Inspections are undertaken by building owners however temporary accommodation isn't often in blocks and therefore the possibility to inspect similar neighbouring properties is limited.		
5	Landlords should implement a data driven, risk-based approach with respect to damp and mould. This will reduce over reliance on residents to report issues, help landlords identify hidden issues and support landlords to anticipate and prioritise interventions before a complaint or disrepair claim is made.	Partial	<p>We have a dashboard which pulls together data from our systems, providing the service with an overview of all jobs and operations, including damp and mould priorities, where we can breakdown and target weaknesses and delays.</p> <p>We are currently progressing with a data project which will give us significantly increased access to our data and enable us to increasingly identify and respond to themes of damp and mould across the borough in a risk-based and proactive way.</p>
	Non-RBG TA stock commentary		
	Setting the Standard: The central pan-London inspections team, completes inspections of temporary accommodation on at least an annual basis. They inspect and grade all bed and breakfast and studio properties used by local authorities for temporary accommodation.		

	Inspections check that the property meets a decent level of quality and management standards. Where category I hazards are identified, they notify the Environmental Health Service of the host borough and notify all placing boroughs that the property should not be used until the issues have been remedied.		
6	Where properties are identified for future disposal or are within an area marked for regeneration, landlords should proactively satisfy themselves that residents do not receive a poorer standard of service or lower living conditions, that steps are taken to avoid homes degrading to an unacceptable condition and that they regularly engage and communicate with these residents.	Yes	We provide continuous services for residents that have a decent status under the allegations policy and continue to treat problems and conduct repairs for residents to ensure residents still receive a good service and are not subject to living in low living conditions. Throughout all our regeneration programmes and initiatives engaging and communicating with residents every step of the way through appropriate communication channels.
	Non-RBG TA stock commentary		
	No additional comments.		
7	Landlords should avoid taking actions that solely place the onus on the resident. They should evaluate what mitigations they can put in place to support residents in cases where structural interventions are not appropriate and satisfy themselves they are taking all reasonable steps.	Yes	When treating cases of damp and mould we take a holistic approach and evaluate what reasonable mitigations can be put in place to support residents without solely placing the onus on them. This includes taking actions such as: making sure residents have fully working, good quality extractor fans, trickle vents are being utilised and left open, windows are not closed or taped up, using data loggers to monitor condensation and temperature levels.

	Non-RBG TA stock commentary		
	Since the start of 2023, we have actively sought to take action on all damp/mould cases, to resolve all issues that are brought to our attention. Where there are vulnerabilities exacerbated by damp/mould, these are assessed by Disability & Home Improvement Team as category 1.		
8	Together with residents, landlords should review the information, materials and support provided to residents to ensure that these strike the right tone and are effective in helping residents to avoid damp and mould in their properties.	Yes	<p>We have completed a review and updated our online damp and mould information. We worked closely with residents and staff to develop this information, including testing content with those who have complex needs, to ensure that the tone struck is supportive and doesn't apportion blame, whilst giving practical tips on how to reduce condensation for those who are able.</p> <p>These are now being distributed through additional channels.</p>
	Non-RBG TA stock commentary		
	There is a damp and mould "how to treat" insert in the signup pack. We survey residents and send text messages monthly to ask about clients' experiences of temporary accommodation, which is reported quarterly.		
9	Landlords should be more transparent with residents involved in mutual exchanges and make the most of every opportunity to identify and address damp and mould, including visits and void periods.	Yes	<p>We are transparent with residents involved in mutual exchanges by providing advice at viewings and sending letters to incoming and outgoing residents where we name defects that current exist within properties, the actions we have taken to address them and any next steps.</p> <p>Any repairs required are taken while the current resident is in situ, where appropriate.</p>

	Non-RBG TA stock commentary		
	Temporary accommodation officers seek to note any repair issues when attending for non-repair reasons. This is a standard expectation of these officers. Disability & Home Improvement Team inspects all void leases.		
10	Landlords should ensure their strategy for delivering net zero carbon homes considers and plans for how they can identify and respond to potential unintended consequences around damp and mould.	Yes	Our net zero strategy considers how to manage unintended consequences when undertaking works including compliance with the PAS 2035 standard. This includes approaches whether they are government funded projects or otherwise.
	Non-RBG TA stock commentary		
	No additional comments.		

Chapter 2 – From inferring blame to taking responsibility

No	Recommendation	Comply:	Evidence, commentary and any explanations
11	Landlords should review, alongside residents, their initial response to reports of damp and mould to ensure they avoid automatically apportioning blame or using language that leaves residents feeling blamed.	Yes	All content changes and new communications have been reviewed and tested with residents and staff for language and tone to avoid apportioning blame. All staff responding to damp and mould queries/reports have undertaken unconscious bias, dispute resolution, taking and receiving feedback as well as customer service training to ensure consistency in language and tone.

	Non-RBG TA stock commentary		
	General advice is always provided to ensure ventilation and reduction of the likelihood of the build-up of condensation, however, inspections of temporary accommodation properties will look for any structural or mechanical deficiencies that may be the route cause		
12	Landlords should consider their current approach to record keeping and satisfy themselves it is sufficiently accurate and robust. We would encourage landlords to go further and consider whether their record keeping systems and processes support a risk-based approach to damp and mould.	Partial	Although we have a records system for recording damp and mould there are some challenges in terms of record keeping that we are looking into e.g. capacity. We have considered how our system can support a risk-based approach to damp and mould and this will be expanded in the future.
	Non-RBG TA stock commentary		
	Environmental Health teams use a fit-for-purpose database that captures complaint data and risk assessments. We are also looking to further improve our reporting capability by the addition of hazard specific codes.		
13	Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.	Partial	<p>We have triaging processes throughout different stages of a repair. When residents call our Customer Service agents follow call scripts and a set of question and answers to help us identify what the problem is. Our new self-service repair reporting webform also has a series of triaging questions for residents to follow. Once a repair has been reported, our operational team's triage on a case-by-case basis. Cases will be reviewed and accelerated if the problem is severe and/or if prioritisation is required due to the residents' circumstances and needs.</p> <p>We seek to response within our published SLAs however we are reviewing our capacity to ensure we can undertake damp and mould responses within our target times.</p>

Non-RBG TA stock commentary			
<p>When damp/mould is reported, the resident contacts the landlord. If the resident informs us they have had no response then we email the landlord immediately. If the issue remains unresolved, the Disability and Home Improvement Team attend.</p> <p>An initial risk assessment is made whereby resident are asked to provide photographs, and details of occupancy. The result of this risk assessment will help to determine the response time for each individual case.</p>			
I4	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.	Yes	<p>We report, monitor and review missed appointments including refusal and no access cases regularly. We tailor our approach depending on the reason behind a missed appointment. If we are unable to make an appointment, we will re-schedule it and contact residents over the phone and via text messages to let them know. If an appointment is refused, we follow up with tenancy colleagues and follow our formal refusal policy.</p> <p>We intend to review the process and means of communication with residents with the aim of improving it.</p>
Non-RBG TA stock commentary			
Disability & Home Improvement officers inspect a proportion of temporary accommodation properties each year to which includes an assessment of all hazards including mould and damp. The recording system has been amended to specifically flag up where any mould or damp is found in a property, to record whether it is serious and ensure it is reported back to the temporary accommodation team so action is taken to resolve it.			
I5	Landlords should ensure that their staff, whether in-house or contractors, have the ability to identify and report early signs of damp and mould.	Yes	Our staff and the contractors we use have a wealth of experience and specialist expertise knowledge on Damp and Mould, who report back instances of damp and mould while carrying out other works.

			<p>Internal and external staff are highly proactive in identifying early signs of Damp and Mould. This results in significant cross team working across our services. However, we recognise the need to deliver in house training specific to Damp and Mould and are currently exploring options for this.</p> <p>Any identification of overcrowding is progressed through out allocations policy which provides additional banding in the case of overcrowded households.</p>
	<p>Non-RBG TA stock commentary</p> <p>We are planning to refresh training for all temporary accommodation officers which will help them to identify damp/mould early. Moreover, we are providing equipment for officers to diagnose damp problems.</p> <p>Environmental Health teams have appropriate training, qualifications and experience. Qualifications include Environmental Health or Housing related degrees, certificates in Housing Health and Safety Rating System.</p>		
16	Landlords should take steps to identify and resolve any skills gaps they may have, ensuring their staff and contractors have appropriate expertise to properly diagnose and respond to reports of damp and mould.	Partial	<p>We take steps to ensure our staff as well the specialist damp contractors we use, are competent, knowledgeable, and experienced. We also encourage trade staff to attend courses to upskill themselves on how to treat damp and mould, including attendance at a course ran by Inside Housing.</p> <p>We recognise the need to bring in additional capacity in this area, this will be explored as part of our damp and mould re-design. We will also be undertaking a technical assessment of our workforce's skills at the point new staff are hired.</p>

	Non-RBG TA stock commentary		
	<p>We are planning to put training in place to support temporary accommodation staff to correctly handle reports of damp and mould. We will discuss this regularly at team meetings.</p> <p>Environmental Health teams have refresher training and will identify any skills gaps where further support may be necessary. Examples include bespoke damp and mould training for staff.</p>		
17	Landlords should ensure that they clearly and regularly communicate with their residents regarding actions taken or otherwise to resolve reports of damp and mould. Landlords should review and update any associated processes and policies accordingly.	Partial	<p>We currently utilise all avenues and channels to ensure we regularly communicate with residents including phone calls, text messages, letters, online resident reporting, emails, resident groups and panels. We aim to keep residents up to date throughout the end-to-end journey of their repair, including any actions or steps that are being taken and ensure operational teams are meeting our response times in line with published standards.</p> <p>We are currently reviewing how we can improve our communication holistically to provide a better experience for residents. The new website content and new webforms has been our first result related to this, with more coming as part of the Repairs Transformation Programme.</p>
	Non-RBG TA stock commentary		
	Temporary accommodation officers follow-up reports of repairs to ensure that they are progressing appropriately. We set expectations with residents early and encourage a dialogue where actions taken do not meet their expectations.		
18	Landlords must ensure there is effective internal communication between their teams and departments, and ensure that one individual or team has overall responsibility for ensuring complaints or reports are resolved, including follow up or aftercare.	Yes	We have an in-house dedicated complaints team who take ownership and are responsible for complaints and resolving queries. The team take a holistic approach in joining up with others to ensure we are resolving problems for residents as effectively as we can.

19	Non-RBG TA stock commentary		
	The Disability and Home Improvement and Temporary Accommodation teams have clear communication channels for feeding back the outcome of assessments.		
	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.	Partial	Our Complaints policy closely tracks the Complaint Handling Code. We have a redress policy for Housing, but this will be reviewed.
	Non-RBG TA stock commentary No additional comments.		

Chapter 3 – From disrepair claims to resolution

No	Recommendation	Comply:	Evidence, commentary and any explanations
20	Landlords need to ensure they can identify complex cases at an early stage, and have a strategy for keeping residents informed and effective resolution.	Yes	The expertise of our staff and specialist contractors help identify and resolve complex cases of damp and mould at an early stage. Our staff take ownership of the end-to-end case management of complex cases and will communicate with residents throughout. We utilise our existing channels to keep residents involved and act accordingly depending on the case (e.g. calling residents, sending text messages, emails or letters).
	Non-RBG TA stock commentary		

	Where there are complex needs or substantial works, we move the client out as soon as possible. Where landlords do not promptly comply with our instructions to remedy repair issues, we advise the landlord that we may stop paying the nightly rate as the property is not habitable. We handle these reports in leases in a similar way, but we can charge repair work to the landlord.		
21	Landlords should identify where an independent, mutually agreed and suitably qualified surveyor should be used, share the outcomes of all surveys and inspections with residents to help them understand the findings and be clear on next steps. Landlords should then act on accepted survey recommendations in a timely manner.	Yes	We conduct specialist surveys and reports regularly. This could be for smaller interventions such as new wall installations or structural challenges in large blocks. We engage with residents throughout by tapping into resident networks and groups such as hubs and tenancy estate groups, as well as resident panels for bigger programmes of work. We also communicate with residents individually where appropriate and advise them of the outcome of any specialist contractors and any works required after.
	Non-RBG TA stock commentary		
	We do not currently have a process in the temporary accommodation team for engaging the services of independent surveyors. Where residents choose to engage an independent surveyor themselves, we will consider this information.		
22	Where extensive works may be required, landlords should consider the individual circumstances of the household, including any vulnerabilities, and whether or not it is appropriate to move resident(s) out of their home at an early stage.	Yes	<p>We assess the feasibility of undertaking remedial works with households in situ and adapt the delivery of works sympathetically to ensure minimal disruption to residents' life and consider any vulnerabilities.</p> <p>Where a move is needed we use cross departmental panels and determine if additional priority is required under our allocations policy.</p>
	Non-RBG TA stock commentary		
	Where landlords inform us that the resident needs to move in order to carry out works, we move them, or when the Disability and Home Improvement team recommends moving them.		

23	Landlords should promote the benefits of their complaints process and the Ombudsman to their residents as an appropriate and effective route to resolving disputes.	Yes	This is required in the Housing Complaint Policy with information supplied to residents as a standard process.
	Non-RBG TA stock commentary		
	No additional comments.		
24	Landlords should continue to use the complaints procedure when the pre-action protocol has commenced and until legal proceedings have been issued to maximise the opportunities to resolve disputes outside of court. Landlords should ensure their approach is consistent with our jurisdiction guidance and their legal and complaint teams work together effectively where an issue is being pursued through the complaints process and protocol.	Yes	This is required in the Housing Complaint Policy as a standard process.
	Non-RBG TA stock commentary		
	No additional comments.		

Chapter 4 – From a complaints to a learning culture

No	Recommendation	Comply:	Evidence, commentary and any explanations
25	Landlords should consider how best to share learning from complaints and the positive impact of changes made as a result within the organisation and externally. Systems should allow the landlord to analyse their complaints data effectively and identify themes, trends and learning opportunities.	Partial	Complaints are reviewed monthly which provides an opportunity to identify recurring themes and/or, the ability to share best practice. We have also fostered a culture where officers can highlight themes that may escalate into complaints, including resulting in changes in our systems and policy.

			<p>There is an ongoing programme in place reviewing our directorate-wide approach to learning and developing mechanisms for dealing with issues with process/system changes that are picked up through the complaints process. Learning from adverse Ombudsman determinations is an example of this programme.</p>
	Non-RBG TA stock commentary		
	At the end of the financial year reports are collated to look at trends and lessons learnt. This allows us to look at ways to improve the service and identify any training needs.		
26	Landlords should ensure they treat residents reporting damp and mould with respect and empathy. The distress and inconvenience experienced by residents in this area is some of the most profound we have seen, and this needs to be reflected in the tone and approach of the complaint handling.	Yes	<p>We know that instances of damp and mould can be highly distressful and disruptive for residents and that all cases need to be handled sensitively. To ensure this staff have completed the Housing Ombudsmen's dispute resolution training, unconscious bias training, giving and receiving feedback training and have reviewed the 'It's not lifestyle' spotlight report.</p> <p>Internally, we also ensure staff members responding to complaints and regularly communicating residents have the support they need and feel a part of a supportive culture.</p>
	Non-RBG TA stock commentary		
	Our complaints are managed by a team who ensures that our final response is empathetic and understanding of the circumstances of the client, even where we are unable to uphold it. Complaints address the concerns raised by residents, and offer housing options advice to meet their needs. Responses are understanding and empathetic to their situation.		