

London Borough of Hillingdon

Self-Assessment against the Housing Ombudsman Recommendations concerning Damp and Mould

Updated September 2024

Chapter 1: From reactive to proactive	
Housing Ombudsman Recommendations	Current Practice
<p><u>Recommendation 1:</u> Landlords should adopt a zero-tolerance approach to damp and mould interventions. Landlords should review their current strategy and consider whether their approach will achieve this.</p>	<ul style="list-style-type: none"> • A Damp, Mould and Condensation Policy and Practice note is in place. This includes a zero tolerance approach to DMC. • A Decant operational practice note supports a seamless approach to prioritising tenant decants where necessary. • A review of the policy is in process in conjunction with tenants.
<p><u>Recommendation 2:</u> 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.</p>	<ul style="list-style-type: none"> • In addition to the DMC policy and practice note, operational procedures set out the steps in an end to end process which is taken to ensure that interventions are sustainable. This includes a checking procedure to sign off or prompt follow up work where necessary. Data is routinely collected as part of this process. • The process covers the ‘end to end’ spectrum of presenting mould / dampness issues i.e. from new tenant sign up / mutual exchange inspections, through incident reporting / case management / linkage to planned works /complaint management / resolution / aftercare and ‘learning’ from what works well and what not so well. • A mid-year and year-end update report is provided to landlord board. (October and April)
<p><u>Recommendation 3:</u> Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to ‘find their silence’.</p>	<ul style="list-style-type: none"> • The council is taking actions to maximise opportunities to get behind the front door via a proactive programme of welfare checks. The aim is to deliver a step change in the frequency of tenancy visits and actively gathering information on DMC is a key element. • The objective is to move from a reactive to proactive approach in identifying DMC issues and acting on them. This includes developing a better understanding of perceived barriers to direct reporting by tenants. • Stock condition surveys are taking place across the entire housing stock of circa 10,100 properties. By September 2024, a total of 4,505 properties have been surveyed including 3,704 general needs and 801 sheltered/extra care. • Where Category 1 and 2 hazards are identified, which includes but is not limited to DMC related issues, these are handed over to the maintenance service to address. All data gathered is used to inform Planned preventative works programmes. • Regular toolbox talks on damp and mould identifiers are given to operatives and requirements to report back on property conditions • DMC training has been attended by repairs and maintenance staff and by tenancy management staff. Attendance at refresher training will be required on an annual basis. • Operatives have been provided with an “I have a concern” survey available on PDAs associated with the property to raise and record issues. Team Leaders daily discipline is to regularly review all works completed the previous day which includes the “I have a concern” function. • Tenancy Management have developed a formal decant process which includes DMC. Staff training and guidance on its use has been provided. Tenancy Management home visit templates have been reviewed to specifically capture signs of damp and mould. • Staff of all levels are supported by the decant practice note to recommend decants where there is a need for residents to either temporarily or permanently move from the property in order to resolve any issues which includes DMC. • Communications around DMC have been increased and are ongoing. Articles are included in the tenants and leaseholders quarterly e-newsletter and includes information regarding proactive reporting of repairs and how to do so. • A review of leaflets and information on the website was completed in 2023. • A staff reporting portal has refreshed following feedback from a repairs scrutiny meeting with tenants. This has informed several enhancements. Phase 1 implementation provides Tenancy Management Officers access to the portal to view residents information and to raise, diagnose and schedule repairs. • The complaints web page was updated on 1 April 2024 to set out clearly the complaint process, the changes required of us as a result of the new and revised Complaint Handling Codes, giving the complaint team contact details for those residents who cannot access our services, complaint team staff reminded of the procedure to follow when handling reasonable adjustment requests and the introduction of a Reasonable Adjustment log so we have details of any adjustments made.

<p>Recommendation 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.</p>	<ul style="list-style-type: none"> • During 2024/25 comprehensive surveys are taking place across our housing stock. This will enable us to better understand presenting issues in relation to housing conditions. This will enable, not only DMC to be identified in individual properties, but will also help to improve the understanding of property types, more prone to DMC and other contributing factors. This will be further supported by the information gathered during tenancy visits which will add richer detail regarding occupants e.g. overcrowding. This will support the development of plans to address issues affecting groups of properties. • We already utilise activity data from repairs to inform planned works. This includes works to properties with solid walls and metal windows which have been identified as more susceptible to DMC. The stock condition information when complete will provide richer data to further assist in developing planned works.
<p>Recommendation 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.</p>	<ul style="list-style-type: none"> • The combined information from stock condition surveys and tenancy visits will support a more risk based approach to address DMC. • Power BI data sheets will increasingly enable hot spots to be identified that are more prone to DMC. • We are in addition trialling sensors in properties as part of a London Councils London-wide initiative. These aim indicate a number of factors that could potentially cause DMC, such as excess humidity and low temperatures and will enable more preventative approaches.
<p>Recommendation 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.</p>	<ul style="list-style-type: none"> • The same standard of service continues to be provided to properties in regeneration areas or earmarked for disposal.
<p>Recommendation 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 the structural interventions are not appropriate and satisfy themselves, they are taking all reasonable steps.</p>	<ul style="list-style-type: none"> • We are committed to taking ownership and responsibility of DMC issues and providing a comprehensive response. It is recognised that this entails fostering a culture that is empathetic and aims to work in collaboration with our tenants to find and deliver tailored solutions that will work for them. • This approach is supported by the policy and practice notes developed and by comprehensive and ongoing training sessions to raise awareness of the relevant issues and how to respond. • An overhaul of our response to complaint management, including formal complaint responses and service requests, is helping to embed the culture shift required.
<p>Recommendation 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.</p>	<ul style="list-style-type: none"> • During autumn 2024 we are working with tenants to review our policy and practice note together with our DMC leaflet, website and e-newsletter communications.
<p>Recommendation 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.</p>	<ul style="list-style-type: none"> • We have introduced a new Mutual Exchange Policy and Practice Note which makes reference to management responsibility and accountability for DMC issues.
<p>Recommendation 10: Landlords should ensure their strategy for delivering net zero carbon homes consider and plans for how they can identify and respond to potential unintended consequences around damp and mould.</p>	<ul style="list-style-type: none"> • Delivering net zero is a key area of work for the council and external resources have been secured to assist with this. In developing the required works for properties, actively considering the impact of DMC is a key consideration. • Planned work investment has been markedly increased and will continue at a higher level over the next few years. This includes elements that address affordable warmth, especially insulation measures and a very significantly increased boiler replacement programme.
<p>Chapter 2: From Inferring Blame to Taking Responsibility</p>	
<p>Recommendation 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.</p>	<p>See response to recommendation 7 above</p>

<p><u>Recommendation 12:</u> Landlords should consider their current approach to record keeping and satisfy themselves it is sufficiently accurate and robust. We would encourage landlords to go further and consider whether their record keeping systems and processes support a risk-based approach to damp and mould.</p>	<ul style="list-style-type: none"> • We have a comprehensive end to end process, as described above, to track the progress of DMC works. • Our records include a flag on properties where DMC has been reported, so the DMC history remains apparent. Other flags include those who are vulnerable so that this is taken into account. • Revisits to properties with previously existing DMC circumvent earlier stages of the process. • Reasonable adjustment log introduced by the complaint team to ensure we capture all requests for adjustments received.
<p><u>Recommendation 13:</u> Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.</p>	<p>See response to 12 above</p>
<p><u>Recommendation 14:</u> 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.</p>	<ul style="list-style-type: none"> • Our process has a 3 contact method attempts, with recording to evidence that they have. For DMC cases, on the 3rd attempt a letter is sent which is also shared with tenancy management colleagues and allows further time for a repair to be booked. If the client is vulnerable, a flag will already have appeared and targeted arrangements put in place. • A complex panel has also been created, jointly chaired by the Head of Housing Management and the Operations Manager for Repairs and Voids. • Our system allows easy identification of the types of repair that are not completed due to lack of access so we are able to interrogate this in relation to DMC.
<p><u>Recommendation 15:</u> Landlords should ensure that their staff, whether in-house or contractors, have the ability to identify and report early signs of damp and mould.</p>	<ul style="list-style-type: none"> • We provide regular toolbox talks on damp and mould identifiers to operatives and the requirement to report back on property conditions. Wider housing staff have also attended training on how to recognise DMC. • We will continue to make sure that training opportunities and refreshers are available.
<p><u>Recommendation 16:</u> 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.</p>	<ul style="list-style-type: none"> • Operatives complete a skills matrix on joining the organisation. • Full induction processes and regular training are in place to ensure that staff have the right skills. Any skills gaps are also picked up during personal review processes. • A contractors welcome pack provides information on expectations. The skill set expectation is also covered in our contractual arrangements.
<p><u>Recommendation 17:</u> 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.</p>	<ul style="list-style-type: none"> • After information is provided to residents on management and control of DMC, if we do not hear further from them, we will proactively engage to find out whether further action is necessary. • The end-to-end process includes keeping residents informed of progress and being clear about actions that will be taken.
<p><u>Recommendation 18:</u> 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.</p>	<ul style="list-style-type: none"> • A cross departmental approach has brought teams together to comprehensively address this issue. Communication between teams works well and processes and structures have been developed to aid this e.g. complex case panel. • Ownership generally rests with the maintenance service as they are responsible for responding to complaints of DMC. That response will involve other services as necessary. • There is one central complaint handling team that oversees all complaints and keeps a record of those follow up actions that have been promised and chase officers to ensure that they are followed up and completed.
<p><u>Recommendation 19:</u> 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.</p>	<ul style="list-style-type: none"> • The Policy and Practice Note includes details of how to make a complaint and the complaints process is compliant with the Housing Ombudsman Complaint Handling Code. Any compensation would be considered on a case by case basis. Information about our complaint policy is published on the complaint web page at www.hillingdon.gov.uk/complaints • Quarterly reports will be provided to the Select Committee, Landlord Board and Corporate Management Team. The Select Committee will be acting as the Member Responsible for Complaints.
<p><u>Recommendation 20:</u> Landlords need to ensure they can identify complex cases at an early stage and have a strategy for keeping residents informed and effective resolution</p>	<ul style="list-style-type: none"> • The complex case team has been created and is involved in any particularly complex cases. These would be identified early aided by the flags on our system
<p>Chapter 3: From disrepair claims to resolution</p>	

<p><u>Recommendation 21:</u> 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.</p>	<ul style="list-style-type: none"> • If it is believed that DMC may be due to a structural issue a building surveyor contact is arranged. When property inspections take place, full photographic evidence is taken, along with notes detailing what is required to resolve the issue. • When referred to surveyors the outcome of the report will be submitted to the department with clear outcomes and actions required to resolve issues. Follow up action to take place either utilising in house DLO or by obtaining quotations for works. If works are large options are considered for recommending decants. Residents are kept informed as appropriate.
<p><u>Recommendation 22:</u> Where extensive works may be required, landlords should consider the individual circumstances of the household, including any vulnerabilities, and whether it is appropriate to move resident(s) out of their home at an early stage.</p>	<ul style="list-style-type: none"> • There is a formal decant process and procedure note in place for temporary or permanent decants. This is followed by maintenance service staff where they believe a temporary or permanent decant is required. • A Complex Case Panel has been established to provide an individual focus on specific complex case and ensure joined up working. • Operatives have been provided with a “I have a concern” survey available on PDAs associated with the property to raise and record issues. • Back-office staff empowered to recommend decants where they see the need for urgent engagement with residents to either temporarily or permanently move them from the property in order to resolve any issues.
<p><u>Recommendation 23:</u> Landlords should promote the benefits of their complaints process and the Ombudsman to their residents as an appropriate and effective route to resolving disputes.</p>	<ul style="list-style-type: none"> • The complaints process is accessible via the council’s website at www.hillingdon.gov.uk/complaints and where someone is unsure what to do, there is a helpline for residents to call for assistance. • Information on how to complain is made readily available through various channels • Information about the complaint process was included in the April 2024 newsletter and future editions can be found on the housing webpage: Housing - Hillingdon Council and Housing news: information for our tenants and leaseholders (govdelivery.com) • Contact details of both Ombudsmen are provided on the complaint web page at www.hillingdon.gov.uk/complaints
<p><u>Recommendation 24:</u> 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.</p>	<ul style="list-style-type: none"> • Relevant staff are aware of and comply with the requirement to continue work after a letter before action has been issued. • Tenants and their lawyers are also made aware of the need to allow entry to carry out works prior to formal legal action having commenced. • The Council’s Corporate complaints procedure sets out our approach in this respect and it can be found at www.hillingdon.gov.uk/complaints
<p>Chapter 5: From Complaints to a Learning Culture</p>	
<p><u>Recommendation 25:</u> Landlords should consider how best to share learning from complaints and the positive impact of changes made as a result within the organisation and externally. Systems should allow the landlord to analyse their complaints data effectively and identify themes, trends and learning opportunities.</p>	<ul style="list-style-type: none"> • A lessons learned log is being maintained. Quarterly reviews have been implemented. • There is a commitment to update Landlord Board and Cabinet Members on a quarterly agreed basis with annual reporting to Select Committee prior to formal reporting requirements to the housing ombudsman. • The Council has also launched a new reporting tool using Power BI in which all staff can access real-time data relating to their own service and also across the Council. The report provides data on lessons learnt, themes, compensation paid, service improvements, etc. <p>There is also the facility to record compliments within the Council’s complaint system for compliments submitted externally through GOSS and also to those that are received by post or via email.</p>
<p><u>Recommendation 26:</u> Landlords should ensure they treat residents reporting damp and mould with respect and empathy. The distress and inconvenience experienced by residents in this area is some of the most profound we have seen, and this needs to be reflected in the tone and approach of the complaint handling.</p>	<ul style="list-style-type: none"> • We always strive to treat residents with empathy and sensitivity. We recognise that DMC can exacerbate existing mental health and other conditions. • Oneserve system has facility to include warning badges that are used to some extent to log tenant specific information on vulnerabilities. • Staff training includes autism awareness and disability awareness. Rolled out to all repairs staff in early 2024. • The Local Government and Social Care Ombudsman ran a course for staff within the Council on the handling of complaint in May 2024. In addition, the Council runs Master classes on the handling of complaints which those staff involved in the complaint process are offered.