



Damp and Mould Strategy and Action Plan for Council Housing 2025-2028



Introduction

Damp and mould cause serious concern because of their health and wellbeing impacts. This Strategy sets out how the Council is tackling the root causes of damp and mould and the plans that we have in place to improve the service offered to tenants who encounter damp and mould.

This Strategy defines both how we will strengthen our rapid response to reports of damp and mould, and the proactive, and long-term actions that we will take to prevent its appearance and recurrence. In this way, our Strategy will contribute to our priority of providing, safe, quality, and affordable homes as a social landlord.

Our Strategy will achieve lasting improvement in how we tackle damp and mould. It is, in part, a direct response to the increased level of scrutiny of how Councils tackle damp and mould following the tragic death of Awaab Ishak. In November 2022 a coroner's report found that Awaab's death was a result of prolonged exposure to damp and mould. Issues of damp and mould are not new, but the result of long-term, entrenched issues within the housing system that require innovative approaches to resolve. Our Damp and Mould Strategy and Action Plan presents our approach and response and incorporates guidance provided as part of Awaab's Law.

Purpose of the Strategy

There are three purposes to this Strategy and Action Plan:

- 1) To formalise the established operational processes, that we already have.
- 2) To set out our aims to increase efforts to tackle damp and mould to reduce the rate of its presence and recurrence in Council homes.
- 3) To provide assurances for tenants of the processes in place to eliminate damp and mould by addressing its root causes.

Measuring performance

The performance measures identified within the Action Plan will be used to quantify performance on an annual basis, but monitoring will not be limited to an annual review. Key Performance Indicators in relation to damp and mould are already in existence and monitored and reported on monthly.

This Strategy and Action Plan will be monitored by senior officers who will also report on performance regularly to the Council's Landlord Services Committee. This will ensure the Strategy is effective and up to date with any changing regulation, legislation, and best practice.

National context

Statutory duties which apply to West Lancashire Borough Council.

Section 11 of the Landlord and Tenant Act 1985

Section 11 of the Landlord and Tenant Act 1985 requires landlords to carry out basic repairs. It states that landlords must keep in repair and proper working order the structure and exterior of the building (including internal walls and plasterwork); the installations for water, gas and electricity including sinks and toilets; and the installations for space and water heating.

Homes (Fitness for Human Habitation) Act 2018

Requires all social or privately rented houses and flats to be safe, healthy, and free from things that could cause serious harm.

Landlords are required to ensure that any home they rent out is free of serious hazards from which a risk of harm may arise to the health or safety of the tenant or another occupier of the property. It does not contain a definition of fitness for human habitation but highlights freedom from damp as a condition to consider, alongside other prescribed hazards.

Where a landlord fails to do so, the tenant has the right to take action in the Courts for breach of contract on the grounds that their home is unfit for human habitation.

The Act does not cover people who have 'licenses to occupy', instead of tenancy agreements. This may include lodgers (people who live with their landlord), some people who live in temporary accommodation, and some, but not all, property guardians.

Part 1 of the Housing Act 2004

Part 1 of the Housing Act 2004 introduced the Housing Health and Safety Rating System (HHSRS), which can be applied to any tenure. It requires the HHSRS to be used in the enforcement of housing standards.

The HHSRS is as a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in homes. This assessment method focuses on the hazards that are present in housing and means a higher burden can be placed upon landlords generally to minimise or avoid potential hazards and to review conditions regularly including to rectify damp and mould in properties. Category 1 hazards are the most serious, followed by Category 2.

Part 1 of the Housing Act 2004 introduces a duty on the local authority to take appropriate enforcement action if it assesses that a Category 1 hazard is present in a property. It also empowers the local authority to take several other actions if a Category 2 hazard is assessed as being present and the Council decides to take action.

The Environmental Protection Act 1990

Section 79 and 80 of the Environmental Protection Act 1990 include provisions and controls for "statutory nuisances" and includes where the conditions of a property are "...in such a state as to be prejudicial to health or a nuisance". The relevant provisions relate to the impacts of poor housing conditions, rather than the conditions themselves. Dampness, condensation, or mould growth are examples of defects could be considered a statutory nuisance if there is a risk to health. It applies to private and Council housing. Council tenants can request an investigation by the Council's Environmental Health team, and if a statutory nuisance is identified, an abatement notice can be served requiring the nuisance to be addressed. Tenants can also take their own legal action under Section 82 of the Act.



Section 4 of the Defective Premises Act 1972

Under section 4 of the Defective Premises Act 1972, a landlord owes a duty of care to ensure that tenants (and their household) and visitors are reasonably safe from personal injury or damage to their property resulting from the defects.

The duty is triggered if the landlord 'knows or ought to know of the relevant defect' regardless of whether the occupier had informed the landlord of it. 'Relevant defects' are items of disrepair arising or continuing on or after 1 January 1974. Where damage or injury results from a landlord's failure to meet repairing obligations, actions under the Defective Premises Act 1972 can be brought alongside actions in negligence and actions for breach of contractual rights. However, injury (whether physical or financial) must arise for a claim to be brought, and whether the landlord is liable will depend on the circumstances of each case.

Social Housing (Regulation) Act 2023

This legislation aims to take a proactive approach to regulating social housing and taking action against landlords who do not meet standards.

Of most significance to the issue of damp and mould, it introduces new consumer standards and strengthens the enforcement powers of the Regulator of Social Housing.

Decent Homes Standard (DHS)

The Decent Homes Standard (DHS) applies to the social rented sector and was introduced in 2000 to provide a minimum standard of housing conditions. It was updated in 2006 to take account of the introduction of the HHSRS. It is a non-statutory standard which requires that a "decent home":

- Meets the current statutory minimum standard (being free from category 1 hazards)
- Is in a reasonable state of repair.
- Has reasonably modern facilities and services (kitchen being less than 20 years old, bathroom being less than 30 years old, adequate noise insulation and kitchen space, and an adequately located toilet)
- A reasonable degree of thermal comfort



Guidance on damp and mould for rented housing providers

This guidance for private and social landlords, published in September 2023, follows engagement with the housing and health sectors and met a government commitment made in response to the coroner's report on the death of Awaab Ishak. It sets out the health risks associated with damp and mould and sets out expectations of how landlords should respond to reports of damp and mould.

Renters' Reform Bill

In May 2023 the Government introduced the Renters (Reform) Bill which aims to introduce several reforms to the sector set out in a white paper in 2022. This includes the introduction of a Decent Homes Standard to the private rented sector.

Forthcoming legislation and guidance

Awaab's Law

Awaab's Law is part of the biggest government reforms affecting social housing in a decade. It brings about changes to ensure tenants in rented accommodation are protected from the damaging effects of damp and mould. Addressing issues with social landlords not complying with rules and regulations, it enforces timely action to prevent health hazards and rectify any issues within specific timeframes.

Tackling damp and mould in alignment with the Council's strategic priorities

Build resilience to climate change and reduce our carbon footprint.

Many of the preventative measures being delivered by the capital works and retrofit programmes to minimise the conditions that allow damp and mould to develop are also key to delivering the Council's climate agenda. This was originally set out in the Climate Change Strategy and Action Plan 2020-2030.

Provide safe, quality, and affordable homes as a social landlord.

Several key actions from the Council's Housing Strategy are closely aligned with the actions in this Strategy to tackle damp and mould. This includes those associated with making the best use of all existing homes while encouraging well-managed and maintained homes across all tenures (5.3) and delivering the residential building objectives of the Council's Climate Change Strategy 2020-2030 (5.5).

Reduce health and wellbeing inequalities.

Ensuring our tenants homes that are free from damp and mould will assist in providing safe, quality, and affordable homes and reducing health and wellbeing inequalities.



We are committed to aligning the service that we provide to support delivery of our strategic priorities to ensure that our vision **West Lancashire together; the place of choice to live, work, visit and invest,** is achieved.

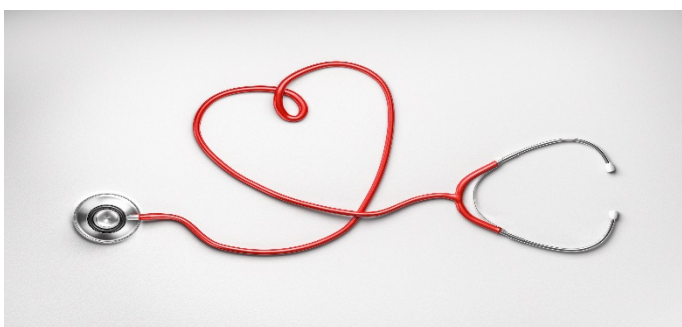


Understanding damp and mould

Dampness is the result of excess moisture, which can originate from:

- Cold bridging - This can be caused for instance by insulation not fully extending into the eaves of a roof or window reveal, as well as poorly installed cavity wall insulation.
- Type and location of radiators - Damp can occur when radiators are located on internal walls, leaving external walls cold. Radiators could also be too low in heat output to adequately heat a room.
- Blocked, broken or covered ventilation – For example, blocked air bricks and malfunctioning window vents.
- Poor, malfunctioning or no air extraction in kitchens and bathrooms.
- Bridging damp – This can occur when moisture travels into the property from outside and is generally due to problems with damp membranes and blocked cavities, or where ground levels are above the damp membrane.
- Penetrating damp from render systems: This could be due to the render's age, the render mix being too dense, or poor brickwork pointing.
- Leaking or overflowing guttering – Where the gutter is damaged or needs clearing.
- Leaking roofs - For example when tiles are damaged or missing.
- Unvented and non-condensing tumble dryers - These can produce excessive amounts of water vapor inside the house, encouraging condensation.
- Inadequate ventilation - This is the primary cause of excessive humidity, particularly when bathing, within the home: However drying clothes on radiators, cooking with lids off pans and even tropical fish tanks all add to the moisture levels within a property.
- Fuel poverty - This is becoming a major factor in the increase of damp, mould, and condensation problems when tenants are unable to adequately heat their home.

The development of mould growth is the most tell-tale sign associated with condensation dampness. The appearance of mould may be black, white, yellow or green in colour, depending on the specific type of mould and the surface that it grows on.



What are the health impacts?

Tenants with damp and mould in their home are more likely to have respiratory problems, respiratory infections, allergies, or asthma. Mould can also cause allergic reactions, and skin contact with mould can cause rashes or exacerbate skin conditions.

Many of the most serious health impacts of damp and mould occur gradually, over a long period of time. However, in some vulnerable groups the short-term impacts can be more severe, which is why it is important to respond to the issue quickly.

Damp and mould can also be a contributing factor to poor mental health.

Who is most vulnerable?

Some people are more sensitive than others, including:

- babies and children
- older people
- those with existing skin problems, such as atopic eczema
- those with respiratory problems, such as allergies and asthma
- those with a weakened immune system, such as those having chemotherapy.

The inability to heat a home due to high fuel costs (fuel poverty) can exacerbate damp and mould issues and make it harder to prevent condensation-related damp. People who are fuel-poor may also be unable to afford the costs of some other solutions such as dehumidifiers. Overcrowding, often the result of poverty and a lack of housing affordability, can also increase humidity and condensation, making damp and mould more likely.

Age is another existing inequality which affects the prevalence of damp and mould. Older people who are unable to keep their home warm and dry, whether through fuel poverty or because of structural issues with their property, can not only experience a greater likelihood of damp and mould, but will also be more vulnerable to illnesses.

We consider vulnerabilities and, where appropriate, decant tenants until the damp and mould is rectified or during the period of repairs.

Our approach

Principles

To achieve lasting improvement in dealing with damp and mould, including its root causes, the Council's Strategy and Action Plan are guided by principles that align to the Housing Ombudsman Service's 2021 report, Spotlight on: Damp and Mould. Our approach is developed around the following key elements.

- **Prevent** – We will invest in our homes so they are energy-efficient and well insulated and so they are protected from damp caused by property-related conditions.
- **Inform** – We will provide our customers with advice and support to help them on financial matters and energy usage to help combat fuel poverty. We will offer support and information on how customers can play their part in preventing damp, mould and condensation occurring, dealing with each situation on a case-by-case basis in an empathetic and supportive way.
- **Identify** – Through knowledge of our housing stock gained via periodic surveys, staff knowledge, contractor reporting, analysis of data, tenant awareness and by responding to damp reports from our customers, we will continue to identify damp and mould and build our knowledge of damp and mould in our homes.
- **Act** – Where our investigations have identified the existence of damp, we will prioritise cases where appropriate and take prompt action to apply the best solution to deal with each occurrence of damp or mould that we identify. This may include initial responses (e.g., mould washes) and longer-term solutions such as remedial repairs, upgrading insulation, improving heating and, where appropriate, addressing the causes through planned investment.

- **Resolve** – We will ensure that the solutions we apply work, and we will continue to monitor the success of those solutions and refine our approach as necessary until the damp has been eliminated. We will also advise our tenants of the cause of the damp and of any actions on their part that will help to prevent its re-occurrence.
- **Monitor** – Where we have identified a damp problem, we will keep in touch with tenants and will monitor the situation until it is reasonable to conclude that the damp has been eliminated and should not return.
- **Review** – We will periodically review our Damp and Mould Policy, Strategy and Action Plan to ensure that our approach remains effective and to ensure we keep pace with developments in the treatment and management of damp and mould. We will also learn from our experiences of dealing with damp in our homes and from any feedback or complaints regarding our handling of damp and mould related issues.

Prioritisation of damp cases and reports

We know that damp can affect anybody, but it may be more harmful to some vulnerable tenants, or people with certain medical conditions. Our processes will be sensitive to the different needs and vulnerabilities of our tenants, and we will prioritise our response to damp accordingly to protect tenants who may be more vulnerable to the effects of damp and mould.

Awareness-raising and campaigning

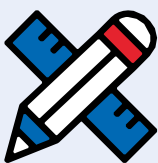
As part of the Strategy, we wish to ensure that tenants and stakeholders understand the issue and where they can get help. Regular campaigns will include media relations, a revised damp and mould leaflet, attendance at community impact days, and we will aim to change behaviors to improve awareness, understanding, and above all, access to support.



Responding effectively to reports of damp and mould

The Council's primary response to reports of damp and mould from tenants comes via our Customer Services Team to our Damp and Disrepair Team. In January 2024, the Council established its Damp and Disrepair Team to intervene in cases of damp and mould early before they become serious disrepair cases that can be costly to the Council and detrimental to the health and wellbeing of tenants.

Worried about damp, mould, or condensation in your Council home?



Visit the webpage at <https://repaironline.westlancs.gov.uk> or telephone us on **01695 577177** to request an inspection.

For more information about damp and mould visit our website at <https://www.westlancs.gov.uk/housing/i-am-a-council-tenant/repairs-and-improvements/damp-and-condensation>

When a report of damp or mould is made, our call center officers triage each case and will book a repair or arrange for a surveyor to visit the tenant's home to assess the cause of the problem.

Council damp and disrepair surveyors may conduct a damp survey, to assess the cause of the issue as soon as possible. In cases where leaks or disrepair are a factor, the Council takes action to resolve the cause of the damp and mould and may also need to undertake additional general repairs. We strive to identify the underlying causes of damp and mould.

Part of the Damp and Disrepair Team is an internal mould wash team who will attend to remove all mould on a cyclical basis until the underlying causes are rectified.

Where all other factors have been ruled out and condensation is determined to be the cause, the performance of or requirement for mechanical ventilation is checked, and a review of occupancy and living arrangements may be undertaken. In such cases, the mould is safely removed, and tenants are provided with practical advice to reduce the risk of mould and damp problems persisting. Information and advice are based on what is practicable for the tenant's home and circumstances, for example having the heating running at all times may not be affordable for some households, or they may be forced to

dry washing indoors due to a lack of outdoor space. Overcrowding is also an issue affecting households in Council properties, as a shortage of supply means long waiting times for larger homes.

We strive to ensure that we have all mechanical ventilation cleaned or serviced annually.

Following completion of the works, tenants are asked to provide feedback on the works and their experience of the service. A number of post inspections will take place where appropriate.

As an indicator of the team's success, we record the number of damp and mould reports by tenants. This has been increasing due to us proactively encouraging people living with damp and mould to come forward.

The team have produced a damp leaflet which contains a QR code linking to the damp page of our website. This is regulated promoted to tenants. The team also attend community impact days and events at sheltered schemes to increase awareness of the team and how to report damp and mould.

Struggling to heat your home?

The Household Support Fund may be able to help.

More information on how to apply can be found on our website [westlancs.gov.uk](https://www.westlancs.gov.uk) or contact our Money Advice team on 01695 585252 or by email to moneyadvice@westlancs.gov.uk



The Council will build on the success of the first year of the Damp and Disrepair Team by improving the accessibility and efficacy of the team. This will include reviewing the online reporting tool to ensure that it is as accessible and easy to use as possible.

We will also review our IT systems, identifying improvements to the case management and data collection systems used by the team. This will enable us to ensure that issues of damp and mould are responded to the first time and that we have data to enable the team to operate more efficiently and to better monitor the success of the team.

We will also develop our processes for referring cases to the Damp and Disrepair Team. A number of pathways have already been established for referrals to the team. In some cases, issues are raised through other routes such as via Housing Officers who are trained to identify cases of damp and mould, or by residents in person through the Impact and Sheltered Scheme days.

The Council's repairs and gas contractors, who service our homes every year, have been trained to identify signs of disrepair including damp and mould, and report homes of concern back to the Damp and Disrepair Team in weekly reports.

We have also developed strong links between the Damp and Disrepair and Team and our corporate complaints processes so that every case reported in those channels is referred into the Damp and Disrepair Manager for a comprehensive assessment.

We will continue to deliver training across staff within the housing directorate and explore opportunities for training and awareness-raising with officers from other directorates.

From August 2024, the Council rolled out mandatory training on damp and mould for officers in the housing directorate. Staff who enter residents' homes, such as surveyors, independent living officers and customer liaison officers will be required to undertake an e-learning course focused on damp and mould.

Additionally, technical staff working within the dedicated Damp and Disrepair team undertook the Property Care Association's Surveying Timber and Dampness in Buildings course and exam, to ensure they have the latest information about legislation and guidance.

Finally, we are continuing to develop our resident involvement framework, which ensures that residents can raise building-wide maintenance and disrepair issues and provide feedback on the Council's performance in resolving issues.

The Tenant Repairs and Maintenance Group will focus on improving the operation of the service and the resident experience. The aim is for the Repairs & Servicing Team and tenants to work together to monitor the services that the team provide, ensuring the delivery of an efficient, effective, and consistent responsive repairs service whilst being mindful of value for money.

Our Impact and Sheltered Scheme days provide opportunities to raise awareness for residents of the issue and how to report it, as well as providing opportunities to report issues in-person for those not confident using the online or telephone reporting.

We are always striving to improve and as such we are inviting external audits of our Damp and Disrepair Team, policies, and procedures to highlight any areas where we can look to improve.

Spotlight on staff training:

All Housing Officers will receive mandatory training on identifying and responding to damp and mould.

Damp & Disrepair Surveyors received specialist damp training from the Property Care Association



Improving our collection and use of data

At the time of writing this Strategy around 91.6% of the Council's homes have been surveyed as part of a stock conditions survey.

This includes system and component condition, remaining lifespans, decency and HHSRS issues, including damp, as part of the survey.

We recognise that property data is only half of the equation. Of equal importance is the data we hold about tenants. This data can help to identify tenants who might be at higher risk of damp and mould due to overcrowding, who might face additional challenges in engaging with us (for example language barriers) or who rarely contact us.

We commissioned an external provider, Acuity, to carry out a survey to obtain further data about our tenants so that we can better understand their needs. We are trying to ensure that as many tenants as possible complete the survey. By cross referencing data on tenants with property related data, such as property archetypes with high levels of damp and mould reports, we will be able to target our proactive work where intersecting risks arise.

As part of the Acuity survey tenants were asked if they had any issues of damp or mould. We ensured that all those who advised that they did, were contacted by our team and the solution recorded.

Investing in our stock to prevent damp and mould.

Our 2019-2024 Asset Management Strategy sets out how we intend to invest in our homes, so they remain financially viable and an attractive housing option for



people wishing to live in West Lancashire.

We will shortly be reviewing and updating our Asset Management Strategy in the light of the new stock data received.

As the stock condition information referred to above is received, we will be analysing its content and determining how future investment needs may need to be re-assessed, given the passage of time since that policy was approved; the investment that has been made in homes over that time and also the effects of that same time on the overall condition of homes.

Additionally, new asset management challenges have emerged over that time that will need to be catered for. These include increased investment to support the Council's journey towards 'zero carbon', the requirement to move all homes to EPC 'C' by 2030, and also a greater focus around compliance generally, but fire safety in particular, following the Grenfell disaster and the subsequent introduction of the Building Safety Act 2022.

The incidence of damp and mould within the Council's homes and the challenge this creates as the Council continues to maintain the fabric of its homes is a requirement that the new Asset Management Strategy will need to tackle. Some of this will be dealt with through repairs, but prevention is the best solution, and the new Asset Management Strategy will, amongst other objectives, seek to ensure that programmes of work improve the Council's homes, ensuring they are energy-efficient and well insulated which will help combat the incidence of damp and mould.



Strategy Action Plan

Action	New or existing initiative?	How we will measure performance	
1.1 Responding effectively to reports of damp and mould	1.1.1 Continue to respond to enquiries through the Damp & Disrepair Team	Existing	Number of damp cases reported. Number of damp inspections taken place.
	1.1.2 Ensure mould washes are carried out within 5 working days	Existing	Number of mould wash treatments carried out. Number of mould washes completed within 5 days of a surveyors visit where required.
	1.1.3 Set up effective referral and reporting mechanisms with other external agencies	Existing	Number of reports received from external agencies.
	1.1.4 Deliver mandatory routine training to Housing staff	Existing	Percentage of housing staff who have completed mandatory damp and mould training.
	1.1.5 Post inspect damp works	Existing	Number of damp post inspections. Percentage of concluded cases at post inspection.

Action	New or existing initiative?	How we will measure performance	
1.2 Improving our collection and use of data	1.2.3 Better understand our tenants	New	Percentage of tenants completed Acuity survey
	1.2.2 Use stock condition surveys to collect data on the rate of damp and mould in our stock	Existing	Percentage of properties surveyed
1.3 Investing in our stock to prevent damp and mould	1.3.1 External works to building fabric	Existing	Number of properties (units) improved per year
	1.3.2 Kitchen and Bathroom Replacements	Existing	Number of kitchens replaced per year Number of bathrooms replaced each year
	1.3.3 Increase energy efficiency of our stock	Existing	Percentage of Council stock with an EPC of C or above
	1.3.4 Service and clean all ventilation fans	New	Percentage of ventilation fans cleaned
1.4 Focusing on vulnerable groups	1.4.1 Trial property MOT inspections of households of older people	New	Number of properties MOTs per year
	1.4.2 Damp and disrepair team attendance at tenant events	Existing	Number of events attended



**Damp & Mould Strategy for Council Housing
2025-2028**