

Self-Assessment against Ombudsman Spotlight on Damp and Mould – December 2024

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Chapter 1: From reactive to proactive

Ombudsman Criteria	Comply	Comments
1. 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.	Yes	In May 2024 we introduced a new Damp and Mould Policy that outlines this approach. We carry out annual proactive visits to all properties which includes a check in place for damp and mould. We also regularly communicate with residents to ask if they have any issues with damp and mould.
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	Policy approved in May 2024, outlining our approach to damp, mould, and condensation. This policy is being reviewed annually to ensure we continue to comply with best practice.
3. Landlords should review the accessibility and use of their systems for reporting repairs and making complaints to 'find their silence'.	Yes	<p>The Resident Portal was introduced in January 2023 as another means for reporting repairs and complaints, this is in addition to all other available resources including via email, letter, phone, and in person. The complaints process is well advertised and accessible for residents to raise concerns. In March 2024 there was a restructure of the housing team which introduced Estate Managers that work on our estates. Part of this role is to complete a tenancy audit at every property each year, this ensure that all residents are contacted every year for this check.</p> <p>A process has been introduced to periodically check tenancies and properties whereby no complaints or repairs have been raised over a 12-month period and prioritise for a tenancy audit.</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	<p>We have recently completed a stock condition survey programme of all our properties including a full Housing Health and Safety Rating System (HHSRS) assessment, looking thoroughly at each property and any associated hazards. The data from this programme has been used to inform investment plans, as well as immediate priorities.</p> <p>When damp and mould issues are identified at a property via resident feedback, a proactive inspection from one of our staff, a report from a contractor, neighbouring properties are also checked for recent data to see if there are any widespread concerns.</p>

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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.	Yes	<p>We have recently completed a programme of stock condition surveys to our properties including a full Housing Health and Safety Rating System (HHSRS) assessment. The data from these surveys has been used to drive our damp and mould programme.</p> <p>We have installed sensors in several homes that have reported issues with damp and mould to monitor the conditions in those properties. This data has been used to inform requirements for those properties and we are currently investigating the potential to extend the installations of sensors. All data from stock condition surveys is being used to drive investment plans.</p> <p>When carrying out damp and mould surveys, resident data is utilised to identify any properties housing residents with vulnerabilities. These properties are then prioritised within the programme.</p>
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	<p>We currently do not have any sites identified for disposal or regeneration. All properties receive the same level of service.</p> <p>A disposal process is currently in draft form and this information will be included.</p>
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	<p>The policy clearly sets out how we will respond to reports of damp and mould with a clear focus on what our responsibilities are and the support available to our residents.</p>
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 produced a guidance leaflet that provides advice to residents about damp and mould. This has been reviewed by residents to ensure it meets the right tone, it is published on the website. The damp and mould policy was also reviewed by residents.</p>
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>In addition to annual tenancy audits where any issues are highlighted, an inspection is carried out prior to a mutual exchange being agreed. We have not experienced this, but if there was evidence of damp or mould a plan would be put in place prior to the move or with the incoming resident for transparency. When a property is void, if damp and mould is present, this will be fully treated prior to reletting.</p>

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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 new Asset Management Strategy is currently in draft form, ready to be launched alongside our new Corporate Strategy in Spring 2025. This sets out our approach to net-zero carbon homes, including unintended consequences around damp and mould.
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Chapter 2: From inferring blame to taking responsibility

Ombudsman Criteria	Comply	Comments
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	We have produced a new policy and guidance leaflet that provides advice to residents about damp and mould and what our response will be. These have both been reviewed by residents to ensure it meets the right tone.
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.	Yes	All reports of damp and mould have an inspection carried out by one of our Technical Officers. All records are saved centrally with automatic alerts included for reminders to check on cases at certain points in the process. Full Housing Health and Safety Rating System (HHSRS) inspections were completed as part of our recent stock condition survey programme that gave an appropriate risk rating for damp and mould.
13. Landlords should ensure that their responses to reports of damp and mould are timely and reflect the urgency of the issue.	Yes	We will respond to reports of damp and mould in our properties within seven working days. This is set out in our policy and meets the requirements of Awaab's Law.
14. 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	We have written a process map for how damp and mould cases are dealt with that detail clearly the approach for any missed appointments. All information about missed appointments is recorded on the centralised tracker.
15. 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	Training has been provided to all staff that regularly inspect our homes to identify damp and mould. Information also provided to contractors.
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.	Yes	The Property Services team has had significant change over the last couple of years with qualified people recruited to oversee and contribute to the damp and mould programme. The qualifications within the team include undergraduate degrees in surveying and memberships of professional bodies.

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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.	Yes	We have created a section on our website specifically for damp and mould. In addition, an advice leaflet has been created that is shared with all residents that report issues with damp and mould and proactive communication sent out periodically via newsletters. The policy and procedure have both been recently reviewed and the policy published on the website. Residents who have an open damp and mould case have regular communication from our team as part of dealing with the case.
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	There is one person responsible for the formal complaint process (the Head of Housing). Follow up actions are monitored after complaint responses sent out with regular meetings of complaint handlers to review actions are on track.
19. 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.	Yes	The complaints policy was updated in August 2024 and approved by the board in September 2024. The policy is fully compliant with the Complaint Handling Code and will be reviewed every two years or following change in regulation.

Chapter 3: From disrepair claims to resolution

Ombudsman Criteria	Comply	Comments
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	We have appropriately qualified, technical staff employed that manage the repairs team. Where complex cases arise, these staff are involved from the earliest possible opportunity to ensure these cases have the correct level of oversight. We have a robust communication system which is constantly used to keep residents informed and updated.
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 have several external partners that we work with to arrange independent surveys when they are required. All actions raised from independent surveys are added to our centralised tracker and monitored through to completion.
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	An assessment is made following an inspection whether the works can be completed with the residents in situ, or whether a temporary decant it required. All vulnerabilities are factored into this decision making process.

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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	The ability to escalate complaints to the Ombudsman is promoted in all Stage 2 Complaint responses, is on the IDS website and has been mentioned in resident newsletters. Benefits of our complaints process including recent lessons learnt from complaints is on our website.
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 included in our disrepair and damp and mould processes.

Chapter 4: From a complaints to a learning culture

Ombudsman Criteria	Comply	Comments
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.	Yes	Complaints are monitored by the IDS Board quarterly, at the Operations Committee quarterly, and by the Senior Management Team monthly. A complaints dashboard is published each month to provide transparency to residents and other stakeholders, this includes lessons learnt from recent complaints.
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	All operational staff have completed complaint handling training with the approach to residents a key part of this training.